



WGFD Web Survey System Survey Comment Report

Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Compet

06/11/2025 08:04:58

**Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps,
Tags, Preference Points and Compet**
Wildlife Division
Stefanie White - 307-233-6400

Survey End Date: 06/10/2025
Survey Questions: 0

Survey Customers:	0	Comment Only Customers:	323
Completed Surveys:	0	Total General Comments:	311
Question Comments:	0		

Comments

Date Range: 2025-04-18 to 2025-06-10

1 Commissioners, I am writing you today in strong opposition to some of the proposed changes to the Landowner License qualifications. Specifically with respects to increasing the animal use days and minimum acreage requirements. As a smaller partial owner who has a great working relationship with the G&F and enrolls in the Access Yes Program this is quite a slap in the face after years of cooperation. Smaller partials provide critical habitat just as larger partials do and the regulation specifically states that Landowner Licenses are to be provided to the Landowner as a tool for promoting wildlife. These changes will greatly harm landowner relationships the G&F depends on to manage wildlife populations. These changes are also completely arbitrary numbers that have no scientific direct impact on wildlife management. I applaud you for cleaning up abuse within the system on corporate ownership but ask that good stewards of the land like my family are not caught as collateral damage. The regulation already states that properties cannot be purchased just for the purpose of obtaining licenses and this needs to be enforced. I know a grandfather clause has been discussed which seems reasonable and/or I would encourage you to find a way to include an exception for the department for folks who allow public access. Please reconsider the 3,000/640 proposal

Final Comment **Porter, Dusty** **Casper, WY** 4/18/2025 1:37:00 PM

2 I am not ok with the proposed changes, which are in favor of the large land owner and outfitters. Very disappointing. Smaller land owners are getting pushed out unfairly, yet our land is heavily impacted by game use. If the proposed changes to smaller lands tag allocations are approved, i would expect financial compensation for the game wrecking havoc on my land.

Final Comment **Smith, Tharon** **Lehi, UT** 4/18/2025 5:52:00 PM

3 We strongly oppose the proposed changes that favor large landowners and outfitters. As landowners, we are satisfied with the current 160-acre qualification requirement for antelope and elk. Any changes in this threshold would unfairly disadvantage smaller landowners and concentrate benefits among a select few. If the state moves forward with this change, it must be prepared to compensate all affected landowners for the significant damage that wildlife causes to our lands. The financial burden of such compensation would be substantial and likely unsustainable. Maintaining the current qualifications is not only fair but also fiscally responsible. With being completely irresponsible, this would make hunting a commodity(for the rich) , just like it has in new Mexico.

Final Comment **Smith, Brian** **RockSprings, WY** 4/19/2025 4:03:00 PM

4 Darin Smith 7401 Hazer Ct Cheyenne, WY 82009 darin171@yahoo.com (307) 421-8081 April 19, 2025 Wyoming Game and Fish Commission 5400 Bishop Blvd Cheyenne, WY 82006 Dear Members of the Wyoming Game and

Fish Commission, I am writing to express my strong opposition to the proposed changes to landowner licenses outlined in Chapter 44, Draft 04.14.2025.12.docx, specifically under Section 8(b). While I understand the intent to manage wildlife populations and ensure fairness, I believe these changes unfairly burden landowners and undermine the traditional role of landowner tags in supporting wildlife conservation and local economies. The proposal to limit landowners to drawing licenses in competitive public drawings, rather than receiving them directly, disregards the unique contributions landowners make to wildlife management. Many of us maintain large tracts of land that provide critical habitat for species like deer, elk, and wild turkeys. By hosting these animals year-round, we incur significant costs—such as fencing, water management, and habitat preservation—that directly benefit the state's wildlife populations. The current landowner tag system recognizes this partnership by allowing us to hunt on our own land, which also helps manage overpopulation and reduce crop damage. Forcing landowners into a competitive drawing system diminishes this incentive and could discourage active participation in conservation efforts. Additionally, the proposed restriction on resident and nonresident family members obtaining licenses without participating in the public drawing process overlooks the practical realities of family-run operations. Many Wyoming landowners rely on family members to assist with land management and hunting activities that align with the Commission's wildlife goals. This change would create unnecessary barriers for families, potentially reducing the number of tags utilized and impacting local economies that benefit from hunting-related revenue. Moreover, I am deeply concerned that this new system disproportionately benefits large landowners and outfitters, creating an unfair advantage while placing smaller landowners at a significant disadvantage. The proposed qualifications under Section 8(a)—requiring a minimum of 160 contiguous acres for antelope, deer, or elk, and 640 acres for wild turkeys—favor those with vast landholdings, who are often better positioned to navigate the competitive drawing process due to their resources and connections. Large landowners and outfitters, who frequently cater to high-paying clients, can leverage these tags to generate substantial revenue, effectively turning public wildlife into a private commodity. Meanwhile, smaller landowners, who may not have the means to compete in the drawing or the acreage to qualify as easily, are left with limited access to tags for their own land. This shift also raises concerns about increased monitoring of wildlife on private lands. Under the new system, the Commission's oversight of tag allocation could lead to more intrusive tracking and management requirements, placing an additional burden on landowners to report wildlife activity. Large landowners and outfitters, with their greater resources, are better equipped to handle such demands, while smaller landowners may struggle to comply, risking penalties or exclusion from the licensing process. This creates an uneven playing field, where those with the most resources can dominate access to wildlife, further marginalizing smaller landowners who have historically played a vital role in Wyoming's conservation efforts. I urge the Commission to reconsider these changes and maintain the existing landowner tag system, which has historically balanced the needs of wildlife management with the rights of landowners. The proposed system risks prioritizing the interests of large landowners and outfitters over the broader community of landowners who contribute to Wyoming's wildlife legacy. I would welcome the opportunity to discuss this further or provide additional insights from my experience as a landowner. Thank you for your consideration. Sincerely, Darin Smith Wyoming State Senator

Final Comment	Smith, Darin	Cheyenne, WY	4/19/2025 4:47:00 PM
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5 I would be very reluctant to believe anything that the Wyoming government says. I faithfully followed the rules for almost 25 years and the rules were changed. This is government overreach to the highest level. I hunted in Wyoming for almost 50 years and followed all the rules and regulations that were required. But because hunters followed the rules and paid to get preference points, The state residents wanted to jump the line, so new rules were written . Hopefully some law firm from the East will sue the state for millions for changing their rules. Sincerely Jim Salisbury

Final Comment	Salisbury , James	Lambertville , MI	4/20/2025 9:33:00 AM
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6 Wyoming Game and Fish Commission, I am disappointed to hear about the discussion occurring about increasing the acreage for landowner tags. I am a small acreage owner in the sense of landowner tags. My husband and I purchased our dream property in the Big Horn Mountains in 2021. We may "only" own 240 acres, but it is a wildlife mecca. The property is in elk and mule deer crucial range and is also inhabited by antelope in the hot summer months, black bear, mountain lion, sage grouse, foxes, coyotes, and bobcats. Sage Grouse leks are in close proximity to our property. There hasn't been a time where we didn't see wildlife on our property each time we go up there! With the proposed change from a minimum of 160 contiguous acres of land to either 160 acres of cropland or a minimum of 640 contiguous acres of rangeland, I fear our "small landowners" will start subdividing their land if they

can no longer receive landowner tags. This could be detrimental to the wildlife especially on crucial winter ranges that are needed for survival. Private land is crucial in providing wildlife food, water, and shelter. The landowner tags are a bonus given to those landowners who support the wildlife on their very own private property. If we remove the landowner tag incentive, it's hard telling what will happen to our private lands that provide habitat for Wyoming's wildlife. I foresee it decreasing at a rapid rate and along with that, our wildlife numbers. I'd like to see the Commission focus on days of use rather than acreage. Some landowners might have smaller acreage but with the location of the property, the wildlife use it a lot more than other places. When we purchased our property, the landowner tags were not guaranteed. We worked closely with our local game warden to provide evidence of 2000 days animal use by the elk in order to receive our landowner tags. This should be a mandatory requirement for all landowners seeking landowner tags. The Wyoming Game and Fish should also look closely at what landowners are receiving tags to make sure people who have multiple entities aren't receiving more than 2 tags a year. This could help cut down on the number of landowner tags given out. I'd also like to see the Commission grandfather in everyone who is already receiving landowner tags. When and if the land changes hands, it should be re-evaluated for landowner tags. As we all know, there are certain areas in the state that are over quota for elk. I do not think these areas should limit landowner tags. The landowner tag limits should be specific to the areas and how the wildlife populations are doing there. This should be at the discretion of the Game Warden. In order to conserve Wyoming's tremendous natural beauty and abundant wildlife, we must make careful and thoughtful decisions about how to proceed with landowner tag changes. We must protect big game winter ranges to ensure that our grandchildren will be able to enjoy Wyoming's rich and varied big game herds, the associated human recreational opportunities, and the state's ability to manage big game into the future. Sincerely, Emma Allen

Final Comment	Allen, Emma	Basin, WY	4/21/2025 1:17:00 PM
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I am a joint landowner with my dad. We bought 420 acres in 2020 in elk hunt area 7. Changing the landowner requirements to the proposed amount and requiring that it be contiguous is going to make it impossible for several smaller landowners to ever qualify. My dad has lived in Wyoming all of his life (63 years), and I have lived here my entire 37 years. You would be better off going to a general elk tag at this point. When we bought our land, we walked the land with the game warden looking for scat based upon the complex formula, which made sense. When we look at animal units, we are required to have 5.5 elk on our land every day. Obviously, doesn't happen, but there are days, like in November when we harvested our elk where we had about 75 head or so. 3000 animal units is a ridiculous amount. If it needs to be raised to 320 acres, that seems reasonable, but 640 contiguous is frankly not attainable for us. The large landowners would only get larger. We don't even hunt public land in Area 7. We hunt our property every day because my dad is 63 and we know that if we harvest an elk, we can get it out; and we have harvested an elk on our property every year that we have owned it. I would like to take my daughter out on this property and allow her to harvest an elk, deer, or even a turkey, but at some point, the cost just gets to be too much. My dad wants to take his grandson on a hunt at our place. We are currently building a cabin on our property. We have spent money on spraying cheat grass, putting in water tanks, etc. and all for the betterment of the wildlife. If this new large landowners only get tags, then we would probably subdivide our property and sell it. Our neighboring property would buy it so he could get his elk tags, and then we would sell the cabin separately to try to recoup our money. I sincerely hope the Wyoming Game and Fish reconsiders this proposal. I am a Wyomingite through and through. To lose our elk tags would be devastating.

Final Comment	Johnson, Jason	Cheyenne, WY	4/25/2025 10:16:00 AM
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Dear Wyoming Game & Fish, I am writing to express my concerns and provide testimony regarding the current landowner hunting license system in Wyoming. The system, which allows landowners with at least 160 contiguous acres to apply for a limited number of hunting licenses, is rooted in a clear and intentional purpose: to reward and incentivize private landowners who provide uninterrupted, year-round wildlife habitat. This system is not a reimbursement for crop damage or depredation—it's a recognition of the stewardship role landowners play in maintaining viable, healthy wildlife populations across the state. The System Already Serves Its Intended Purpose: Habitat Incentive Wyoming's wildlife is not only a public treasure—it is also dependent on private landowners for habitat, especially in the winter months when animals rely on low-elevation lands that are often privately owned. The current 160-acre threshold is based not on agricultural production, but on habitat value. A small property providing unbroken habitat—such as rangeland, sagebrush steppe, or aspen groves—may be more critical to wildlife than a

large industrial farm planted fencepost to fencepost. Altering the requirements to focus on cultivated acres fundamentally misunderstands the system's intent. It shifts the reward from habitat provision to crop production, when Wyoming already has separate tools—such as Game and Fish depredation payments and damage claim systems—that exist specifically to address financial losses due to wildlife on cultivated land. Raising the Acreage Requirement Would Only Reward the Largest, Wealthiest Landowners An increase from 160 acres to 640 acres would disproportionately benefit a small number of large landowners, many of whom already enjoy significant economic advantage and often lease hunting access at high prices. This would shut out small and mid-sized landowners—those who are often most connected to the land and most in need of a tangible benefit for tolerating the daily impacts of wildlife. Removing this benefit from those with less than 640 acres tells hundreds of responsible, conservation-minded landowners across Wyoming that their contribution doesn't count unless they are part of the elite. That is neither fair nor consistent with the public interest. Habitat is Habitat—Not Just Cropland Limiting the landowner license to "cultivated" acreage misunderstands wildlife biology. Elk, mule deer, and pronghorn are not dependent on hayfields alone. They rely on native grasses, shrubs, and forests for food and cover. In fact, many species actively avoid areas of intensive cultivation. A 160-acre native pasture with intact habitat may provide more ecological value than 1,000 acres of tilled soil. Restricting access based on cultivation could actively disincentivize habitat conservation, encouraging landowners to plow and irrigate land to qualify—damaging the very habitat the program is designed to protect. There Is Already a Mechanism for Wildlife Damage Compensation The suggestion that landowner licenses should only go to those with significant crop damage ignores the existence of Wyoming's well-established wildlife damage compensation process. That program evaluates and compensates financial loss due to wildlife, separate from hunting license allocations. To overlay the landowner license system with a damage-based requirement is redundant and confusing, and could create bureaucratic entanglements that delay or deny rightful access. Don't Punish Good Stewardship with Bad Policy Wyoming's landowner license system is one of the few tools available to encourage good stewardship on private land. Whether the land supports trophy elk, sage grouse, or a local deer herd, the value of that stewardship should not be measured by the size of a deed or the number of center-pivot sprinklers. The current system—rooted in habitat protection, not profit—is a fair and functional approach. By increasing the acreage threshold or restricting based on cultivated land, we would undermine the integrity of the program, exclude responsible smaller landowners, and concentrate benefits in the hands of a few. That's not conservation—it's consolidation. Sincerely, Island Richards

Final Comment	Richards, Island	Rock Springs, WY	4/25/2025 1:56:00 PM
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9	I am concerned about the current land owner program. It is working well. Land owners provide a ton of habitat and get nothing in return. Keep it limited in numbers and so they can NOT sale the tags. Don't change a good thing.
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Final Comment	Smith, Nathan	Highland, UT	4/27/2025 4:29:00 PM
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10	I am opposed and very disappointed in this proposed rule change to make landowner licenses only available to large (640+) acreages. My family has worked and scraped for 30 years to make quality habitat for the States big game animals. All the while growing up I promised my Daughter she would be able to hunt and enjoy her place in the mountains. Please dont make me a liar! She has been raised to respect and trust G&F and their wildlife management practices. This proposal falls FAR FAR away from that trust. I hate to think of the chaos this will cause to the Wardens and their job. There seem to be but a few trouble area issues that could be solved short of starting a range war! Respectfully submitted Ken Ball.
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Final Comment	Ball, Ken	Glenrock , WY	4/28/2025 3:45:00 PM
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11	I am also opposed to the new regulation requiring 3,000 animal use days. Thank you.
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Final Comment	Ball, Ken	Glenrock, WY	4/28/2025 4:43:00 PM
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12	Raising the minimum acreage for landowner licenses from 160 acres to 640 acres seems arbitrary and likely will impact a large percentage of individuals for whom hunting their property has long been a tradition. It isn't clear what problem this solves. There is already a minimum number of land-use days per species that is required for landowner tags -- if that minimum is achieved, the specific amount of acreage should be irrelevant. If the issue is pressure on
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public land, then restrict landowner tags to hunting their own property. Either of these solutions (enforcing the minimum land-use days per species and requiring hunting on their own property) would likely solve whatever the perceived problem is, without removing what has likely been a long-held privilege by existing landowners.

Final Comment	Fertig, Ray	Laramie, WY	4/29/2025 4:30:00 PM
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- 13** My wife and I own about 450 acres off from Palmer Canyon Road in Wheatland, WY. We strongly disagree with the proposed changes to landowner tag acreage requirements and animal use days. Kevin Christopherson was recently quoted in the Cowboy State Daily about how this new proposal would actually encourage the subdivision of large legacy ranches and further damage critical wildlife habitat. My wife and I agree with everything he said in the article. I'm an avid outdoorsman and we bought this land for its beauty, receiving landowner tags to hunt elk on the property was an added bonus. We donate land use to Hunting with Heroes, WY and allow friends in WY to hunt the land. These proposed changes feel like a punishment even though we have taken measures to improve the land and wildlife habitat and share our land with others.

Final Comment	Roskowiak, Nick	Buffalo , MN	4/30/2025 11:49:00 AM
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- 14** In reference to this draft allowing nonresidents with 20% ownership in the landowner tag pool should be stopped all together, as its making it a rich mans game. landowners drawing a landowner tag should be designated to the private property they drew the tag for, not the whole unit.

Final Comment	Miller, Owen	Moorcroft, WY	4/30/2025 8:49:00 PM
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- 15** It's ridiculous that they want to increase the acreage of land for land owner tags. This is an excellent way to get teachers to pull their land from walk in access. You're letting the people that don't own anything, dictate what the actual owners with habitat get. Slippery slope. Keep it the way it is. Also slow land owners to sell their tags.

Final Comment	Neville , Frank	Kaycee , WY	4/30/2025 9:11:00 PM
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- 16** As a small landowner/landowner license recipient, I would like to bring attention to points that I believe have been severely overlooked by the proposed changes that the Game and Fish is proposing to landowner license qualifications #1 Some of the smaller tracts of property are in the most premier habitat obviously for a parcel to currently qualify (qualified by Game and Fish personnel). The game is there. Why does it matter if more acres are involved. Why should it matter if the game resides on 160 or 640 acres? #2 One of the possible consequences to disqualify these smaller parcels that currently receive landowner tags (such as the one we own) is that the property would be worth significantly more subdivided into yet even smaller pieces. Our particular acreage sits in and is adjacent to (as denoted by the Game and Fish) crucial elk wintering habitat and critical moose habitat. Subdividing this piece would be detrimental to the wildlife with the increase of human activity. #3 If fracturing of property is the reason for eliminating smaller 160 to 639 acre parcels, it would seem to me that instead of disenfranchising and discriminating against the existing parcels should be grandfathered in. The existing criteria is an intertwined value of the property and should not be punished with the passage of new criteria. #4 We all understand that big game licenses are getting more difficult to draw every year as it's a finite amount while demand grows. However, it should be taken into account that we, as potentially affected property owners, provide much more to the game in those areas than non land owning hunters. We have fences that are constantly needing repair from elk knocking them down, hay that they eat, their normal grazing on the property, etc. We happily put up with all of these things in exchange for our landowner tags. #5 Please carefully consider all these points and grandfather in all currently qualifying parcels and make changes to future parcels only, as that way no one is negatively affected by a reform to stop future fracturing of larger ranches.

Final Comment	Miller, Scott	Thermopolis, WY	5/1/2025 4:53:00 AM
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- 17** I am writing this comment in regards to the proposed landowner changes being discussed. I have lived in Wyoming my entire life and have spent that time building my life here in our great state of Wyoming. The changes that I see proposed are fundamentally unfair to the smaller landowner and penalize us because we don't have enough land and that is where I completely disagree with that thought process. It is the private landowners here in Wyoming both

small and large that have allowed our wildlife to flourish and multiply and have safe places to live. The Wyoming game and fish and Wyoming landowners have always worked together well to be good stewards of the land and shepherds of the wildlife. To change this fundamental process for the benefit of the rich is not only unfair but is also telling our future generations what? The Wyoming Game and fish will cater to the rich but will not work with the common Wyoming work class person who is just trying to build their little piece of the American dream through the blood sweat and tears that comes with building a ranch or farm from the ground up.

Final Comment	PARKER, DEAN	RAWLINS, WY	5/1/2025 8:01:00 AM
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18 I strongly disagree with the commission's proposal to change landowner license requirements from 320 to 640 acres. I even more so disagree with the commission's desire to change the animal use days from 2000 to 3,000 days. I believe this mainly stems from sportsman's jealousy of landowners land ownership and the wildlife on his land and is therefore able to hunt those animals. This is America the everyday sportsman have just as much right and opportunity to buy land that fosters wildlife as anybody else. If they want it bad enough, they can make the sacrifices necessary in their life to save up and buy land such as landowners already before them have. Furthermore, landowners feed the mass majority of our wildlife with their irrigated Meadows, range lands, creek bottoms and even out of their haystacks all winter long. Most landowners drill Wells, set up water tanks, plant crops, and therefore facilitate and create habitat suitable for benefiting Wyoming's wildlife. Landowners should not be penalized by this new commission rule in favor of the sportsman. If you want landowners to continue to create habitat, and harbor space and tolerance for wildlife eating away at their bottom dollar, you should be promoting their stewardship, not penalizing it. Do not revert landowners tolerance of wildlife on their land back to disgust and hatred of those animals by penalizing them and making the benefit of a hunting tag harder to obtain. Again, the commission should be looking at ways to support and benefit landowners tolerance and fostering of wildlife by improving their availability and benefits of landowner tags

Final Comment	Harris, Mccort	Meeteetse , WY	5/1/2025 2:05:00 PM
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19 The landowner tags and process for attaining tags should not be altered for those parcels that have already qualified for tags. Those parcels/tags/landowners should be grandfathered in after having already met the quota. The 270 potentially affected properties would be a maximum of 540 licenses. The state sold 77647 elk licenses in 2023. 15042 of those licenses to non residents. If 1/3 of the properties under 640 were cultivated and half the remaining properties qualified for deer and antelope and half for elk it would be 180 licenses that we would even be talking about which is .23 percent of the elk licenses sold. Non residents bought 19.37% of the licenses. The amount of licenses that landowners take is minuscule in proportion to the number of licenses sold. When you take in to consideration that they provide habitat at a cost to them personally, it is truly a small price to pay to give the landowners tags for providing habitat/wintering ground etc. Please do not disenfranchise small landowners who are contributing to Wyoming's wildlife. At minimum grandfather in all existing qualifying acreage/parcels and landowners. Thank you!

Final Comment	Boren, Stephanie	Thermopolis, WY	5/1/2025 5:17:00 PM
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20 For landowner tags, in addition to the significant interest of 20%, please include the language "No individual or entity shall be listed as owner or part-owner of more than one (1) qualifying property. This would prevent big ranches from subdividing and giving 20% interest to a number of folks. So long as the primary owner remains on all the properties, only one would qualify. I totally support the changes made to increase the qualification requirements, and limit the folks abusing the system. I believe the vast majority of the abuse is taking place on those smaller (<640 acre) parcels. Thank You so much for finally taking action on a vulnerable set of regulations that are actively being abused!

Final Comment	Wittkop, Wyatt	Buffalo, WY	5/1/2025 5:55:00 PM
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21 I strongly support this in regards to landowner tags and tightening requirements. The landowner tags have been abused worse every year with 1% owners and land divided to minimum acre requirements to obtain even more.

Final Comment	Wittkop, Wade	Cody, WY	5/1/2025 9:53:00 PM
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Do not mess with acreage requirements put emphasis on animal use days and simply enforce the rules that you have would solve a lot of your problems

Final Comment

Trudeau, Andrew

Jefferson, AZ

5/2/2025 6:29:00 AM

23

As a nonresident, I fully support this change. This will make access to tags fairer & encourage nonresidents to get back into applying in Wyoming & bring more revenue to the state & the wildlife. As a person who sees the state of Wyoming as a wonderful place to hunt & spend time in, this would ultimately be a better thing in the long run, both for the state, & the wildlife.

Final Comment

Moser, Brock

MARCUS, IA

5/2/2025 8:24:00 AM

24

Hello. My name is Blaise Allen. I am a fifth generation Wyomingite, and now call Basin my home. I am a landowner, small-scale rancher, hunter and most importantly husband to my wife, Emma, and father to my son's, Tate and Lane. Professionally, I am a rangeland conservationist and work with other Wyoming landowners every day to develop conservation systems that allow for sustainable agriculture while also maximizing benefits to wildlife and other natural resources. Thank you for the opportunity to provide comment with both my personal opinion regarding changes to the landowner license allocations and a textbook example of how shortsighted decisions could yield significant unintended consequences. I would like to state unequivocally that I strongly oppose an increase of acreage limitation to the current landowner license allocation regulation. A little over four years ago, after a decade of saving up and with help from my in laws, my wife and I realized our ultimate dream and purchased 240 acres of spectacular rangelands. This was the first expansion of our fledgling cow/calf operation and boy were we excited. And it wasn't just some random acreage, this was land in exceptional condition and was literally teeming with wildlife. In fact, it sits smack dab in the heart of the Black Mountain elk crucial winter range identified by the Game and Fish in elk Unit 41. The 240 acres were also adjoined to another 70+ acre BLM grazing allotment that we have the good fortune of stewarding. We had big plans to protect the property from future development, improve the habitat and provide a place for my in laws to come and hunt with their family. All activities I have had the good fortune of experiencing with my family my entire life here. It was picture perfect and in no time I had an inventory completed and began making improvements to benefit our planned sustainable grazing system. I worked closely with the local game warden to first understand the requirements for obtaining landowner elk licenses. To be completely honest, my first conversation didn't go too well as the game warden seemed defensive and almost angered at discussing the notion of providing landowner tags for "small" acreage producers. He guaranteed us nothing and let me know that the burden was indeed on the landowner to provide proof the land met all the requirements and was used extensively by wildlife. I left that conversation a little upset myself, but now I have a sense of appreciation and gratitude for the warden in ensuring that all the requirements are actually being met before simply approving landowner tags. After that conversation I placed 6 trail cameras throughout the 240 acres to capture what animals were actually using the land and when. The results when I first pulled those cards were simply amazing! Not only did I record videos of extremely large herds of elk traversing the skyline of our parcel, but I also photographed things like mule deer, coyotes, mountain lions and black bear. This place was a mecca and I deliberately limited my disturbance to them. In just a couple of weeks I was able to easily prove over 2000 days animal use, but I wasn't done there. The elk were obviously using the property for food and cover, but I was informed the regulation says water is also needed. There is only one spring on our property, but we also have water rights from adjacent property springs as well. I moved some cameras to our water sources and provided the warden with a copy of our water rights as well as all the documentation of proof from our cameras. I gained more knowledge about our property than I would have ever expected. We documented elk from September through June, deer during the summer and early fall, and even a few antelope later in the heat of summer. In the end, he agreed that we met the criteria and issued our family 2 landowner licenses. Although it really was a ton of work on my end to document and prove significant use, looking back I feel that it was the right course of action. The process I went through with Game and Fish is exactly what needs to be done. The burden of proof is entirely on the landowner just as it should be, as opposed to some arbitrary acreage limitation. I fully understand that thousands of elk depend on not only our private property, but the surrounding private lands as well. Being conservation minded, our family continues to make improvements and have reached out to state and federal partners to seek ways to continually make improvements. In most recent years we have used conservation funds to help develop additional water sources that will not only benefit our livestock operation, but also the local wildlife as well. This brings me to the place where the topic you are currently debating to

increase the acreage requirements for landowner licenses comes into full focus. You see, although it is not the primary reason for our particular purchase, being eligible to earn a landowner license was a very important factor in considering the purchase of our land and conserving the wildlife values it provides. In fact, if not for that potential, we likely would not have been able to secure the family investment and make the deal come together. Instead, this incredibly important parcel of land would have most likely been subdivided into smaller portions and sold to the highest bidder. A worrisome trend we are witnessing at breakneck speed across the West and right here in our great State. The opportunity to earn non-transferable landowner licenses is a critical tool currently in our conservation toolbox to encourage voluntary and incentive-based conservation to maintain critical wildlife habitat and working lands. Please think about this 5th generation Wyomingite, my young family and our incredible slice of heaven before making a final decision. Consider the unintended consequences that these changes may bring: • Further subdivision of important habitats that already prove a 2,000 days use and meet the requirements for food, cover and shelter. • Potential land conversion, especially in dryland farming areas, to meet the 160 cultivated crop requirement. • Further loss of public access to these properties that often let cow and doe hunters on. Additionally, take science and animal behavior into consideration. Our place for example is 240 acres, mostly comprised of loamy 15-19" ecological sites that produce ~1000lbs of preferred forage per acre. That's 240,000 lbs of dry matter annually produced! A mature elk is considered 0.60-0.65 animal unit equivalent, and eats ~18lbs of dry matter/day. For 2000 days use x 18lbs/day= total of 36,000lbs of forage needed to meet 2,000 days use (*54,000lbs needed to meet 3,000 days use). For our livestock operation we use a conservative harvest efficiency (HE) that helps promote proper grazing and leave some forage behind for wildlife. A take half/leave half approach is similar in nature- 240,000 lbs X 0.25HE= 60,000lbs available for livestock, and 60,000lbs remaining for wildlife and other losses. In my opinion this is a perfect example of what we mean when we say we want to encourage voluntary and incentive-based conservation in Wyoming by producing win-win solutions on private land. It comes at no cost to the tax-payers and produces beneficial outcomes that cross all kinds of boundaries. These are the exact types of actions that I would think Governor Gordon and the Game and Fish would like to hold up as a true example of success. I urge the Commission to not move forward with arbitrarily increasing the acreage limitation and put additional emphasis on more frequent burden of proof on landowners applying for those licenses. Any decision otherwise will not only likely have significant unintended consequences for my property, but also for countless other landowner stewards across Wyoming. Sincerely, Blaise Allen

Final Comment	Allen, Blaise	Basin, WY	5/2/2025 2:11:00 PM
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25

We are adamantly opposed to any changes to the acreage requirements for landowner tags. After watching several of the previous commissioner meetings (and the November 15th one in particular) it appears to me that what is trying to be accomplished here is a final effort by individual(s) that could not force the written recommendation from the entire Wyoming Wildlife Taskforce. Final Recommendations by that taskforce can be found here: https://drive.google.com/file/d/1cTuTOMxXNPzg0P1_qaDnNf5IJCDTDSJr/view. In summary, the taskforce wanted substantial interest (>20%), proof/documentation that substantiates the game use, and to reverify every 5 years. There was overwhelming public comment on both sides of the aisle, but one thing that is without question is that private lands are essential to providing habitat for all wildlife, including Wyoming's Big Game species. Our property in the Bighorn Mountains is a crucial winter range for mule deer and elk and is an important parturition area. Although we have less than 300 acres, our property is managed in a way to sustain agricultural use, as well as maintain up to 3,000 days use of elk. This landowner tag approach has been working for many years and empowers landowners to continue on-the-ground improvements that not only help their agricultural operation, but also to improve terrestrial wildlife habitat. If the regulations are changed as written, not all conservation on these properties will cease or go away, but the ramifications for increased further development and subdivision may occur. That in itself will have a much longer and more permanent detrimental impact on these important habitats than remaining with the current regulations. Additionally, some property owners will also no longer allow access during cow season, or times of the year they are not hunting as they had in the past. The acreage numbers thrown out are arbitrary and have no science to back them up. We are opposed to any change to landowner license allocations regarding acreage and increased days use. We do support the following addition: "(iii) The landowner applicant shall be solely responsible to provide adequate documentation verifying that they meet all Commission regulation requirements governing landowner licenses."

Final Comment	Green, Joseph	Bloomfield, NY	5/2/2025 2:39:00 PM
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26

I oppose any changes to CHP 44 landowner license allocations as suggested. Your effort to increase the acreage on rangeland was arbitrary and based on perception rather than science and reality. Private land areas throughout Wyoming are essential for wildlife habitat, ours included. I would venture to say that smaller areas (160-640 acres) that can easily prove 2-3000 days of use by a species is much more important habitat than someone with 10-20,000 acres that might barely make that day's use requirement. There's a reason for it and it's because wildlife value the food, cover and shelter that those smaller acres may provide. Commissioner Bell made statement in the November meeting that in his area there are the same 6 elk that bounce around between 160's every night to get each landowner to their 2,000 days use. Now imagine there are 9 elk that do the same thing on adjacent lands of 640 acres-You've reached 3000 days use! This narrative is pretty preposterous, and disregards a game warden's knowledge of their local wildlife populations, their ability to use common sense in allocating tags to proper lands, and is used to paint a truly absurd picture that is not reality. What matters most is important habitat, and that can be defined by the amount of time animals spend in the area (if there's no food, cover or water they won't stick around). So any change made to increase the acreage limit is not made in the best interest of the wildlife, and may bring to fruition many unintended consequences, further reducing public access to private properties and potentially further subdivision of important habitats.

Final Comment

Green, Cody

Williston, ND

5/2/2025 2:40:00 PM

27

I agree with the changes proposed in Chapter 44. I especially agree with the change to how landowner tags are given and the change in acreage and how that system works. Although there are honest landowners there has been a lot of work into cheating the system to take limited quota tags from all hunters. With this change it will help fix the broken system we currently have and provide more opportunity to all hunters in our great state of Wyoming. Thank you for your time.

Final Comment

Richards, Myles

Worland, WY

5/2/2025 2:46:00 PM

28

Landowner tags should be capped. Several premium big game units are hard to draw for the general public and some people apply their whole lives and never obtain such a tag while a landowner gets to hunt it every single year. These animals aren't private livestock. They belong to the public and everyone should have a fair chance to draw these coveted tags. 20% cap is still probably too high but it's a start.

Final Comment

Thompson, Cody

Cheyenne, WY

5/3/2025 7:23:00 AM

29

As primarily a public land hunter, I'd actually like to advocate for the landowner on this topic. I have always respected the way landowners care for their land and the wildlife that call it home. Public lands get overrun with people and livestock, we need private landowners to continue to provide habitat to wildlife, this benefits everyone on both sides of the fence. My fear is that disqualifying landowners by increasing the minimum acreage will cause them to no longer care. I know many landowners who allow hunters after they are done hunting themselves and are afraid that changing this could lead to more land being cut off. I could also see more animals congregating on private land if the landowners are not hunting them. Small token of appreciation to give for such a huge benefit provided.

Final Comment

Walsh, John

Casper, WY

5/3/2025 7:30:00 AM

30

Regarding the proposed restrictions on landowner tags: If the primary purpose of the proposal is to keep out-of-staters from buying up smaller parcels simply to qualify for landowner tags, it seems the logical approach is to restrict those tags to Residents, perhaps even to residents who live on the property in question. That would be fairer to voters like me, who have lived on our 605 acres (with 70 under pivot) year round for 10 years.

Final Comment

Burkhart, Matt

MEETEETSE, WY

5/4/2025 1:25:00 PM

31

Addressing Chapter 8 - Landowner Licenses: Narrowing the scope of landowner tags enhances the value of larger parcels while devaluing smaller. This lacks foresight and simply grows the slice for a narrower group, not the pie nor the resource. Put the resource first, then develop the policy. The Landowner Tag System should incentivize: 1) Health and growth of the resource 2) Increased access for nonowner hunters. If a property can support landowner tags, it should support a commensurate number of nonowner tags. While some minimum acreage and use days may

be needed as a baseline, every property is different. Hence a Regional warden that is tied to each community, each property. The warden should have ultimate discretion. If viewed as a reward for simply owning a large tract, the considered changes delivers zero value to the state or its residents, while punishing those smaller tract owners that manage and allow other hunters appropriately. In that sense, it should be discontinued and tag availability increased for the general hunting population.

Final Comment	Taylor, Randall	Dubois, WY	5/5/2025 5:23:00 PM
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32

I'm really supportive of the proposed changes. I really like that surrendered tags can be given to the next person in the limited quota drawing. I'm also really supportive of the changes made to landowner tag qualification. However, I'd still like to see a cap on the percentage of tags that can go to landowners. In the "statement of reasons", the cap is mentioned but not included in the draft regulations. I think 20% of type 1 and 30% of other tags in areas with really low draw odds would be fair. Landowners should only be able to hunt their property with the tag. Why are they getting type 1 trophy tags every year? The whole purpose is to give landowners hunting opportunity because they have animals on their property but getting type 1 each year is unfair to the public unless its on their own property. It doesn't make sense to give type 1 tags to the landowner brothers from Baggs so that they can drive to the other end of the unit 124 to shoot giant bulls on public land every year. I want Landowners to have the opportunity to hunt their own property. If they have game on it, it makes sense to allow them to hunt their own land. If they want to hunt off their property, they should put in for limited quota tags in a 20% capped landowner drawing. Thanks.

Final Comment	Harrison, Sean	Rock Springs, WY	5/6/2025 2:54:00 AM
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33

I am writing to you as a lifelong resident and landowner in Wyoming (52 years) to express my concern about any potential changes to the landowner process, specifically the 160-acre rule with the 2,000 unit use days (AUD). As a landowner, I rely on this system, and I want to ensure that it remains fair and consistent for all, not just for large ranching operations. The current process has worked for many of us, providing a reasonable and equitable approach to managing wildlife, land access, and hunting opportunities. Any changes that would shift the balance in favor of large ranchers, to the detriment of smaller landowners like myself, would be unfair and could harm the relationship between landowners, wildlife, and the broader Wyoming community. As a resident of this state, I care deeply about preserving Wyoming's natural resources and supporting sustainable management practices. The 160-acre, 2,000 UUD framework has helped ensure that small landowners can manage their property while also contributing to the conservation and health of our wildlife. I believe that this system should remain unchanged, as it continues to serve the needs of both the landowners and the state's wildlife. I ask that the Game and Fish Commission carefully consider the potential impacts of any proposed changes to this process and ensure that future decisions prioritize fairness, sustainability, and the needs of all landowners, regardless of their size. Thank you for your attention to this important matter. I trust that you will make the best decision for Wyoming's landowners, wildlife, and the future of our state. Sincerely, Brian K Smith 307-389-2254 Rock Springs , Wy Sweetwater County

Final Comment	Smith, Brian	Rock Springs, WY	5/6/2025 3:12:00 PM
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34

I am opposed to the proposed changes to Chapter 44. My family and I own 600 Acres in Albany County, WY. I purchased this land 6 years ago, for our use as agriculture and recreation. We currently run a small cow/calf operation on the land during the summer and winter approximately 200 head of elk and a dozen mule deer. During this 6 years I have had the opportunity to take my family hunting, friends hunting for their first time, and a military veteran hunting several times. When we had first purchased the land it had been overgrazed for many years. We pride ourselves in taking care of this land and have limited the amount of cattle and time we graze on it. Every year we replace miles of fence that have been damaged by the elk. We have never asked the game and fish for any funding for the damages caused by the elk. This year alone I have spent \$1,365.76 on fencing materials. I believe if the state could tell the "small land owners" what problem they are trying to solve, we could help you figure that problem out. Without punishing the "small land owner" that work the land as hard or harder than the large land owners do. Feel free to call or write. 307-554-6622 jw4wllc@outlook.com Thank you, Jared Williams

Final Comment	Williams, Jared	Glenrock, WY	5/7/2025 6:57:00 AM
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35

I am writing this comment in response to the Wyoming Game and Fish Commissioners looking to change the current Landowner license system. I am firmly opposed to any changes to the current system and subsequently tilting the system in favor of the bigger landowners and elites. I am a life long Wyoming resident and have worked my entire life to have land of my own and consider myself a good steward of the land and Wyoming's wildlife. By doing what is proposed it will actually do the opposite and make smaller landowners break up their properties and diminish even further quality habitat in favor of lots and cabins to other people who want their cabin in the woods.

Final Comment

Rodabaugh, Valerie

Rawlins, WY

5/7/2025 11:14:00 AM

36

Changing land owner tags to 640 acres is extreme, Double the 160 to 320 is a responsible amount. Or if you change to 640 grandfather in 320 or more acres

Final Comment

Killion, Pam

WHEATLAND, WY

5/7/2025 12:06:00 PM

37

Please leave the 160 acres for landowner's tag as they are currently written. This allows WYOMING families who are born and raised in Wyoming to enjoy the land. My son wants the opportunity to enjoy hunting with their grandpa. If you change this - you are stripping our youth of these opportunities. 2000 animal units is an average of 5.5 animals a day for 365 days on the property. If you take away the landowners tag, you are creating more area of refuge for the animals to not be moved around. My dad and brother have spent a lot of time, money, and effort to make that habitat better for wildlife such as spraying for cheat grass, repairing the water tanks, and working on the fence to make it wildlife friendly. I would recommend 320 acres range land and 2000 animal units. Thank you for your consideration.

Final Comment

Maloney, Kylie

Cheyenne, WY

5/7/2025 7:07:00 PM

38

Please maintain the current requirement of 160 acres for a landowner's tag. This provision allows families who have deep roots in Wyoming—like mine—to continue enjoying the land and passing down traditions. I was lucky enough to harvest my first elk on my in laws property. My son dreams of hunting along his family just as generations before have. Changing this policy would take away valuable opportunities from our youth. A threshold of 2,000 animal units averages to about 5.5 animals per day over a full year. Removing landowner tags would unintentionally create more refuge areas where animals congregate without being moved, which could negatively affect population management. I have personally invested significant time and labor into improving wildlife habitat with my in laws— repairing water tanks and modifying fences to be wildlife-friendly. These efforts benefit the broader ecosystem, not just our own property. As a recommendation, I support a requirement of 320 acres of rangeland and 2,000 animal units. Thank you for your time and thoughtful consideration.

Final Comment

Maloney, Dave

Cheyenne, WY

5/7/2025 7:13:00 PM

39

Please maintain the current requirement of 160 acres for a landowner's tag. This allows Wyoming families—many of whom have lived here for generations—to continue enjoying and caring for the land. It also gives families the opportunity to hunt together as a meaningful and responsible hobby. My family (husband, son, son in law, grandkids) looks forward to the chance to hunt alongside each out, continuing a tradition that connects us to each other and to the land. The 2,000 animal unit requirement averages out to about 5.5 animals per day year-round. If landowner tags are eliminated, it could lead to more areas where wildlife congregate without natural movement, ultimately disrupting balanced and effective wildlife management. My family—especially my husband and son—have invested countless hours, hard work, and personal funds into improving the land for wildlife. They've sprayed for invasive cheatgrass, repaired and maintained water tanks, and modified fencing to make it safer and more accessible for wildlife. These efforts go far beyond personal benefit; they help support the overall health of the ecosystem and contribute to responsible land stewardship. I respectfully urge you to retain the current 160-acre threshold for landowner tags, which supports local families and responsible land management. Alternatively, if changes are necessary, I recommend considering a balanced requirement of 320 acres of rangeland along with 2,000 animal units. Thank you for your thoughtful consideration and for your continued commitment to preserving Wyoming's land, wildlife, and longstanding family traditions.

Final Comment

Johnson, Deborah

Cheyenne, WY

5/7/2025 7:24:00 PM

40

Section 8: ONLY RESIDENTS OF THE STATE OF WYOMING SHALL QUALIFY FOR "LANDOWNER LICENSES" "LANDOWNER" LICENSES SHALL ONLY BE USED ON PRIVATE LAND. Section 8(a) (i), (ii) should stay as is. OR residents of She state of Wyoming Landowners that currently qualify for landowner licenses shall be grandfathered under the current regulations. Landowner licenses shall not exceed 25% of the total allocated licenses for a given hunt area. If more than 25% of allocated licenses in a given hunt area are designated for landowner use, a draw system shall be used to determine which landowners are awarded licenses. 75% of the available licenses in a given hunt area MUST be available for non-landowner use.

Final Comment

OAKES, DONALD

CASPER, WY

5/11/2025 6:11:00 AM

41

Section 8: ONLY RESIDENTS OF THE STATE OF WYOMING SHALL QUALIFY FOR "LANDOWNER LICENSES" "LANDOWNER" LICENSES SHALL ONLY BE USED ON PRIVATE LAND. Section 8(a) (i), (ii) should stay as is. OR residents of She state of Wyoming Landowners that currently qualify for landowner licenses shall be grandfathered under the current regulations. Landowner licenses shall not exceed 25% of the total allocated licenses for a given hunt area. If more than 25% of allocated licenses in a given hunt area are designated for landowner use, a draw system shall be used to determine which landowners are awarded licenses. 75% of the available licenses in a given hunt area MUST be available for non-landowner use

Final Comment

Ewing, Robert

CASPER, WY

5/11/2025 6:13:00 AM

42

Section 8: ONLY RESIDENTS OF THE STATE OF WYOMING SHALL QUALIFY FOR "LANDOWNER LICENSES" "LANDOWNER" LICENSES SHALL ONLY BE USED ON PRIVATE LAND. Section 8(a) (i), (ii) should stay as is. OR residents of She state of Wyoming Landowners that currently qualify for landowner licenses shall be grandfathered under the current regulations. Landowner licenses shall not exceed 25% of the total allocated licenses for a given hunt area. If more than 25% of allocated licenses in a given hunt area are designated for landowner use, a draw system shall be used to determine which landowners are awarded licenses. 75% of the available licenses in a given hunt area MUST be available for non-landowner use

Final Comment

OAKES, Rachel

CASPER, WY

5/11/2025 6:15:00 AM

43

It appears that someone is trying to snuff out the little guy. Maybe we just don't care about the families in Wyoming anymore. Many of the families in Wyoming depend on the wild game. There is no reason the WGF needs to move the landowner tags to (A) Consist of a minimum of one hundred sixty (160) contiguous acres of cultivated land. What about those that do not have an area large enough to cultivate? or;(B) consist of a minimum of six hundred forty (640) contiguous acres of land. Why so much? You go from 160 to 640 over night? Why not make it the 320 as first suggested? When it boils down to it, they still pay the same price as everyone else for the license. The biggest difference is that the landowner also has to maintain and pay for the land.

Final Comment

Hershberger, Perry

Douglas, WY

5/11/2025 10:57:00 PM

44

I disagree with the change for existing land owners. My family has 160 acres out of Wheatland and should be allowed to keep the landowner hunting license. Changes that would make sense - require that any harvesting stays with the landowner or direct family within 2 generations (eg - grandparents to grandkids) - friends and others cannot harvest on the landowner license. Also the state should grandfather in families that have owned the land for years / are current owners, and only remove the 160 acre min acre ownership, if given or sold to non-family, or given or sold to family more than 2 generations away from current owner. This would allow it to be handed down to family in perpetuity.

Final Comment

Sachse, Heather

Cheyenne, WY

5/12/2025 3:58:00 PM

45

Dear Wyoming Game and Fish Department or To Whom It May Concern It is my understanding there is possible consideration to change/ increase the land requirements that would be required when applying for a landowner tag and it may negatively impact current applicants in this matter. The intention of this email was to request that this not be a proposed change and that the current requirements remain the same as they currently are in Crook County. I have been a Wyoming resident my entire life and thoroughly enjoy the beauty that our State has to offer. My family

has spent an incredible amount of time working toward getting property that would allow for the privilege of applying for landowner tag. If the acreage requirements were increased that would make it harder to continue to have this benefit. Having a smaller acreage size to have this benefit has made it possible to continue to enjoy some of the amazing things that Wyoming has to offer, including landowner permits. I am requesting the acreage requirement be considered to remain the same, if possible. I would appreciate any consideration be given to this topic and hope that as a concerned Wyomingite these concerns will be taken into account as these decisions are further discussed. So with that being said, as I mentioned above my intention of sending this input is to request that this department please consider leaving the current rules and acreage requirements around landowner tags as they are currently at this time. Thank you for your time and consideration in this matter. Erica Wood (307) 660-1981

Final Comment	Wood , Erica	Moorcroft , WY	5/12/2025 8:54:00 PM
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46	I support the proposed changes to the Landowner license regulations. I feel this is a good mix of changes that would eliminate those that have been gaming the system in order to get LQ tags in hard to draw area.
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Final Comment	Steffen, Chris	Green River, WY	5/13/2025 10:28:00 AM
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47	The landowner changes proposed should be made as proposed. There are far too many abuses by landowners with small parcels, small interest in land holdings and so on in which these persons are abusing the privilege of the landowner licenses and taking advantage of the system as it currently exists.
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Final Comment	Weimer, Kenneth	Upton, WY	5/13/2025 3:30:00 PM
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48	I'm in favor of Wyoming landowner permits in limited quota areas, But what I'm not in favor of is letting the landowner hunt the entire area every single year. People are buying parcels of land just for the sole purpose of being able to get tags every year. I believe the landowner should have to hunt their own land and not the entire hunt area, Unless they enter the draw like everyone else. This is NOT fair to all the folks that might hardly ever draw a tag, And when they do there is one less Trophy bull or buck due to seasoned landowner hunters that know the whole area well. The game and fish give the landowner tags out to compensate the owner for damages and feed loss, So it's not right that the landowner can hunt several drainages away from their land and harvest a trophy animal that has never set foot on their property every single year. This proposal would be easy to enforce these days with satellites and the wardens all having cell phones to check property boundaries. If landowners want to hunt the entire area they should have to draw a tag like the rest of us to harvest a trophy bull or buck or possibly they should only be able to hunt antlerless game on the whole area. Casper news just released a Wyoming G&F video that says elk numbers are now too high in 2025 and they want to issue more elk tags to the landowners, This is NOT right unless the tags are for antlerless elk. I'm trying to give everyone a fighting chance. Bill Mathews Thermopolis Wy. Wyoming native for 63 years.
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Final Comment	MATHEWS, BILL	THERMOPOLIS, WY	5/13/2025 8:20:00 PM
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49	I am writing in strong opposition to the the proposed changes to Chapter 44, specifically changing to 640 Acres and 3,000 use days for landowner qualifications. Multiple task forces have reviewed this topic and have all settled on the fact that this drastic of a change is completely unnecessary and unwarranted. Consensus has been that moving to 320 is sufficient to accomplish the goals and eliminate most of the abuse of the system. I agree that some changes need made and support adjusting to 320 acres minimum. Small land owners are critical to Game and Fish Operations as well as public access. I can assure you that unintended impacts from this drastic of a change will be huge. Small landowners will decide to not participate in HMA, Access Yes, Veteran Hunts, Youth Hunts, Walk-In only, and more. As a small land owner ourselves, we have provided access and had a strong working relationship with the Game and Fish. In fact just this morning, we were contacted by the Game and Fish access coordinator about our thoughts on some possible changes to the HMA Rules to help the G&F achieve some goals in our particular area. If these types of changes are made, we will likely reconsider our working relationship and willingness to participate in the access programs. I'm sure we won't be alone in this sentiment. Decades long partnerships between small land owners and the Game and Fish will likely be terminated by this drastic of a change. Small landowners provide food/water/habitat just like large land owners. Our property is critical elk calving ground and and while smaller than some major landowners, elk thrive on our acreage in the spring and summer. While I agree there is abuse in the
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system right now, us and many others are not the problem. Changing to 320 acres and requalifying properties would solve the abuse.

Final Comment	Porter, Shane	CASPER, WY	5/15/2025 10:03:00 AM
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50

May 13,2025 To Whom it may concern; We are writing this letter in response to the proposed changes of chapter 44 section 8 involving the land owner tags. We are lifetime residents of Wyoming and have been farming and ranching our whole lives. We own 600 (+ or -) contiguous acres consisting of approximately 40 irrigated and the remainder being mountainous livestock grazing and wildlife habitat. If this proposal is adopted, the new regulations will make acquiring land owner tags for our property unavailable. For the last eighteen years, our family has had the opportunity to recoup the loss of crops and fence damage by being granted the land owners tags. Every year we experience thousands of dollars in crop damage from elk, deer, and antelope eating, tromping, and bedding down on our crops. Most of this damage is done at night when the general public never sees. Every spring we spend countless hours repairing the fences due to big game damage during the winter. This work has to be done, and has been very burdensome to our family. Time and money has to be spent to facilitate livestock grazing on the non irrigated portion of our property. We have never made a claim to the state of Wyoming for these damages. We have invested into a system that provides water to livestock and all wildlife in the back country of our property. This has facilitated all animals access to water without the need to cross the highway to the river. We have six children and many grandchildren that have been able to utilize the land owner tags. We have considered this a fair price for the hard work and money loss of crop revenue caused by big game damage. We have allowed others to hunt on our property and have allowed access to the state and federal lands that are accessible through our property. If we are unable to obtain landowner tags, this property will no longer be available for general public hunting. Furthermore we will no longer allow the public to access the state and federal lands through our property. We do not want to add to the already restricted public access inventory, but if this proposal goes through and landowner tags are no longer available to us, it will affect future public access. Respectfully, Carl and Carol Yorgason 307-431-6410 598 Hwy 290 Meeteetse, WY 8243

Final Comment	Yorgason, Carl and Carol	Meeteetse , WY	5/16/2025 7:52:00 AM
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51

I am 100% against changing the acreage requirement for landowners. It sounds like to me that large land owners are trying to control the smaller ones, and in a sense pick on the little guy. As a disabled Veteran, I have been granted an amazing opportunity to be able to receive a donated Elk tag and hunt this year. I know there are many landowners who help out veterans such as myself. If the acreage requirement changes, this could greatly reduce the opportunities for veterans who are disabled to enjoy the great outdoors. Please vote against this change.

Final Comment	Peterson, Casey	casper, WY	5/16/2025 9:08:00 AM
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52

the proposed changes for reporting to be done by landowner needs to be a WGF Form that specifies to all landowners what and how the documentation is acquired, so all landowners do the same thing to qualify. This section: (ii) (B) consist of a minimum of six hundred forty (640) contiguous acres be utilized by the type of big game or wild turkeys for which the applicant applied to the extent the land provides food, cover and water for a minimum of three thousand (3,000) days of use during the twelve (12) month period immediately preceding the date of application. The landowner applicant shall demonstrate that the species of wildlife for which the license application has been made utilized the described land for a minimum of two thousand (2,000) days of use during the twelve (12) month period immediately preceding the date of application. (iii) The landowner applicant shall be solely responsible to provide adequate documentation verifying that they meet all Commission regulation requirements governing landowner licenses.

Final Comment	Inchauspe, Joyce	Sheridan, WY	5/17/2025 9:13:00 AM
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53

Hello and thank you for receiving comments - Chapter 44, Section 8. Please keep the minimum acreage at or below 320 acres and do not raise it to 640 acres. We continue to have a large elk and mule deer herds that winter on property, thus I recommend keeping the 2,000 days instead of increasing to 3,000. There is no shortage of elk or mule deer in the area. While I may not be an official resident of WY, my heart has been here for 40 years. I am a

landowner of roughly 540 acres plus ~1,500 BLM leased acres in the North Fork drainage of the Shoshone River. My primary use of the deeded land is for hunting and providing wintering range for wildlife, mostly mule deer and elk. Currently I have no incentive to develop the land for other usage, however losing landowner tags for big game will change the equation and potentially lead to developing the land for other uses. Let's keep the undeveloped land undeveloped!!! Thank you.

Final Comment	STEWARD, BLAKE	BOERNE, TX	5/19/2025 8:42:00 AM
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54	As someone who has been looking to purchase land and move to WY, 640 acres would put me completely out of the running for landowner tags. You will, if enacting, now only be enabling the wealthiest of landowners and cutting tags for many, many landowners. I am totally okay if you want to limit the landowner tags to just the landowner's property but increasing the amount of land owned is a solid NO for me. 160 acres doesn't guarantee landowner tags now but at least it is somewhat affordable.
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Final Comment	Bleemel, Harold	French Lick, IN	5/19/2025 9:39:00 AM
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55	I believe all landowner tags should only be allowed on the land in which they were issued and landowners should have a separate quota that doesn't effect the public draw
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Final Comment	Marquette, Chance	evansville, WY	5/19/2025 2:49:00 PM
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56	The increase in acreage for landowner license eligibility from 160 to 640 seems excessive. It is particularly onerous in the many areas of the state where private land intermingles with public land.
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Final Comment	Bartley , Bruce	Buffalo, WY	5/19/2025 9:50:00 PM
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57	I am opposed to increase in acreage requirement for landowner license eligibility from 160 acres currently to 640 acres. The person that lets me use his cabin and land has about 500 acres. The animal used on these acres is well over 3000 use days. A four-time increase is excessive, something lower could be much more agreeable. An increase that you propose will limit landowner from giving access to their land. The other thing is they are the ones feeding the herd, and hunting is a way to control the deer and elk herd.
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Final Comment	Schuh, Brian	Kaukauna, WI	5/20/2025 6:33:00 AM
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58	Regarding the proposed increase acreage requirements for landowner eligibility, I would like to request retaining of the current rules and oppose acreage expansion. I am lucky to have a WY landowner offering to host my hunting days and am speaking for his interests. The main reason for my objection is that there will be property owners injured by the expansion who may have purchased acreage with licensing intents who will lose compliance after a large investment. This proposed expansion is drastic in size. I also think it is important for all state game agencies to be mindful that increases in rules and regulations can decrease future young hunter participations as requirements become an overwhelming complexity. I am curious of the intent behind these proposed landowner requirements; Is the intent to reduce Tag allocations or to increase revenue?
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Final Comment	BOWLAND, GEORGE	GENOA, OH	5/20/2025 6:46:00 AM
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59	I oppose the drastic increase in acreage required for land owner license eligibility from 160 to 640 acres. I also oppose the increase to animal use days from 2000 to 3000. Please consider these objections. All the best.
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Final Comment	Rix, David	Columbus, IN	5/20/2025 7:45:00 AM
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60	I support the proposed changes for issuance of Landowner Licenses.
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Final Comment	Pranger, Tony	Thayne, WY	5/20/2025 8:17:00 AM
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61	I would like to oppose the increase in acreage required for a landowner tag.
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62 I fully support the proposed changes regarding qualifications for landowner tags. I own 160 acres in the Bear Lodge Mountains. I receive a deer non-resident landowner tag but when I asked the Game Warden about an elk tag, he advised that Crook County had more landowner tags than any other County in Wyoming. I still apply via the regular application process, which is fine. However, I have noticed that all the landowners surrounding me are receiving 2 landowner elk tags every year. Many of these have parcels not much bigger than my 160 acres. A large landowner started selling parcels about 10 years ago - and I have definitely seen a decline in elk numbers with the increased number of hunters in my area - almost all are receiving landowner tags. A landowner tag should equate to an owner providing habitat for elk - or at least have some crops impacted. All of my neighbor landowners have neither of this - but they relentlessly pursue the shrinking number of elk in our area. Raising the benchmark to be able to obtain a landowner tag is excellent - Thank you! Also making sure they do indeed have the numbers of elk is critical. Obtaining a landowner tag should be an exception, not the rule! Thanks for the opportunity to provide comments.

63 I would support adding language to make more acreage required for LO licenses. I also would like to see all LO licenses come from the Non Resident pool of licenses. Land Owners should also be limited to lands they own or lease, not the whole area for hunting on LO licenses. Absolutely do not support transferrable licenses for Land Owners.

64 I'm commenting on non-resident landowner tags. I submitted an elk application for the 2025 draw for unit 111-1. I did my research and based on 2024's draw odds and tag allocations(which did not change), that I had about a 3% chance in the random draw. I was confused when I checked my draw odds and saw 0 tags allocated in both the regular and special random draw. I didn't understand this but quickly found that all the tags were given to non-resident landowners. Wyoming F&G took my application fee, charged me a credit card fee, and held my money for 4 months under the pretense that I was applying for a hunt that I at least had a chance at. This is wrong on so many levels. My hunt app was wasted and I paid money for a chance at a tag, which I was denied. The NR landowners drawing needs to be drastically limited, too many tags are going to these applicants. It is unfair that they can take an entire quota for any given unit if enough of them apply. They should not be allowed to hunt public land. The drawing should take place before the app deadline for regular non residents so that we can see how many tags we are actually applying for. Non-residents keep getting shorted and shorted. Paying higher fees, fewer tags, worse and worse draw odds, now this? This program honestly shouldn't even exist.

65 Please instate a cap on land owner licenses and limit landowner tags to private land only.

66 Hello, I do oppose the increase in acreage requirements from 160 acres to 640 acres for landowner tags. Increasing the required acreage by such a drastic amount is entirely unreasonable. Current landowners, both resident and non-resident, have invested already enormous sums of money to purchase, maintain and manage at least the minimum 160 acres. At current land prices in WY, it would require a minimum of \$1 million to purchase another 440 acres, if it was contiguous and available, which are both unlikely. I'm not sure what the rationale behind this proposal, but it appears to benefit large acreage landowners and squeeze the smaller landowners out. At the very least, current smaller landowners currently meeting the 160 acre requirement should be grandfathered in. Thank you for your consideration.

67

Having talked to many game wardens and biologists it has come to my attention that there are some issues with certain deer areas and the amount of land owners tags given in those areas. First of all there is no way all those land owner would qualify under the current system if they were reanalyzed. The current system is not being properly enforced but criticized for not working at the same time. This makes zero sense. I would like to suggest having various levels of tags based on species and herd objection. In this manor herd management and herd objectives are more inline with the over all objectives. Example mule deer have a low population and making this category a maximum 1 per qualifying land parcel. And elk areas where herd management has been very difficult allowing the current 2 per qualifying parcel. The animal use day calculation of 2000 days currently is a significant impact to a landowners grass for their livestock and the landowner tags has been one of the few perks to appease the situation. I feel like landowner damage claims will double if not triple in the coming years and who is going to pay for that. Tag fees will have to go up. This blanket approach is most certainly not beneficial for the wildlife or landowner relations. The problems need to addressed individually thru targeted changes the accurately fix the isolated issues. I feel landowners alienation with increase damage claims reduce access agreements and will create a mass exit and partition of properties multiplying traffic and pressure to public lands. There common sense approaches that can target the problems please address the problems versus reducing them only.

Final Comment

Lovelace, Sean

Casper, WY

5/23/2025 5:04:00 PM

68

I have been reading about the proposed landowner qualifications for landowner permits. I feel very strongly that ONLY landowners that live in Wyoming and cultivate their own land with at least 640 acres should qualify for landowner permits. Landowners who DO NOT use their property for agriculture purposes should not qualify for landowner permits. In addition, I strongly feel that any landowner issued permits means that those landowners can ONLY hunt on their own property or at most, adjoining private land. By implementing these changes, there would be many more kids able to receive limited quota tags of lifetime that they cannot draw now, due to too many tags issued to non-agriculture landowners. I would appreciate a response to this comment. Thank you for the opportunity to comment.

Final Comment

Ausmann, Craig

Newcastle, WY

5/26/2025 6:36:00 PM

69

I just wanted to voice my support for chapter 44. I especially like the proposed changes to the landowner tags. Please adopt these changes, especially not allowing landowner tags to landowners who purchased tge property specifically for the tags Also thank you for not allowing landowners to sell their landowner tags. Thanks

Final Comment

Winter, Whitney

Gillette , WY

5/26/2025 8:49:00 PM

70

I am opposed to the changes in regulations in Chapter 44. I was born and raised in Casper and I am a lifetime bow hunter. My grandmother put almost all of her wealth into land so that her family could enjoy hunting privileges for generations. Some of my fondest childhood memories revolve around September evenings spent hunting with my family. I have long looked forward to the day when I could take my son hunting with me and tell him of his family legacy. This is all being put in jeopardy by the commissions proposal to raise the required acreage to secure landowners tags to 640 acres. Our story is not unique. Many Wyomingites like us have sacrificed greatly to secure land and preserve it. If the acreage requirements are indeed elevated to 640, not only will our legacy be dashed, but so will the hopes of any hard working Wyomingite who dreams of having landowners tags of their own. Charlie Munger once said: "Show me the incentive, and I'll show you the outcome." In modifying policy, it is extremely important to consider what incentives are being given. For landowners that own less than 640 acres, would it make sense to for them to hold onto their land and continue to pay taxes on it? Would it be worth the effort to continue to protect the elk habitat that they posses if they don't get landowners licenses? Or would it make more sense to subdivide their land and sell to the highest bidder? This is no speculation, we have been in talks with many landowners in the state who acknowledge that if they lose their right to hunt on their land, they will subdivide their properties and sell it. Does that sound conducive to elk habitat? The ensuing loss of elk habitat would be irreversible and severe. The Game and Fish department has already invested time and money into finding the right number, which they determined was 320 acres. I respectfully ask the commission to follow this informed recommendation rather than an arbitrary number set without any consideration of consequences. I have great respect for your

department and for what you do, and I thank you for taking the time to read my letter. We the people of Wyoming do not want 640 acres.

Final Comment	CHRISTOPHERSON, KAHNER	CASPER, WY	5/26/2025 10:14:00 PM
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71	I believe 160 acres isn't enough (unless your on a feedground)! It should be 640 or more and it needs to be checked by GandF personel. And if not on their own property it needs to revert to a cow liscense!
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Final Comment	stigen, david	casper, WY	5/27/2025 3:32:00 PM
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72	I just applied for my cow tag knowing I will not draw a bull tag. I think 160 acres is not enough. It should be raised to 640 acres, if not, more. Thank you, Emily Foster
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Final Comment	FOSTER, EMILY	CASPER, WY	5/27/2025 4:18:00 PM
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73	Subject: Changes to Landowners requirements Date: 5/27/25 To: Wyoming Game and Fish commissioners, This letter is in strong opposition to the proposed changes to the landowner license section of Chapter 44. As a longtime Wyoming residents and landowner, my family and I are firmly against raising the minimum acreage requirement from 150 to 640 acres. These changes, as proposed, are deeply flawed and will cause lasting harm to the very people who have worked for generations to support wildlife and steward this land. Increasing the acreage requirement will directly strip many responsible landowners of a privilege they have held for decades. These are not outside developers or speculators, they are Wyoming families who have contributed to the state's ranching legacy, managed wildlife habitat, and partnered with the Wyoming Game and Fish Department in good faith. This proposal alienates those partners and undermines the trust and cooperation that have taken years to build. We understand the concern about developers subdividing land to exploit the current rules. But punishing all landowners for the actions of a few is unjust. If the true intent is to address new development abuses, then the regulation should apply going forward — not retroactively. A forward-looking rule that limits eligibility based on future sales, elk use days, or habitat criteria would be far more fair and effective than blanket disqualification. If a landowner currently meets the 2,000 elk use days under existing regulations, they have clearly provided substantial wildlife value and deserve a landowner license. Removing that recognition sends a message that the Department no longer values the critical role private landowners play in managing elk populations and providing essential habitat. Our property lies within Elk Area 7, where the Game and Fish Department has openly acknowledged the need to reduce elk numbers , even going so far as to issue Type 8 tags with nearly year-round seasons. In light of this overpopulation, it is completely counterproductive to now push landowners away from participation. You cannot reduce elk herds effectively while simultaneously alienating those who host them on private lands. This proposal will hurt more than it helps. It will not solve the development issue, and it risks irreparably damaging the relationship between Game and Fish and landowners who are vital to achieving wildlife management goals. We urge the Commission to listen to those of us who live here, who work this land, and who have proven our commitment to conservation. Do not move forward with this change as written. Respectfully, Chuck, Lisa, Jessica, Ben, Brooke Mangus
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Final Comment	Mangus, Chuck	Douglas, WY	5/27/2025 8:02:00 PM
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74	What you'd like to implement for the landowner regulations sounds fair.
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Final Comment	Hockaday, Allen	Casper, WY	5/28/2025 10:04:00 AM
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75	Director Bruces memo to JAC members French and Winter are not an accurate representation of the evolution of studies done pursuant to changes to chapter 44. Rather, the changes she indicates are that of a somewhat chaotic November 2024 Commissioners meeting wherein then Commissioner Ralph Brokaw rejected G&F study in lieu of his personal recommendation of much higher acerages and larger AU counts to receive licenses. In essence this is NOT elements of the exhaustive studies done, but rather the grenade he threw on his way out the door. ALL WRONG!
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Final Comment	Ball, Ken	Glenrock , WY	5/28/2025 11:35:00 AM
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76

I would like to see the commission vote in favor of changing the rules for landowner permits owning 160 acres too 640 acres . Thank you for proposing this change .

Final Comment

Doerr, Vincent

Casper, WY

5/29/2025 12:52:00 PM

77

I am for the new proposed changes. The present regulations seem to give some residents an advantage to receive tags with little justification, at a time when hunting licenses are increasingly difficult to obtain.

Final Comment

Ramich, Wayne

Casper, Wy, WY

5/29/2025 2:48:00 PM

78

Thank you for the opportunity to comment on the proposed amendments to Chapter 44, Section 8 regarding landowner licenses. How does this rule change “promote the maintenance of wildlife habitat and aid in attaining wildlife management objectives” as required by WY Stat § 23-1-303? It appears the main rationale is the perception that “too many tags go to landowners.” However, significantly reducing tags for Wyoming landowners may actually undermine this goal. Below are several potential unintended consequences to landowners, wildlife populations, and public access. Analysis of the 2024 landowner draw results for elk, antelope, and deer shows that most hunt areas allocate only a small percentage of their total quota to landowners (see data below). The data does not substantiate the perceived issue and therefore does not justify a sweeping overhaul of a long-established qualification system. Even if reducing the number of landowner tags were a valid objective, the proposed changes do not offer a sustainable solution—especially in hunt areas with few available tags. Under the new system, a small number of affluent individuals—likely nonresidents—could still consolidate enough acreage to qualify, recreating the very concern this proposal aims to solve. Meanwhile, hundreds of current landowners, many of them Wyoming residents who have participated responsibly for years, would be disadvantaged. Their continued involvement supports the intent of WY Stat § 23-1-303 by promoting habitat stewardship and sound land management. The proposed distinction between “cultivated” and “non-cultivated” land raises serious concerns. The term “cultivated” is undefined. According to Webster’s, it can refer to land improved by care and labor or to land actively tilled for crops. Even this guidance is open to interpretation. Does it include seeding, fertilizing, sagebrush removal, tree thinning, pest control, grazing rotation, or fencing? Without a clear definition, this change is likely to cause confusion, disputes, and legal challenges. If “cultivated” land is defined as land used to grow crops, why does it require fewer acres to qualify? If intended to compensate for crop damage, the **Wildlife Damage Claims Program** already serves that purpose. If the reasoning is that cultivated land provides more value to wildlife, then why not also consider riparian areas, timber, caving areas, water sources, or migration corridors? There’s also the troubling possibility that landowners may alter practices to meet a vague definition of “cultivated,” potentially degrading native rangelands and critical wildlife habitat. The proposed changes could trigger a cascade of unintended outcomes. They may encourage land consolidation among fewer, wealthier (often nonresident) owners, reducing public hunting access through walk-in areas. Conversely, they may prompt land fragmentation, as incentives to maintain large, contiguous parcels diminish—impacting habitat quality. Without the landowner program, landowners may pursue alternative income sources, like outfitting or access fees, with less regard for harvest or herd health, potentially lowering future quotas. The rule could also promote outfitters leasing multiple now-disqualified parcels, locking up access to significant acreage and further limiting public opportunities. There are more balanced, long-term solutions that avoid these risks. Alternatives could include reducing the number of tags per landowner from two to one; setting a percentage cap on landowner tags by hunt area (e.g., 10–30%), based on area size, quota, and harvest goals; or giving preference to resident landowners or those with long-term ownership. These targeted strategies could address perceived issues while better supporting the goals of WY Stat § 23-1-303. In light of the concerns outlined, the proposed changes to landowner license qualifications appear both unjustified and potentially harmful. WY Stat § 23-1-303 is best served by fostering strong, cooperative relationships with landowners who provide essential habitat and public access across Wyoming. The data does not support claims of landowner tag over-allocation, and the proposed amendments risk undermining long-standing programs that have aligned private interests with conservation goals. Rather than introducing vague terms and inequitable standards that may discourage sound land management, fragment habitat, and reduce public access, we urge decision-makers to reconsider the rule. A better path forward involves working directly with landowners to craft clear, data-driven policies that uphold habitat objectives while ensuring equitable license allocation. Protecting the integrity of the landowner program is not only in the interest of landowners but of all who value Wyoming’s wildlife heritage and the shared responsibility of managing it wisely. Thank you for considering these alternatives. Data Summary The data shows most hunt areas with landowner applicants allocate only a small

share of tags to landowners. While a few tag types show higher proportions (50–75%), these are rare and typically occur in areas with low quotas and high private land percentages. Elk In 2024, landowner tags were issued in 47 of Wyoming's 69 elk hunt areas, covering 62 of 145 tag options: • 26 had <5% landowner allocation • 12 had 5–9.9% • 17 had 10–19.9% • 5 had 20–29.9% • 1 had 41% • 1 had 75% — Area 54, Type 3 (8-tag quota) Deer Landowner tags were issued in 33 of 67 areas, covering 43 of 72 tag options: • 20 had <5% allocation • 7 had 10–19.9% • 9 had 20–29.9% • 6 had 30–50% Antelope Landowner tags were issued in 88 of 99 areas, covering 96 of 120 tag options: • 37 had <5% allocation • 22 had 5–9.9% • 23 had 10–19.9% • 8 had 20–29.9% • 6 had 30–65% — (65%: Area 53 , 20-tag quota)

Final Comment	Lewis, Kevin	Basin, WY	5/29/2025 8:40:00 PM
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79 The landowner tags can be great for historic ranches and families that have been there for generations. It's a way to balance the competition between elk and cattle etc. However, it also offers the downfall of pay to play hunting. I live in the Midwest and have hunted WY the last 3 years. If I had the money, I would buy 160, 340, 640 acres, whatever the number, just to get a guaranteed elk tag. That is not right for me to be out of state and do that. I support Wyoming and I apply year after year. I did not draw a elk tag this year. Just please be careful with these programs, as I know guide's/outfitters support them while mainly chasing profits. And I know some WY politicians support this as they see tax dollars from residents and non residents. If we aren't carefully, all western states will become pay to play and that really erodes at the North American Model of Wildlife Conservation. There are ranches/landowners that already herd elk herds off of public ground back on to private(i.e. unit 7Elk) with a fourwheeler or horses. I know you get sent the videos of it happening. God Bless Wyoming, sadly, from a Minnesota Army vet

Final Comment	Day, Josh	Belview, MN	5/30/2025 12:23:00 AM
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80 I am in full agreement with the proposed changes. It would also seem fair that the landowner tag would also be limited to hunting the qualifying property.

Final Comment	Requa, Charles	Powell, WY	5/30/2025 7:59:00 PM
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81 I am letting y ou know I am opposed to the proposed changes to the qualifications for landowners license requirements. I am the owner of 600 acres in Crook County, the third generation owner of this property. My land has been a natural habitat for both whitetail and mule deer, antelope, and elk during the entire time my family has owned this land. Never once have we submitted applications for damages to crops or grazing land. The amount of usage by wildlife has increased over the years and is welcomed by us. I disagree with the idea of increasing the acre and usage requirements you are imposing. Thank you, Tom W. Necklason Sundance Wy. 82729 307-290-2636

Final Comment	Necklason, Tom W.	Sundance, WY	5/31/2025 5:25:00 PM
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82 Seems like the commission is making changes to hurt landowners once again. The task force didn't even recommend it why are you doing it

Final Comment	Johnson, Scott	Verona, WI	6/1/2025 7:02:00 AM
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83 Thank you for the opportunity to comment on the proposed amendments to Chapter 44, Section 8 regarding landowner licenses. Wyoming Statute § 23-1-303 directs the Wyoming Game & Fish Department to issue landowner licenses in order to "promote the maintenance of wildlife habitat and aid in attaining wildlife management objectives." This reflects the Legislature's recognition that partnering with landowners is critical to achieving wildlife conservation goals. For decades, this program has fostered strong relationships between landowners and the Department, resulting in meaningful habitat stewardship on private lands. The proposed changes to the rule introduce a significant risk of undermining this longstanding partnership. Altering the program after decades of success could reduce landowner cooperation in unpredictable ways. One of the most concerning potential outcomes is increased subdivision and development of private lands that no longer qualify for landowner licenses, an outcome directly at odds with habitat preservation. I am aware of just such a circumstance, whereby several hundred acres of prime elk grazing and calving habitat may be subdivided and developed if the proposed rule is imposed. It is my understanding that the proposed changes are being considered in part to slightly improve draw odds for the general public and to

address a perception that guaranteed landowner tags are unfair. However, the actual impact on draw odds would be minimal. Based on the 2024 draw results: • Of the 145 elk license types, only 41 had landowner applicants where first-choice applicants did not already have 100% draw odds. If all landowner applicants were removed, the draw odds would increase by just 3% on average for these tags. • If landowner tags were reduced by half, the increase in draw odds for these elk licenses would average only 1.5%. • For antelope, halving landowner tags would increase draw odds by 3.25% for 75 out of 120 license types. • For deer, the increase would average only 1.5% for 23 out of 72 license types. These marginal gains come at the potential cost of degrading critical wildlife habitat and weakening relationships with the very landowners who help sustain it. Regarding concerns about fairness, the Department must weigh whether marginal gains in draw odds are worth jeopardizing a program that has proven instrumental in furthering wildlife management. If reducing the number of landowner tags issued to address "fairness" is prioritized over partnerships and habitat stewardship, then the proposed rule may meet that objective. But if the Department's primary mission is to support wildlife objectives through collaboration with private landowners, as clearly outlined in state statute, then I respectfully urge the Wyoming Game & Fish to leave the rule unchanged. Thank you for your consideration.

Final Comment

Lewis, Brady

Dayton, WY

6/1/2025 12:29:00 PM

84

With regard to the proposed changes in the landowner permits. To quote the Wyo G&F regarding the proposed changes, landowner permits... "provides qualifying landowners the opportunity to hunt elk, deer, antelope and turkey in exchange for providing habitat resources to these species." I cannot comment on the amount of land a landowner should own, or the number of the number of animal-use days, to make it reasonable to provide landowner licenses "in exchange for them providing habitat resources to these species." The policy does make sense, though. There is no doubt that the herds and hunters are benefiting from these landowners owning and stewarding the land. The part of the proposed change I would like to comment on, as it makes no sense to me, is the 20% ownership interest in a corporate or partnership owner. The G&F is issuing the tags to the "Landowner." If that landowner is a corporation, partnership, trust, or whatever, It should be up to them to determine how they want to distribute the tags between their owners/members. The G&F will not be issuing fewer tags under the regulation, just arbitrarily dictating the internal working and governance of a corporate landowner. I cannot see how this benefits the state, hunters , or the wildlife.

Final Comment

White, Steve

maple plain, MN

6/1/2025 6:49:00 PM

85

Dear Commissioners, 6th generation landowner here!! STOP & PLEASE CONSIDER... We as landowners have provided quality habitat, have allowed controlled access and hunting, managed wildlife, participated in the walk in program, invested much time and money into managing our prime forested and sage grouse areas. By implementing the drastic changes I fear good landowner relations will take a turn the wrong way with all landowners it impacts! The data shows the general public in most areas won't have the odds changed much in the way of increased drawing percentages. The damage done by such changes could have landowners, pulling out walk in or public access, disrupting habitat that was once managed for wildlife (sub division or cultivation) and many other changes. I don't believe this proposed change is a wise change, please consider retaining the existing qualifications and to at the least grandfather in long established landowners and especially ones who have been in Wyoming for many generations! Some changes to consider could be: • Capping landowner tags at 30% of the total licenses in any given area to maintain hunting opportunity for all. • Ending abuse by large corporations by requiring individual ownership of at least 20% of any corporation, trust, or LLC to qualify. • Ensuring the system remains fair, practical, and beneficial for Wyoming residents who actively manage wildlife habitat. • Requiring landowner permits be issued to Wyoming Residents only – thus eliminating those who own land for the sole purpose of obtaining a land owner permit, but do not live in or care about Wyoming. If landowners lose eligibility for landowner licenses, there will be a financial incentive to subdivide property, thus fragmenting open spaces and potentially reducing habitat quality. Furthermore, if landowners—who account for a large portion of the annual elk harvest—are no longer participating in the system, harvest rates could drop, worsening already high elk populations in some areas. The WG&F Commission should not alienate the very people who have been on the front lines of habitat conservation and wildlife management. Instead, we should be finding ways to reward responsible stewardship, not penalize it. Thank you for your time and consideration and for your diligent and hard work. I urge you to reconsider these proposed changes and to support the continued participation of small, committed landowners in Wyoming's wildlife management system.

86 While catering to the outfitters is a "nice gesture", taking landowner licenses away for the people who actually work the land for a living, seems counterproductive. We meet the needs of wildlife through the resources we provide. They eat our stock-piled forage, salt and mineral licks, and drink for our water improvement project areas. We even build our fences to accommodate wildlife movement. Getting a guaranteed license is a small incentive to continue our wildlife friendly practices. Also, the outfitters are providing a trophy animal to hang on the wall, while most of us ranchers use the meat to feed our families or donate to the local Food from the Field, a Wyoming Hunger Initiative, as our son did last year with his deer. Please reconsider changing this requirement. Thank you!

87 I have lived and worked here for 70+ years. I have contributed to improving the elk habitat just about every year. Taking away my ability to get a landowner's is wrong. The outfitters put zero into the day to day needs of the wildlife. We live and work among them, making accommodations for them and meeting their nutritional and water needs.

88 I am writing this to express my strong opposition to the proposal changes to the qualifications landowner licenses. These changes will have a significant and harmful impact on small landowners, like me who have responsibly provided wildlife habitat and supported Wyoming's hunting traditions for over 25 years. The current rules of 160 acres and 2,000 animal use days strike a fair balance between opportunity and stewardship. I urge you to retain these existing qualifications and to grandfather in current properties that meet them. All I am asking is that you listen to the landowners that will be affected by your changing this Chapter 44 regulation in the proposed format.

89 To Whom it May Concern: I understand the need to make changes to the way landowner tags are issued; however, I think there are numerous options to satisfy all parties without making such broad changes. I think that landowners enjoy being able to give their tags to family members as they might be older and no longer hunt but still want to see someone using their property. People will not want to legally change the ownership of their land and therefore family members will be cut out of the hunting opportunity. There needs to be a process for existing tagholders to be grandfathered in under the previous criteria. When land is sold, the new owners will have to step up to the new, more stringent qualifications. Also, this may need to be implemented on a unit by unit basis rather than a one size fits all method. I understand that in some units and for some species, landowner tags make up the majority of tags issued. These are the units where a new solution must be presented. However, in other units where landowner tags still make up a small portion of the total tags issued, the current law may still be suitable. I urge the commission to strongly consider all reasonable alternatives before making these major changes. There are chunks of land that have been in families for decades for the sole purpose of hunting. Don't penalize these people. Thank you, Shane Richendifer

90 DO NOT change the landowner license, if you wanna mess with something simply put a cap on it and preference points. Any other alternative will definitely wind up in a lawsuit

91 I am writing in opposition to the commission's proposed changes to landowner qualifications of increasing the minimum acreage and animal use days. I feel that many of the smaller landowners such as my family provide great habitat for wildlife on our lands. Our family and many others like us, make improvements to habitat, and communicate, cooperate and work with the Wyoming Game and Fish in many ways including conservation, hunting and access for other members of the public. These changes could result in adverse changes to those relationships and landowner co-operation. For example, at this time, we would not subdivide our property and sell off parcels to

others who might further develop (build cabins, roads, etc.) primarily because of the opportunity to obtain landowner tags. However, these changes could cause us, and many landowners across the state to change this mindset and result in landowners taking advantage of the monetary opportunities their land provides. Essentially, choosing financial gain over conservation and habitat preservation. Additionally, I have had a difficult time understanding what problem(s) these proposed change will solve. Less than 2% of the total tags issued currently go to landowners, only some of which will be eliminated by these changes. This seems to be an immaterial impact on the number of tags made available to the general public statewide so that is likely not the "problem" the changes are intended to solve. I'm sure there are other concerns that these changes aim to solve but there are other, better, ways to do this without impacting Wyoming resident landowners. For example, tags could be limited to Wyoming landowners that are Wyoming residents. I would also be supportive of a Landowner Cap to ensure that each hunt area always equitably distributes licenses between landowners and the public every year. I won't speculate further on why these proposals are being considered but this change is not the answer to such a complicated issue and could have unintended and significant negative impacts to Wyoming hunters, habitat conservation, and landowner cooperation with the Department who's tasked with managing our game populations. Again, I am strongly opposed to these proposed changes and ask the commission to please consider my thoughts and opinions when making a decision. Respectfully submitted, Luke Carlson Elk Area 23

Final Comment	Carlson, Lucas	Casper, WY	6/3/2025 1:49:00 PM
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92 I oppose any changes to the acreage or day use minimum requirements for Landowner Licenses in Section 8 of Chapter 44. During my research I've found no basis for the proposed changes. In 2022 The Wildlife Task Force made several recommendations based on what I believe was 18 months of research. None of the recommendations mention acreage minimums or day use minimums. Small landowners provide the same wildlife benefits as large landowners. The habitat that small landowners provide like water, food, safety; hunting opportunities, migration routes, calving areas, cattle grazing etcetera are essential to a healthy environment for all wildlife. It makes sense that the small acreage landowners should receive the same opportunity to hunt their property as the larger landowners. I own 300 acres near the headwaters of Box Elder Creek in Area 7. If the acreage and day use requirement increases are implemented, please add a grandfather clause for existing landowners. I'm 66 years old and losing the privilege and opportunity to apply for landowner tags would mean that it's likely that I would never be able to hunt bull elk on my property again in my lifetime. My family has been fortunate to harvest dozens of elk in area 7 over the past two decades. We appreciate your dedication to the conservation of Wyoming Wildlife.

Final Comment	Sauvageau, Patrick	ANCHORAGE, AK	6/3/2025 2:51:00 PM
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93 DO NOT alter the landowner requirements if you simply enforced the rules you have you would eliminate your problem....you're going to end up in multiple lawsuits

Final Comment	Strait, Mandy	Jefferson , SD	6/3/2025 4:00:00 PM
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94 I am a non-resident Wyoming landowner, with 400 acres SW of Laramie on the Big Laramie River. Our ranch provides habitat for pronghorn, mule and whitetail deer, moos elk, waterfowl, neo tropical migratory birds and a host of non-game species. I am opposed to the acreage increase to 640 acres as this will curtail or eliminate my hunting opportunities with my Wyoming resident family. I have never hunted unit wide, only on our family property. I suggest instead of the increased acreage requirement, limit LOP hunting to acreage owned by the LOP tagholder. I believe this would solve the issues with LOP tags. My family has always provided access to those who request permission to hunt or fish. If the acreage increase is instituted, we will re-evaluate the access we provide to Wyoming hunters. Find other ways to regulate those who are abusing the system, and support those who provide valuable habitat for Wyoming wildlife even though they don't own a "trophy ranch". This change favors large landowners and exacerbates the commercialization of wildlife along with limiting hunting to the wealthy. William Richardson President, Richardson's Overland Trail Ranch LLC. 111 Hart Road Laramie Wyoming 82070

Final Comment	Richardson, William	PHILOMATH, OR	6/3/2025 4:08:00 PM
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95 Dear Sirs, I am opposed to the proposed changes to Chapter 44. First of all my property is not in a limited quota area and more restrictive rules do not make sense. Secondly, I understand that large land owners are using tricks to

increase the number of landowner tags available to them such as multiple owners, multiple LLC's, and so on. As a result, it is my understanding that in some limited quota areas that there are few tags available to the public. It is my belief that the 44 changes will make landowner tags for smaller and average size properties not available while large land owners will continue to soak up tags and manipulate the system. Since tags go to the individual owner and who really needs more than two or three animals to put in the freezer, why not simply limit the tags to two or three per owner regardless of the number of LLC's and such. Requiring 20% or more ownership to be eligible does make some sense. Thanks for allowing this comment but I will say that it was almost impossible to find how to leave comments and this definitely limits your feedback

Final Comment	Roshon, Steve	Meeteetse, WY	6/3/2025 4:25:00 PM
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96	Dear Commissioners, I strongly oppose the proposed changes to the qualifications for land owner licenses, specifically the increase in minimum acreage to 640 acres and the requirement of 3,000 animal use days. These changes will have a significant and harmful impact on small landowners who have responsibly provided wildlife habitat and supported Wyoming's hunting traditions. We have hunted this land in Natrona county for 25 years and understand we are grateful to to do so with the acreage we have, by going to 640 acres we will not have this opportunity to enjoy this. I urge you to reconsider the 640 number. 320 would be a fair trade off in my opinion. Thank you for your consideration. Angie Bowe
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Final Comment	Bowe, Angie	EAU CLAIRE [WI5470100], WI	6/3/2025 5:33:00 PM
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97	Both of us oppose the Chapter 44 new regulations on going from 160 acres to 640 for landowners. This regulation will wipe out all of our hunting privileges. You will be wiping out family tradition of hunting in Wyoming as we have been for over 20 years. We own over 500 acres but not 640. Please do not destroy our hunting privileges and family traditions.
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Final Comment	Bowe, Bill and Deb	Eau Claire, WI	6/3/2025 5:47:00 PM
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98	I agree with increasing the minimum requirements for qualifying for a landowner license from 160 acres to 640 acres and from 2000 days use to 3000 days use. Owners of 160 acre recreational cabin sites should not qualify as a landowner as they do not make their living ranching and do not provide a meaningful amount of habitat to big game animals. Landowner license holders also should only be allowed to hunt their own fee deeded land. In the case of migratory game I would have no issue allowing landowners to hunt until 12/31 or even 1/31 as long as they hunt their own land. Please do not consider grandfathering those obtaining licenses under the current 160 acre requirements if the regulation does change to 640. In my opinion, landowners should first have to try and draw a license like regular applicants. If unsuccessful in the drawing, then issue a limited landowner license valid only on their land.
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Final Comment	Gilbert , Joe	Sheridan , WY	6/3/2025 9:09:00 PM
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99	Senator Charlie Scott made a very valid point at the public meeting last night in Casper. The proposed 20% ownership cap is totally unworkable. There are many big family ranches that are held in corporations or LLC's for estate purposes that have already or soon will be diluted past this point. There needs to be exemption granted to wholly owned LLC's or corporations that are set up to pass land down to future generations. Our Family property is held in Arrowhead Ranches LLC by three children of the original owner, and we are at 33.33% after one generation. One more generation and there will be no one that qualifies for landowners' tags, although we have tens of thousands of elk use days on our property. A fix that is directed at abuse from large corporate entities, will adversely affect every landholding family in Wyoming.
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Final Comment	christopherson, kevin	Casper, WY	6/4/2025 4:37:00 AM
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100	DO NOT alter the acres simply enforce the rules you have, you will end up in multiple lawsuits
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Final Comment	Trudeau, John	Jefferson , SD	6/4/2025 5:51:00 AM
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101	DO NOT alter the acres simply enforce the rules you have and your problem will solve itself
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Final Comment	Hammit, Molly	Jefferson , SD	6/4/2025 5:58:00 AM
102	DO NOT alter the acres requirements simply enforcing the rules you have will eliminate your problem		
Final Comment	Schmitz, Eric	Elk point, SD	6/4/2025 6:04:00 AM
103	DO NOT mess with the rules simply enforce the rules you have and your problem will solve itself		
Final Comment	Bottger, Andy	Jefferson , SD	6/4/2025 6:07:00 AM
104	DONT change anything your system works just enforce your rules		
Final Comment	Nearman, Andrew	Elk point, SD	6/4/2025 9:45:00 AM
105	DONT change anything landowners do more for wildlife than anyone simply enforce the rules you have		
Final Comment	Hasenbank, Chris	Elk point, SD	6/4/2025 9:47:00 AM
106	DO NOT change your laws landowners do more for wildlife than anyone....you will end up in a lawsuit		
Final Comment	Hasenbank, Madison	Elk point, SD	6/4/2025 9:49:00 AM
107	Landowners protect wild life and should be rewarded don't change a thing		
Final Comment	Penfield, Devan	Elk point, SD	6/4/2025 9:51:00 AM
108	Landowners deserve more...they protect more wildlife than anyone....DO NOT CHANGE A THING		
Final Comment	Rensink, Josh	Sioux center, IA	6/4/2025 9:53:00 AM
109	DO NOT take away from landowners they provide more for wildlife than anyone		
Final Comment	Rott, Tarri	Sioux falls, SD	6/4/2025 9:55:00 AM
110	DO NOT take away from landowners they provide more for wildlife than anyone		
Final Comment	Toupal, Rusty	Jefferson , SD	6/4/2025 9:58:00 AM
111	DO NOT TAKE AWAY FROM LANDOWNERS they are the ones protecting wildlife		
Final Comment	Treeby, Rex	Sioux falls, SD	6/4/2025 10:00:00 AM
112	I support the proposed changes to increase the acreage requirements for landowner tags.		
Final Comment	Dobric, Nick	Dubois, WY	6/4/2025 10:44:00 AM
113	DO NOT alter landowners rights they do more for wildlife than anyone, you will be in a lawsuit if your not careful		
Final Comment	Peterson, Tanner	Vermillion, SD	6/4/2025 2:30:00 PM
114	DO NOT alter the landowner tags they are the ones who provide provide more for wildlife than anyone you WILL get yourself in an unnecessary lawsuit		

115 The drafted changes to Chapter 44 (increased acreage and animal use levels) to the landowner license requirements are good changes. Emphasis to retain license opportunities for the general public should be a priority. There should be no hunt areas where landowners take all of the available licenses (resident or nonresident). This needs to be fixed. Thank you.

116 As a Wyoming resident and Landowner I am opposed to the changes in Chapter 44.

117 I'm writing in reference to the new proposed changes to Chap 44. I'm very against the proposed changes to the Landowner acres needed and AUD mandate. I'm a resident landowner and I received landowner tags. My property is in the Black hills which has very high elk numbers. I don't see how taking tags out of landowners hands is fair. Not just me but all private property owners provide food, shelter and water year round for these animals. If you change the regulations you will essentially say, we dont care, what you do for our wildlife, if you don't own 640 acres then you don't apply. There are a few bad apples that do take advantage of the recent tag situation but don't punish all of us for a few bad apples. Couple solutions, you can tell these big ranches that if you sub divide your land you cannot receive landowner tags if you subdivide below 640 acre parcels. You can Grandfather in all the current landowners before you make changes. You can tell non resesident land owners that you cannot get landowner tags anymore. In South Dakota you can own 10,000 acres as a nonresident and you cannot get a elk tag no matter what.. In closing, Im very against this new rule proposal. Thank you.

118 I have now been to 3 meetings on this topic and still do not understand what the primary issues intended for change to title 44 are. How can that be? What I have heard is at best ambitious relative to the proposed changes. They are as follows: That it will mitigate diminishing resources, specifically mule deer decline. My solution. Curb hunting mules and take more whites. Destruction of habitat and migratory routed by subdivision. My opinion This is not a solution to this problem at all In fact taking away these licenses will only make it worse! G&F thinks in wrong that landowner licenses on smaller tracts are being used to increase valuation of property when sold or marketed. Sportsmen's clubs instead of working ranches. My question? Why is this a battle you want to fight?? City sportsmen think there are too many landowner tags and little properties do not deserve them. Fact. Perhaps 2% of all tags go to landowners. Solution. If G&F wants a partner in small landowner they should educate the public on this issue. All commission changes seem to be a (non) solution in search of a problem. You all have serious procedural problems in your attempted execution of what you are doing here. Though not a lawyer I know that improper procedural execution is a litigable issue here

119 These comments are concerning chapter 44, section 8: Landowner licenses. Firstly, I want to mention that I agree with the 5 bullet points that were recommended by the WWTF, as shown on the G&F website. These changes are long overdue. I also agree that the amount of qualifying acreage be changed from 160 contiguous acres to 640. Hopefully this will prevent subdividing for the sole purpose of obtaining landowner licenses. Only thing I would add is to make sure there are no loopholes when discussing the final draft to these regulations. Thank you for your time.

120 To the Wyoming Game and fish Commisioners I am commenting on the suggested rule change to the requirements for land owner license regulation 44. I am very disappointed to see that this rule is even being brought up for discussion. My family has always tried to be good stewards of both our land and Wyomings wildlife and I think it is very unfair to now penalize us smaller landowners just for the simple fact that we don't own enough land. Wildlife has

prospered on my familys ranch and we have grown up enjoying the wildlife and the Wyoming way of life. I am totally opposed to changes proposed to the current landowner system.

Final Comment	Parker, Garrett	Rawlins , WY	6/5/2025 10:41:00 AM
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121 To the Wyoming Game and Fish Commision: I am writing this comment in response to the proposed changes to the current Wyoming Landowner System. I am totally opposed to the suggested changes and am very surprised as them being put forth after the wildlife task force suggested no changes. My family has ranched in Wyoming for years and own ranches in three counties. The mere fact that we don't own 640 acres all together seems inherently unfair and very much against the Wyoming way of life. I feel the current system rewards landowners for being good stewards of both our land and everyones Wildlife here in Wyoming

Final Comment	Parker, Lisa	Rawlins, WY	6/5/2025 10:49:00 AM
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122 I am writing in opposition to the proposed changes to the current Wyoming Landowner license system. I have grown up here in Wyoming and completely love to hunt and fish. I am completely opposed to making any changes to the current system and think it is unfair to penalize the smaller landowners for the supposed abuses of larger landowners when current enforcement of current laws would solve this problem while not hurting small ranches and farmers that provide just as much if not more habitat for Wyoming wildlife to prosper in.

Final Comment	Sanchez, Lecia	Rawlins, WY	6/5/2025 11:41:00 AM
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123 Do not change the landowner requirements enforce the rules you have set. This change is going to cause big problems with access and create more wildlife sanctuaries. The taskforce attempted to find common ground on this and failed seems as if the department learned absolutely nothing from the taskforce. Plenty of better options we're discussed on the taskforce just make any area with over 30% landowner tags general that will solve all problems. Make these areas less desirable and an opportunity unit.The department has no problem classifying our general areas and opportunity area and refusing to change them to make the hunting better. This is going to hurt my outfitting business and eliminate access for locals on ground I lease

Final Comment	Fink, Clifford	Greybull , WY	6/5/2025 12:07:00 PM
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124 To the Wyoming Game and Fish Commissioners: I am writing this in protest of the suggested changes to the current landowner system. I don't believe it is fair or right to take away tags for smaller landowners because they don't own 640 acres but provide just as much or even better habitat for all of Wyomings wildlife. Please leave the current system in place and look for ways to work with all landowners.

Final Comment	Sanchez, Gabby	Rawlins, WY	6/5/2025 12:29:00 PM
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125 I am writing this in response to reg 44 and the changes to the current landowner license system. As a lifelong resident of Wyoming I am very disappointed to see the proposed changes to the acre requirements and increase of animal use days. I have a farm here in Fremont County and it is absurd to think that only landowners with 160 acres of cultivated crop ground would qualify to have landowner tags. I own 265 acres but only 95 acres irrigated but the rest being river bottom ground and I assure you it is very good habitat for all wildlife. I am opposed to any changes to the current system

Final Comment	Parker, Dean	Kinnear , WY	6/5/2025 12:50:00 PM
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126 Thank you for taking public comment on Chapter 44 - landowner tag changes. I do not agree that a blanket policy should be done for the entire state. We need to do better in truly managing each parcel. Wildlife use on land that is either used by grazing livestock or raising of crops is the purpose of giving out these tags to landowners. Therefore common sense would say to look at each parcel and the numbers of wildlife and give out tags accordingly. Grazing of livestock and raising of crops needs to be part of any amount of land required for cultivation, not just raising of crops as wildlife take away from our grazing land too. Thank you for managing better than what this proposed change is suggesting. Wyoming can and should do better for wildlife and landowners!

127

I am writing this in response to changes to chapter 44 on landowner license requirements. I am completely opposed to increasing the requirements of acreage to 640. I feel the current system is fine and rewards landowners who are good stewards of our lands and wildlife. It is completely unfair to only reward large landowners and penalize smaller ones even though we both provide good habitat for all wildlife. It is also very wrong to change from the current 160 acres to 160 acres cultivated as that is not how homesteading here in Fremont County worked and I can guarantee that many farms with under 160 cultivated have way more than 2000 animal use days let alone 3000

128

I am strongly opposed to any changes to chapter 44 and landowner licenses here in Wyoming. I have lived in Wyoming and Rawlins my entire life and have always felt that here in Wyoming everyone has the same chance to be successful and live here and enjoy our great outdoors. By raising the requirements of acres and animal use days to the suggested 640 acres and 3000 use days it only rewards large landowners and hurts small landowners. Here in Carbon County and through out Wyoming almost half of the state is private and not just large landowners have good habitat as many smaller ranches and farms have just as many animals if not more as they are not outfitted on and making money off of our wildlife. Why take away from the small guys just to let the rich get richer.

129

I am totally against chapter 44 changes to landowner requirements. The current system that has been in place is working and if there are people abusing the system then you need to enforce current laws. It is unfair to penalize small landowners because rich wealthy out of state landowners are buying ranches and subdividing for the purpose of getting landowner tags (which is illegal by current laws). I am a life long wyoming resident and don't think the current system needs changed but that current laws and regulations just need enforced

130

My name is cody crosby I own 200 acres south of rock springs. I would like to specifically to share my thoughts on the proposed changes to the landowner tag program. I'm not wealthy but work hard and spent 20 years saving money for the purpose of having a remote place where I could recreate with friends and family. My kids and I have enjoyed camping, fishing, riding horseback and hunting on our property for the past 10 years. We have been good stewards of the land. And as it pertains to hunting, we work to make sure that the wildlife we love, have feed and water and little or no pressure from the stress of an area almost entirely accessible by the public. Our work on our land is not for profit. We grow hay for wildlife use. It isn't bailed and sold for livestock. We don't allow any livestock grazing on our ground. Each year we plant trees, alfalfa and brome grass. We spend a lot of money and time building and maintaining fences for the purposes of keeping livestock out and at the same time allowing Wildlife to pass easily on to and off of our ground. Not once have we requested any money from the State for damage from wildlife. In fact, we welcome the damage caused by wildlife. We spend a lot of time and effort spraying for weeds. I think that without our efforts in this regard, because of its proximity to the county road, our ground would largely be greasewood and cheatgrass. I don't see how anyone could argue to at least some degree our efforts improve the overall health of the elk - and as we know, a struggling deer herd, in the area. While I understand and agree that some landowners abuse the tag system, it seems illogical to say that only landowners with less than 640 acres abuse the system. And I would argue that a guy who owns a couple hundred acres for his friends and family to enjoy, may have much greater interest in wildlife than a large landowner who is motivated by crop production and livestock grazing. And why would you punish some land owners because of the irresponsibility of other land owners? If changes need to be made to allow more public, who aren't landowners access to tags, I'm open to reasonable conversations that could include owners being required to provide a certain amount of public access, landowner's participating in a draw, or simply enforcing the rules of the program as they are already written and take tags from land owners who don't qualify for tags because they don't meet the feeding hours qualification. There are other ways to achieve the purpose of allocating more tags to the public, if in fact that is the purpose of these proposed changes. If these proposed changes are made, what happens when smaller land owners no longer have the value of landowner tags and sell their ground to larger land owners who may not value healthy game herds. In our area much

of the water is locked up by landowners who own the canyon bottoms. Do those landowners use that water for the benefit of game herds or is their first priority taking care of their livestock and watering their production crop? Will smaller landowners like myself be as motivated to spend time and money maintaining and improving their land in order to benefit wildlife if they don't receive landowner tags? Two years ago we had a young disabled Hunter that we allowed access to our place who killed a trophy bull that he may not have been able to kill on public land. Will those opportunities be available if smaller properties like mine are sold off to be subdivided for cabins or ranchettes? I would urge the game commission and department to consider the distrust this would cause by telling smaller landowners who have qualified for tags for a hundred years, that all of a sudden they don't qualify. And finally, I would also ask that you consider the adverse affect these proposed changes would have on wildlife in the area. Thank you.

Final Comment	Crosby, Cody	Coalville , UT	6/5/2025 3:46:00 PM
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131 I'M OPPOSED TO THE PROPOSED LANDOWNER TAG CHANGES, I BELIEVE THAT ALLOWING THE SALE OF LANDOWNER TAGS WILL ONLY BENEFIT THE WEALTHY AND WILL MAKE IT MORE OF A RICH MAN SPORT. I'M ALSO OPPOSED TO RAISING THE ACREAGE REQUIREMENTS. I BELIEVE THERE SHOULD BE A PERCENTAGE CAP ON THE PERCENT OF LANDOWNER TAGS THAT CAN BE GIVEN OUT IN EACH AREA AND IF THERE ISN'T ENOUGH LANDOWNER TAGS AVAILABLE ALL LANDOWNER SHOULD BE PUT IN A RANDOM DRAW FOR THE AVAILABLE TAGS.

Final Comment	BARTLETT, BRAD	RAWLINS, WY	6/5/2025 4:13:00 PM
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132 As a landowner I am against the idea of increasing the current number of acres to acquire a landowner tag any more than it is now. I believe it should be left the way it is now.

Final Comment	Engstrom, Chad	Rawlins , WY	6/5/2025 6:25:00 PM
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133 Joseph and Tina Benson 14750 Hwy 220, Casper, WY 82604 jbenson@email.com (307)267-3004 Wyoming Game and Fish Commission 5400 Bishop Blvd. Cheyenne, WY 82006 June 6, 2025 Dear Commissioners, Thank you for allowing us to respond to the proposed changes to Chapter 44, Section 8, regarding landowner licenses. We are responding as current landowners who would be adversely effected by this change. Our first question is what is the goal of this change? Is it to improve wildlife habitat? Herd management? We feel the only goal this achieves is to appease a small number of the public that feels it is unfair to give out landowner tags. If the goal is to improve habitat it could, in fact, harm habitat. If the goal is to improve herd management, again, it could hurt the herd. If there is no benefit to keeping 160 acres, small landowners may subdivide their land into smaller parcels. This would increase the amount of human impact on habitat. Calving areas, wintering areas, grazing areas could all be lost for wildlife use. The goal of appeasement goes against two task forces that have already reviewed this system and did not recommend increasing the acreage or animal use day requirements. Why were these task forces formed and funded if their recommendations were not accepted? After looking at the draw percentages throughout the state, reducing the number of landowner permits does not significantly effect the draw odds in most areas. I'm sure you are aware of all the data so we won't reiterate them. If the proposed changes are enacted, it will be at the cost of alienating small landowners who have unilaterally cooperated with the Game and Fish to achieve the optimum habitat and herd health. We urge you to take into consideration all aspects of this change and to respect the current landowner's position. We are all Wyoming Wildlife Conservationists. Thank you for your time and consideration, Joseph and Tina Benson

Final Comment	Benson, Joseph	Casper, WY	6/5/2025 7:54:00 PM
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134 I oppose the changes to landowner's license requirements. Specifically increasing the acreage requirement. Family traditions will be destroyed.Consider making the rule effective for new owners going forward and grandfather the property owners who've been enjoying their tags for decades.

Final Comment	Burgfechtel, Brian	Salt Lake City, UT	6/5/2025 11:51:00 PM
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135 To the Wyoming Game and Fish, I would like to say that I am in opposition to chapter 44 regulation changes. Though I am an out of state Hunter I do appreciate the opportunity to own property in the state of Wyoming where I can hunt and bring the next generation of Monroe's hunting. I am a fourth generation Hunter and I have two more generations coming up . Our hunting ranch would be greatly affected by these changes. If these changes are made, it would greatly affect the conservation of our property in a negative way. As the state of Wyoming knows area 19 in which our property lies has an abundant amount of elk and eliminating landowner tags in these areas would not help manage the elk heard. Thank you, Scott Monroe.

Final Comment **Monroe, Scott** **Shaver Lake, CA** 6/6/2025 10:33:00 AM

136 479.253.1115 70 S. Main St. Eureka Springs, Arkansas 72632 sbaker@cs.bank John F. Cross, Chairman June 5, 2025 K. Ball P. O. Box 842 Glenrock, WY 82637 To Whom it May Concern: I am a native of Eureka Springs, Arkansas. I have been traveling to Wyoming every year since 1953, hunting and/or fishing, and this will be my 72nd year in a row. We have family out there, and it is the Fuller Family, who homesteaded on our ranch back in the 1890s by Doug Fuller. I have an ownership interest in part of that land. It is called "The Point" or Copper Mountain, half-way between Shoshoni and Thermopolis. I have killed every game animal in Wyoming except a Mountain Goat, and never could draw one. Many elk, deer, antelope, moose, and a few sheep. I am outraged that the State would like to take my 210 acres of deeded pasture land and raise the requirement to 640 acres for a non-resident landowner license!!! My son, Charles T. Cross, also shares my landowner acreage, and now they are trying to take away his hunting rights too! We have our either-sex elk tags approved and expect to see either-sex antelope tags approved as well. What is going on out there? Is this some kind of a fat-cat deal where only those who have hundreds of acres of deeded land will be able to have a license without the random draw? Please refer me to somebody so we can put a stop to this manipulation, as it is not right, and the Game and Fish knows it's not right!! All the best, John Fuller Cross, Sr. Chairman

Final Comment **Cross, John Fuller** **Eureka Springs, AR** 6/6/2025 10:51:00 AM

137 I am writing this comment to voice my opposition to changes to chapter 44 regarding landowner license requirements. The current system is fair and rewards all landowners who are good stewards of not only their land but also all wildlife. The proposed changes are not fair and will penalize smaller landowners.

Final Comment **Sanchez, Angel** **Rawlins, WY** 6/6/2025 12:27:00 PM

138 after reading the changes to land owner requirements I think that would be awesome if implemented. I agree 100% with the acreage designations and acreage requirements. I have heard some talk I dont know if it is a fact that there was a consideration of allowing landowners to sell their landowner licenses for a profit. Having been in that situation in another state, in the before it was allowed and after that was allowed I can tell you that turned into a shit show for the landowners that actually applied for licensed too hunt. after the implamation of that policy I could only draw a landowner license every 8 years or so if I was lucky. I had better luck applying as the general public...

Final Comment **johnon, stanley** **riverton, WY** 6/6/2025 1:42:00 PM

139 I am writing this in response to changes proposed to chapter 44 in regards to landowner tag requirements. I am totally against these changes as proposed, there is nothing wrong with the current system that has been in place since 1949. If the new changes are enacted and the rich just keep getting richer and the little guy takes it in the shorts it is just plain wrong.

Final Comment **Parker, Dave** **Rawlins, WY** 6/6/2025 1:55:00 PM

140 I am in favor of the proposed recommendations in Chapter 44 of the Wyoming Game and Fish regulations. As a new female hunter, I value the opportunity to hunt and hope to one day share that experience with my children. However, I've found it increasingly difficult to draw tags, and it's clear that some landowners are taking advantage of the current allocation system. It's unfair when small land parcels are used primarily to obtain tags, limiting access for everyday citizens. I support restricting landowner tags to larger properties—those over 1,000 acres—and requiring smaller landowners to prove they actively support wildlife habitat. Additionally, smaller landowners should not receive

premium Type 1 and Type 2 tags; instead, they should be limited to cow and doe tags and required to choose which species to apply for—not receive tags for multiple species. These changes are necessary to ensure fair access and preserve the integrity of Wyoming’s hunting opportunities for all residents.

Final Comment

Borden , Olivia

Powell, WY

6/6/2025 8:24:00 PM

141

I support the proposed changes in Chapter 44 of the Wyoming Game and Fish regulations. As a former resident of the state, I've seen firsthand how difficult it can be to draw tags, especially when landowner preferences seem to skew the process. I would like to eventually return to Wyoming to hunt, but I find it disheartening that non-resident landowners are taking massive amounts of tags from the pool. It's frustrating to see smaller landowners using limited acreage primarily to access tags, while the general public struggles to get opportunities. I've spoken with others who feel the same way. Many of us agree that landowner tags should be reserved for those managing larger properties—1,000 acres or more—that truly contribute to wildlife habitat. Smaller parcels shouldn't automatically qualify for tags, especially not premium Type 1 or Type 2 licenses. Those landowners should instead receive cow or doe tags and be required to choose a single species to hunt, not multiple. What's wrong with a cow tag? If these changes do not take effect I fear the everyday resident/ non resident will find themselves never able to hunt in Wyoming. The system needs to be fair and balanced. Everyday hunters deserve a reasonable chance to participate, and these changes would help ensure the process remains equitable and grounded in conservation values.

Final Comment

Chesser, Reba

Billings, MT

6/6/2025 8:39:00 PM

142

I am writing to express my opposition for the majority of the proposed changes to the Chapter 44, Section 8 regarding Landowner Licenses. I appreciate the opportunity to express my concerns for each of the proposed changes to the Chapter below. Changing Acreage Requirement from 160 to 640 contiguous acres of land My family has a ranch approximately 29 miles south of Glenrock in the Laramie Mountains. The property is located between 7700-8600 feet of elevation and provides ideal habitat for a variety of game species, most of which are elk. The elk utilize our ranch for approximately 7 to 8 months of the year, depending on winter conditions. The ranch is home to very large numbers during the calving season, summer, and fall rut. The property has a long-standing history of receiving Landowner Elk Tags that dates back several decades. I understand that there is a need to have a minimum acreage requirement included in the criteria for receiving landowner tags, however I believe that the current requirement of 160 acres is a very appropriate number and should not be adjusted. It is my belief that small ranches are just as important in the role of managing big game species and just as deserving of landowner licenses as that of neighboring large ranches. It is my strong opinion that a significant number of ranches between 160 and 639 acres have higher animal densities on a per acre basis, and often better habitat than that of some ranches over 640 acres. A large concern that I have with raising the minimum acreage requirement is the indirect effect that such a change would have on critical animal habitat as a result of subdividing land. As an example, a 320 acre ranch today likely has 1 driveway, 2 or 3 vehicles, 1 or 2 ATV's, 1 residence, 1 out-building, 1 fenced-in pasture and 1 or 2 barking dogs. If that ranch loses their landowner licenses and decides to subdivide and sell, the results are devastating for the animals that live there. After dividing that same 320 ranch into 40 acre parcels, you now have 8 driveways, 16 to 24 vehicles, 8 to 16 ATV's, 8 residences, 8 out-buildings, 8 fenced-in pastures and 8 to 16 barking dogs. That 320 acre ranch that was once home to an abundance of wild game has now become a full scale neighborhood with a handful of animals passing through on occasion. Ultimately it is the wild game that suffers as a result of subdividing land like this. Once that critical habit is gone, it will be nearly impossible to recover it. Increasing the number of animal use days from 2000 to 3000 days This proposed change was a last-minute addition that is not supported by any scientific or factual data obtained from a study. It is my understanding that two wildlife task forces have looked at this topic, and have not recommended any changes to the current 2000 animal use day requirement. It is my opinion that the current requirement has served as a reasonable and effective number for years, and is not in need of adjustment. Significant Interest I support your desire to establish a reasonable definition for “significant interest”, however simply setting a minimum ownership interest number at 20% will directly penalize ranches owned by large families. Essentially a 20% requirement would disqualify any families with 6 or more children from qualifying for landowner licenses at the point the ranch is passed down from one generation to the next. Once a ranch is passed onto grandchildren, the likelihood for a disqualification for landowner licenses increases even if you used a lower number like 10%. I respectfully ask that you consider establishing criteria for Significant Interest in a way that does not penalize those multi-generational ranches. Expanding the definition of “immediate family member” I support your

proposed changes to this definition. I have both biological children and step-children and I feel this change is very appropriate for the many blended families like ours. Capping Landowner Licenses I do not support putting a cap on the number of landowner licenses, especially in Hunt Areas that are over population objective. According to the Wyoming Game and Fish Department's website, "nearly half (48 percent) is federal public land, and the State of Wyoming owns another 5.6 percent". This would mean that a total of 53.6% of land in Wyoming is public and the remaining 46.4% is held by private landowners. If the Commission was looking to implement a state-wide cap on landowner licenses, then I believe it would only be fair to establish that cap at 46.4% to directly align with the amount of land currently being held by private landowners in Wyoming. Thank you for your time and consideration. Sincerely, Andrew Roskowiak

Final Comment	Roskowiak, Andrew	Glenrock, WY	6/7/2025 9:20:00 AM
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143 Comments I am writing this to express my strong opposition to the proposal changes to the qualifications landowner licenses. These changes will have a significant and harmful impact on small landowners, like me who have responsibly provided wildlife habitat and supported Wyoming's hunting traditions for over 25 years. The current rules of 160 acres and 2,000 animal use days strike a fair balance between opportunity and stewardship. I urge you to retain these existing qualifications and to grandfather in current properties that meet them. All I am asking is that you listen to the landowners that will be affected by your changing this Chapter 44 regulation in the proposed format. It is appallingly reckless to cater to Wyoming's 1% over the hundreds of tax paying landowners that this will nullify. Wyoming used to be associated with common sense and equality.

Final Comment	Teten, Kevin	Wheatland, WY	6/7/2025 6:33:00 PM
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144 Dear Wyoming Game & Fish, Please don't lose sight of what makes our landowner hunting license system so valuable: it honors habitat, not just acres farmed. Wildlife in Wyoming rely on a patchwork of native lands for survival—and many of those patches belong to small and mid-sized landowners who care deeply about conservation. If you change this system to reward only big cultivated farms or large landowners, you will send the wrong message. You'll tell the very people who are doing the hard work of protecting habitat that their efforts don't matter unless they plow the land or own massive acreage. Habitat is habitat—whether it's native grassland or aspen groves. Raising the minimum acreage or focusing on cultivation risks habitat destruction and undermines decades of good stewardship. Keep this program what it was meant to be: a reward for protecting wildlife habitat—not a perk for the biggest and wealthiest. Sincerely, A. Kelly Richards

Final Comment	Richards, Albert	Rock Springs , WY	6/7/2025 8:08:00 PM
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145 Testimony for the Wyoming Game & Fish Commission. Provided by Dave True. Thank you very much for allowing me to provide testimony for the Wyoming Game & Fish Commission. My name is Dave True, and I am a member of the True Family in Casper, Wyoming. We own and operate True Ranches, a diversified cattle operation in the eastern third of Wyoming. We have a long history of cooperating with the Wyoming Game & Fish which will be expanded upon later in this document. The purpose of my testimony is to advance the idea of allowing landowners to market the game licenses for which they have historically qualified over the years. The concept is outlined in the following: Landowner Licenses: - Allow landowners to market their licenses under the following conditions: o Landowner has at least 2,000 ac of owned land in the respective game habitat in order to market the licenses. This would not increase the number of potential licenses for qualifying landowners. Furthermore, this specific requirement would demonstrate that the landowner has adequate deeded acreage that can be hunted by the assignee to whom he/she conveyed the license. o Requiring the qualified landowner to allow some degree of public access to landowner's property for hunting that species. o Giving Game and Fish Commission the option to limit the number of landowner licenses to no more than 40% of the licenses available in that hunt area. □ If more than 40% of the total licenses are applied for by qualified landowner applicants, and the G & F Department decides to limit the number of available landowner licenses, all landowner applicants are put into special draw for 40% of the licenses. - Raise the number of acres owned to qualify for a landowner license to 640 acres along with providing a minimum of 3,000 animal days per year on grasslands. o Grandfather those previously qualifying with 160 to 640 acres. Such grandfathering would run with the owner, not the land. This is intended to allow landowners an opportunity to offset the significant costs of providing habitat for the specific species. Speaking from experience, the expense of such care of Wyoming's wildlife is extensive ranging from loss of grazing and hay production, fence damage, along with

the loss of harvested crops. The Department has long had tools to offset these carrying expenses but they have fallen well short of fully compensating the landowner. By allowing those qualified landowners to market the licenses will provide some revenue to offset the costs associated with housing wildlife at no expense to the State. Another related observation, many neighboring states including Idaho, Utah, Colorado, and Nevada allow the transfer of their landowner licenses. As mentioned above, True Ranches has had a long history of cooperating with the G&F Department through access agreements. We have many Hunter Management areas along with Walk-In cooperative agreements. Additionally, through a similar arrangement, the public is allowed access to our LAK Lake in Weston County. Additionally, there are at least four of True Ranches' properties involved with Hunter Management and Walk-In areas. In addition to these arrangements with the Game & Fish and other direct public access, we have thousands of acres signed up with Infinite Outdoors. Through the I.O. app and website, hunters and fishermen may reserve areas providing them a low-cost access to deeded lands carrying hundreds of huntable game and fish. Returning to the main purpose of this testimony, we believe that allowing landowners to market their landowner licenses with the above-mentioned provisions will provide a just avenue to help offset the expense of providing habitat to Wyoming's wildlife without expanding the number of landowner licenses currently qualified for and not at the cost of our State. Thank you very much for your serious consideration.

Final Comment	True, Dave	Casper, WY	6/8/2025 6:51:00 AM
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146 Regarding the landowner tags. I served on the Wyoming Game and Fish Commission, at which time the Private Lands, Public wildlife program was started. Landowner licenses were discussed at this time; however, the Commission voted not to pursue this issue. At this time, I asked a former G&F Commissioner, Mr. Dave Nelson, for some history. Mr. Nelson served from 1971 to 1974, the period when antelope licenses went from "standing in line" to a draw method. He told me that many landowners complained that antelope were eating their crops and they couldn't draw a tag to kill one. Mr. Nelson added that the current landowner license system was created by regulation as a way for the landowner to get a license without going through the draw. Landowners can currently be compensated for crop damage through damage claims, and landowner coupons, but current landowner licenses were never meant to be compensation. bypassing the draw is inherently wrong. President Theodore Roosevelt once said that our wildlife should be available to everyone, whether he is a is not a man of means. in other words, equality. as an example of inequality, look at elk area 31 which offers 50 type 1 licenses, 8 of which go to nonresident. There is a potential for 10 landowner licenses. This leaves only 32 for the typically over 3,000 resident applicants. In short, I support strengthening the regulations. The only thing that would be fairer would be to eliminate landowner licenses completely. Thank you for your consideration of these comments.

Final Comment	Hunzie, Mike	Diamondville, WY	6/8/2025 9:24:00 AM
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147 I am writing to express my concern about the landowner tag proposals. My family and I enjoy hunting on our land and we are good stewards of the land. We own 200 acres in Sweetwater County and qualify for 2 elk and 2 deer tags each year because we meet the requirement for feeding hours with those two species. Caring for the habitat on our land has been very beneficial in teaching our children how to work and how to care for something more than themselves. Learning how to plant grass and alfalfa, and then fertilize those crops and irrigate those crops, to then see the benefits of that work by wildlife coming into the fields and using those crops, has been extremely beneficial to growth and learning of our children. Without the motivation of landowner tags I fear our kids may no longer have that drive to work our land. Hunting is one of the few things our kids all love to do together and hunting on this land keeps my family in touch with one another and gives them a reason to take time from their busy lives and be together. Please don't take that away from my family by making these changes. Thank you. Danielle Crosby

Final Comment	crosby, danielle	coalville, UT	6/8/2025 9:40:00 AM
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148 My Brother and I have been coming to Wyoming for over 25 years. We were very excited to purchase a small plot of land around 20 years ago, out side of Ten Sleep. We have enjoyed going out there during the summer and again for Elk season. We joined the Elks Club in Worland, and have been members there since 2002. We have pulled Landowner tags every year. That doesn't ensure your going to get a bull, some years are better then others, but we always love our time out there. We also spend a lot of money in the state of Wyoming, buying our grocery out there, fuel, additional Mule deer tags, conservation stamps, and so on. We have been offered opportunities to hunt with friends in Montana and Colorado, but we pass because we love our land in the Bighorns, and the friends we've

made over the years. We're very disappointed that the state would mess with the land owners in this way. We ask that the Wyoming Game & Fish reconsider their actions that will impact so many hunters. Thank you for taking the time to read my comment.

Final Comment

Glunz , Jerome

Northbrook , IL

6/8/2025 9:41:00 AM

149

I am writing to express my concern about the landowner tag proposals. My Dad and mom and brothers and I enjoy hunting on our land .We own 200 acres in Sweetwater County and qualify for 2 elk and 2 deer tags each year because we meet the requirement for 2,000 feeding hours with those two species. My dad taught us how to plant smooth brome grass and alfalfa for the wildlife to use. We have to go every other week in the summer to spray weeds and irrigate. in the fall and the spring we spread fertilizer. This does more than grow feed for the game animals. This gives me time with my dad and my brothers. It's hard work, but it's very gratifying. And then in the fall it gives us a chance to all be together to hunt together as a family. We do camp on the property and ride horses so we would still enjoy it without landowner tags, but I'm nervous we would only enjoy it separately and wouldn't come together in the fall without the tags. This would be a bad thing for me and my brothers. Please don't make these change or if you do, please grandfather the current landowners who have taken good care of our land and have done what we can to strengthen the health of the game herds by making our land better for the wildlife in our area. thanks for reading, Jesse Crosby

Final Comment

crosby, jesse

coalville, UT

6/8/2025 9:50:00 AM

150

Landowner and Sportsman AGAINST Chapter 44 Changes in Any Form Please vote NO to the misguided proposals for changes to Chapter 44 Landowner licenses. 1. Statewide "blanket approaches" to wildlife management are not biologically based or rooted in regional conditions. 2. Populations of elk are growing and increased quotas are appropriate for many areas, not decreased access to landowners suffering depredation and providing habitat for big game species. 3. The animal use day metric is a biological approach negating the need for acreage requirements. 4. Tampering with acreages for access to licenses reeks of social engineering and is departmental overreach. 5. Landowners of all acreages contribute to the overall habitat, herd health, and support of wildlife. Creating arbitrary and punitive limits on any further conditions to access landowner licenses is simply a wrong-head approach. Please accept no modifications or begin the slippery slope towards any changes to Chapter 44 landowner licenses which have stood so long as a rightful privilege to landowners and Wyomingites supporting wildlife through our great state.

Final Comment

TAYLOR, LT

NEWCASTLE, WY

6/8/2025 10:01:00 AM

151

I am writing to express my concerns with the current landowner tags proposals. Raising the acre requirement would only benefit the largest wealthiest Landowners. An increase from 160 acres to 640 acres would benefit a small number of large landowners, who already enjoy economic advantage and often lease hunting access at high prices. This would shut out small and mid-sized landowners—those who are often most connected to the land and most in need of a tangible benefit for tolerating the daily impacts of wildlife. Removing this benefit from those with less than 640 acres tells hundreds of responsible, conservation-minded landowners across Wyoming that their contribution doesn't count unless they are part of the elite. We care for our 200 acres as much or more than landowners with 2,000 acres. We didn't come by our land by inheritance, we worked and saved in order to purchase it, and taking landowner tags away from us sends a message that you are in it for the large elite ranches and that you have something to benefit from in those relationships. the optics of these changes looks bad and would be a black eye on the integrity of the game commission. I would respectfully ask that you withdraw these proposals.

Final Comment

crosby, kelly

coalville, UT

6/8/2025 10:09:00 AM

152

Dear Game commission, I am writing to express my concerns about the landowner tag proposals. We own 200 acres in Sweetwater County. Learning how to plant grass and alfalfa, and then fertilize those crops and irrigate those crops, and see the deer and elk come into those fields at night has been extremely gratifying to me. Without the motivation of landowner tags I would no longer have that drive to work our land that way. this is something I hope to be able to share with my kids when I have a family of my own. Please don't take that away from me by making these changes. Thank you for considering this. Rachel Crosby

153

Dear Commissioners, I am writing to express my strong opposition to the proposed changes to the qualifications for landowner licenses, specifically the increase in minimum acreage to 640 acres. These changes will prevent non resident members of my family from hunting on and near our small portion of a family homestead. I am a fourth generation Wyoming resident. I went to the University of Wyoming for undergrad (2001) and graduated from UW Law in 2004. I have only ever lived and worked in Wyoming. I currently own (along with my three siblings, none of whom are Wyoming residents) 240 acres in Weston county on Mush Creek road. This was originally owned by my great grandfather (Tom Bruce). The names of some of the real, living, great grandchildren (and great-great grandchildren) of our original ancestral homesteader use these landowner licenses each year to hunt antelope on their ancestral homestead (without having to build points) include non Wyoming residents Michael Reimer (SPID 17640006546), Lance Emry (SPID 17769039075) , Jackson Emry (SPID 17634005064), and Nina Emry (SPID 21503075137). We only have two landowner tags, so these heirs have to take turns. And we make big plans to make sure the ones whose turn it is to get to the family ranch in October. Two of my children (lifelong Wyoming residents) have also used our landowner tags to be sure they could hunt upon turning 12, and their names are are Sophia Reimer (SPID 800288348562), and Warren Reimer (800288348561). My third child and son Asher (SPID 800288901275) just turned 12 this year and will use his first landowner tag this fall. My brother Michael Reimer, mentioned above, has three beautiful daughters ages 5, 3, and 1, all of whom live in Colorado and I'm planning on helping get hunters safety and SPIDs as soon as they are old enough. I will personally take them antelope hunting on their ancestral ranch with these landowner tags in the coming years. If you take this away you are unnecessarily severing their own legacy. They will not buy and wait for points, they will just give up hunting. Or they will never start hunting, because they will be 18 years old by the time they have enough points and probably not interested because their family (me) was not able to introduce them at a younger age. I urge you to remove any impact on small, multigenerational landowners like my family who have responsibly provided wildlife habitat and supported Wyoming's hunting traditions for generations. I plead with you to build in some sort of *grandfathered status* in current properties like ours should you decide to make any prospective changes. Thank you

Final Comment

Reimer, Christopher

Newcastle, WY

6/8/2025 11:01:00 AM

154

Left over elk tags in Our area why are you wanting the landowner tags taken away. Why do you want to graze our land for free? With your wildlife?

Final Comment

Justice , Scott

Meeteetse , WY

6/8/2025 11:14:00 AM

155

Dear Wyoming Game and Fish Commission, I'm scribbling this down like a note from my place near Tensleep. I'm a non-resident landowner, and my brother and I, we've been coming out to our one hundred sixty acres of grazing land—not grazed all year round—for over twenty-five years now, each owning fifty percent. I'm a proud member of the Elks Club community, and over the years, I've been hired by sheep herders and helped you folks at Game and Fish sort out a couple of events. We've brought family and friends to the property all that time, camping, fishing, hunting, and just loving Wyoming's environment. We rent horses from local outfitters year-round, too, keeping their cash flowing. I've got a suggestion for Chapter 44, Section 8. Can you let two folks, each owning fifty percent of one hundred sixty acres of grazing land, qualify for landowner hunting licenses? This'd help folks like us, sharing property for years, get a fair shot at elk, deer, antelope, and turkey tags, while keeping rules tight to stop system-gaming. Our hunting trips with a party of ten, plus camping, fishing, and horse rentals, bring cash to Tensleep businesses all year—hunting alone pumps over three hundred million dollars annually into Wyoming, supporting jobs at outfitters, lodges, and small-town shops. Thanks for reading my scribbles, John.

Final Comment

Glunz, John

Skokie , IL

6/8/2025 11:43:00 AM

156

To whom it may concern, I oppose the proposed changes for all landowners. They do not represent a significant amount of tags allocated and the proposed changes seem very biased. If you have identified problems inside the landowner system there are many equitable options for all landowners, ie a cap w landowner draw system etc? As far as corporations are concerned, if fraud has been identified it should be handled case by case. Simply because a group of people come together and purchase land (BIG CORPORATIONS) it does not dictate that there rights as

landowners are any less important than any other person or persons. As things continue to change in this country and property continues to become something only the king can afford corporate ownership is something that will only continue to expand. In my opinion that is a good thing. It gives normal people the opportunity to be landowners, landowners rights should all be the same. Those rights should be cherished and not abused by anyone.

Final Comment	Monroe, Wes	Evansville, WY	6/8/2025 1:28:00 PM
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157 I am opposed to any changes in determining how landowners get landowner tags. I have been a landowner for almost 20 years. Our family has invested a significant amount of our resources, both financial and time to be good stewards of our Wyoming land for wildlife. Our land is prime habitat for elk and deer. It includes two streams, a pond, woods, and grazing land. I am sure our land provides more habitat for wildlife than some properties that are many times the size of our. The Fish and Game has taken our deer tags from us and has granted elk tags based on their usage criteria. They have always had this right and to arbitrarily put a new criteria of increased acreage would only restrict their ability to make their decisions on landowner tags. For these reasons, I feel a continuance of the present method of determining landowner tags should not be changed in any way. Thank you for considering my thoughts on this. David Carlson, landowner

Final Comment	Carlson, David	Casper, WY	6/8/2025 2:35:00 PM
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158 I am opposed to all of the proposed changes to the landowner eligibility regulations. I recommend the WG&F council adopt a regulation which will require the principal landowner own the property for a minimum of 5 (five) years before that property is eligible for a landowner draw. With an exception made for land ownership change due to inheritance. (Basically because that ownership change is never by choice)

Final Comment	Raber, Monte	Belle Fourche, SD	6/8/2025 8:44:00 PM
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159 As long-time Wyoming landowners and avid outdoorsmen, we've made the intentional choice to keep our land undeveloped to support prime wildlife habitat. Our property provides vital winter range for both resident and migrating elk and mule deer — not by chance, but through conservative land management rooted in deep respect for the land and its wildlife. The current landowner tag program is one of the few tools that rewards responsible stewardship. It allows us to manage the herds effectively while maintaining the land in its natural state. Raising the minimum acreage requirement from 160 to 640 would strip away that incentive and push families like ours toward development — not out of desire, but necessity. Without the ability to hunt and manage game through landowner tags, the pressure to sell or subdivide becomes harder to resist. Offers from vacationers and developers grow more appealing, and the very habitat this policy aims to protect would begin to vanish. We urge you to consider the broader impact. True conservation comes from those who live on and care for the land — not from regulations that discourage us from doing so.

Final Comment	Bair, Chris	Cody, WY	6/8/2025 9:39:00 PM
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160 I am writing to express my strong opposition to the proposed changes in Chapter 44 that would raise the minimum acreage required for landowner hunting tags to 640. This change would directly impact and undermine my family's conservation efforts and our ability to contribute to responsible wildlife management. Our land provides critical winter range for elk and mule deer herds, including both resident and migratory populations. We take pride in preserving the land, ensuring that it remains healthy, undeveloped, and welcoming for wildlife. As conservation-minded landowners, we see ourselves as partners in managing these herds sustainably, and the landowner tags are a vital tool that helps us maintain that. If the proposed minimum acreage is adopted, our property would no longer qualify for landowner tags. This would fundamentally change our incentive structure. Currently, the opportunity to hunt responsibly and manage herds gives us a compelling reason to keep the land open and undeveloped. Without access to landowner tags, we would face increased economic pressure to develop the property, which would result in the permanent loss of winter range for these important wildlife populations. In short, landowner tags help align private land management with conservation goals. Removing them for properties like ours would make it harder—not easier—to achieve the Department's stated objectives of sustainable herd management and healthy wildlife habitat. I respectfully urge you to reject this proposed change and continue to support private landowners who are committed to wildlife conservation and sustainable land management.

161

Wyoming Game and Fish, the Ag Committee and others, The Chapter 44, Section 8 proposed regulation changes appear to be an outright attack on Wyoming landowners; a bullying attempt by vocal non-landowners who outnumber those who own land currently qualifying for landowner tags in Wyoming. The stated goal to open-up licenses to the public in specific units has turned into a greater assault on all units in Wyoming. This will come at great costs to those who live on currently-qualifying acreage and have chosen to own their land at least partly due to local game populations as it removes their big game tags and devalues their land. I understand the proposed definition of "Significant Interest" and prohibiting subdivision for purposes of increasing landowner licenses. Capping landowner licenses to 20% of available licenses clearly demonstrates the Game and Fish Department or State does not value those who have owned and lived in that unit, often for generations. Landowners with wildlife on their land should be prioritized, not penalized or shunned. Should they not be able to have a tag to more effectively help the Department reach its harvest goals than travellers would? Should they stay at home in the fall while travelling citizens hunt whatever public ground is available somewhere else in the unit? This is insane! 20% is too low! 50-75% or higher still allows tags to the public in largely private units, with many units currently falling below 50-75% eligible landowner enrollment. The 160 acre minimum requirement was presumably chosen historically for logical reasons (as we used to make decisions more commonly), presumably recognizing the Wyoming families that even homesteaded this beautiful state, rewarding them if the original site had not been divided. The Department's or State's disregard for historically important families or logical former benchmarks to satisfy newcomers or vocal nonresidents is appalling. While cultivated land can be damaged to a greater economic effect per acre by wildlife than rangeland, rangeland provides better habitat for wildlife. Increasing the minimum acreage requirement by 4 times for rangeland owners is oppressive and indicates the only apparent reason to award landowners any tags is to curb wildlife crop depredation, not to provide opportunity or priority to the people who live in those areas and enjoy hunting locally and effectively. Increasing the minimum wildlife use days to 3,000 days annually would demonstrate the Department's priority is to reverse-engineer a target number to reach a political goal (satisfying a large vocal group) instead of creating a target number for scientific or population-control reasons. 2,000 land use days is a lot of days; enough to expect possible harvest, and presumably based on previous thoughtful consideration of what constitutes "significant use" to expect possible harvest. A 3,000 land use day target is reverse-engineered for political goals. Requiring landowners to provide their own documentation of animal use days is absurd. Would this not likely be abused or "fudged" by some landowners? Is the documentation work that onerous for Game and Fish biologists? Can this work not be expected by Wyoming taxpayers or license buyers? Requiring investigation for landowner license eligibility every 5 years could be instituted reasonably, but has the inherent possibility of becoming very bureaucratic or paperwork-intensive if not implemented in a respectful way to landowners. It would be nice if the Department or State could just increase the number of game on the ground for everyone but since that is not possible, The Wyoming Game and Fish Department needs to decide where the finite number of tags will fall. Currently, many, many more tags go to non-landowners than to landowners each year. The proposed regulation changes go too far to further dump tags into the huge non-landowner tag pool. The Department needs to see that these regulation changes will transfer too many already limited tags out of landowner hands; estranging an unfortunately fewer number of people embedded in our landscape to the joy of the travelling masses. What will the Department do?

162

I am writing to express my strong OPPOSITION to changes to the qualifications for landowner licenses. Specifically me and my family oppose the increase in acreage requirement from 160 acres to 640 acres and the 50% increase in use days from 2000 to 3000. Twenty-one years ago my father bought a piece of property on currant creek in Sweetwater county. He spent his life savings to buy this property. Our family has been investing in habitat improvement on this property for decades now. We have spent hundreds of hours and thousands of dollars on fencing to keep cattle off our property, planted trees, sprayed for weeds which have allowed native grasses to thrive, and planted alfalfa in our pasture. My grandfather, father, brother, and hopefully soon my brother's children have been coming to our small piece of property where we fish and hunt together as a family.(four generations) In addition to improving our habitat we have been a good partner with the local game & fish. On at least two occasions the local game warden contacted us to gain permission to collar elk and deer on our property. We were happy to be able to partner on these efforts. Our efforts and investments benefit ALL sportsman, not just landowners. However, if smaller

landowners were to no longer qualify for licenses, thousands of hours of effort and possibly millions in investments in habitat will likely dry up completely. The current proposal rewards only the largest and wealthiest landowners who likely are not as personally connected to the wildlife habitat small landowners have worked so diligently to improve. Don't punish the good stewardship of thousands of small landowners with bad policy. We OPPOSE all the changes being reviewed. However, if any of the changes are adopted, current landowners should be grandfathered as long as the property remains in the same family. Thank you for your time and consideration of my comments. I urge you to reconsider these proposed changes and to support the continued participation of small, committed landowners who are investing their hard earned dollars and sweat to be good stewards for wildlife.

Final Comment

Scott, Brandon

Atlanta, GA

6/9/2025 5:16:00 AM

163

I am writing to express my strong OPPOSITION to changes to the qualifications for landowner licenses. Specifically me and my family oppose the increase in acreage requirement from 160 acres to 640 acres and the 50% increase in use days from 2000 to 3000. Twenty-one years ago my father bought a piece of property on currant creek in Sweetwater county. He spent his life savings to buy this property. Our family has been investing in habitat improvement on this property for decades now. We have spent hundreds of hours and thousands of dollars on fencing to keep cattle off our property, planted trees, sprayed for weeds which have allowed native grasses to thrive, and planted alfalfa in our pasture. My grandfather, father, brother, and hopefully soon my children have been coming to our small piece of property where we fish and hunt together as a family.(four generations). It is our hope that this family tradition of stewardship and love for this property will continue for many more generations. In addition to improving our habitat we have been a good partner with the local game & fish. On at least two occasions the local game warden contacted us to gain permission to collar elk and deer on our property. We were happy to be able to partner on these efforts. We have also provided access to a disabled youth hunter who was able to take a trophy bull on our property. Our efforts and investments benefit ALL sportsman, not just landowners. However, if smaller landowners were to no longer qualify for licenses, thousands of hours of effort and possibly millions in investments in habitat will likely dry up completely. The current proposal rewards only the largest and wealthiest landowners who likely are not as personally connected to the wildlife habitat small landowners have worked so diligently to improve. Don't punish the good stewardship of thousands of small landowners with bad policy. We OPPOSE all the changes being reviewed. However, if any of the changes are adopted, current landowners should be grandfathered as long as the property remains in the same family. Thank you for your time and consideration of my comments. I urge you to reconsider these proposed changes and to support the continued participation of small, committed landowners who are investing their hard earned dollars and sweat to be good stewards for wildlife.

Final Comment

Scott, Hunter

Crystal Lake, IL

6/9/2025 6:50:00 AM

164

I am writing to express my strong opposition to the proposed changes to the qualifications of landowners licenses. These changes will have a significant harmful impact on small landowners and many small family operations that have responsibly provided habitat and support the Wyoming Game and Department in their research and advocacy regarding wildlife and natural resources. The current rules of 160 acres and 2,000 animal use days strike a fair balance between opportunity and stewardship. I urge you to retain these existing qualifications and to grandfather in current properties that meet them. It is critical that you listen to the many small landowners that will be affected by your changing the Chapter 44 regulation in the proposed format outlined. Please do not be persuaded only by large and powerful operations that are focused on serving their purposes and not the needs and requests of the majority of family operations in Wyoming.

Final Comment

Good, J.R.

Wheatland, WY

6/9/2025 7:32:00 AM

165

I am writing this to express my strong opposition to the proposal changes to the qualifications for landowners licenses Chapter 44 Regulations. As operators for generations in Wyoming and having several family members, all of whom care deeply about the future of Wyoming wildlife and natural resources, we want our children and grandchildren to be able to participate in hunting without having to have thousands of acres to get landowner licenses. I ask you to remember that Wyoming is not just for the rich and powerful but also for the dedicated and hardworking who are the backbone of this wonderful state of ours. I am asking you to keep the existing qualifications and in fact ensure them further by grandfathering the current properties that meet those requirements.

166

Input on Proposed Landowner Tag Rules Landowner Tags Benefit Wildlife and Increase Hunting Opportunities: Landowner tags provide an incentive and reward landowners for managing their property to the benefit of wildlife. Improved habitat helps populations flourish, which benefits all hunters and wildlife lovers. • All wildlife benefits from the conservation initiatives and tolerance to depredation provided by private landowners. • It promotes a cooperative relationship between landowners and G&F. • The program encourages landowners to allow access to other hunters • Game and Fish Director Angi Bruce summed it up recently when commenting on the “Landowner of the Year Awards” saying, “The partnership between G&F and Wyoming’s landowners is not just beneficial, it’s critical to our shared success in wildlife management and conservation.” The Problem that Needs to be Addressed: There is legitimate concern about the increasing percentages of tags being allocated to landowners in some special draw units, leaving fewer tags available for the general public. Conceding that is an issue, the proposed changes cause more problems than they solve. Issues with the Proposed Solution: • The proposed changes aim to address this problem by dramatically reducing the number of landowners who would qualify for landowner tags by raising the acreage requirement by 4X, animal hours by 50%, and adding a minimum ownership percentage of 20% o I found it particularly concerning when I asked the authorities at the Casper public meeting how many landowners who currently qualify for tags would not qualify under the new rules, and no one had statistics. o It is a fair assumption that most currently qualifying landowners would not qualify under the current system if all three of the new criteria are applied. • The primary issue with the proposed changes is: eliminating most landowners from the tag eligibility removes the tangible incentive for all those landowners to continue to invest in managing their land for wildlife. o As a whole, smaller landowners are more apt to prioritize managing their property for the benefit of wildlife because their livelihoods are generally not dependent on the livestock business. o Many landowners commented in the open forum meetings that if they lose access to tags, they will be much less inclined to allow public hunting, or access through their property. (myself included) o It is dramatically more lucrative for a property owner to lease their property to an outfitter than participate in public access programs through G&F. • Landowner tags increased 26%, from 2,800 in 2014 to 3,518 in 2021, according to data provided by Game and Fish License Section Manager Jennifer Doering. Doering pointed to two causes for the increase. After 2019, G&F adopted an online landowner application process, which made the licenses more accessible. Secondly, organizations have recruited landowners to procure licenses that can in turn be donated to disabled military veterans. Donated veteran tags account for 404 of the 718 landowner licenses added between 2014 and ‘21, more than 56% of the increase, according to data Doering provided. (WyoFile June 21, 2022) o Providing hunting opportunities to disabled veterans is a noble, worthwhile and important thing to do. Unfortunately, the ability to donate tags to such organizations has unintended consequences of inflating the number of landowner tags issued. The majority of the recent rise in landowner tags are going to these programs. o The head of “Hunting for Heros” stated at the Casper public meeting that approximately 90% of their 200+ antelope tags were donated by landowners who wouldn’t ordinarily apply for a tag. These groups market aggressively to such landowners as the primary source of their tags. o At a minimum, this needs to be factored into the landowner tag analysis and conversation. o More appropriately, there should be another category of tags made available to these individuals and organizations. • Eliminating the option for landowner tags on parcels smaller than 640 will reduce property values. o To recapture that value, many properties will be subdivided into smaller “ranchettes” and cabin parcels. With those come fences, roads, dogs, buildings, and No Hunting signs. The fragmented landscape blocks access to food, water, cover, and migration corridors. The cumulative result of the above means less habitat and less access = less animals and fewer hunting opportunities for everyone. Alternative Proposal: Below is an alternative to the current proposal that addresses the issue but retains the benefits the landowner tag incentive provides to all. • Establish a maximum percentage of landowner tags for any draw unit/species. i.e. 40%. o When the number of landowner tags reaches that threshold, they could be reduced to one tag per landowner, or it could stay at 2 tags, but every other year. If it hits the threshold again, it could go to every third year. o This addresses the issue of tag over consumption by landowners but retains the force of landowners big and small who are committed to working with G&F to optimize populations and hunting opportunities. o I understand there is a WY statute that was interpreted by the AOG that landowner tags can’t be issued under a competitive draw. If that could be changed or reinterpreted, a points-based landowner only draw for units over the threshold would be a very good option as well. • At a minimum, if the acreage/animal day requirements are ultimately raised, existing 160+ qualifying landowners should be grandfathered in for as long as the property does not change hands. In closing, I challenge the commission to find a creative way to address issues of increasing percentages of landowner tags without decommissioning the army of passionate wildlife champions who are your private landowners. Our Story: We are the

villains in this conversation. I'm a resident of Minnesota who owns 280 acres of recreational land in WY that qualifies for landowner tags. We are not "Rich out of states". In 2019, our family realized a lifelong dream by buying into a working cattle ranch as minority partners and became part of the central Wyoming community. We spend as much time as we can here. We worked the ranch, helped neighbors with branding, moving cattle, equipment maintenance, and home projects; and we hiked, explored, and hunted on and around Green Mountain. When the majority ranch owner decided sell the ranch, we chose to trade our equity for 280 acres, build a home, and continue as part of the Sweetwater River Valley/Jeffery City community. We maintain a small cattle herd we run with one of the neighboring ranchers. We've left our land unfenced and open for free range grazing. We've met most of the Jeffery city residents and look for every opportunity to support and assist with community services and activities Our ideals and values align with Wyoming's. In the process of building our home we've supported the local economy using all WY contractors and materials, including: o General Contractor o Subcontractors o Well o Septic o Power o Gas o Excavation o Building materials o Appliances o Furnishings Come to think of it, ours might be the first new house built in the Jeffery City area in the last 30 years. I can't imagine anyone being more committed to managing their land for wildlife than we are. Specific initiatives include: - Removing all barb wire fencing - Enhancing the stream and riparian areas with faux beaver ponds - Replanting grass - Cleaned up all the old trash and equipment. - As a result, we have continual antelope, deer, elk, wild horses and cattle ranging free on our property that easily meet the 2000 animal unit requirements. - We allow public access and hunting on our property. We're not bad people. We were just born in the wrong state. Please contact me with any questions. Sincerely, Jon Schroeder
jon@schroedersalesco.com 612-817-7900

Final Comment	Schroeder, Jon	Maple Grove, MN	6/9/2025 9:25:00 AM
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167

I STRONGLY OBJECT to the proposed regulation change regarding landowner license acreage requirements from 160 acres to 160 acres cultivated or 640 acres of land. There are many others who've posted many good reasons not to change the regulations. I realize that they're are probably changes coming, my biggest objections are to the change in acreages. I believe tyne small tracts should still have access to licenses even if there are limits to those licenses. Perhaps there is a grandfather list, or something to that effect.

Final Comment	Stanton, Dan	Green River, WY	6/9/2025 10:17:00 AM
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168

I am a landowner in Natrona County. My family has stewarded land in this part of the state since 1974. Several years ago, we were fortunate to be able to expand our holdings to over 340 contiguous acres, which qualified us for landowner tags under the current guidelines. Since that time, we've continued our participation in the Muddy Mountain Hunter Management Area—opening up thousands of acres of public land by allowing access through the private road that crosses our property. In addition to supporting public hunting access, our land plays an important role in local wildlife conservation. Each spring, between 300 and 400 elk calve on our property. They remain on and around our land through December, depending on weather. We've maintained an excellent relationship with Wyoming Game & Fish for decades, and have always taken seriously our shared responsibility to Wyoming's wildlife and natural resources. In light of the proposed amendments to Chapter 44, Section 8, I am writing to share my sincere concerns regarding how these changes will affect not only my family, but hundreds of other landowners who serve as habitat providers, wildlife partners, and public access points across this state. 1. Minimum Acreage Changes (from 160 to 640 acres unless cultivated) I strongly urge the Commission to reconsider this proposed increase. The existing 160-acre requirement is sufficient when combined with meaningful enforcement. Rather than raising acreage minimums or prioritizing cultivation status, I suggest the Commission perform periodic requalifications, every 3–5 years, to ensure landowner tags are going to legitimate wildlife contributors. The idea of distinguishing between "cultivated" and "uncultivated" land is especially troubling. Cultivating our parcel which we could do, would actively harm the diverse and native habitat that currently supports elk, deer, and other wildlife. It would destroy forage-rich native grasses and shrubs, increase erosion, and reduce the land's natural watershed functions. In our case and many others, cultivation would directly conflict with habitat conservation goals. Moreover, I've heard from many fellow landowners that should they no longer qualify for landowner tags, they may consider subdividing their parcels into 40-acre tracts. The ripple effects of that would be damaging: more roads, more fences, more buildings—and significantly more habitat fragmentation. Perhaps most concerning, many landowners in the Access Yes and HMA programs are questioning their continued participation if they lose eligibility for landowner licenses. These programs represent a carefully balanced "give and take," and we risk losing valuable public access

at a time when it's already limited. The downstream effect of removing landowner incentives would not be more hunting opportunity—but less. 2. Increase in Animal Use Days (from 2,000 to 3,000) The “use days” metric is arbitrary at best and lacks consistency or scientific justification. When we asked local habitat biologists how the number was derived or why it should change from 2,000 to 3,000, we received no clear answer. That lack of transparency is problematic for any regulation. While my land likely meets the increased threshold due to the sheer number of elk present in spring, many smaller but ecologically significant parcels may not. I urge the Commission to retain the 2,000-use day requirement and instead commit to better and more consistent requalification efforts. Again, this is not about preventing oversight—it’s about creating policy that is transparent, science-based, and feasible for landowners who are already contributing to habitat and access in meaningful ways. 3. Ownership Threshold Change (Minimum 20% Ownership in Entity-Owned Land) As a Certified Financial Planner with over 20 years of experience working closely with Wyoming families on estate and succession planning, often involving land, ranches, and trusts, I can tell you that under typical generational wealth structures, it is rare for an individual family member to retain a 20% ownership stake in a trust, partnership, or LLC—especially by the second or third generation. This proposed change would unfairly penalize exactly the kind of families Wyoming should be proud to support: multigenerational landowners who have passed down their ranches and values across decades. I personally work with several large ranch families who currently allow public access and qualify for landowner tags—but not one member of their ownership group holds 20% or more. This change would disqualify them despite their deep roots and responsible stewardship. If the intent of this regulation is to prevent misuse or dilution of landowner tag eligibility, there are other, more effective mechanisms that wouldn’t undermine long-standing Wyoming families and ranching legacies. In summary, while I understand and respect the need to review landowner tag policies, I believe these proposed changes will have harmful unintended consequences: -They will incentivize land subdivision and habitat loss. -They may reduce public access rather than increase it. -They do not reflect the on-the-ground realities of wildlife use, land stewardship, and family land ownership structures in our state. - Lastly in 2024 there was 172,656 Total tags sold, out of that roughly using 2025 numbers for Landowner tags (received info from G&F) 3,668 went to landowners, that is 2.12% of those total tags sold. This is obviously a small of the tags, while I understand there are a few areas that most tags go to landowners, fix that problem don't through everything into the same category because that is like comparing apples to oranges. Cap the number of tags in those areas to something like 40% and have a draw or alternate every tag issuance to landowners every other year. Wyoming’s system has always been strongest when it supports collaboration between landowners, hunters, and the Game & Fish Department. I respectfully ask the Commission to reconsider these proposals and explore alternatives that reward legitimate landowners for their contributions—without compromising habitat, heritage, or public access. Thank you for your time and thoughtful consideration. Shawn M Porter Land Owner Natrona County, Wyoming

Final Comment	Porter, Shawn	Evansville, WY	6/9/2025 11:22:00 AM
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169

It is entirely unfair for the people who configured and/or purchased their property, according to your (WGF) guidelines, to loose their landowner privileges for this reason. Much of the rural economies (land values, etc) have been built around the existing rules that WGF is arbitrarily trying to change. WGF already monitors game populations and adjusts the available tags accordingly. If there is an issue with a given population in a specific hunt area where there are not enough tags for the number of affected landowners, then ask the landowners to go through a draw. Although this would likely not be necessary since the numbers of days used by the species would have also dropped and many would no longer qualify anyway.

Final Comment	King, Jason	Rawlins, WY	6/9/2025 11:32:00 AM
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170

Input on Proposed Landowner Tag Rules Landowner Tags Benefit Wildlife and Increase Hunting Opportunities Landowner tags provide an incentive and reward landowners for managing their property to the benefit of wildlife. Improved habitat helps populations flourish, which benefits all hunters and wildlife lovers. ☐ All wildlife benefits from the conservation initiatives and tolerance to depredation provided by private landowners. ☐ It promotes a cooperative relationship between landowners and G&F. ☐ The program encourages landowners to allow access to other hunters ☐ Game and Fish Director Angi Bruce summed it up recently when commenting on the “Landowner of the Year Awards” saying, “The partnership between G&F and Wyoming’s landowners in not just beneficial, it’s critical to our shared success in wildlife management and conservation.” The Problem that Needs to be Addressed There is legitimate concern about the increasing percentages of tags being allocated to landowners in some special draw

units, leaving fewer tags available for the general public. Conceding that is an issue, the proposed changes cause more problems than they solve. Issues with the Proposed Solution

- The proposed changes aim to address this problem by dramatically reducing the number of landowners who would qualify for landowner tags by raising the acreage requirement by 4X, animal hours by 50%, and adding a minimum ownership percentage of 20% o I found it particularly concerning when I asked the authorities at the Casper public meeting how many landowners who currently qualify for tags would not qualify under the new rules, and no one had statistics. o It is a fair assumption that most currently qualifying landowners would not qualify under the current system if all three of the new criteria are applied.
- The primary issue with the proposed changes is: eliminating most landowners from the tag eligibility removes the tangible incentive for all those landowners to continue to invest in managing their land for wildlife. o As a whole, smaller landowners are more apt to prioritize managing their property for the benefit of wildlife because their livelihoods are generally not dependent on the livestock business. o Many landowners commented in the open forum meetings that if they lose access to tags, they will be much less inclined to allow public hunting, or access through their property. (myself included) o It is dramatically more lucrative for a property owner to lease their property to an outfitter than participate in public access programs through G&F.
- Landowner tags increased 26%, from 2,800 in 2014 to 3,518 in 2021, according to data provided by Game and Fish License Section Manager Jennifer Doering. Doering pointed to two causes for the increase. After 2019, G&F adopted an online landowner application process, which made the licenses more accessible. Secondly, organizations have recruited landowners to procure licenses that can in turn be donated to disabled military veterans. Donated veteran tags account for 404 of the 718 landowner licenses added between 2014 and '21, more than 56% of the increase, according to data Doering provided. (WyoFile June 21, 2022) o Providing hunting opportunities to disabled veterans is a noble, worthwhile and important thing to do. Unfortunately, the ability to donate tags to such organizations has unintended consequences of inflating the number of landowner tags issued. The majority of the recent rise in landowner tags are going to these programs. o The head of "Hunting for Heros" stated at the Casper public meeting that approximately 90% of their 200+ antelope tags were donated by landowners who wouldn't ordinarily apply for a tag. These groups market aggressively to such landowners as the primary source of their tags. o At a minimum, this needs to be factored into the landowner tag analysis and conversation. o More appropriately, there should be another category of tags made available to these individuals and organizations.
- Eliminating the option for landowner tags on parcels smaller than 640 will reduce property values. o To recapture that value, many properties will be subdivided into smaller "ranchettes" and cabin parcels. With those come fences, roads, dogs, buildings, and No Hunting signs. The fragmented landscape blocks access to food, water, cover, and migration corridors. The cumulative result of the above means less habitat and less access = less animals and fewer hunting opportunities for everyone. Alternative Proposal Below is an alternative to the current proposal that addresses the issue but retains the benefits the landowner tag incentive provides to all.
- Establish a maximum percentage of landowner tags for any draw unit/species. i.e. 40%. o When the number of landowner tags reaches that threshold, they could be reduced to one tag per landowner, or it could stay at 2 tags, but every other year. If it hits the threshold again, it could go to every third year. o This addresses the issue of tag over consumption by landowners but retains the force of landowners big and small who are committed to working with G&F to optimize populations and hunting opportunities. o I understand there is a WY statute that was interpreted by the AOG that landowner tags can't be issued under a competitive draw. If that could be changed or reinterpreted, a points-based landowner only draw for units over the threshold would be a very good option as well.
- At a minimum, if the acreage/animal day requirements are ultimately raised, existing 160+ qualifying landowners should be grandfathered in for as long as the property does not change hands. In closing, I challenge the commission to find a creative way to address issues of increasing percentages of landowner tags without decommissioning the army of passionate wildlife champions who are your private landowners.

Final Comment

Guenther, Kelly

Watertown, SD

6/9/2025 11:34:00 AM

171

I am writing to express my opposition to all of the proposed changes in the landowner tag system. I am one of the owners of a corporation that has been in place for over 60 years, and for many our owners, it has been handed down to successor family members for many years. We have more than enough use days for elk to support any changes that have been suggested, and we take very seriously our role as stewards of this land and the resource. In our case, there is no abuse of the two tags that we have been given annually. If the proposed changes are because some landowners are "abusing" the system, I know that there are other changes that could be implemented to curtail the abuse. There should be many factors to consider on how tags are awarded, b penalizing owners of a corporation that has more than 5 owners seems unfair. I encourage the Commission to explore other thoughtful options that

genuinely aim at curtailing any abuse of the system, on a case by case basis, and not by penalizing existing, long term owners who have a corporation or partnership for practical reasons.

Final Comment	Churchman, Bret	Reno, NV	6/9/2025 11:35:00 AM
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172 Dear Wyoming Game and Fish Commissioners, We urge you to consider the negative consequences that the proposed changes for Chapter 44 Section 8 regulations will cause for Wyoming sportsmen and sportswomen. We own 648 acres, 575 acres of which are contiguous, and support well over 10,000 elk use days in Hunt Area 56. We manage our property with an emphasis on wildlife habitat by participating in the Grasslands CRP program and are in the process of placing a conservation easement on the property to preserve the integrity of elk and mule deer migration corridors. Access to landowner elk tags has allowed us to do the following: • donate elk tags to the Wyoming Disabled Hunters (and provide hunting access to the WDH since its formation in 2008), • provide access to non-family members for hunting on our property (knowing that we are not competing with the public for elk tags). The loss of landowner licenses will impact our ability to share access with members of the public who do not have the privilege of owning a piece of this great State. While we understand and support the reasoning behind the proposed changes, we urge you to incorporate flexibility in the rules that allows good land stewards such as ourselves to continue receiving landowner licenses. Respectfully, Ballinger Rocking R Ranch, Wapiti

Final Comment	Adams, Joel	Powell, WY	6/9/2025 11:39:00 AM
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173 One of the proposed landowner changes states that to qualify for a landowner tag, the individual in a corporation must have 20% or more ownership. If you look at Rock Springs Grazing Association, we own over 550,000 deeded acres, however, the largest shareholder is around 10% and most are under 5% ownership, so no one in RSGA would qualify for a landowner tag. I feel any organization who owns a significant amount of property should be entitled to a base number of tags to distribute to shareholders no matter the ownership stake. Thank You, Dustin Eaton

Final Comment	Eaton, Dustin	Farson, WY	6/9/2025 11:50:00 AM
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174 I would like to make a comment regarding the sale of land for the purpose of obtaining landowner licenses. I don't think the Game & Fish have the right to dictate under what premise an individual's property can be sold. I believe an individual has a constitutional right to sell their land for any reason they see fit.

Final Comment	Eaton, Dustin	Farson, WY	6/9/2025 12:08:00 PM
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175 I oppose transferable landowner licenses, I want to speak up and plan to attend the meeting on July 15-16 to speak up again. Thank you

Final Comment	Wallis, Benjamin	Casper, WY	6/9/2025 12:13:00 PM
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176 I want to express support for the upcoming proposal of requirements for landowner tags. I feel that at a minimum the the small parcels up for tags should be reviewed to be sure they still comply. The percentages in some area have a large amount of tags going to landowners. And if tags is going to be the states way to compensate landowners how do we justify 2 tags for the 160 acre landowner vs the several thousand acre landowner that some have probably over 30,000 use days a year. Game patterns have changed and there is lot of small land parcels probably don't even comply with the current regulations let alone the new requirements. Maybe a reward of another kind should be implrather than a landowner tags? I truely do feel for landowners that have thousands of use days especially elk as they can eat some groceries. But maybe small landowners can be compensated on an individual assessment monetarily instead of gauranteed licenses. The small landowners and individuals that have a share in a corporation taking up percentage of tags shouldn't be happening

Final Comment	Busking, Gerald	Douglas , WY	6/9/2025 12:28:00 PM
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177 Commissioners: I am writing this letter to raise my concerns over the proposed changes to the landowner licenses. I have been a landowner for twenty years; my family owns a total of four hundred acres in the Big Horn Mountains. The landowner is the most vested and valuable of all hunters. We purchased the land, we pay taxes on the land, we

provide habitat for the wildlife, we establish safety zones for wildlife. Other hunters will come and go; we will always be there. We have been the single biggest supporter of wildlife preservation due to our continued presence. I have spent thousands of dollars making land improvements to benefit and improve wildlife habitat. The following are reasons I believe the private landowner is critical to the future of Wyoming's Wildlife. Drought conditions continue to persist resulting in reduced habitat. Chronic overgrazing on public lands continues, ranchers who are required to have their cattle off the mountain by October 15 run until the middle of November. Severe over hunting, there are 1225 elk tags issued in our area. The hunting season started in August and runs through December. The only safety zone for the elk is on private property. Unlimited resident and nonresident deer tags. I am very concerned about the influence of outfitters on the game and fish decision making process. I have always had a feeling that outfitters had been trying to reduce the number of landowner tags so they could have more opportunity for their clients. This suspicion was confirmed in the game and fish meeting I attended in Cody. I can't believe that the committee recommending changes to landowner tags has outfitters on it. This is clearly a conflict of interest. This issue won't go away. Small landowners like me will not accept any decision to reduce landowner tags for past landowners. I am not opposed to making changes going forward but am opposed to any retroactive changes. Please be mindful of the good that landowners provide to Wyoming's Wildlife. We are vested in the preservation of wildlife and wildlife habitat. Sincerely, James M Seckman

Final Comment

Seckman, James M

Powell , WY

6/9/2025 12:35:00 PM

178

Dear Game and Fish Commissioners: First, I would like to thank you for your service. My name is James B Seckman, I am a landowner in the Big Horn Mountains. I am here to speak to you about the proposed changes to the landowner licenses. I am opposed to these changes and will do my best to explain my opposition to the proposal. The elk hunt area I wish to address is area 45. The presence of landowner tags has had no or little effect on the elk hunting in area 45. I have been a landowner and an avid hunter for over 15 years in this area, so I speak to you as someone who has knowledge and has seen changes in this hunting area. This area has gone from a premium hunting area to a marginal hunting area in the past 15 years. I attribute most of these changes to four main factors. 1. The first was the game and fish expanding the hunting season of cows and calves into August through December on all non-Forest Service land. This has led to major changes, elk are now hunted for five months out of the year, which has completely changed the elk mating grounds, has reduced birth rates and displaced many elk. 2. The second change I have seen is the increased number of outfitters operating in area 45. There are at least three outfitters operating in this area on a full-time basis (camp based) and many others who guide in this area on a daily basis. These professional hunting guides understand the migration of the elk, because of the number of roads and trails in area 45 there are very few areas that are not penetrated by outfitters. Outfitters are being paid to kill elk and in my opinion are the single biggest impact on hunting in area 45. 3. The third change is the change to long range hunting. For years hunters were limited to how far they could shoot now hunters are shooting up to 1000 plus yards. On the south paint rock road, we have seen outfitters having their clients shoot across the canyon under windy conditions over 1000 yards. There used to be safety zones or places the elk could go during the season to get away from pressure, with long rang hunting there are not many of these places left. 4. The fourth is the result of chronic over hunting. In 2025 there will be 1,225 elk tags issued. This is also a general deer hunting area with unlimited out of state deer tags available. The hunting season now starts on September 1 and goes through December 21st. Due to the lack of elk and the number of people hunting, most people are moving away from hunting in this area. It is often harder to find a cow elk than a bull. There are 20 to 25 landowner tags issued in in this area, 2% of the total. Most of these landowners like me haven't harvested an elk in years. This area is very vulnerable due to the number of roads and trails in area 45, the only effective breeding grounds and safety grounds are private property provide by landowners like me. I have made many habitat improvements on the 280 acres I own. I have deer, elk and moose that reside on my property year-round. It is my understanding that the outfitters in the state and the game and fish biologists are driving these changes to landowner tags. Both of these groups have failed the Wyoming sportsman. Outfitters are driven by the pursuit of profit like most of us who own businesses business. The more hunts the more kills the more money they make. The biologists have approved the seasons and the number of tags. They have completely failed at their jobs. Common sense should tell them you can't issue 1,225 elk tags in an area that is so accessible, has so many professional outfitters and has a limited number of elk. Common sense should also tell them you can't hunt elk from August thru December with 1,225 hunters and not affect the quality and the number of elk. I would also like to point out a major flaw in the game and fish counting of elk in the winter. I know for a fact that many of the elk being counted are from an adjoining area and only winter in area 45. I ask you not to penalize me for

the bad decisions made by outfitters and over hunting allowed by the game and fish. I would not be opposed to grandfathering existing landowners and making these changes going forward. I understand in other areas that people are purchasing 160 acres just for the landowner tags. If the Game and Fish is serious about the sustainability of hunting in Wyoming, they should reduce the number of tags available, reduce the length of the hunting season and reduce or restrict the number of outfitters who may hunt in each area. Thanks for your consideration. James B Seckman

Final Comment	Seckman, James B	Powell, WY	6/9/2025 12:43:00 PM
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179 Dear Commissioners, My name is Matthew Seckman. I would like to express my opposition to the proposed changes to the Landowner Licenses. My parents have owned property in the Big Horn Mountains my entire life. Most of my earliest memories are from those mountains. I don't think the Game & Fish appreciates or realize how important private landowners are to the success of Wyoming wildlife. For the past twenty years we have made significant land improvements to our property. These improvements were exclusively for the wildlife, elk, deer, moose and turkeys. To preserve habitat for wildlife we don't allow any livestock on our land and pay higher property taxes because of it. Private landowners provide habitat, water, feed and a safety zone for Wyoming's wildlife that can't be found on public lands. I ask you to reconsider this proposal to change the landowner permits. You will disenfranchise all landowners with these changes. The changes will harm Wyoming's wildlife and harm the fragile relationship between landowners and the Game & Fish. Thank you for your consideration, Matthew Seckman

Final Comment	Seckman, Matthew	Powell, WY	6/9/2025 12:44:00 PM
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180 Dear Commissioners, My name is Brenda Seckman. I would like to express my opposition to the proposed changes to the Landowner Licenses. My husband and I have owned land in the Big Horn Mountains for the past twenty years. Our family has spent countless hours in these mountains. Our two children subsequently purchased land in the same area. This land is something that will stay in our family for generations. I am asking the Game and Fish Commission to hear the voices of the private landowners concerning the proposed changes to the landowner hunting license. We have spent unmeasurable time, money and our family's labor to improve our land to accommodate wildlife. We have seen the number of elk in this area drop substantially from the time that we purchased the land. If the Game and Fish Commission should make any hunting changes it should be to decrease the number of licenses issued for this area to non-landowners. I ask you to reconsider this proposal to change the landowner licenses. These landowner licenses are very precious to our family as I am sure they are to the many other landowners. Thank you for your consideration, Brenda Seckman

Final Comment	Seckman, Brenda	Powell, WY	6/9/2025 12:58:00 PM
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181 This proposal is a blanket fix to a subset of isolated problems. With every action there is a reaction and from my understanding there has not been any due diligence of the up and coming reaction problems that occur from this change. The local game warden has stated that this will exacerbate his current problem of trying to manage the elk in his area. It will eliminate people with a much higher kill rate from being able to help plus his more pressing concern of landowner relations will go right down the tubes. The wardens have fought for years to build up relationships with landowners to maximize the game and fishes ability to manage herds and this is going to flip those upside down. I'm here to speak for the wardens that have to deal with the fall out because I feel they are scared to speak out and risk their jobs. Please vote no on the landowner tag changes and force the rule makers to identify the problems and govern against the problems. Don't allow this mass regulation to pass and start a wildfire. Thank You for your time!

Final Comment	Lovelace, Kerry	Casper, WY	6/9/2025 1:05:00 PM
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182 Scott and Kristen Miller PO Box 364 – Thermopolis, WY 82443 netsirk64@icloud.com – 307-921-0032 Wyoming Game and Fish Commission 5400 Bishop Blvd. Cheyenne, WY 82006 June 9, 2025 Dear Commissioners, We are writing to express our strong opposition to the proposed changes to the qualifications for landowner licenses, specifically the increase in minimum acreage to 640 acres and the requirement of 3,000 animal use days. These changes will have a significant and harmful impact on small landowners like us who have responsibly provided wildlife habitat and supported Wyoming's hunting traditions for decades. We own 240 acres that are in and adjacent to (as classified by the Game and Fish) crucial elk winter habitat. It currently qualifies for elk and deer landowner

licenses. The current rules, 160 contiguous acres and 2,000 animal use days, strike a fair balance between opportunity and stewardship. They also recognize the contributions of smaller landowners who provide year-round support for Wyoming's wildlife populations. We urge you to retain these existing qualifications and to grandfather in current properties that meet them. Two government-appointed task forces have already reviewed this system and did not recommend increasing the acreage or animal use day requirements. Disregarding their findings undermines the very purpose of those reviews and calls into question the need for these proposed changes. Additionally, the unintended consequences of this proposal could be severe. If small landowners lose eligibility for landowner licenses, there will be a financial incentive to subdivide property, thus fragmenting open spaces and potentially reducing habitat quality. Furthermore, if landowners, who account for a large portion of the annual elk harvest, are no longer participating in the system, harvest rates could drop, worsening already high elk populations in some areas. THE WG&F Commission should not alienate or discriminate against the very people who have been on the front lines of habitat conservation and wildlife management. Instead, we should be finding ways to reward responsible stewardship, not penalize it. Thank you for your time and consideration of our comments and for your diligence and hard work. We urge you to reconsider these proposed changes and to support the continued participation of small. Committed landowners in Wyoming's wildlife management system. Sincerely, Scott and Kristen Miller

Final Comment	Miller, Scott	Thermopolis, WY	6/9/2025 1:28:00 PM
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183	I am against changing the acreage requirement and animal use requirement for landowner licenses. I do not have a property which qualifies for landowner licenses, so I am viewing this as a public land hunter. The areas that I hunt have a had a huge increase in elk populations over the years, and the strategy to control this has been to issue more licenses. Many if not most of these licenses are held by public land hunters, and with the additional pressure, many of these elk are pushed onto private lands. I rely on these private landowners hunting their properties to keep the elk moving. Sure, they can get a type 8 cow license, but with this they won't hunt their properties enough to keep the elk from staging there. I feel that with the increasing elk herds, and the need to harvest more elk, cows as well as bulls, we shouldn't be putting additional restrictions on private land which will only give these elk additional areas to avoid hunters. Thank you
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Final Comment	Magnusson, Dennis	Cheyenne, WY	6/9/2025 2:10:00 PM
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184	<p>RE: Public Comment on Draft Revisions to Chapter 44, Section 10 – Governor Complimentary Licenses for Bighorn Sheep and Moose Dear President Lundvall, Members of the Commission, and Director Bruce, On behalf of the Wyoming Wild Sheep Foundation (WY-WSF), we appreciate the opportunity to provide comments on the draft changes to Chapter 44 regulations, specifically Section 10, regarding Governor Complimentary Licenses for bighorn sheep and moose. We respectfully request that the Commission consider the following modification: allow one (1) of the five Governor Complimentary Licenses issued annually for each of these species (bighorn sheep and moose) to be valid for any hunt area in the state that offers a Type 1 license. We believe this revision serves the best interests of both wildlife conservation and the financial sustainability of species management programs.</p> <p>1. Conservation Funding Opportunity The Wyoming Governor's Big Game License Coalition (WGBGLC) program has demonstrated overwhelming success in raising funds for conservation. Ninety percent (90%) of proceeds from Governor license sales are returned to the WGBGLC, where they are directly reinvested into species-specific conservation projects. In addition, the remaining 10% retained by the non-profit sellers is frequently funneled back into conservation work, maximizing the overall benefit to the species these licenses are meant to support.</p> <p>2. Growing Costs, Shrinking Revenues The financial burden of managing wildlife, particularly bighorn sheep and moose, continues to grow. Meanwhile, traditional revenue streams such as general license sales are not keeping pace with these demands. This problem is amplified for bighorn sheep and moose following the shift to a 90/10 resident/nonresident license allocation, which has significantly reduced overall license revenue for the Department. Providing a high-value Governor license that is valid statewide would help offset these funding shortfalls.</p> <p>3. Real-World Example of Conservation Value At our WY-WSF annual convention on June 7, 2025, the auction of the Wyoming Governor's Bighorn Sheep License brought in a record-breaking \$300,000, WY-WSF's highest-ever sale for this license. A key driver of that success was the unique opportunity to access a hunt area that had not been available in recent years and, under the proposed revision, would once again become off-limits.</p> <p>4. Practical Mechanism for Equity Among Non-Profits To ensure fairness among non-profit organizations that sell Governor Complimentary Licenses, we propose that the "any area" tag be rotated annually among the WGBGLC-approved nonprofit conservation groups</p>
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that sell these tags. This approach would provide equitable access to the higher-value license while allowing each group the opportunity to maximize funds raised for conservation. 5. A Balanced Proposal By maintaining four of the five Governor Complimentary Licenses under the current area restrictions and designating just one as statewide-eligible, the Commission can preserve the intent of conservative harvest while still allowing flexibility that maximizes fundraising potential for Wyoming's most conservation-reliant species. Thank you for considering this important modification. We believe this balanced solution will bolster conservation funding, enhance the value of Governor Licenses, and ensure that Wyoming continues to lead the West in innovative, collaborative wildlife management. Sincerely, Katie Cheesbrough Executive Director Wyoming Wild Sheep Foundation

Final Comment

Cheesbrough, Katie

Cody, WY

6/9/2025 2:12:00 PM

185

Dustin Ewing 324 Esterbrook Road Douglas, WY 82633 dewingwyo@gmail.com 307-351-0315 June 9, 2025 Wyoming Game and Fish Department Wildlife Division Attn: Regulations 3030 Energy Lane Casper, WY 82604 RE: Opposition to Proposed Landowner License Regulation Changes To whom it may concern, I am writing to respectfully voice my strong opposition to the proposed changes to the Landowner License Regulations, specifically the increase from 160 deeded acres and 2,000 Animal Use Days (AUDs) to 640 deeded acres and 3,000 AUDs. As a 40-year Wyoming resident married to a fourth-generation Wyomingite, and as parents of four children who we hope will choose to build their lives in this great state, these changes strike deeply at our family's values and aspirations. I did not inherit my 440-acre property, which currently qualifies for an elk license in Area 7. Instead, I worked tirelessly throughout my professional career to acquire this land, not just for recreational purposes, but as a way to contribute meaningfully to Wyoming's wildlife and natural heritage. This proposal disproportionately impacts individuals like myself — hardworking Wyoming residents who have invested our resources and energy into acquiring land under the current rules. Jumping the requirement from 160 to 640 acres creates a massive financial barrier, one that could prevent many future landowners from pursuing their dream of owning property and participating in Wyoming's wildlife stewardship traditions. My property serves as critical summer elk calving and breeding ground. We exceed the current 2,000 AUD threshold and would continue to meet or surpass the proposed 3,000 AUD level. Over the years, we've taken meaningful action to enhance wildlife habitat — thinning overgrown forested areas, restoring meadows, limiting vehicle access, and creating a thriving environment for elk and other wildlife. These changes were made with a long-term conservation vision, supported in part by the understanding of landowner license eligibility under current regulations. Should these regulations change, the value of our property — both economically and ecologically — would be seriously diminished. I fear it will push landowners like myself to subdivide properties just to reclaim value lost by the new requirements. In my case, the property is bordered on nearly all sides by U.S. Forest Service land. Subdividing would be a regrettable outcome, dramatically altering the landscape and jeopardizing prime elk habitat that benefits both public wildlife populations and private land stewardship. I understand that part of the rationale for these changes is to address concerns about absentee landowners or misuse of the landowner license system. While I recognize these issues exist, they likely represent a minority of cases. Sweeping regulatory changes that penalize all landowners — especially ethical, conservation-minded residents — are not the answer. I encourage the Department to consider more targeted solutions. For example: • Better management of the license program based on verified Animal Use Days, regardless of whether the land is 160 or 640 acres. • Establishing performance-based eligibility that rewards landowners for active wildlife stewardship. • Promoting conservation practices such as riparian restoration, wildlife fencing, and habitat improvement as part of the licensing criteria. • Offering tiered or conditional landowner licenses based on conservation contributions and AUD benchmarks. These approaches would support wildlife management goals while also maintaining fairness and opportunity for responsible landowners who are invested in Wyoming's future. They would also help foster the kind of strong, cooperative relationships between private landowners and the Wyoming Game and Fish Department that are critical to long-term wildlife success. Lastly, I urge you to consider how this change might affect future generations. Many young Wyomingites dream of staying in this state, owning land, and participating in our outdoor traditions. We should not make it harder for them to achieve this by eliminating incentives tied to achievable land stewardship goals. A 160-acre tract, well managed, can be just as impactful to wildlife as a 640-acre one. Let's preserve that dream for those who are working hard to be part of Wyoming's future. Thank you for considering my comments. Kind regards, Dustin Ewing

Final Comment

Ewing, Dustin

Douglas, WY

6/9/2025 2:26:00 PM

186

The proposed change to require 640 contiguous acres for landowner licenses will have a serious impact on Wyoming families who currently qualify under the existing rules. Many of us rely on these tags to help feed our families each year. If the concern is that land is being purchased solely to obtain hunting tags, then new regulations should focus on future land transactions—not punish families who have responsibly managed their property for generations. We have long provided valuable wildlife habitat and used our tags with integrity, solely for the purpose of feeding our families and supporting our way of life. In addition, the proposed 20% ownership requirement for land held in partnerships or corporations creates an unfair barrier for many landowners. This threshold is twice the amount originally recommended by the Commission earlier in 2024. Families often incorporate land for practical and financial reasons, and shares are commonly divided among relatives and close partners. The land itself only generates a limited number of tags—typically just one or two—and our usage of those tags does not burden the overall system. Changing the rules based on how the land is owned, rather than how it's used and maintained, feels punitive and disconnected from the reality of how families manage land in Wyoming. What should matter most is the land itself—its size, its health, and the habitat it provides. We have cared for the same large parcel of land for over 50 years. It has never been subdivided or developed and continues to provide essential, high-quality habitat for countless wildlife species. Like many of our neighbors, we take pride in being good stewards of the land and of Wyoming's natural resources. Grouping families like ours in with those who may exploit the system feels unjust and discouraging. We respectfully ask the Commission to consider more balanced and targeted measures—ones that address genuine abuse without stripping long-time, conservation-minded landowners of their rights. We are committed to protecting Wyoming's wildlife and habitat. All we ask in return is fair treatment and the opportunity to continue doing what we've always done: care for the land, support our families, and preserve the heritage that makes Wyoming so special.

Final Comment

Harris, Ned

Casper, WY

6/9/2025 3:35:00 PM

187

My family and I have finally gotten acreage in the mountains and the rules are changing re: landowner tags?? How about enforcing the rules and regs that are already on the books??? NOT IMPRESSED.

Final Comment

Hunt, Nathan

Basin, WY

6/9/2025 3:39:00 PM

188

We've finally landed a parcel in the Big Horns, which NEVER come up for sale, and now the rules re: landowner tags are going to change? NO. 1. Blanket "solutions" don't solve problems very often. They create them! In this case, for the smaller landowners. 2. Enforce the laws and rules already on the books. We're not California and don't want to be---they're swimming in laws and exploding into anarchy. I certainly hope that the landowner pushback on this issue breaks some eardrums.

Final Comment

Hunt, Georgia

Basin, WY

6/9/2025 3:44:00 PM

189

Dear Readers, As land owners in both Sweetwater and Uinta counties and law-abiding citizens we have furnished habitat – food, water, shelter...land - for the wildlife that thrive on our ranching operation on the checkerboard. We have tolerated and dealt with the problems associated with migratory paths, fence and water issues, hunters and the general public, and a myriad of other issues that arise from operating in a multiple use area. We have had the opportunity to work with and observe several leadership teams from the Wyoming Game and Fish and value the efforts to both effectively manage the wildlife and also maintain the integrity of our Wyoming values. In response to the proposed regulation changes, including Chapter 44 Section 8, which covers landowner licenses we have several concerns. There is no doubt that this is a very complex issue but after careful review of the proposed changes we strongly recommend a new taskforce be appointed to carefully and objectively analyze the issues, review the original intent as to why landowner licenses were originally granted and propose changes beginning with the end in mind. In other words, what is the end goal(s), what will that look like 5, 10, or even 20 years from now and what impacts possible changes might have on the wildlife, the landscapes, the outdoor enthusiasts and the landowners. The call for comments indicates that "the proposed updates are the result of a comprehensive and transparent process initiated by Governor Mark Gordon's Wyoming Wildlife Task Force in 2021-22." My question to that declaration is: Where is the data and the action plan from that comprehensive and transparent process? After attending one of the meetings on June 4th, numerous valid questions were asked regarding the cultivated land and changes to the minimum acreage requirements as well as the process on calculating the animal use days but no one was able to

provide adequate answers. It appears the changes have been proposed but the specifics on how they will be carried out has not yet been determined – this is a risky way to do business! Action plans backed with clear goals, data, formulas, and forethought at the bare minimum should be included with each proposed change. In 2024 in Hunt Area 30, there were 40 Type 1 Elk Tags and 600 applicants. 15% Non-Residents: - 6 Non-Residents 85% Residents: -10 Landowner Tags (LOTS) ...which left 24 Resident Draw Tags for the general public or a 4% chance to draw a Type 1 Elk. The proposed changes would increase that chance to 6%. In other words, the proposed changes would have drastic impacts and only increase a residents chance in the draw by 2%. Is it worth it? I would answer emphatically, NO! Strongly Oppose: Changing the minimum acreage requirement. To be eligible under the proposed changes, landowners must own a minimum 160 contiguous acres of cultivated land, or a minimum 640 contiguous acres of land regardless of the amount that is cultivated." A statewide blanket approach may not be the best solution. Think of the impact of cultivating 160 acres in the forest! Will a home or other dwellings be allowed on the properties – whether it is 160 or 640? What about dogs and other pets that might be a deterrence to a conducive habitat? How will Game & Fish fairly evaluate and assess the environments? Might be in Favor Of: "Increasing the required minimum animal-use days from 2,000 to 3,000 during the 12-month period preceding application. Use days are calculated by multiplying the number of animals with the number of days using the property. For example, 30 deer for 100 days, or 150 elk for 20 days would equal 3,000 use days." However, I do not see how Game Wardens will be able to absorb this monumental task to their already busy schedules. And I am gravely concerned of the integrity of this process if it is left up to individual landowners to report. The honest will remain honest, but those smaller landowners who bought the minimum acreages in the first place for the sole benefit of the hunting privileges will undoubtedly find a way to be deceitful on this one. Strongly Oppose: "The requirement of significant interest of 20% or more to prevent abuses identified where individuals were becoming "owners" solely to qualify for landowner licenses. Applicants would need to provide information demonstrating they are bona fide Wyoming landowners." The business structures of family ranches are unique to each individual family situation. To demand that ranchers divide significant interests up in a family ranch for the sole purpose to obtain hunting licenses is absurd. American farms and ranches are declining at a rapid rate and this proposed change would just add insult to injury. My family has worked positively and effectively with the many entities required in our business dealings and are confident that the Wyoming Game and Fish and the appointed Commissioners will continue to respect landowners. We have cooperated and supported several studies involving collaring, migration and habitats. We also recognize we neighbor what is commonly known as the Greater Little Mountain area, it truly is a multiple use area and should be preserved as that. We know you have many issues to deal with and are doing a hard job. I have several ideas that might serve as possible solutions and would be more than happy to share them at an appropriate time. For now, I respectfully ask for you to reconsider the proposed changes. Yours Truly, Dana Vercimak Bench Y Land, LLC

Final Comment	Vercimak, Dana	Lyman , WY	6/9/2025 4:11:00 PM
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190 To whom this may concern, I am addressing my concerns of the proposed changes to the landowner tags and acreage. I am against this change, as I am sure there are a ton!! It has been a dream of ours to have property on the Big Horns! This dream became a reality two years ago when 200 acres became available and we jumped on the chance to own property up on those beautiful mountains that we call home. We were just able to apply for landowner tags this year and now you are talking about changing the number of acres you can have to even apply for landowner tags. A lot of us small landowners depend on these tags to provide for our families and put meat in our freezers. For some odd reason, I have a gut feeling that this is fueling the outfitting companies and has dollar signs written all over it. I would love to hear some real feedback on why you would even consider this change and who is really profiting from it. Please don't take away the one thing that small landowners have or in our case haven't even had the chance to experience!!!! Thank you

Final Comment	Hunt, Calyn	Greybull, WY	6/9/2025 4:15:00 PM
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191 Commission members, I am 100% against transferable licenses to landowners. Our wildlife is not for sale.

Final Comment	TOWNSEND, GORDON	CASPER, WY	6/9/2025 4:16:00 PM
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192 Testimony for the Wyoming Game and Fish Commission Ownership Percentage Requirement By Dave True This is Dave True from Casper, a member of the family who owns True Ranches, a diversified cattle operation in the eastern

third of Wyoming. These comments relate to the proposal that applicants must demonstrate a significant ownership interest, defined as at least 20% of the property in order to apply for Landowner Licenses. Although the reasoning behind this proposed regulation is rather straight forward, the unintended consequences are not positive. This provision will penalize Wyoming families who have ranched and farmed in our state for generations. With multiple generational operations, there likely are more than just 5 family members owning their operations. This will unintentionally penalize those legacy agricultural families who make up the backbone of our ag industry. Another unintentional consequence likely will be family ranches being split up in order for family members to qualify for landowner licenses. The result will be driving more qualified landowners legally applying for additional tags. Obviously, not a result that is desired by the Game and Fish nor the many hunters in our state. This may indeed be one of those situations where the cure will be worse than the disease. Thank you very much for taking these comments into consideration.

Final Comment	True, Dave	Casper, WY	6/9/2025 4:53:00 PM
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193	I guess I'm not understanding the need or reason for this change. Many of the small land owners possibly received their land from within their family, while others have worked or saved money to purchase their parcel they now own. I guess please the large land owners and to heck with the small land owners?? If area seven needs to get the elk herd reduced, then put more elk tags out there. More tags, hopefully more elk killed.
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Final Comment	Johnson, Nancy	Glenrock , WY	6/9/2025 5:40:00 PM
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194	Chapter 44, Section 8 Landowners: I have owned 240 acres in Albany County for 36 years. Why are we changing? If the public is complaining, give out more licenses to make up the difference. A change will hurt the harvest of elk, and the public will still find it difficult to get access to land they can hunt on.
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Final Comment	Johnson, Danny	Glenrock, WY	6/9/2025 5:50:00 PM
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195	Dear Wyoming Game and Fish Committee, I am writing this letter in response to the proposed changes in Landowner Licenses that you are set to vote on in the upcoming months. I was able to attend the in-person meeting that was held in Cody and was given very little insight as to why these drastic changes are being initiated. First, I would like to share a little bit of history about hunting impacts on my life and some reasons that I believe these changes would be unfair, as well as detrimental to hunting in Northwestern Wyoming. In the early 2000's, my parents were able to purchase a 160-acre parcel of land in the Big Horn Mountains and along with that came the coveted ability to receive landowner elk tags. This was a great financial sacrifice that my family made to curate a wild game safe haven as well as ensuring our ability to enjoy this beautiful place that we call home. I have been receiving landowner tags on rotation within my own family since I was first able to hunt big game- nearly 20 years ago. To learn that this is unjustly being taken away from my parents, siblings, spouse and now my own son and daughter is very concerning to me. I feel like what we provide through our private lands in hunting area 45 rightfully earn the ability to hunt elk each year. We have spent a great amount of money on habitat enhancement- not just for elk but turkey, black bear, grouse, mule deer and moose. Along with installing all wildlife friendly fencing to help protect the natural grasses from domestic livestock that have been grossly overgrazing the Big Horn Mountain range for years. The amount of wildlife that inhabits our property throughout the year is very vast, which we are grateful for. But along with that comes a lot of destruction as well. But without complaint we mend our fences, fix our structures and continue working to create more habitat. I understand things may be different in other parts of the state, but landowner tags in our area make up less than 2% of all tags that are being sold. The reality is, with the proposed changes, I feel that the Wyoming Game and Fish is saying that someone from another state has just as much right to be able to hunt in our area than those of us who are working firsthand to protect and provide for this wildlife. The proposed acres changes in section 44 are going to completely eliminate anyone being able to obtain a landowner tag except many "corporate ranches", who it appears are creating a large issue of unjustly obtaining landowner tags by creating less than 1% owners. From research I have done it appears that most of the influence for these proposed changes is coming from Outfitters. I could go on and on about my concerns with Outfitting in Wyoming. But I will spare you that. Individuals and companies that are exploiting wildlife for profit have no right to be making decisions like this. Speaking from Elk Hunt Area 45 I can boldly say that the comparison of outfitters in this area vs individuals' landowners do not come close to what they provide the area monetarily, conservational and improving hunting. It makes sense that outfitters would be so vocal about these changes. Because ultimately, the more tags
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that their potential hunters have the ability to draw equals more money in their pockets. Finally, with the proposed changes and potential for many “small landowners” losing their landowner licenses is going to change the quality of hunting in Wyoming forever. Many individuals will not feel that the financial burden of owning these lands are worth it and will subdivide and sell their parcels. Losing some of the most valuable habitat for wildlife. Big ranches are going to be contracted with outfitters only having the ability to hunt their lands. We can already see this happening, causing many hunters to lose their longtime hunting spots. Because truly, when hunting, animals are going to flock to their safe havens. Once those are gone and these landowners stop investing their own money and time into improving these hunting areas, we will never be able to get them back. I believe that each of you has been put in the position that you are for the intentions of keeping hunting sacred and ever improving in Wyoming. These are huge changes that are being proposed that will have many long-term negative impacts on families and hunting in Wyoming. Please vote these changes down. Thank you greatly for your time and commitment to Wyoming, Nicole Burningham

Final Comment	Burningham, Nicole	Greybull, WY	6/9/2025 6:48:00 PM
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196 Do you know how many parcels would be impacted by the changes proposed for landowners license? The vast majority of private land parcels are under 640 acres. Almost every section of the old railroad land is under 640 acres. These smaller properties provide crucial wildlife corridors for migration and movement of herds. By changing the size of land owners parcels you are setting up these parcels to be farther subdivided into small buildable lots. This could cause migration paths to be blocked. This could also affect property values and tax revenue. Small parcels provide critical habitat in some areas. Why would these property owners be incentivized to enhance their properties to benefit wildlife? Many of these owners currently work to make their property better for wildlife.

Final Comment	Schroeder, Jack	Jeffery city, WY	6/9/2025 7:17:00 PM
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197 Hello I'm writing to express my concern regarding the proposed changes to the landowner license provisions outlined in Chapter 44. As a current landowner in Area 7 who has enjoyed hunting on our land for many years, I take great pride in the opportunity to pass down this tradition to my children and grandchildren. The proposed changes are deeply troubling. They appear neither fair nor constitutional, favoring only large-scale, wealthy landowners while disregarding the interests of everyday individuals who have worked hard to acquire property and participate in responsible wildlife conservation and elk harvesting. Wyoming's Constitution recognizes hunting as a heritage and forgoing that right to tax paying landowners is not just. Wyoming has long stood as a state that welcomes and supports sportsmen in their efforts to contribute to the stewardship of our natural resources. This proposal runs counter to those values. It's difficult not to question whether political motivations are influencing these changes—motivations that could ultimately harm the very foundation of wildlife management in our state. Please let me know how I can further voice my opposition to this proposal. I would be happy to take any additional steps needed to advocate for fairness and responsible land stewardship. Thank you for your time and consideration. Sincerely, Tony Salerno

Final Comment	Salerno, Anthony	Grand Rapids, MI	6/9/2025 7:25:00 PM
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198 I am not sure this has been brought up but many of the 160-640 acre landowners who now receive landowner tags have reason to enhance habitat and keep their land for themselves and many times allow others to hunt. If they cannot receive tags except every 4-10 years, or more for non residents, will they keep that land or will they sell it in smaller tracts? I fear many without the benefit of tags for hunting will see no reason to not divide and sell it. Maybe a slight reduction tags from 2 to 1 any tag for these smaller tracts is a better idea. I think you will do much damage if this proposal passes. Thank you Doug Schlabach

Final Comment	Schlabach, Douglas	KEYSTONE, SD	6/9/2025 7:32:00 PM
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199 The idea of a ranch less than a section has less wildlife than a 2000 acre ranch is ludicrous. We have approximately 400 acres but have elk deer antelope and moose on and off all year. All we ever wanted is a way for our family to hunt on this land. Now you want to take away the landowners tag. Now there's talk of letting owners of 2000 acres to make money off the coveted tags Wyoming landowners can apply for. If this nonsense continues I have no choice but to stop access to our ranch both to hunting and fishing. How about this for a tagline on social media? Hastag access, hell no.

200

Honorable Wyoming Game and Fish Commission, I request that you follow the North American Model of Wildlife Conservation when weighing transferable landowner tags. Transferable landowner tags in limited-quota areas create a private market while reducing hunting opportunity for the general public. A core tenet of the North American Model of Wildlife is 'wildlife for all' (1). Transferable landowner tags blatantly contradict that tenet by preferentially giving hunting opportunity to the wealthy who could afford premium limited-quota tags through private sales. I urge you to reject all requests to modify regulations pertaining to transferable landowner tags. Regards, Guy Litt References: (1) <https://www.fws.gov/story/2022-04/north-american-model-wildlife-conservation-wildlife-everyone>

201

G&F Commissioners, I'm writing this response in regard to the landowner licenses and would like to recommend the following: 1. Please keep the acreage and use days as they currently exist, 2000 use days and 160 acres as I feel there are important areas that meet those requirements that support deer, elk, and pronghorn. I'm fully supportive of the current landowner tag program as there is no question that landowners provide critical habitat that all Wyoming Citizens benefit from. In my opinion, granting these licenses to qualifying landowners under the current regulation increases wildlife habitat, landowner tolerance, and also as an incentive to open up private property to public hunting. 2. Rather than increase the acreage requirements, I would recommend that the GF reevaluate and requalify existing and future lands that may or may not qualify for landowner tags. There seems to be thought that many of the current lands actually don't qualify. I agree, and the GF should be directed to go out and qualify these questionable properties, which are primarily the minimum acreages. Landowners should have to qualify on a yearly basis when the use days, available habitat, etc. are in question. In the past some wardens and biologists have made it clear to landowners that some years they qualify and some years they don't. This practice needs to become normalized to ensure that abuses to the program do not exist. 3. Another thing that I've hears legislators and GF concerns about are lands being subdivided strictly for the ability to acquire landowner tags. The regulation already exists that does not allow this practice, perhaps the GF should be disqualifying those properties that are not following regulation. 4. It may be worth considering not allowing NR landowners to acquire landowner tags or at least put a significant cap on the numbers they can acquire from the NR pool of tags. This would dissuade out of state interests from acquiring property simply to gain access to landowner tags. 5. Finally, it may be worth considering caps on Resident and Non-Resident landowner tags where the total tags allocated for a hunting unit are very limited. For example, elk area 124 that issues very limited number of bull permits. In that area landowners tag a very high percentage of the total tag quota. Thank you for considering the above comments. Buzz Hettick, Laramie Wyoming.

202

Wyoming Game and Fish Commission After attending three separate landowner meetings, and watching previous Commission meetings, I have concluded that these proposed regulations are aimed at only a few problems that could be fixed in a much less invasive way Commissioner Masterson stated in two separate meetings, that the main issue is "decreasing resources, and increasing demand." Apparently, there are a few antelope or deer areas where landowner licenses take up all, or most of the licenses issued in those areas, and public hunters are essentially drawing dead with no chance of obtaining a permit. Instead of a broad far reaching rule change that permanently and negatively affects hundreds of landowners in areas don't have these problems, a much narrower targeted solution should be applied. HIGH DEMAND AREA, SPECIAL RULE When landowner license applications, reaches 50% or greater, in any one area, this special rule would apply. 1. All landowners in affected areas would immediately be limited to 1 license per landowner. 2. All landowners in these areas would be immediately notified that their area has met this special criteria, and they would have a choice as to which land owner license would be deleted. 3. This high demand area special rule would stay in effect until available licenses increase high enough to drop landowner licenses below the 50% threshold. Implementing a simple rule like this would address the few current and potential future problem areas, while avoiding the devastating unintended consequences of this overly broad proposal. thank you for considering this alternative. Kevin Christopherson

203

CH 44 Draft 04.14.2025.12.docx Section 8. (a) (i) The increase from 160 contiguous acres to a minimum 640 contiguous acres will lock out all smaller land owners from having the right to landowner permits on their properties. This change favors all of the larger land holders in Wyoming. I do not support this change and am asking that it not be made. Strike changes (A) and (B). These changes are highly biased in favor of larger land holders and remove all smaller land holders from the right to have landowner permits.

Final Comment**Welty, Lawrence****Chugwater, WY****6/9/2025 9:12:00 PM**

204

Wyoming Mule Deer Alliance June 6, 2025 Comments in support of proposed revisions to Chapter 44: landowner licenses. Dear Wyoming Game and Fish Commissioners, The Wyoming Mule Deer Alliance is a volunteer-led, unincorporated group of hunters who advocate on behalf of mule deer herds and mule deer hunters to perpetuate sound, science-based management and promote public support of mule deer hunting opportunities. We appreciate the opportunity to provide comments in support of the proposed revisions to Chapter 44 regarding landowner licenses. We appreciate the Commission's efforts to address issues with landowner licensing. The increased minimum acreage for qualification disincentivizes further subdivision of our Wyoming landscape and keeps larger tracts of land intact. While we fully support the proposed 640-acre minimum for qualification, we have reservations about the clause allowing landowners with 160 acres of cultivated land to earn landowner licenses. We believe this could create unintended consequences of native habitat converting to cultivation to meet the minimum requirement. We also appreciate the additional animal use days to qualify, as it helps assure qualifying lands are truly providing habitat for wildlife. Collectively, these revisions both foster support for additional wildlife in the state, and increase available opportunities for non-landowning hunters. With the current system, many, or even all, available limited quota licenses might be issued to landowner applicants and unavailable to non-landowner applicants. This is a much fairer way to issue licenses and helps distribute opportunity to a greater number of hunters. The proposed revisions enhance the clarity of landowner eligibility and requirements while detailing the status of family or landowner affiliates to more fairly issue hunting opportunity. Specifically detailing how (and who) is eligible for a landowner license is necessary to prevent abuse of the system by shareholders in landowning corporations that simply want to acquire desirable hunting licenses in our state. This revision will nurture landowners that want to better steward their lands for the benefit of our state and its herds. Thank you once again for the opportunity to submit comments on this proposed revision. The Wyoming Mule Deer Alliance fully supports the proposed revisions to chapter 44. On behalf of all WMDA members, Sincerely, Jill McMurray Jason West Braden Tethal Braxton Hamilton Pinedale Lander Evanston Cora

Final Comment**McMurray, Jill****Pinedale, WY****6/9/2025 9:23:00 PM**

205

The primary issue with the proposed changes is; eliminating most landowners from the tag eligibility removes the incentive for all those landowners to continue to invest in managing their land for wildlife. Many landowners have commented that if they lose access to tags, they will be much less inclined to allow public hunting, or access through their property. (myself included) It is dramatically more lucrative for a property owner to lease their property to an outfitter than participate in public access programs through the Game and Fish. Eliminating the option for landowner tags on parcels smaller than 640 will reduce those property values. To recapture that value, there will be many more instances of property being subdivided into smaller "ranchettes" and cabin parcels. With those come fences, roads, dogs, buildings, and no Hunting signs. The chopped up landscape blocks access to food water, cover, and migrations corridors. The cumulative result of the above means less habit and less access = Less animals and fewer hunting opportunities for everyone. Here is an alternative to the current proposal that addresses the issue but retains the benefits the landowner tag incentive provides to all. Establish a maximum percentage of landowner tags for any draw unit/species. i.e. 30%. When the number of landowner tags reaches that threshold, they could be reduced to one tag per landowner, or it could stay at 2 tags, but every other year. If it hits the threshold again, it could go to every third year. This addresses the issue of lag over consumption by landowners but retains the force of landowners big and small who are committed to working with the Game and Fish to optimize populations and hunting opportunities.

Final Comment**Russell, Mike****Lakeville, MN****6/9/2025 9:31:00 PM**

206

To whom it may concern, I'm reaching out to express my strong concern with the proposed changes in Chapter 44, Section 8. After reviewing the Wildlife Task Force recommendations, meeting minutes, and the public feedback, The proposed jump to 160 cultivated acres or 640 total acres seems like a big shift that wasn't even part of the Task Force's original list of landowner tag suggestions. I don't see where this idea came from, and I don't believe there's been a clear explanation as to why such a significant change is suddenly being considered. From my understanding, this issue might've started in the southwest corner of the state due to the number of deer tags to deer population. However if that's the case, why implement a statewide rule change? Different areas face different challenges, and it doesn't make sense to penalize landowners across Wyoming, especially in regions where elk numbers are well above normal. It feels like the core problem is the landowner tag system being blamed on acreage size when the real issue lies in how the rules are enforced. People working around the system through things like subdividing land or creating LLCs aren't going to be stopped by a new acreage minimum. That kind of misuse should be addressed directly, not by limiting responsible landowners. Another concern that's been brought up is how some realtors are advertising properties by promoting that they qualify for landowner tags. While I understand the frustration, I believe there are better ways to address this issue than changing the acreage requirements. Instead of punishing current landowners who have followed the rules for years, why not place stricter regulations on how landowner tags can be used in marketing? The Game and Fish Department could work with the real estate commission to enforce rules that prohibit advertising landowner licenses as a guaranteed benefit of owning certain parcels of land. This could include fines or disciplinary action for realtors who use tags as a sales tactic. My father bought property over 25 years ago because he took pride in owning land and wanted to create a place where he and future generations could enjoy the great outdoors and hunting wildlife. If the real worry is that landowner tags are becoming too dominant in some limited draw areas, then capping them at 20% of available licenses makes sense. But changing who qualifies altogether doesn't seem like the right solution. I do believe landowner tags should stay in the family and not be transferred or sold, and I understand the need to address misuse. But if eligibility rules are going to change, there should at least be a way to allow landowners subject to previous guideline. I respectfully ask the Commission to reject the proposed changes to acreage requirement on landowner tags. Thanks for taking the time to read my thoughts.

Final Comment

Fanto, Lane

Casper, WY

6/9/2025 10:09:00 PM

207

Hello, I'm writing to reiterate that I strongly oppose transferrable landowner licenses. Wyoming wildlife is held in public trust and belong to all of us, not just landowners. Giving them the ability to sell their tags to the highest bidder will turn WY into a pay to play state that benefits the rich while degrading the quality of hunt for those of us that take pride in hunting public lands and the opportunities they provide everyone, regardless of income status. It simply goes against the Wyoming ethos. WDGF had already begun showing it's favoritism towards private landowners over public landowners in other ways, do not allow a decision like this to reinforce that notion among the public land hunters you rely on to manage your wildlife. Thank you for your time and consideration.

Final Comment

Schoborg, Todd

Laramie, WY

6/9/2025 10:51:00 PM

208

I am opposed to the Proposed CH 44 changes. 100% Opposition to CH 44 Proposal Michael Porter's Background- □ 4 generations of Porter's in Casper, WY □ Landowner on Muddy Mtn for the past 49 years. □ Member of First Governor Task force appointed by Gov Mead. □ Wealth Advisor in Casper, Wy for the past 30+ years □ Own a RV Park in Casper, Wy for the past 16 years. □ Past board President for Wy Wild Sheep Foundation and Mule Deer Foundation. □ 49 Year partnership with WG&F in Casper □ Founding member of the Muddy Mtn Hunter Management Area- Largest in the State. Why does this topic keep Coming Up? □ Two different Gov. Task Forces have NOT made acreage or use day recommendation to the WG&F Commission. □ I have held 6 meetings with WG&F Staff and 1 meeting with Director Angi Bruce. □ The only two answers I could get: o 4-5 deer or elk areas had a large % of landowner tags at 45% of total tags. o Corp/LLC issuing a 1% ownership to employees to get landowner tags. □ WG&F Staff WG&F Commision Proposal: □ Change to 640 acres, 3000 use days, and 20% ownership. Consequences □ Extreme damage to WG&F partnership with landowners □ Potential loss of hundreds of 1000s of acres of land closed from landowners □ Small acreage ranches being sold as 40 acres parcels. □ Hunter management programs, Access yes, and conservation efforts eliminated by landowners. □ Donated tags by landowners to disabled vets will be cut in half. □ Elk harvest numbers will decline immediately. Elk are way over objectives. Solutions: □ Drop the Ch 44 proposal immediately. □ Change the ownership to 5% for landowner tags. □

WG&F Staff re-qualify every landowner tag every 3-5 years. ☐ If the animals are not on the land, pull the tags back. ☐ Place a cap on areas where the landowner tags are higher. ☐ Keep the minimum acreage at 160 and 2000 use days. ☐ Create a steering committee for solutions on problem areas. ☐ DO NOT use a blanket approach to an already good system Second Option: ☐ Re-qualify all landowner tags. ☐ Grandfather the landowners that qualify for antelope, deer, or elk. ☐ Change to 5% ownership. ☐ Appoint a steering committee to establish a new qualifications for landowner tags. Observations: ☐ Wyoming had 171,000 total tags in 2024. Only 3668 went to landowners which is less than 2%. This change will only eliminate around ½ of those. ☐ Families and Ranches has worked with the WG&F for 50+ years. This has the potential to destroy those long time partnerships. ☐ I asked Director Angi Bruce to testify to the Commission on the number of landowners considering closing off their land and not signing new contracts for HMA/Access until this is resolved. ☐ The Muddy Mtn HMA is the largest in the state. It will be the smallest HMA if CH 44 is approved and 1000s of sportsmen will not be able to access 110,000 they have been able to access for the past 50 years. ☐ I have met with over to 100 landowners in the past 3 weeks that are all opposed to this! ☐ We have held 6 meetings with Director Bruce and her staff over the past 3 weeks. ☐ We have attend all of the WG&F meeting on this topic. ☐ We have sent letters to WG&F Commissioners, submitted comments, and tried to attain meetings. Please STOP this proposal of CH 44 and let's address the small problems together!

Final Comment	Porter, Michael	Casper, WY, WY	6/10/2025 7:21:00 AM
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209 I am opposed to the Proposed CH 44 changes. 100% Opposition to CH 44 Proposal ☐ Re-qualify all landowner tags. ☐ Grandfather the landowners that qualify for antelope, deer, or elk. ☐ Change to 5% ownership. ☐ Appoint a steering committee to establish a new qualifications for landowner tags.

Final Comment	Porter, Stacie	Casper, WY	6/10/2025 7:25:00 AM
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210 I am opposed to the Proposed CH 44 changes. Consequences if this proposal passes: ☐ Damage to WG&F partnership with landowners ☐ Potential loss of hundreds of 1000s of acres of land closed from landowners ☐ Small acreage ranches being sold as 40 acres parcels. ☐ Hunter management programs, Access yes, and conservation efforts eliminated by landowners. ☐ Donated tags by landowners to disabled vets will be cut in half. Solutions: ☐ Drop the Ch 44 proposal immediately. ☐ Change the ownership to 5% for landowner tags. ☐ WG&F Staff re-qualify every landowner tag every 3-5 years.

Final Comment	Porter, Whitney	Casper, WY	6/10/2025 7:28:00 AM
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211 I am opposed to the Proposed CH 44 changes. Gage Porter's Background- ☐ 4 generations of Porter's in Casper, WY ☐ Landowner on Muddy Mtn for the past 49 years. ☐ Young adult that would like to purchase land in the future and maybe get elk tags. Young hunters that have land need to be able to hunt and enjoy the hard work we do for our land. Having the ability to provide habitat, shelter, food, water for the animals is critical. We also allow the public to hunt on and access the mountain through our land. I would say getting landowner tags is a great trade for both parties. Please oppose this proposal to CH 44. Consequences will be very damaging to WG&F partnerships.

Final Comment	Porter, Gage	Casper, WY	6/10/2025 7:37:00 AM
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212 I believe landowner tags should be limited in nature in areas with low draw odds, and also low quota numbers landowner tags should not be greater than 25% total quota. These licenses shall not be made for sale by landowner after draw and must be used by the family members who apply. I would like to see preference points used as the number of points you have your in the drawing that many times giving everyone top to bottom a chance in drawing a license.

Final Comment	Bouley , Todd	Rawlins , WY	6/10/2025 7:45:00 AM
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213 I strongly oppose any consideration for transferrable landowner tags for several reason. First, it is a direct violation of the North American Model of Wildlife Conservation (wildlife is a public resource and democracy of hunting is a standard). Monetizing wildlife will further divide the hunting and ranching communities, where there is already considerable tension on access to elk, in particular. Additionally, this could reduce opportunities for Wyoming residents who don't own significant amounts of land but still deserve an opportunity to pursue big game with the

same odds as someone who owns ranch land. Lastly, this will attract big money from wealthy non-residents who seek to gain financially from our wildlife resources.

Final Comment	Fronk, Nate	Rock Springs, WY	6/10/2025 7:46:00 AM
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214 Landowner tags should only be given to the landowner listed on the deed, to be used on that private land only, after other methods of removal have been utilized. No landowner tag should be allowed to be sold, or transferred. Wildlife belongs to the state, not the landowners. They need to be reminded of that every year. Selling landowner tags is nothing but greed, and a play for making money off of something that doesn't belong to them in the first place. If landowners have problems with wildlife, they can let friends and family hunt. If they don't have those, then they can utilize your AccessYes program or lease it to an outfitter. Thousands of people wait years for the CHANCE to draw a tag, and now all those people could be cut in line by someone who just writes a check. Income inequality is a very real thing and getting worse each payday. Selling landowner tags would make it the King's wildlife, not the State's. Selling landowner tags benefits the people who need it the least, and only them. They have enough money and power as it is, they don't need to be making more money off of our wildlife.

Final Comment	Madsen, Peter	CASPER, WY	6/10/2025 7:54:00 AM
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215 I am writing this in opposition to chapter 44 changes. After thoroughly reviewing all of the subject matter I am completely opposed to changes submitted. In 2022 the Wildlife taskforce made no such recommendations after a thorough review and I am at a loss as to why so suddenly in November 2024 such drastic changes were recommended. As the Game and Fish said while giving out the landowner of the year award we need landowners or there will not be an abundance of wildlife. These changes will create negative situations from subdivisions to extreme loss of habitat.

Final Comment	PARKER, DEAN	RAWLINS, WY	6/10/2025 7:54:00 AM
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216 Opposition to Chapter 44 changes. I recently attended the Casper public meeting about landowner license changes thinking that this would be a good thing for the public. However, as primarily a public land hunter myself, after hearing from the landowners in the room, I am concerned about the potential loss of access to my favorite spots if these changes take place. Access is getting harder and harder so we should work with landowners to open up places to hunt; I support the current system that gives landowners (big and small) a small thank you for the access and habitat they provide but did like the idea about the landowner cap which seems like a fair compromise in hard to draw areas.

Final Comment	Cassel , Dave	Casper, WY	6/10/2025 8:11:00 AM
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217 Please don't further monetize our wildlife to non residents by making licenses transferable. When I moved here as a young boy my grandparents made a life sculpting decision pulling me away from Portland Oregon, a place that was turning into a city of no morals. The biggest reason we moved was to hunt Pronghorn here. I spent my childhood outdoors chasing deer and antelope across the prairie. Landowners at that time we're very willing to let people hunt their property and share the resource. As our society has changed this has become more often the exception and not the rule. Access is difficult unless you have a thick wallet to afford it. Unfortunately I am not one of those people who will ever own enough land to receive these licenses. Nor am I someone who could afford to pay the fees they charge to hunt private ground With that all being said allowing the transfer of landowner licenses puts our great state more online with the states we don't want to be. It will ultimately cause landowners that don't typically hunt to apply for those licenses just to transfer them and take more away from resident hunters. Our hunting traditions have been dwindling away in the form of gaming consoles, cell phones and other distractions for years already. Lets not give people more reasons to avoid the outdoors even more when we very obviously need it most. Regards, Kris Skinner

Final Comment	Skinner, Kristopher	Riverton, WY	6/10/2025 8:18:00 AM
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218 Landowners tags should never be transferable. The landowners tags should not come out of the total general population quota taking tags from any legal resident or nonresident. The landowners tags should only be good on land the landowner owns not the whole unit. Landowners tags should only be the type 6 or 7 or type 4 cow/calf or

doe/ fawn. We the general public are fed up with these greedy landowners running Wyoming game and fish it is time we all have a say in what happens with the wildlife that is owned by the state of Wyoming NOT the Wyoming landowners.

Final Comment	Vaughn , David	Green River , WY	6/10/2025 8:21:00 AM
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219 There is no reason in the world that landowner tags should be transferable, or should be able to be sold. Just as there is no reason that outfitters should have the ability to sell tags, or have quotas issued to them. We the people addressed this issue back in the mid to late 1990's, and the sportsmen/sportswomen of this state overwhelmingly said no. This oath the game and fish is trying to take to increase revenue, or to take licenses away from the quotas to sell, or give to anyone, is wrong. And most likely illegal according to state statutes. I was born and raised in this great state, and I am damn tired of anyone thinking that they are owed a living by profiting from selling, or set aside licenses. The state of Wyoming does not guarantee me a living, nor do they set aside a certain amount of business for me. So why do you, the game and fish, think that anyone is due a guaranteed living from the ability to sell, transfer, or dole out our public wildlife to people that most likely don't even reside here except for limited times of the year?

Final Comment	Malkuch, Yon	Sheridan, WY	6/10/2025 8:24:00 AM
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220 I do not support the changes to landowner licenses. I agree there are some instances of abuse, I do not feel as though the proposed will actually fix any of the problems mentioned and will just piss off the good landowners. The proposed changes do not do anything to prevent the subdivision of properties; the 20% ownership sounds like it will eliminate a significant amount of big Wyoming ranches and for some reason the cap, which sounds most beneficial and has the greatest support, cannot be done through this process. I am greatly concerned about losing access if these changes go through. It is also very apparent that the wardens on the ground do not want this to happen either.

Final Comment	Barens, Chad	Casper, WY	6/10/2025 8:25:00 AM
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221 I am writing to express my concerns regarding the proposed changes to the requirements and allotment of landowner licenses in Wyoming. As a dedicated landowner who has actively participated in this program, I believe these changes would have a significant negative impact on families like mine who contribute to wildlife conservation and management. In recent years we have worked with Wyoming fish and game to allow you access to our property in Smoot to allow you to collar fawns as we have have several collared female mule deer on our property. We support you in your efforts to manage the populations and without these tags we will not be able to hunt deer or elk very often as we will have to build 5-10 points in order to draw a tag. For years, my family and I have been committed to supporting the local wildlife population. We currently feed around 50 head of deer and 80 head of elk on our property. This commitment comes with substantial costs, including damages to our fences and our alfalfa crop. Despite these challenges, we have always viewed our role as stewards of the land and wildlife with pride and responsibility. The landowner license program has been instrumental in allowing my children to experience the outdoors and develop a deep appreciation for nature and conservation. It has provided us with the opportunity to engage in sustainable hunting practices, which in turn helps manage the wildlife population and maintain ecological balance. Removing or reducing our access to landowner tags would not only be unfair but also counterproductive to the goals of wildlife conservation. Our efforts to support and sustain the local wildlife population should be recognized and rewarded, not penalized. The current system acknowledges the contributions of landowners and encourages continued participation in conservation efforts. I urge you to reconsider the proposed changes and maintain the current allotment of landowner licenses. By doing so, you will ensure that families like mine can continue to play a vital role in wildlife management and conservation. Thank you for your attention to this important matter. Sincerely, Whit Sargent For reference Lon Nield is the property owner and it is listed under Nag Ranch. The land is located in Smoot.

Final Comment	Sargent, Whit	Coalville, UT	6/10/2025 8:53:00 AM
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222 My overall opinion is that the commission has made recommendations to change the issuance of landowner licenses and the "cure" (increasing minimum acreages and requiring cropland) is many times worse than the "disease" (purchasing land for the primary purpose to obtain landowner licenses). From what I understand the requirement for

additional acres to 640 and 160 of cultivated cropland are to reduce the number of people buying 160 acres of land for the primary purpose of obtaining landowner licenses. CH 44 of the regulation already states "Any lands purchased or subdivided for the primary purpose of obtaining landowner licenses shall not be eligible for landowner licenses." From past conversations on this topic, the WG&FD either will not or cannot enforce this statement (too vague, cannot measure people's intent or thoughts...) in the regulation. If this is accurate, then likely the department cannot measure how many people are actually buying land for this purpose. If you cannot enforce this statement you cannot measure this statement, nor evaluate how significant the number of violations of this statement occur. I would challenge the commission to accurately define this problem that you believe exists and that it needs to be addressed by eliminating hundreds of Wyoming landowners from applying for landowner tags. In the section of Ch44 I do not see definitions for "cultivated land" nor "adequate documentation", terms being used in the proposed changes to the existing regulations. A definition from the Cambridge Dictionary for cultivation is "the act of preparing land and growing crops on it". So, the commission is suggesting that landowners increase the number of acres of cultivated crop land among a higher concentration of big game animals (2000 to 3000 days of use) in order to still remain eligible for landowner licenses. Gee, I thought the WG&FD did not want big game animals on crop land. Does the WG&FD not have enough complaints about big game damaging cropland currently, I guess we need more complaints. Then the department can open up more tags for big game on or within ½ mile of irrigated land and payout more for crop damage? What are you fellas and gals a think'in? Furthermore, does not the commissions thought process to force landowners who purchase land to keep it in agricultural use (in this case under "cultivation") run against personal property rights? If you own land, you should be able to use it for whatever purposes you want and have the same rights and opportunities as your neighbor. In reality, the property tax system already financially precludes landowners from not losing their agricultural tax assessment. Do you really need to further restrict personal property rights more? "Cultivated" is more restrictive than "agricultural". If I asked each one of the commissioners if they support personal property rights, I would bet a pretty good sum that you would all say yes. But here you are, further infringing on property owners with your new proposals. I have tried to understand where and for what reasons the two proposed requirements for 160 acres of cultivated land and 640 acres of land came from. These proposals did not come to the commission from the WWTF. WWTF took up this same issue of landowner licenses and after much negative public input, decided to not recommend the proposals the commission has stiff armed the department into, in these new proposed regulation changes. These two proposals appear to be cooked up by the commission alone, they certainly were not recommended by the public at large in Wyoming. The commission's excuse that these changes need to be made to stop people from buying 160 acres of land for the primary purpose of obtaining landowner licenses does not hold water. I have not seen any data on this on the WG&F website. The proposal to increase in acres from 160 to 640 leads the public to believe that the commission again is underhandedly trying to have big game licenses controlled by big land owners, where repeated attempts have been made to increase the number of licenses to these large landowners, and then the final step is to allow them to sell these licenses on the open market. When big game can be sold on the open market, there will be much less big game hunting opportunities for the general public, and Wyoming's way of life will take a huge hit. The reason why this topic is so important is that in nearly every area of the state, deer populations are absolutely plummeting downward, the number of permits available are dropping with the populations and objective levels, drawing odds continue to decrease (most deer and antelope draw odds are far less than 50%, many in the teens), and landowner tags while not a guarantying a permit provide a much better chance of being able to hunt and also hunt on your own property. Instead of directing the department to better understand how to increase big game populations and objective levels, the commission wastes time and resources bickering how to divvy up who should get the small number of licenses which remain available. The hunting community has lost so much opportunity in the last 50 years. Used to be that most areas of the state were open from October 15th through the end of the year and most of the state were general areas. It feels like the commission does not understand that hunting in Wyoming is a family activity, with long family traditions, and it needs to remain so. Not big company officials on company financed guided party excursions, or big landowners selling licenses to the highest bidders. As a kid I could not wait to go hunting with my father. Now, I would guess our youth may only draw one or two tags throughout their middle and high school days. And this is not due to the human population of the state increasing. This is due to a reduction in big game populations. Instead of the commission focusing on how to resolve our low big game populations, you keep focusing how to get the few licenses available into the hands of large land owners. Shame on you. Shame on you all.

223 Land owner hunting tags obviously have been a huge part of wyoming hunting for a long time. Although I don't agree with the % of land owner tags given in some hunt areas i recognize that land owners have a right to hunt their own land. often property is being bought just to acquire hunting tags. I DO NOT think the ability to sell or transfer tags to non family (military excluded) should be approved. If land owner tags can be sold it will turn into a rich man's game. If a land owner wants to sell a tag they need to either have a cap like the price of an actual tag or they should have to enter a seperate draw. Using state owned resources (wildlife) to line their pockets is not right. I vote no to transferable land owner tags.

Final Comment **McArthur, Ben** **Casper, WY** 6/10/2025 9:21:00 AM

224 Please do not allow landowners to price everyone but the rich out of hunting. Allowing them to sell landowner tags will send prices skyrocketing and have them close their lands to public use.

Final Comment **Coyen, Daniel** **N LAS VEGAS, NV** 6/10/2025 9:26:00 AM

225 A couple of things. I don't think that landowners shouldn't be allowed more than two licenses per species per Hunt area regardless of how many individual ranches they own in that hunt area. Also I believe that there should be a percentage cap of the quota given to landowners. Other than those two issues I support the proposed changes.

Final Comment **Threlkeld, Paul** **Casper, WY** 6/10/2025 9:37:00 AM

226 I have not read the proposed changes as I should and I am sending my comments based on what others have told me is in the proposal. It is my understanding part of the proposal requires a person to be a minimum 20% owner to qualify. I am a share holder of Little Sandy Grazing Assoc. Inc. located in Sweetwater and Sublette Counties and have taken care of the distribution of permits to any interested shareholders for several years. Our bylaws require that only family operated livestock operations are eligible to own shares and 20% is the maximum anyone can own. Currently, we have no shareholders that own 20% of the outstanding shares, therefore, the way I understand it, we will not be eligible for any landowner hunting permits. We have approximately 6500 deeded acres and 80,000 acres of state and federal grazing permits. Obviously, the improvements we have made in water distribution are very critical for wildlife habitat and our irrigated meadows supply feed. The downside of LSGA becoming ineligible for landowner permits is losing our desire to assist in habitat improvements and the possibility of the general public losing access to thousands of acres in the little sandy and squaw creek drainages. The only road that camper trailers and low profile vehicles can travel, passes through LSGA deeded property. We spend a great deal of time gathering livestock and fixing damaged gates, picking up trash caused by people crossing our property and the only thing we receive is a few landowner permits. I understand there have been some that see this as a loophole in the permit process and have been taking advantage, but the consequences of making such a change could have unintended consequences. There should be some thought put into the process so the people that have been contributing more than their fair share (LSGA has been in business since the 1960's) lose their desire to help. Steve Mines

Final Comment **Mines, Steve** **Farson, WY** 6/10/2025 9:45:00 AM

227 I am opposed to idea of allowing Wy landowner licenses of any type to be sold in any fashion or transfered to any person or organization with the exception of charity organizations for the disabled or veterans.

Final Comment **Bruner, David** **Cheyenne , WY** 6/10/2025 9:52:00 AM

228 Landowner tags should not be allowed to be transferred. Landowners have other avenues of making money of wildlife if they so please. Including offering trespassing fees.

Final Comment **Wheeler , Lindsey** **Casper, WY** 6/10/2025 9:59:00 AM

229 I am a current landowner of property located in the South Fork area of Park County. I was born and raised in Wyoming and grew up working on the very ranch I was fortunate enough to purchase four years ago. I have a great amount of respect for Wyoming and have been hunting and fishing since I was young. Hunting and fishing are two of Wyoming's greatest sports that can be enjoyed by people from all walks of life – which is why I am writing to express

my concern and strong opposition to some of the proposed changes to landowner hunting tags in Wyoming. These changes represent not only a threat to longstanding traditions and rights but also a broader encroachment on private property rights. My concerns over the changes to the proposed regulations, specifically Chapter 44, Section 8, can be put into four categories: 1) the effective reduction or elimination of landowner tags due to the changes in the acreage and use day requirements, 2) the definition of immediate family, 3) vague and ambiguous regulation language and 4) government curtailment of private property rights. Over the past two to three years, I have seen the price of out-of-state hunting licenses more than double. It seems apparent that reducing the number of landowner tags or changing the regulations to effectively eliminate or severely limit the issuance of landowner tags, is a strategy to increase revenue by reallocating these tags to the general draw. This tactic undermines the value of land ownership and ignores the role landowners play in wildlife stewardship. Wyoming regulations have previously provided, and still provide, that “any lands purchased or subdivided for the primary purpose of obtaining landowner licenses shall not be eligible for landowner licenses.” Ch. 44, Section 8. I believe this sufficiently addresses any concerns about individuals purchasing properties to obtain landowner tags. In furtherance of that point, I find the idea that a threatening number of individuals are purchasing up lands in Wyoming large enough to qualify for landowner tags to be somewhat of a red herring playing on the emotions of Wyoming people and a reckless disregard for Wyoming people’s common sense. I purchased my property from Mt. Baker Holdings, LLC and it is fair to say Mr. Bill Gates saw more value in Wyoming’s land and the benefits of property ownership in Wyoming than just trying to “buy up” landowner tags and turning the property into an elite hunting camp as that has not happened with any of the South Fork properties he owns. However, the availability of landowner tags was part and parcel of the marketing and my eventual purchase of the property. What is the rationale behind doubling the acreage requirement and increasing the use days by 1000 days? Changing the regulations to make landowner tags more difficult to obtain, or for some, taking away landowner tags entirely, is comparable to stripping one of the essential rights that come with fee simple ownership. These tags are not mere privileges—they are tied to the ownership and responsible use of private land. In 2021 I was issued landowner tags for elk and antelope. Three years ago, my antelope landowner tags were revoked after the Game Warden claimed insufficient use days. I responded by fully complying with the law and submitting photo evidence documenting dates and the wildlife observed which establish well over 2,000 use days. Despite meeting the legal criteria, my request was denied—demonstrating an inconsistency and arbitrary administration of these policies. This issue would be further compounded by the change to Section 8(a)(iii) which is vague and leaves room for further arbitrary enforcement. This section does not clearly indicate how a landowner is to provide “adequate documentation verifying that they meet all Commission regulation requirements governing landowner licenses.” The last thing Wyoming landowners or hunters need are regulations that are not clear and leave room for varying interpretation. As someone without direct children, I am only able to share landowner tags with my 70-year-old father under the current and proposed statutory definition of immediate family. This excludes my nephews, niece, and brother-in-law from hunting on land I lawfully purchased, again curbing my rights and impeding family traditions. I believe the definition of immediate family should include collateral descendants. I do support the inclusion of step-parents, step-children, and step-grandparents in the proposed regulations. The proposed regulations also have consequences beyond just the loss of landowner tags. I currently allow 10–12 individuals to hunt on my property annually, including children, special needs individuals, wounded veterans, and local Wyoming residents. What incentive would I—or any landowner—have to continue offering this access if I am denied the right to hunt on the property I legally own? In addition to allowing these individuals to hunt on my property, I permit Game and Fish access through a road easement to patrol nearby hunting areas. That cooperation is jeopardized if the state removes landowner tags, as there is little incentive for me to support any Game and Fish activities on my land. I have spoken with several landowners who manage large ranches and receive landowner tags. They, too, are concerned with the proposed legislation. Many are prepared to completely close access to hunters and Game and Fish personnel if these policies are enacted. Several are also willing to pursue legal action if their rights to landowner tags are diminished or compromised. In sum, the overarching issue is one of government overreach. While millions of dollars are invested in new administrative buildings, critical resources and solutions for real wildlife challenges are neglected. Rather than expanding bureaucracy, our State should be focusing on preserving wildlife and respecting those who maintain its habitats. Wyoming has always upheld strong property rights and the principle of quiet enjoyment. The proposed changes to landowner tags represent a direct and negative intrusion into these core values. In most states, landowner tags can be sold, helping landowners recoup some value from their investment. Wyoming already prohibits this. Stripping these tags after they’ve been previously granted further diminishes the value of land and the rights of those who have spent their hard-earned money investing in Wyoming’s landscapes and economies. Wyoming has always upheld strong property rights and the principle of quiet enjoyment. The

proposed changes to landowner tags represent a direct and negative intrusion into these core values. In most states, landowner tags can be sold, helping landowners recoup some value from their investment. Wyoming already prohibits this. Stripping these tags after they've been previously granted to landowners who have met the requirements further diminishes the value of land and the rights of those who have spent their hard-earned money investing in Wyoming's landscapes and economies. Finally, restricting land use and hunting access on private property runs contrary to the fundamental American right to travel and invest freely. As Wyoming resident born and raised, I can appreciate the position of other residents who do not want individuals purchasing land for the sole purposes of obtaining landowner tags; however, it is not the government's role to decide who can move into or invest in this state. I would strongly recommend the reconsideration of this legislation. It is your duty to uphold the integrity of property rights, wildlife stewardship, and the fair treatment of Wyoming's landowners. I hope you will consider the full impact of these proposed changes and work to protect the rights of landowners and the stewardship of Wyoming's wildlife.

Final Comment	Allison, Josh	Cody, WY	6/10/2025 10:01:00 AM
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230 No transferable landowner tags!!!! This is a horrible idea. Hunting does not need to be a rich man's sport. Listen to the people. We are all strongly against (of course except for the wealthy hunters and greedy landowners).

Final Comment	Jones , Brad	Story, WY	6/10/2025 10:02:00 AM
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231 Transfer/selling of landowner tags. Totally oppose. There is a draw for a reason.

Final Comment	Muench , Michael	Thermopolis , WY	6/10/2025 10:09:00 AM
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232 I wanted to send another letter to further my initial submission. I think that small landowners ultimately get hurt by this change in landowner tag requirements. The people that have worked hard to buy land or have inherited land from other family members. The large ranches are not impacted by this at all. I thought the focus was to try and kill more animals on private land to pressure them back onto public ground? This regulation change is too far reaching and must be implemented on a unit by unit basis. Landowners should be rewarded for feeding and giving habitat to 'the states' animals. If this regulation change is passed, the relationship between the Game and Fish and Landowners will be damaged. Landowners will not want to give permission to the public. Please do not pass this regulation change.

Final Comment	Richendifer, Shane	Severance, CO	6/10/2025 10:21:00 AM
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233 To: Wyoming Game & Fish From Rocky & Lisa Eades – owner H-V Ranch, 3362 Cold Springs Road, Laramie Peak Range To Whom it May Concern, We are writing to express our strong opposition to the proposed changes to the Landowner License in Chapter 44, Section 8, scheduled for a vote in July. We believe raising the minimum acreage from 160 to 640 acres won't resolve the Game and Fish Department's concerns about ranch fragmentation or the ratio of landowner tags to general public licenses. This proposed 640-acre blanket policy is a one-size-fits-all approach that doesn't account for the unique challenges in each hunt area, where landowner tag numbers, public license numbers, and species populations vary significantly. More thorough research is needed before revoking privileges from a substantial number of landowners. The proposed changes to annual use days are also problematic. Many landowners with parcels between 160 and 640 acres experience higher wildlife use days than larger properties. We contribute to wildlife support as much as, if not more than, larger landowners. Our smaller parcels are often disproportionately impacted by wildlife feeding and grazing, leading to reduced grasslands and increased fence damage. Furthermore, removing landowner licenses could incentivize many small landowners to subdivide and sell their land. This would result in more roads, fences, and increased disturbance to wildlife and the landscape. Non-profit organizations like Hunting for Heroes, which rely on tags donated by small landowners for veterans, would also be negatively impacted. Specifically, in Area 7, elk populations already exceed Game and Fish targets. Reducing landowner tags in this area, which includes significant private land, would directly lower harvest numbers. We urge you to reconsider and not implement any changes to the landowner license and annual use days. Thank you, Rocky and Lisa Eades

Final Comment	Eades, Rocky & Lisa	Douglas, WY	6/10/2025 10:22:00 AM
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234 Commissioners, This comment is in opposition to the changes proposed in Chapter 44 on landowner licenses. This subject was discussed in depth by the Governor's Wildlife Task Force and it's subcommittee, and recommendations made did not include raising minimum acres or increasing use days. Other issues surrounding these licenses may also have unintended consequences. Landowners in Wyoming are valuable to our wildlife resource for the habitat and/or access they provide. Without landowner participation, the job of the Game and Fish Dept would be extremely difficult. Passing these proposals could damage the good relationships that currently exists with many landowners and the G&F. Issues of concern pertaining to these licenses need review, specifically subdividing for more tags and caps in certain areas where landowner licenses may exceed the percent of private land within a hunting area. Ownership requirements are far too high in the proposed regulation, as many landowner families may not have a single member who owns 20%, yet the entire property is 100% family owned. Clearly, with the uncertainty of resolving these issues with the current proposals, the Commission should regroup with stakeholders and resolve the matter. Respectfully, Jeff Muratore Casper, Wy

Final Comment **Muratore, Jeff** **CASPER, WY** 6/10/2025 10:26:00 AM

235 As a Wyoming resident hunter and Backcountry Hunters and Anglers member I oppose any effort to allow transferable landowner tags. Wyoming's wildlife should not be for sale by individuals!

Final Comment **Eckerle, William** **Alta, WY** 6/10/2025 10:26:00 AM

236 I support limiting the percentage of Landowner Tags within a Unit being given to Landowners. Unit 61 doesn't have a type 2 tag that goes to Non-residents because 100% go to Non-resident Landowners. the average amount should be 320 in my opinion if the animal use hours are met. 640 contiguous acres is too much when you consider so many of the parcels are divided by small areas of public land. To obtain a Landowner license, you should have to own at least 20% of the parcel or company that owns the parcel.

Final Comment **Neighbors , Will** **Auburn, AL** 6/10/2025 10:27:00 AM

237 As a person with no skin in the game there is a simple answer to everyone's concerns. I call it enforcement. From an outsiders view it appears simple enforcement of the current regulation would solve the majority of the perceived problems without cause new problems that are yet to fully be recognized. Our Game and Fish needs to have a focus on game management and harming landowner relations seems very counterproductive.

Final Comment **Karaouni, Mike** **Casper, WY** 6/10/2025 10:28:00 AM

238 The elk herd in area 7 is so far over objective that reducing tags or making taking steps to make landowners suffer is a bad move in my opinion. There needs to be a focus on access above all because the largest problem with hunting these days is hunter density. Hunter density is the most commonly expressed concern among our friends and family.

Final Comment **Lovelace, Michael** **Casper, WY** 6/10/2025 10:32:00 AM

239 I strongly oppose chapter 44. We have been trying to get land for years just to be able to hunt yearly. This is a very upsetting change and frankly BS.

Final Comment **Ewing, Kaden** **Douglas, WY** 6/10/2025 10:41:00 AM

240 I think and truly believe that landowner tags should absolutely NOT be transferable or be able to be sold in any capacity. All that is going to do is benefit people like Wagknhound, or True ranches and allow them to profit more money. Landowners shouldn't be getting tags at all, unless it's in the draw like the rest of us. Or should be for antlerless only but there is no logical reasoning for allowing landowners to get free bull tags for hard to draw areas and be able to transfer them for any reason.

Final Comment **Kolesnikov, Ryan** **Cheyenne , WY** 6/10/2025 10:56:00 AM

241

RE: Chapter 44, Section 8, Landowner Licenses Proposed Changes Dear Commissioners, I'm writing to you to comment on the proposed changes to Chapter 44, Section 8, Landowner Licenses. My name is Andrew Anderson, I have the fortune to be part owner in 3 Wyoming ranches that all currently qualify for landowner tags. I have inherited 1/6th ownership of my great grandfather's homestead ranch located in Carbon County near Hanna. I'm the largest percent owner of this ranch. We currently qualify for deer and antelope landowner tags. I have also married into two large family ranches located near Casper, Bates Creek Cattle Company and Eagle Ridge Ranch. My wife and I own less than 5 percent of these two ranches. The largest shareholder has less than 20 percent ownership. These two ranches are managed and operated by 3 generations of family members. We are significant landowners in Areas 7, 16, and 19 elk, Areas 64 and 66 deer, and Areas 32 and 47 Antelope. We are part of the Muddy Mtn. HMA and provide liberal hunting access to private land not managed by the HMA. Under the proposed rule changes, all three Wyoming Owned and Operated ranches, that I'm a part of, would lose all their landowner tags. I have 2 other relatives, with ranches that I'm not a part of, that are in the same situation based on ownership. I do not understand the problem that is trying to be fixed by the proposed rule changes. It has not been well defined in material posted on the Game and Fish website, and what has been articulated at the 2 meetings in Casper has also not been clear. The proposed rule changes are a statewide "shotgun" approach to fix a poorly defined problem in a few hunt areas around the state. It was stated by Commissioner Masterson at the landowner and the public meetings in Casper, on June 3rd and 4th, that the Commission, even if they pass this rule as is, that they can "quickly" come back and fix any "unintended consequences" of the rule change. I respectfully disagree with this statement and believe that if any form of this rule change is passed by the Commission during their next meeting that they will not be given that chance. They will lose any confidence from landowners that they are capable of fixing the problem that they created in the first place. You will not be given a second chance to get this right. And as Commissioner Masterson stated at both meetings, and I strongly agree with, no one wants the Wyoming State Legislators to get involved, but that is exactly what will happen if you pass this proposed rule. For these reasons I'm opposed to all the rule changes that are currently proposed for Section 8 of the regulations. This rule process must be stopped, until there is a clearly defined problem, with rules that are written to specifically address that problem, without the numerous unintended consequences. Andrew C. Anderson

Final Comment

Anderson, Andrew

Casper, WY

6/10/2025 11:09:00 AM

242

Over allocation of tags in limited entry areas to nonresidents. Take a look at what is happening in the nonresident pool for elk in area 65. The Type 1 tag has a quota of 25 tags. 21 go to residents and 4 go to nonresidents. Because of the nonresident party application system, area 65 has been over allocated by 5 total tags between the last two years for area 65-1. Last year, SEVEN(counting landowners), type 1 tags were issued to nonresidents in area 65 because of party applicants. The quota was 4. 21 tags were issued to residents. This means 75% of tags for the unit were issued to residents and 25% were issued to nonresidents. This year, SIX(counting landowners), type 1 tags were issued to nonresidents in area 65 because of party applicants. The quota was 4. Projecting that 21 tags will be issued to residents this year and 6 have been issued to nonresidents, this makes for 77% of the tags going to residents and 23% going to nonresidents. Both of these over allocated groups were because of the party of 4 in the special points pool for each year. Same party, same group of guys each year. A couple ideas I have to fix this in areas that have such a small nonresident tag pool are: Reduce the party applicant size allowed for nonresidents for elk and maybe other species with very low nonresident tag number allocations. Get rid of party applications?? Take tags out of the nonresident pool the following year to make up for the over allocation of the current year. Increase the quota for residents after the nonresident pool draw to ensure 84%/16% split. 2. Commissioner tag allocations on hunt areas. The vast majority of commissioner tag holders choose to hunt in very limited areas in the greater Cody area for elk. There needs to be a quota system to limit commissioner tag holders so all the pressure isn't in just a few areas. Spread out the commissioner tag hunting pressure a little bit across the many quality units across the state. Some of these late season areas (59 and 56) that have a quota of 10 tags have more commissioner tag hunters than actual random draw hunters that have waited a lifetime to hunt these areas.

Final Comment

Pickar, Dan

Powell, WY

6/10/2025 11:11:00 AM

243

Dear Commission, Thank you for your recent communication regarding the proposed changes to the Landowner License Section and for providing the opportunity for input. Please consider the following: -When considering the amendment to the minimum acreage: -Many small landowners who currently qualify would have no recourse to meet

the amended requirements. Our property borders state trust land and 4 different neighbors. None of that land is for sale so we cannot increase the size of our property currently to meet either the 640 acre or 160 contiguous cultivated acre requirement. -While our property meets the minimum requirements currently, we would not be able to meet the criteria of 160 contiguous acres of "cultivated land" as at least 40% of the property is a forested canyon that cuts right through the middle of the property. Others in a similar situation who could cultivate more land may do so at the expense of grassland or forest, which would be an unintended consequence. I do understand that this provision is intended, in part, as a compensation for the potential loss or damage to crops. However, with more sustainable farming and ranching methods on the rise, cultivated land is not the only land that should be considered. Also, the other suggested change to include any parcel over 640 contiguous acres "regardless of cultivated land present" begs the question "Why would you lock small landowners who currently qualify out of this system based on the amount of cultivated land when a slightly larger landowner is required to possess "0" cultivated land? -Losing the opportunity for landowner tags could decrease the inherent value of the land. This could negatively affect hunters and non-hunters alike who own smaller properties. -For these reasons, I strongly oppose this change. -The number of animal use days: -Do consider that as wildlife populations fluctuate, it may be wise to make this a "floating target". A target of 3,000 animal use days may be preferred when the population is low. But a reduction could be beneficial when the population increases. Adjusting the number of tags available is effective for game management. But you may find small landowners more likely to allow hunter access if they feel they are considered a valued part of the equation. -I do support the department's prerogative to effect such an adjustment with the caveat above. -The "Landowner Applicant" significant interest: -This does not affect me (I don't think)... I don't really understand the problem. If someone has a 20% interest in a property, they would be splitting the access to landowner tags with four other positions and therefore would only be eligible every 5 years. Or, possibly one guy wants to hunt turkeys and another wants to hunt deer and maybe another is interested in elk. If their property meets the animal use days requirements, I don't see the problem. If there were 20 people, the property still only qualifies for a certain number of tags which automatically dilutes each individual's access to the tags that the property qualifies for. -I am curious why it is considered an "abuse" to become a landowner with the intent to have access to landowner tags? Many landowners who hunt make improvements to their property with the intent of creating habitat for wildlife. They also have a tendency to push the price of land up in the area which increases the value of the surrounding land. I hope this is just unfortunate wording that is not reflective of an attitude towards all hunters... -If the point of the proposal is to prevent a landowner from partnering with a hunter to allow that person access to the landowner tags... Again, I do not see the problem. We ALL know that access is everything for successful hunting. If a rancher (or any other qualifying landowner) chooses to partner with someone who hunts to allow that person the benefit of accessing landowner tags, the property still only qualifies for a certain number of tags and they are the same price as for everyone else. It seems like the risk to the landowner of creating such a partnership would limit this issue. If this IS a more accurate understanding of the problem, it seems another solution would be to allow landowners to "assign" or "sell" their tags similar to the way New Mexico handles landowner tags. That does reduce the number of tags available for non-landowner tags (it actually keeps it where it is). Similar to the comments about adjusting the animal use days, I think you will get more cooperation from landowners of all sizes to allow access (walk-in or otherwise) if they have more autonomy over this valuable benefit of land ownership and feel that you value them as a partner. -I do not see the need for this change. It will be a burden for the department to administer and will lead to a lot of headaches and frustration for hunters and possibly the landowners that they are partnering with? I admit, I don't understand the "problem" which is another reason I would not support this change. It should be better defined so everyone affected can understand what the issue is. -Expanding the definition of "immediate family member" -All for it. Landowners should have more say in this benefit, not less. Please take your time in considering these issues. Sincerely, Craig Mathews 928-951-4913

Final Comment

Mathews, Craig

payson, AZ

6/10/2025 11:12:00 AM

244

1. Over allocation of tags in limited entry areas to nonresidents. Take a look at what is happening in the nonresident pool for elk in area 65. The Type 1 tag has a quota of 25 tags. 21 go to residents and 4 go to nonresidents. Because of the nonresident party application system, area 65 has been overallocated by 5 total tags between the last two years for area 65-1. Last year, SEVEN(counting landowners), type 1 tags were issued to nonresidents in area 65 because of party applicants. The quota was 4. 21 tags were issued to residents. This means 75% of tags for the unit were issued to residents and 25% were issued to nonresidents. This year, SIX(counting landowners), type 1 tags were issued to nonresidents in area 65 because of party applicants. The quota was 4. Projecting that 21 tags will be

issued to residents this year and 6 have been issued to nonresidents, this makes for 77% of the tags going to residents and 23% going to nonresidents. Both of these over allocated groups were because of the party of 4 in the special points pool for each year. Same party, same group of guys each year. A couple ideas I have to fix this in areas that have such a small nonresident tag pool are: Reduce the party applicant size allowed for nonresidents for elk and maybe other species with very low nonresident tag number allocations. Get rid of party applications?? Take tags out of the nonresident pool the following year to make up for the over allocation of the current year. Increase the quota for residents after the nonresident pool draw to ensure 84%/16% split. 2. Commissioner tag allocations on hunt areas. The vast majority of commissioner tag holders choose to hunt in very limited areas in the greater Cody area for elk. I don't have the number off the top of my head but I speak to the local wardens about this every year and they collectively agree. There needs to be a quota system to limit commissioner tag holders so all the pressure isn't in just a few areas. Spread out the commissioner tag hunting pressure a little bit across the many quality units across the state. Some of these late season areas (59 and 56) that have a quota of 10 tags have more commissioner tag hunters than actual random draw hunters that have waited a lifetime to hunt these areas.

Final Comment

Helms, Todd

Powell, WY

6/10/2025 11:18:00 AM

245

1. Over allocation of tags in limited entry areas to nonresidents. Take a look at what is happening in the nonresident pool for elk in area 65. The Type 1 tag has a quota of 25 tags. 21 go to residents and 4 go to nonresidents. Because of the nonresident party application system, area 65 has been overallocated by 5 total tags between the last two years for area 65-1. Last year, SEVEN(counting landowners), type 1 tags were issued to nonresidents in area 65 because of party applicants. The quota was 4. 21 tags were issued to residents. This means 75% of tags for the unit were issued to residents and 25% were issued to nonresidents. This year, SIX(counting landowners), type 1 tags were issued to nonresidents in area 65 because of party applicants. The quota was 4. Projecting that 21 tags will be issued to residents this year and 6 have been issued to nonresidents, this makes for 77% of the tags going to residents and 23% going to nonresidents. Both of these over allocated groups were because of the party of 4 in the special points pool for each year. Same party, same group of guys each year. A couple ideas I have to fix this in areas that have such a small nonresident tag pool are: Reduce the party applicant size allowed for nonresidents for elk and maybe other species with very low nonresident tag number allocations. Get rid of party applications?? Take tags out of the nonresident pool the following year to make up for the over allocation of the current year. Increase the quota for residents after the nonresident pool draw to ensure 84%/16% split. 2. Commissioner tag allocations on hunt areas. The vast majority of commissioner tag holders choose to hunt in very limited areas in the greater Cody area for elk. I don't have the number off the top of my head but I speak to the local wardens about this every year and they collectively agree. There needs to be a quota system to limit commissioner tag holders so all the pressure isn't in just a few areas. Spread out the commissioner tag hunting pressure a little bit across the many quality units across the state. Some of these late season areas (59 and 56) that have a quota of 10 tags have more commissioner tag hunters than actual random draw hunters that have waited a lifetime to hunt these areas.

Final Comment

Washington, Lucas

Powell, WY

6/10/2025 11:20:00 AM

246

1. Over allocation of tags in limited entry areas to nonresidents. Take a look at what is happening in the nonresident pool for elk in area 65. The Type 1 tag has a quota of 25 tags. 21 go to residents and 4 go to nonresidents. Because of the nonresident party application system, area 65 has been overallocated by 5 total tags between the last two years for area 65-1. Last year, SEVEN(counting landowners), type 1 tags were issued to nonresidents in area 65 because of party applicants. The quota was 4. 21 tags were issued to residents. This means 75% of tags for the unit were issued to residents and 25% were issued to nonresidents. This year, SIX(counting landowners), type 1 tags were issued to nonresidents in area 65 because of party applicants. The quota was 4. Projecting that 21 tags will be issued to residents this year and 6 have been issued to nonresidents, this makes for 77% of the tags going to residents and 23% going to nonresidents. Both of these over allocated groups were because of the party of 4 in the special points pool for each year. Same party, same group of guys each year. A couple ideas I have to fix this in areas that have such a small nonresident tag pool are: Reduce the party applicant size allowed for nonresidents for elk and maybe other species with very low nonresident tag number allocations. Get rid of party applications?? Take tags out of the nonresident pool the following year to make up for the over allocation of the current year. Increase the quota for residents after the nonresident pool draw to ensure 84%/16% split. 2. Commissioner tag allocations on hunt areas. The vast majority of commissioner tag holders choose to hunt in very limited areas in the greater Cody

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Final Comment	BRESHEARS, JOHN	POWELL, WY	6/10/2025 11:22:00 AM
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247	I am against the transfer of tags. I believe it would effect the ability to access land such as the YES and HMA areas. It is hard enough finding public land that isn't land locked.
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Final Comment	Fazio, Peter	Casper, WY	6/10/2025 11:28:00 AM
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248	I'm opposed to Chapter 44 Section 8 changes. The proposed changes to landowner license requirements will result in small landowners I've hunted on around Story and Buffalo to sell off their prime deer & elk habitat to developers. The land will become hundreds of houses and the habitat will be lost forever. I hope this unintended consequence of eliminating landowner licenses for small landowners is being considered. Whatever the commission decides I hope it includes a grandfather clause for current landowner license recipients to encourage them to hold onto their properties.
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Final Comment	Sauvageau, Mike	Three Forks, MT	6/10/2025 11:28:00 AM
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249	As a young hunter I am against the transfer of tags. It is hard enough finding access to land to hunt and I think this would limit it more.
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Final Comment	Fazio, Evan	Casper, WY	6/10/2025 11:30:00 AM
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250	I am against the transfer of tags. I believe this would limit me to land that we have access to hunt because people would close land that they allow us to hunt now. I think it would effect areas like HMA and "YES" areas. It is hard enough to find land now.
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Final Comment	Fazio, Taylor	Casper, WY	6/10/2025 11:35:00 AM
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251	Transferable landowner tags are a terrible idea and panders to the already pampered ranchers and rich landowners. This goes against the North American model of wildlife management. Allowing this to happen is a slap in the face to every conservationist and sportsman's effort in the last 150 years.
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Final Comment	Barnosky , Joel	Mount Clare , WV	6/10/2025 11:44:00 AM
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252	I am opposed to transferable landowner tags. This is a slippery slope, it leads to greed and money should not be made off our wildlife in the private sector. Thank you
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Final Comment	Ricketts, Quent	Lyman, WY	6/10/2025 11:52:00 AM
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253	I'm a non resident hunter. I have been hunting in Wyoming off and on for over 20 years. I am a proud supporter of Veteran hunts and the impact they have on their lives. Im asking you to vote no on the changes to the landowner tag system mostly due to the immense impact it's going to have on their veteran community. These men and women need this and in some cases it can mean they chose life over death. Please find it in your hearts to save these programs and be a hero in your support!
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Final Comment	Travers, Jake	Sandpoint, ID	6/10/2025 11:54:00 AM
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254	As a landowner in Wyoming, I do not think transferable landowner tags are in the best interest of resident hunters or our wildlife. I don't see any state that currently allows this which has better outcomes. thanks. Alex
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Final Comment	Arnote, Alexander	Cody, WY	6/10/2025 12:01:00 PM
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255

If you the Commissioners must do something for gods sake use the Game and fish data that they spent 2.5 years working on. Brokaw's bomb throw as he went out the door is ALL WRONG!!!

Final Comment**BAll, Ken****Glenrock , WY****6/10/2025 12:04:00 PM****256**

First of all, I propose the commission includes a grandfather clause for landowners that currently receive the benefit of landowner licenses. My family and I have hunted on my brother in law's property in Wyoming for over 30 years. His property has allowed us much higher harvest success rates due to his prime elk habitat and the access his property provides us to the national forest. He will likely lose his landowner license privilege due to the increase in day use minimum requirements. 3,000 animal use days was proposed without any research or scientific backup to support this increase. Small landowners have a higher harvest success rate than the general public. In area 7, where the WDFG would like to see an elk population reduction, the proposed changes would reduce the elk harvest every fall and not help to reduce the overabundance of elk on the large landowners hay fields. The proposed changes would create the risk that landowners that would lose their landowner license privileges would sell to the huge ranch owners. These large ranches would lockup hunting access to the public and the elk harvest in area 7 would be decreased even further. Thank you for listening.

Final Comment**Sauvageau, Dennis****Brush Prairie, WA****6/10/2025 12:04:00 PM****257**

Reasons to Vote No on Chapter 44 Landowner tag changes. 1. There have been no surveys with landowner or public opinions other than here. This leaves very little ability for all parties to make dialogue. 2. The system in NO way can be a one size fits all. Each species and region need to be managed individually to get the best and most efficient results. 3. This change makes it very difficult for Game Wardens to deal with landowners and manage the wildlife effectively. 4. Small landowners are planning to sub divide to maximize their value and this creates so many problems by itself. 5. We need directed regulation to solve the actual problems without handcuffing the Game Wardens flexibility to manage.

Final Comment**Lovelace, Zack****Casper, WY****6/10/2025 12:10:00 PM****258**

Does Wyoming realize how many veterans utilize the current tag system???? These tags not only allow them to hunt but the land access is just as important to be able to have the kind of hunt needed for a disabled veteran. Please make a separate tag system for them if you plan to take away the main source of tags for them. This is not fair to take away these veterans lifeline. Also maybe some youth seasons like other states to allow our youth better hunting opportunities.

Final Comment**Lewis, Robert****Los Angeles , CA****6/10/2025 12:19:00 PM****259**

I oppose the proposed regulation change regarding landowner acreage from 160 to 640 acres and 2000 animal units to 3000 a.u. My family owns approximately 400 acres and have qualified for landowners licenses. We have owned this property in Converse County for over 30 years. Our daughter grew up here and we as a family have cherished our time spent on this beautiful land. We have spent endless hours improving the land to provide increased habitat for the wild animals that traverse and reside on our property, as well as fire mitigation in the forest. Our daughter learned to value the use of this land and she has also learned the skill of hunting. She prefers to consume wild game as this is her primary consumption of red meat. Health and wellness is very important to her and her future husband and family. Thank you for reading my comments and please consider this as valuable reasoning for keeping the current regulation as it stands. Thank you for your time.

Final Comment**Ball, Peggy****Glenrock, WY****6/10/2025 12:21:00 PM****260**

The hunting access in area 7 is already too limited. Big ranchers like Wagonhound, Turtle Rock, Cross, Hourshoe Bend etc. already have us locked out. The smaller ranchers have worked with the state to provide hunter access much more than those big ranches. If you take away the licenses from the smaller ranchers and landowners, they might lock up their land or sell to the big ranches. Either way, the general public hunter is going to lose out. If the

changes are implemented, I recommend you add a grandfather exemption for the ones currently given landowner license preference.

Final Comment	Roberts, Martin	Laramie, WY	6/10/2025 12:25:00 PM
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261 Private ground access would be non-existent if licenses are confiscated from landowners so not only would smaller parcels be fractured up to recoup costs but they would allow no access if the game and fish took the licenses. There is no reason to take them there is opportunity to hunt every year in general areas and in areas with a lot of private ground there are often leftover licenses because there is no access, this would only get worse. The best solution is to leave it how it is now or to put the landowner licenses independent of the quota and if any change needs to be made it would be to only close corporate loopholes where a minimum percentage of ownership is required.

Final Comment	Miller, Nate	Thermopolis, WY	6/10/2025 12:29:00 PM
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262 Dear Wyoming Game and Fish Commission, I very much opposed to the changes as they did not follow the guidelines of the task force. Chapter 44 proposed changes The proposed changes are not in the best interest of the wildlife. Maintaining critical wildlife habitat needs to have a high value placed on it. This should be encouraged and protected. Please make these decisions based on what is best for the wildlife. I have heard said that the small landowner 160 acres + cares and sacrifices more for the wildlife than the mega ranches that run thousands of cattle. The amount of acreage has very little to do with the quality of much needed critical habitat. Critical habitat lost is lost forever. The current direction the commission seems to be headed is penalizing the small landowner and giving it all to the largest wealthy landowners. (Hunting clubs) One outspoken commissioner should not be allowed to quadruple the acreage (shut the door)? It appears as if the movement to try to pass a bill to allow the big ranches to sell tags would need to use the tags taken from the small landowner. This is not right! Why did the task force recommendations get ignored. Was their two years of working on this just a waste of time? Vern Olson 509 499-1770

Final Comment	Olson, Vernon	Greenacres, WA	6/10/2025 12:29:00 PM
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263 i would like to express my opinion of the recent proposal of decreasing landowner big game tags. Please leave it as is. Do not make changes for the few public. Two tags per landowner is not going to make that much difference! Changing to the proposal will do more damage to the hunting privileges of us old timers unnecessarily/. The land owners will stop allowing public access to hunt and fish. they will subdivide and who will benefit from that. Leave them alone please. These landowners deal with the wild game usually daily, depending upon the type of game. They feed them with their resources whether they want to or not, they have to deal with the damage they cause, and are normally very conservative in their management. Many of these landowners allow public hunting if they are respectful of the land and landowners wishes. I realize there are a few public concerns for what reason I do not know what the motivation is. Is it possible that with the current failures of our WGF management has decreased our big game population? Just like a couple of years ago when we lost over a quarter million big game population due to heavy snow and no action from this agency. We live in Wyoming because of our freedoms and resources Wyoming has to offer. We do not need constant changing of rules. We have too many unnecessary rules now. I've hunted Wyoming for well over 45 years and have seen many changes that have not given us better results. My question is have we looked at the complaints thoroughly? Are these complaints from people that have not supported Wyoming as many of us have. Are they newcomers that whine about everything bringing their ideology with them? Respectfully,

Final Comment	Mac Lennan, Janet	Cody, WY	6/10/2025 12:32:00 PM
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264 This comment is in regard to the commission's entertainment of letting landowners be able to sell their landowner tags similar to governor and commissioner tags. As a life long multi generational sportsman of the great state of Wyoming i think this is a terrible idea. If we allow landowners to monetize tags this way we are basically legalizing a game farm. If landowners can sell their tags, and sell a hunt for the same tag none of those funds go back to the state for a public resource. Then those landowners want compensation for the feed those critters eat on their land. Yet they'll refuse any type of hunter mitigation efforts. Please Don't privatize Wyoming wildlife any more than it is now.

265 Land owners should be able to sell their tags. It's ridiculous that they can't.

266 I do not support changes being made to the landowner tag process.

267 The Case Against Auctioning Wyoming Landowner Big Game Tags Wyoming's proposed legislation to allow landowners to sell their hunting tags represents a fundamental departure from the North American Model of Wildlife Conservation and threatens to undermine the democratic principles that have governed wildlife management for over a century. Violation of the Public Trust Doctrine Wildlife in Wyoming "belongs to all and is held in public trust" by the Game and Fish Commission Should Wyoming 'landowner tags' be for sale? A bill proposes big bucks for big bucks. - WyoFile, as emphasized by the Wyoming Game Warden Association. Transferable and sellable landowner licenses are "a step toward the privatization of this public resource and away from the North American Model of Wildlife Conservation." This fundamental principle holds that wildlife belongs to all citizens, not to private landowners who happen to own property where animals temporarily reside. Creating an Unfair Two-Tiered System The auction system would create what critics call "pay-to-play" model that gives wealthy non-residents unfair advantages. Landowner licenses come "off the top" of the lottery system, meaning they're drawn before the rest of the public gets a shot. If these tags could then be sold, it would essentially "put wealthy non-residents — those most willing to pay big bucks for big bucks — at the front of the line." Reducing Opportunities for Wyoming Residents Evidence from other states demonstrates the harmful effects of such systems. In New Mexico, 38% of all elk hunting tags are issued via transferrable landowner tags, and three-quarters of those end up in the hands of non-residents. This "reduces the overall availability of tags in the draw for residents." In Wyoming, similar pressure could result in situations where "there would be potentially zero tags available in a public draw" with "the only way you can hunt this [being] by purchasing a license from a landowner." Existing Problems with the Current System Concerns about the current program already include "worries that some people use the landowner tags to market Wyoming properties as essentially hunting preserves for wealthy out-of-staters." Proposed Limits On Landowner Hunting Tags Could Cut Out Many Property Owners | Cowboy State Daily The system is already experiencing growth that threatens public access, with landowner licenses rising 26% between 2014 and 2021, from 2,800 to 3,518 statewide. In some areas, landowner tag recipients have "dominated the few limited-quota licenses available" for non-resident hunters. Conflict of Interest in Legislative Process The legislative process itself raises ethical concerns. Primary sponsor Senator Laura Pearson acknowledged she would "probably have to recuse myself...because we are landowners in southwest Wyoming." However, her decision to introduce the bill despite this conflict of interest, and the fact that many other legislators are large landowners who would benefit, raises questions about the democratic integrity of the process. Misalignment with Conservation Values The Wyoming Game Warden Association opposes the bill, stating that "the association does not feel this is the appropriate method to show appreciation to those landowners and change such as this will come at the detriment of Wyoming resident sportspeople." Professional wildlife managers and conservation organizations recognize that wildlife conservation is best served by maintaining public ownership and democratic access, not by creating private markets. Undermining the License Allocation System The legislation would "overwhelm Wyoming's license allocation system" and could "stress and pressure" lotteries in hunt areas where landowner tags have already proliferated. This systematic disruption threatens the careful balance that wildlife managers have developed to ensure sustainable hunting opportunities for all residents. The evidence clearly demonstrates that allowing landowner tag auctions would fundamentally alter Wyoming's wildlife management system in ways that benefit wealthy interests at the expense of ordinary residents and the public trust doctrine that has successfully conserved wildlife for generations.

268 Keep landowner licenses as is. We want owners to hunt on their own land to chase elk to public land. Give large landowners a large number of sellable licenses but in exchange the large landowners owner must permit the public to hunt on their land. Any rancher that does not permit public Hunting, should not receive any crop damage

payments. Property owners with at least 160 acres do not interfere with public Hunting and should not count towards the quota. There are not enough landowner licenses to have any impact on the elk population.

Final Comment	Tharp, Dennis	Kanab, UT	6/10/2025 1:15:00 PM
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269 As a Wyoming native who grew up hunting in our great state, I have always had the appreciation of the abundance of state-owned wildlife to pursue each fall. Our healthy game populations are a direct result of the hard work our Game and Fish Department puts into publicly managing the wildlife for all. Therefore, I would just like to voice my opposition to transferable landowner licenses since this idea privatizes and monetizes wildlife. Instead, I would like to see the department move in the opposite direction and think the Department's proposal to put a percentage cap on landowner licenses is a good idea. I am greatly appreciative of the habitat and sanctuary private lands provide for our wildlife, but I still think it is important to give opportunities to the general public hunter who does not own land. In some hunt areas, a majority of available licenses are allocated to landowners ahead of the public draw, leaving low or no odds of drawing a tag for the general public. Therefore, I like the idea of implementing a 20% cap on landowner licenses, and unsuccessful landowners can be put into the public draw with everyone else. Thank you for reviewing my comment.

Final Comment	Aguirre, Alex	Powell, WY	6/10/2025 1:17:00 PM
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270 Honestly, I'm not sure why we even bother to write these public comments. It seems that whatever the ranchers want, is what they get. I think it's funny that ranching accounts for one percent of the Wyoming GDP, but yet the state government continues to bend over backwards for them. Anyway, making landowner elk tags transferable will significantly impact the low income, Do it yourself hunter. Also, hunting used to be an activity to provide food as well as a connection with the land. It has now become a rich man sport and has essentially pushed all other individuals out. Why can't these landowner tags be given to youth? Disabled veterans? Separate draw? Non-motorized hunting only? Why do these ranchers get state subsidies for elk damage but yet refused to allow any hunting on their property? So now they can give all of these tags to their close friends? Or, if your pockets are deep enough, you can pay for one of these tags? These animals do not belong to the landowner! They belong to the state! And why are the land owners making profit off of these animals? I'm not sure if anyone will even read this comment, but hopefully it does reach someone and you can understand that hunting in this day and age is becoming more and more difficult due to the economy and increase in hunting expenses. Doing this will further push that divide. The majority of these land owners are multimillionaires and will just be using these extra tags for their fall hunting trip with their friends. If they want to increase tags for landowners that they can sell, then make it only available to youth, disabled veterans or poorly mobile, elderly. Frankly, most residents and non-residents are getting extremely sick of the pay to play mentality that big game hunting has become. Please, for once! Stand up to these ranchers and make big game hunting in every man sport once again

Final Comment	Scofield, Adam	HILL CITY , SD	6/10/2025 1:19:00 PM
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271 I can tell you from experience the minute the WGFD loses relationships with landowners will be the day they lose the ability to manage the herd period. Good luck

Final Comment	Suenram, Bill	Zenda, KS	6/10/2025 1:20:00 PM
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272 My name is Merlin Hitt, I am representing myself and Lee Mountain Ranch, Inc. located in Albany County. I am commenting on the Chapter 44 draft plan dated 04.14.2025, specifically Section 8, Landowner Licenses. I am against these changes: • Raising the qualifying acreage from 160 A to 640 A • Raising the daily usage from 2,000 DOU (Days of Use) to 3,000 DOU • Shifting responsibility of verification of DOU from wildlife professionals to landowners • Requiring 20% ownership in a corporation Our property (440 Acres) is held in a family corporation. Although all members are native to Wyoming, as is the case with every family, we are scattered, from California to Nebraska and Arizona to Colorado. Some of the non-residents apply and hunt whatever they draw without the Landowner tags, with the promise that when it is their turn they will get the illusive 7-1! Before incorporation, the land belonged to my parents Roy and Ferol Hitt jointly. Dad purchased 200 Acres in 1978, receiving the first Landowner Elk tag (and harvesting the first of many elk) in 1979. An additional 240 acres were added in the mid 1980's. They incorporated in 2015 to ensure their decedents would always have a place to hunt and enjoy. At the time we were

exploring options for preserving the land for future generations, the subject of sub-dividing to increase Landowner tags was discussed and dismissed; the reason being that we felt that additional tags couldn't be justified. Since incorporation the two tags have been shared among family members on a rotating basis. Because of the Landowner Tag program, Roy got to enjoy elk hunting with his grandsons and great-grandson before passing in 2022. Dad and I ran a cow-calf outfit from 1970 to 1997, headquartered just outside Wheatland. After acquiring the Lee Mountain property, the land was used for grazing, usually reserved for a small herd of purebred cattle or the growing remuda. After Dad retired and I sold my cows, the land was leased to a neighbor. As ranchers we observed sustainable agriculture practices such as grazing rotation, and invasive weed control. We developed springs to provide year-around access to water for livestock and wildlife, including Elk, deer, antelope, bear, mountain lion, and the occasional mountain sheep. In addition to providing outstanding wildlife habitat, countless hours of public hunting opportunities have been offered by Lee Mountain Ranch at NO COST. We don't charge for our hunting, never have. We have entertained a huge variety of guests: Air Force Active Duty Four-star Generals, doctors, lawyers, politicians, pastors, carpenters, plumbers, farmers, butchers, teachers, mechanics, and sometimes people who really just needed to feed their family. Quite a few youth hunters bagged their first elk or deer hunting with members of the family. I do have some thoughts I would like to share with the Commissioners, from a small landowner and an avid hunter. • I can understand the problem with subdividing a large tract just to get a Landowner tags, however, shouldn't those who have a heritage of generations be grandfathered in? • Why the need for 20% ownership? I think that further punishes the smaller landowners instead of making it harder to subdivide. Again, couldn't an exception be made to grandfather in the existing smaller landowners? • I think reducing the number of elk landowner Tags will hurt non-profit organizations that depend upon donated tags to provide services to wounded warriors, chairbound hunters and other worthy individuals. • I might support allowing Landowners to sell tags, as long as they allow public access and aren't allowed any additional tags. I'm not sure where the push to make the changes come from. I do not know if it is political, landowner or hunter driven. I can only hope the Commissioners listen to the recommendations of the wildlife professionals who make up the Wyoming Game and Fish. Thank you for your time and consideration of my comments. I would be happy to have a conversation should more information be desired. Merlin Hitt 405 10th Street Wheatland, WY 82201 merlinhitt@gmail.com 307.331.1749

Final Comment	Hitt, Merlin	Wheatland, WY	6/10/2025 1:26:00 PM
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273	We have had 345 acres at Alva WY. We have owned it since 1994. (31 years) We have 36 acres of hay and food plots. Bever Dam Springs runs the length of the property. We have the only large stock dam in this area. We raise hay, alfalfa and oat hay. We fenced off the length of the creek to keep livestock out. We have had a landowner Elk and Deer license for about 25 years. We feel that our conservation efforts and water supplies warrant a landowner license as some compensation for feed loss and damage to gates and fences from elk. Thank you for your consideration and request for comments.
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Final Comment	WHITLOCK, JAMES	SPEARFISH, SD	6/10/2025 1:28:00 PM
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274	Why are we changing the landowner tags and process. leave it alone...Bigger items to deal with then that..... to many things change all at once and you create chaos.....Just leave it alone, leave it be and move on to more important things.
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Final Comment	moody, George	green river, WY	6/10/2025 1:43:00 PM
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275	Please consider a "Grandfather Clause" for those of us that have been paying property tax for over two decades and paying to create habitat for these elk for over two decades
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Final Comment	Steinle, Butch	Casper, WY	6/10/2025 1:46:00 PM
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276	Absolutely oppose notion of landowners being able to sell landowner tags. It's the commoditization of wildlife and guts the N. American model. Also, the "welcome home" hunt idea for people who were born here but moved away is idiotic. If you want to enjoy resident benefits or similar, then a person should make the commitment to live in Wyoming to enjoy those benefits.
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Final Comment	Murphy, Bill	Ten Sleep, WY	6/10/2025 1:49:00 PM
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277

As someone who follows wildlife management science closely, I want to caution against the proposed rule changes to the landowner hunting license system. The existing 160-acre threshold rightly prioritizes habitat value, not mere land area or agricultural output. Scientific studies show that intact native habitats—such as sagebrush steppe and grasslands—are critical for species survival, particularly during harsh winters. Shifting to a model that prioritizes cultivated acreage could actively disincentivize the conservation of these key ecosystems, undermining our collective conservation goals. Moreover, raising the acreage minimum to 640 acres introduces inequity and concentrates benefits among the largest landowners, many of whom already monetize hunting access. Smaller landowners, who often steward crucial habitat patches, would be unjustly excluded. We must maintain the program's core intent: to reward landowners for preserving habitat. The suggested changes run counter to ecological best practices and sound policy.

Final Comment

richards, prescott

rock springs, WY

6/10/2025 1:52:00 PM

278

I oppose transferable landowner tags!! Thank you! Larry

Final Comment

Perkins , Larry

Cheyenne, WY

6/10/2025 2:19:00 PM

279

June 10, 2025 Wyoming Game and Fish Commission RE: Chapter 44 proposed Changes Dear Commissioners: We appreciate the opportunity to provide comments on this important and complex issue. Bates Creek Cattle Company and Eagle Ridge Ranch are significant landowners in Areas 7, 16, and 19 elk, Area 66 deer, and Area 32 Antelope. Collectively the two ranches provide access for public hunting through the HMA programs and other permission given direct to hunters to tens of thousands of acres of our private lands and additionally provide access to thousands of acres of landlocked public lands. Our ranches have a long history of working cooperatively with the Wyoming Game and Fish Department (Department) to provide access to public hunting and improve habitat for both cattle and wildlife. The proposed changes to the Chapter 44 regulations, as written, would significantly damage that relationship to the point we would have to reconsider our relationship with the Department. We value our relationship with the Department and, with the goal of preserving that relationship, we provide the following comments. In our local area landowners provide a significant percentage of the access for public hunting. In fact, we estimate that landowners provide 75% of public elk hunting in Area 19 from both direct use of private lands and access to public lands. We are positive Department staff would confirm that without those landowners providing access to their private and largely or completely landlocked public land the Department would lose any semblance of ability to manage that portion of the elk herd. Under the proposed management structure none of the most significant landowners are likely to receive any licenses. If any of those landowners pulled out of the HMA, the Department would almost certainly have to reduce the number of licenses offered to the public by far more than the number of landowner licenses removed from the public draw. One of the main issues with this proposal is that the problem is not defined. There have been comments about too many landowner licenses being issued in certain areas, but nowhere have we been able to locate a description of what too many is. We are not opposed to fixing a problem, but it is critical to define the problem first. We agree that there is certainly a point at which there are too many landowner licenses. However, what we have not heard is what the parameters are that define "too many." In defining the problem it is important to note that, due to the habitat and landownership variabilities, areas and species should be reviewed individually. Recognizing the significant amount of Department resources necessary to make these determinations by area and species, we think the process would be worth the effort. It seems plain to us that once the level of acceptable landowner licenses is determined, a cap on landowner license should be placed at that level. We understand that it has been suggested that the Wyoming Game and Fish Commission (Commission) lacks the authority to place a cap on Landowner licenses - we disagree. Admitting that we are not attorneys, the Legislature gives broad authority to the Commission to administer Landowner licenses on only three conditions in WS 23-1-302(h): It must be for the "purposes of promoting the maintenance of wildlife habitat", "attaining wildlife management objectives", and that the license issuance must be "without subjection to prescribed means of competitive public issuance." WS 32-1-302 describes the powers and duties of the Commission inclusive of the power to administer a license draw system writ large. Logically it follows that the word "public" in this section would refer to all persons potentially regulated by the Commission. While we were unable to determine when WS 23-1-302(h) was enacted, we believe it generally to have been circa 1970 give or take a decade. The 1970 Black's law dictionary definition of "public adj." refers to the whole body of people and specifically states "not confined to private or individual interests."

We are unsure how a cap on landowner licenses for an area, even one that had a “competitive draw” could be construed as open to the “public” as used in this statute. We would also offer that there are other ways to address this concern, should it persist. For example, a 100% preference point system could be relatively easily administered, where qualifying applicants are placed on a list and licenses are simply awarded top to bottom, thereby not being “competitive.” Furthermore, we would submit that the list method would be the best way to administer licenses, where a cap existed, as landowners would be able to easily understand the system and hopefully it would not be too burdensome for the Department to administer. The 20% significant interest component has vast unintended consequences, targeting traditional family ranches. This provision would disqualify most if not all traditional family ranch members. Ranches are generally passed from generation to generation slowly for various tax and other reasons. Therefore, ownership is commonly vested in multiple generations at any given time, and once in the third generation simple math generally prohibits any one member from having 20% ownership. In our case, a ranch that is transitioning from the second to third generation, not a single person would qualify for a license. In order to avoid this problem, we estimate the percentage would have to be dropped to 5% or lower. Additionally, we question whether the Commission is the appropriate body to determine ownership in a company or trust etc. The Commission is far more suited to determine the number of overall licenses and what qualifies a particular entity, rather than which individual in the entity receives the license. We understand the goal of the 20% is to limit the “corporate abuse.” It seems that if the intent is to obtain landowner licenses even the 20% ownership is not going to result in the reduction of the number of landowner licenses obtained by a corporation. People would still be able to structure lands and companies to obtain the maximum number of licenses. Furthermore, it is unclear to us how creating framework around which individual in a corporation receives a license constitutes “promoting the maintenance of wildlife habitat” or “attaining wildlife management objectives.” In our estimation, the “abuses” are more likely to be non-resident landowners. While we appreciate the constitutional concerns about getting rid of non-resident landowner licenses altogether, the Commission could certainly assign resident/non-resident percentages with a landowner license cap, as they do with all other license draw types. This would likely more effectively address the issue that the “significant interest” portion of the proposed regulation was seeking to fix - better than any convoluted ownership percentage framework. It would also really limit the subdivision of properties by non-residents to obtain more licenses. The word “contiguous” should be removed from the definition of acres in the landownership. We do not understand what the significant difference between contiguous and non-contiguous acres is. We do not support the changes to minimum acreages, which were not recommended by the Task Force. Use days are what should matter. If the Commission is providing licenses for stewardship of the habitat services, then use days are what truly matter. If a smaller landowner provides the same number of use days as a landowner with 10,000 acres it seems arbitrary to reward one landowner and not the other. If the Commission is still concerned, we suggest considering a simple tiered system. For example, 2,000 use days could be 1 license and 3,000 could be 2 licenses. If the Commission moves forward with the 640-acre minimum, there needs to be some exceptions language included to allow for access to be considered. An example that has been used at Commission meetings before, is a landowner in our region that has less than 640 acres but provides critical access to the most used block of public land for the Area 19 elk herd. In order to incentivize hunter access to public lands and to aid the Department in meeting management objectives, the Department should be given the flexibility to award landowner licenses to landowners that provide meaningful access to public lands, even if they do not meet the 640 acres. There are certainly cases where more hunter opportunity is lost through restriction or loss of access to public lands than direct opportunity on public lands. We are against landowners having to prove their use days. We are landowners, generally not trained wildlife biologists. Having landowners certify their use days will either result in a requirement to hire a third party to make that determination or create potential for significant abuse. While we are happy to certify the number of acres that we own, the use days should be up to the Department. We are also not against reasonable recertification. Wildlife use certainly changes over time and we don't object to a reasonable relook at our qualifications. We are also generally against grandfathering. The Department should have the flexibility to manage the landowner license program commensurate with whatever the current habitat and ownership situation is. Landowner licenses are not property rights and grandfathering would turn them into de facto property rights. We have heard that these rights would not transfer if the property ever sold but the reality is that the system required to actually enact that ideal would be so complicated and impractical to implement that it is ill advised. Wildlife patterns change and so do landownership patterns; the landowner license program should have the flexibility to change with it. In light of the serious issues with the current proposal, we urge the Commission to stop the current rule making process, work with the Department to define what level of landowner licenses are a problem, and then work with stakeholders to find a solution tailored to fixing the problem. We appreciate your time in considering our comments and hope that we can

find a path forward that recognizes and maintains the longstanding relationships between the Department and landowners and which aids the Department in enacting their statutory goals. Respectfully submitted, Joe Scott Andy Anderson Eagle Ridge Ranch Bates Creek Cattle Company

Final Comment	Scott, Joe	Casper, WY	6/10/2025 2:24:00 PM
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280 You should not allow transfer of land owner tags. This is the first step in privatization of hunting in your state.

Final Comment	Cole, Daniel	Ortonville , MI	6/10/2025 2:33:00 PM
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281 Dear Commissioners, As a landowner, I'm opposed to the CH 44 proposal. I've attended both the general public and landowner meetings in Casper. The 400% increase in minimum acreage and 50% increase in use days is substantial. This could lead to landowners not participating in Access Yes or potentially selling/subdividing their property. For example, Landowner's involved in the Muddy Mountain HMA may remove their property therefore drastically reducing public access. The Game Wardens responsible for Area 19 said this would severely limit their ability to harvest an already over objective herd. Currently our ranch has over 4,000 acres in "Carbon County Walk in Area 13" and we've decided not to renew until we see how the commission votes. I believe the 20% ownership interest is too high. Considering that some large multigenerational Landowners may not have an applicant with 20% ownership. It's inconceivable that a large family ranch wouldn't qualify because of proper estate planning. I understand the reasoning but believe a smaller ownership interest of 3-5% would achieve the overall goal. Reducing the number of Landowner tags would directly affect organizations such as Hunting with Heros. These groups rely heavily on donated tags. According to Dan Currah, Hunting with Heros receives approx. 90% of their tags from Landowners. Reducing the opportunity for disabled vets to get into the field, I would hope, is an unattended consequence of this proposal. We have donated tags in the past and will continue to support these organizations. Implementing one policy that covers the whole state and multiple species may not be the best approach. If certain areas/regions are the problem, identify and propose changes to those specific areas/regions. A possible solution could be establishing a cap on Landowner tags. Landowner tags accounted for 2% of total tags statewide. Reducing landowner tags, in most areas, isn't going to significantly increase the Sportsman's draw odds but will reduce access as well as wildlife habitat. If changes are to be made, grandfathering current qualifying Landowners would continue the vital relationship between the Landowner and Game and Fish. Thank you for your time. Sincerely, Brian Bummer

Final Comment	Bummer, Brian	Casper, WY	6/10/2025 2:38:00 PM
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282 The current proposal solves nothing. Taking 2% of that tags away from land owning tax payers that build habitat and control a lot of public access to give back to the public draw pool is ignorant. With all the biologists and other opportunities, you guys can't figure out a better management program that continues to reward those of us that hunt, own land, cultivate our property, and donate tags to "Make a wish" style hunts for youth and veterans?

Final Comment	Scott, Joe	Evansville, WY	6/10/2025 2:50:00 PM
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283 Considering my nephew is restricted to a Carnivore / organic diet, we are heavily dependent on these land owner tags for sustenance. This was actually the original design for the program and why we spent over a million dollars on property and land development, its crippling to thing we have to try and alter our required diet, especially with the toxic and current issues on food. Additionally we can't draw tags in our area and I have two of my husbands friends that applied for over 15 years just go get a bull elk tag in area 16. This cripples our family and solves nothing.

Final Comment	Steinle, Audrey	Casper, WY	6/10/2025 2:59:00 PM
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284 Keep WY wildlife in our hands. No landowner Transferable Tags, please. Our wildlife resources quickly becoming available only to the rich and famous. Unfordable to the common man and especially youth. I understand the landowner's plate and trying to eat with a can from their generational ownerships. But the wildlife belongs to us all let's keep it that way. Thank you for your consideration.

Final Comment	FUNK, THOMAS	Encampment, WY	6/10/2025 2:59:00 PM
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285

June 10, 2025 Wyoming Game & Fish Commission RE: Chapter 44 Proposed Revisions Dear Commissioners: The Wyoming Stock Growers Association (WSGA) appreciates this opportunity to provide comments regarding the proposed revisions to Chapter 44 as they relate to landowner licenses. We have been directly engaged in discussions regarding this matter both with the Wildlife Task Force and with the Commission at your earlier meeting in Saratoga. WSGA is generally supportive of the new and revised definitions proposed in Section 2 of the rule. However, we repeat our frequent request that the definition of "Landowner Applicant" be broadened to include a long-term employee actively engaged in the management of the land. WSGA suggests five years as the minimum required employment. WSGA supports the increase to 640 acres for rangelands. However, recognizing that parcels between 160 acres and 640 acres have, in many instances, been valued in part reflecting the value of landowner licenses, we urge that parcels in this range remain eligible for landowner licenses until there is a change of ownership due to a sale of the parcel. We find the provision in Section 8 (a) (iii) "The landowner applicant shall be solely responsible to provide adequate documentation verifying that they meet all Commission regulation requirements governing landowner licenses." Somewhat confusing. Does this preclude the landowner from engaging a local WGFD representative in determining whether the requisite number of use days have been met? At this time WSGA does not support the increase in use days from 2,000 to 3,000. The current number of use days can have a significant impact on a ranching operation dependent on the season and manner in which those use days occur, Further analysis of these impacts should be undertaken before initiating a wholesale increase in the minimum use days. WSGA thanks you for your consideration of our comments. Sincerely, Jim Magagna Executive Vice President

Final Comment

Magagna, Jim

Cheyenne, WY

6/10/2025 3:01:00 PM

286

I am not even a land owner, but I don't understand why we would restrict tags to the men and women that pay and do so much and limit their ability to hunt in their own state and land. If you owned land and could not hunt your own property wouldn't that decrease the value of the property significantly and be incredibly ignorant? Wyoming is already way behind in land owner tags and I doubt any of you commissioners even study the laws in other states. Most of you don't even attend the current meetings we hold around the state yet you want to govern people?

Final Comment

Williams, Frank

Casper, WY

6/10/2025 3:03:00 PM

287

Wyoming has the most conservative landowner tag system in the entire region. Every other state around us recognizes the importance of the landowners and the value they bring to wildlife and its existence. There is a very small group of people with no skin in the game stirring the pot for change and for some reason this is now an issue that the landowners have to deal with. Do those hunters spend their hard earned money on land and habitat improvements? Do those hunters have to spend time and money fixing fences every year? Do those hunters appreciate the access that is currently provided from private landowners? Do these hunters understand the with this change hunter crowding will increase and less pressure on private lands will compound the problems of herd management? Find accurate and targeted regulations to fix the problems not a mass wide range change.

Final Comment

Lovelace, Jeremiah

Casper, WY

6/10/2025 3:04:00 PM

288

Greetings Commissioners, I respectfully request you consider the following before making changes to landowner applications: I believe a sound scientific approach should be made to determine the length of time elk, deer and antelope are on property for the 2,000 -3,000 days required to meet the new requirements. I suggest it be something better than counting feces. I also suggest whatever determination is made is explained and available to the public. Thank you.

Final Comment

Begley, Patrick

Casper, WY

6/10/2025 3:05:00 PM

289

We would like to weigh in on the side of the long time resident small acreage landowner.. There have been numerous well thought out and researched suggestions on the proposed changes to the Landowner Licenses program, submitted so far to the Commissioners. We hope that you will seriously consider these before making your final decisions. Our 160 acres has been in the family for over 50 years. It is in an extremely remote, rugged, undeveloped area. We have elk calving grounds, live springs, shelter and nourishment for numerous species of wildlife: elk, deer, mountain lion, bear, the occasional wolf, turkey and many smaller critters. With our permission, we have allowed private hunting to others. It seems unfair and not inline with the Wyoming spirit to punish the small

resident landowner because of those 'gaming the system'. At the very least, please consider adding a Grandfather Clause that would retain the current regulations. Then figure a fair way going forward to limit unfair acquisition of licenses. A couple of other considerations 1) As octogenarians, having to provide proof of wildlife use ourselves is too much to expect. 2) Losing the ability to obtain a Landowner License will indubitably negatively affect the value of our properties. 3) As a consequence, many properties may be subdivided, therefore subjecting wildlife to increased stress and loss of habitat. Thank you for your thoughtful, fair consideration of our concerns and suggestions.

Final Comment

FIRESTONE, GAY

CHEYENNE, WY

6/10/2025 3:07:00 PM

290

I want to propose a scale system for landowner tags. 1. In areas where herds are under objective the landowner will get only one tag 2. In areas where herds are over objective allow the landowners two tags Some kind of scale related to herd quantity seems to be a good middle ground. Also I believe cause a feud with landowners with ultimately led to less access and make it harder to find a good hunting spot.

Final Comment

Stroope, Cory

Casper, WY

6/10/2025 3:12:00 PM

291

Dear Wyoming Game & Fish Commissioners, My name is Andrea Gumm, and I live in Pocatello, Idaho. I am a fourth-generation hunter and outdoorsman, working diligently to raise the fifth generation of the same. Both of my parents were born and raised in Kemmerer, and I consider southwestern Wyoming part of my home. I'm now passing on my love and appreciation for hunting and conservation to my son, but the landowner acreage change proposed in Chapter 44 threatens the ability to do that at our property and with our family. My father, along with his siblings, is a landowner in Lincoln County on a beautiful 300-acre generational homestead property. Hunting was a way of life for my immigrant ancestors, who fled Czechoslovakia in the early 1900s for prosperity and safety. They found and fell in love with Western Wyoming. Hunting and caring for our land have been a part of our family for over a century, and it is woven into the fabric of our family culture. My great-grandparents, grandparents, parents, uncles and cousins have poured decades of blood, sweat, tears and money into keeping our property together and pristine. It is uniquely located within various elk, deer and pronghorn migration routes, along the great wilderness of national forest and BLM lands. We recognize the responsibility our family has in keeping our property both accessible and fruitful for wildlife in our region. Our family has practiced this for generations. We also understand the role hunting plays in conservation, and the invaluable lessons it teaches our young people. Hunting remains a way of life for our family, and it is because of our homesteaded property and our ability to hunt together that it remains that way. Myself along with my father, uncles, aunts and cousins now live across Wyoming, Idaho and Nevada. Hunting at our family property is our family's way of remaining connected. We live in a world now where relationships are easily discarded, technology takes the place of people, and many have lost sight of the value in truly understanding where we come from and what makes us. I'm proud of our family. We've gone through trials and tribulations like any family, we don't always get along, but through the decades we've remained loyal to two things – each other and the ranch. In the summer, my cousins and uncles get together at the ranch and while fixing fence and moving water, they discuss schedules, who has tags, and what weekends they can come together in the fall. And when fall comes, we hover around the old dining room table under a gas lantern and tell the stories of missed opportunities, the thrill of the chase, and if we're lucky, we're exhausted from helping each other through a successful harvest. Perhaps the best part of the hunt is reminiscing on hunting seasons passed, with our own parents and those who went before us. We hike along the place where we left the ashes of my grandfather, and we sit with our rifles and packs against the tree where his weathered cowboy hat is nailed. We understand the gift and the responsibility of our landowner tags. It is not lost on our family. We honor it, and we're raising our kids to do the same. Without the ability for my dad, myself and my son to access landowner tags, the State has incredibly complicated one of the vital ways we keep our family traditions alive and one of the vital ways we can ensure our children and our children's children honor hunting, land management and wildlife conservation. I understand there are individuals who purchase large swaths of land and then subdivide it for the purposes of profit, using the promise of landowner tags to make their newly subdivided properties more marketable and profitable. Please do not punish generational landowners like us for the greedy deeds of others. I propose the Game and Fish create a multi-stakeholder process to take an even closer look at this issue. I would like to see more work done with other agencies and land managers, including the real estate industry and county governments, to propose a variety of options to solve this dilemma. Perhaps even look to neighboring states like Idaho and Montana to understand if and how they are addressing similar issues. The solutions to this issue should not unintentionally punish those who care for the landscape in a way the benefits and enhances wildlife

for the state. Commissioner Roberts – you said in your bio online that you “want to see the older generation of outdoor enthusiasts get more involved in mentoring youth...” What we are doing with our property is exactly that, and the ability we have to access landowner tags provides us with an incredibly unique way to mentor our youth. My ancestors are buried in the South Lincoln Cemetery in Kemmerer, including my mother who taught me to put time and effort into things you care deeply about. I care deeply about this issue. And with this letter, I can stand over their graves and under their gaze knowing I tried my best to keep our family connected in the ways I know how. We are trying to keep our family “Forever West,” just like the Wyoming slogan. This proposed change largely threatens that, and it scares us all. Thank you for your time, Andrea Gumm

Final Comment	Gumm, Andrea	Pocatello, ID	6/10/2025 3:14:00 PM
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292 Dear Wyoming Game & Fish Commissioners, My name is Mark Krall, and I live in Inkom, Idaho. I was born and raised in Kemmerer, Wyoming and I am a third-generation hunter and outdoorsman. Me, along with my siblings, own and care for a 300-acre generational homestead property in Lincoln County. The land has been a special place for my parents and grandparents, and because of their hard work and the work of my family and our children, it remains a pristine wildlife habitat for a variety of migratory wildlife species across Western Wyoming. Part of my responsibility as an outdoorsman is passing on the lessons in hunting and conservation to my children and grandchildren. The landowner acreage change proposed in Chapter 44 threatens my ability to do that at my property and with our family. For over 100 years, hunting and land cultivation have been foundational to my family and the lessons we are teaching our children and grandchildren. We have worked diligently, consistently and thoughtfully to keep our property balanced with the habitat needed for various species to live and thrive in our region. Along with the work that goes into that, we have utilized the use of landowner tags to bring our family together in the fall to hunt and remain connected, as many of us are now located in different states. I acknowledge the responsibility our family has in keeping our property accessible and productive for wildlife. I also recognize the role hunting plays in conservation. Hunting at the place we work so hard to maintain is an incredible way to instill these lessons into our future generations, and I will be incredibly disappointed in the leadership of the Game & Fish if they strip us of that opportunity. This proposed change will impact my ability to pass along important ancestral experiences to my grandsons and ultimately put a stop to one of the vital ways my brothers and their children remain connected. I ask you reconsider this proposed change and evaluate more collaborative ways to address the issue. Thank you, Mark Krall

Final Comment	Krall, Mark	Inkom, ID	6/10/2025 3:15:00 PM
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293 Keep land owner tags the same. Land owners have a significant impact on the habitat and management of their property and the animals that inhabit it. The benefits include longevity and conservation to our wild life.

Final Comment	Lovelace, Amanda	Casper, WY	6/10/2025 3:25:00 PM
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294 To the Wyoming Fish and Game Commission June 9, 2025 INTRODUCTION This is Reid Lance Rosenthal. I write on behalf of a number of owners (some of whom also plan to submit comment) of five ranches in Albany and Converse Counties. These include Laprele Creek Ranch, Creek Bend Ranch, hidden Canyon Ranch, Big Country Ranch and Quiet Shadows Ranch. I am the manager and an owner in three of such ranches and involved with management on the other two. i am a Wyoming resident residing in Converse County. POSITION STATEMENT The proposed rule changes to Chapter 44 are ill advised, will have unintended consequences including adverse effects to public access, game herd quality, herd management, optimum harvest, land use and habitat conservation. In addition, the proposed rule changes might violate property rights, degrade habitat, spur subdivision, affect market values and adversely affect enjoyment by both Landowners and general public. Given the detrimental affects of the proposed rule changes, the opposition of F and G field staff to such changes and the apparent contradiction between other stated F and G goals (for instance elk herd population numbers in Area 7, we are perplexed as to the underpinning of the proposed rule changes. Politics should play no role. SPECIFIC COMMENTS The proposed rule changes will, or will likely have the following Landowner, general public, management and biological consequences: 1) The application to fixed criteria on a state wide basis is doomed to failure. Wyoming is far too topographically and habitat diverse, even valley to valley to apply a one size fits all approach to recreation or biological realities 2) will reduce overall number of hunters, with deleterious affect on game management objectives (for instance elk population control in Area 7. Perhaps the number of licenses will remain constant, but the ability to use these

licenses relative to herd migration, access, and seasonal fluctuations of elk (and mule deer) numbers at certain elevations in certain parts of the season 3) The set acreages are inapposite to reality. The Commission is not suggesting that there are less elk or wildlife on a 630 acre ranch, then an adjacent 640 acre ranch at same elevation, with similar cover, forage, cultivation, and water resources, are they? Or a 300 acre ranch with 155 cultivated acres will have less wildlife days than an adjacent 300 acre ranch with 160 cultivated acres> 4) there is no differentiation between nor consideration of habitat and critical habitat, for instance critical winter habitat 5) There seems to be no consideration on grandfather clauses. What about Landowners who have owned their property, improved and managed it for years predicated on the existing regs, have been good stewards that provide habitat, have not subdivided? There is no consideration for those folks in this ill conceived one arbitrary size fits all approach 6) There is no consideration for water resources and improvements. Both are critical to wildlife habitat. A 640 acre ranch with poor or limited water will as biological reality support less animal (wildlife) units than a far smaller piece with excellent water, reservoirs, developed springs and tanks and/or live water. 7) There is no consideration for Landowners who have placed all or a significant portion of their property in Conservation easements 8) It is highly unlikely that a Landowner who has enjoyed and relied upon Landowner tags in the past will continue their public access policies as they have in the past, eliminating public access that previously existed. 9) What about Landowner entities which own ranches contiguous to one another --neither fitting the one size fits all approach, but together easily qualifying under the cultivated or overall one size fits all approach. 10) Landowners no longer receiving Landowner tags will enter the general draw, increasing the number of applicants and decreasing chances for general public to draw a tag 11) It is an absolute given that landowners precluded from obtaining Landowner tags will in a number of cases arrive at the conclusion, "if I can't enjoy it, then this land becomes a money deal" conclusion, spurring subdivision with material adverse consequences to wildlife populations, herd quality and health and conservation. 12) There appears to be no differentiation by and between Landowner and species, or acreage required for different species. 13) The reduction in Landowner licenses, and resulting decrease in disabled and military vet donations speaks for itself. A bad idea. 14) The definition of "contiguous" is foggy at best. What about a ranch that is split only by a county or state highway? Irrigated ground on the same ranch split by a ridge does not qualify? 15) The 20% ownership requirement is not realistic, nor does it comport with reality in today's farm/ranch family ownership structure. 16) What is the reasoning behind the increase to 3,000 animal days from 2,000 animal days as a criterion? A ranch that provides feed and habitat for 150 elk for 20 days contributes less to the system and the wildlife than a ranch that feeds 200 elk for ten days? Summer, winter, fall, spring. What if the ranch is key calving or fawning lands? SUMMARY It is our opinion that these proposed regulations, undermine wildlife management goals, decrease public access, make more crowded the general draw system, do not offer "compensation" to Landowners who must put up with crop loss, fence repair, special enclosures for hay yards, and etc. They were obviously promulgated, with all due respect primarily by folks, who know little of wildlife, hunters, hunting pressures, ranch and farm operations or ownership structure, all seemingly to fix a "problem" which amounts to roughly 1400 licenses (elk--less for other species) out of 81,000 issued licenses going to Landowners, who--last time we checked are also members of the Public. On a philosophical basis, taking rights from existing owners who have relied on those rights in management and other decisions is a taking and becomes a reach back precedent. Once begun a Commission different than this one might in the future require 5,000 acres, 10,000 acres, or other forms of future subjective limitations. We suggest at a minimum: --that your field personnel and regional managers be afforded opportunity to comment --that these regs be shelved for further meaningful study --that the Commission approve grandfather status under existing regulations for all Landowners/ranch/farms --that the Commission implement regulations which apply to newly subdivided lands (2025 and forward, with a variation of these restrictions to dampen rural subdivision and license games/marketing that correlate with such subdivisions. This would also put potential buyers and owners "on notice" particularly if coupled with a subdividing seller's mandatory disclosure --that concerns such as we have enumerated in 1-16 above be addressed by folks familiar with wildlife, wildlife management, migration patterns, critical habitat and related crucial considerations. --Potentially tying Landowner permits to some number of required public access permissions for a certain number of days during the respective season for species --that thought be given as to how to more precisely target and administer any new regulations by drainage, township, area or at least region including specific goals and objectives for the regulation change. Thank you for your time and consideration Respectfully, Reid Lance Rosenthal (307 251 0786) cc Owners

295 If the purposes of these changes are top open doors similar to bill 118, I would voice my opposition to this. This was voted down by the people. vote NO to this

Final Comment **Scofield, Kyle** **Anaconda, MT** 6/10/2025 3:31:00 PM

296 I oppose any regulation that lallows transfer of landowner licenses. The entire purpose of these licenses is to allow property owners to hunt animals in limited quota areas where they may be causing damage on their private property. Landowners are now abusing the system and trying to profit from public wildlife instead of addressing the damage issue. I applaud the game and fish for increasing the acreage.Required to apply for a landowner license.I also think landowners should only be able to hunt their personal private property with the landowner tags that they receive.

Final Comment **DeBolt , Brian** **Lander, WY** 6/10/2025 3:32:00 PM

297 I oppose the transfer of land owner tags ...

Final Comment **Huschle , James** **Newcastle , WY** 6/10/2025 3:53:00 PM

298 I oppose the proposed changes to chapter 44. The proposed changes do not fix the problem. If there are large ranches selling small parcels to attract out of state hunters, please address that problem directly. The proposed 20% ownership is arbitrary, the landowner tag goes to the land no matter how many family members may be involved, trying to set percentages of ownership hurts the existing landowners and doesnt solve any problem. The change from 160 to 640 acres will result in damaging those landowners who are the backbone of Wyoming' game protection, feeding, and game law enforcement. These are the stewards of our game lands. Please do not damage them while trying to solve a different problem. Respectfully, Randy Parker

Final Comment **Parker, Randy** **Casper, WY** 6/10/2025 4:02:00 PM

299 Dear Wyoming game and fish, Hi, my name is Connor Gumm. I am a 11-year-old boy from Pocatello, ID. A long time ago my family immigrated from Czechoslovakia to Wyoming and homesteaded land outside of Kemmerer. Hunting was a big part of how they lived. So, I would like to follow in their footsteps by hunting at our family property. My grandpa is a big-time hunter too and it would make me so happy if I were able to hunt with him at our cabin. But sadly, we only have about 300 acres, so if you change the rule in chapter 44, we won't have enough acres to receive a landowner tag. So, it will be very hard for me to hunt in Wyoming with my Grampa. I hope you take my point into consideration. From Connor Gumm

Final Comment **Gumm, Connor** **Pocatello, ID** 6/10/2025 4:09:00 PM

300 Landowners should not have the ability to transfer tags. It will create profit for landowners from our wildlife. They are compensated for wildlife on their land. They should allow public access if they continue to claim damage on their property.

Final Comment **Erickson , McKay** **Afton, WY** 6/10/2025 4:12:00 PM

301 John Joseph Fanto Public Comments to the Wyoming Game & Fish Commission 6/9/2025 I respectfully offer the following comments regarding the proposed changes to Chapter 44, Section 8: Landowner Licenses. 1. Opposition to Increased Acreage and Animal Use Day Requirements I strongly oppose the commission's proposal to increase the qualifications to 160 acres cultivated or a minimum of 640 acres and increasing the animal use days to 3000. • Lack of justification: There is no explanation for the changes in the minimum acres and animal use days in the Statement of Reasons for Chapter 44. The commission should provide clear data and reasoning for these specific thresholds. • No Task Force recommendation: The 2021-2022 Wyoming Wildlife Task Force did not make a recommendation to change the minimum acreage or animal use days required to qualify for a landowner license. • Solution in search of a problem: What specific problem is this trying to solve? Under the current regulations, the 160-acre to 320-acre landowners are not subdividing their property to get more landowner licenses. The current system is functioning as intended. • Unintended consequences: Many smaller landowners have indicated they would have financial incentive to subdivide their properties into 40-acre tracts and sell them if these changes are approved. This

would fragment critical wildlife habitat - the opposite of what these regulations should encourage. • Economic impact on rural families: These changes would disproportionately affect smaller family operations that have been responsible stewards of wildlife habitat for generations.

2. Support for Current Regulations I support keeping the current regulations in which landowner licenses are issued to those landowners who own land which provides habitat for antelope, deer, elk, or wild turkeys and meet the requirements of 160 contiguous acres and 2000 animal use days in the 12-month period prior to the date of application. This system has proven effective and should be maintained.

3. Alternative Solutions for Areas with High Landowner Tag Percentages I would support a cap of 30% on the number of landowner tags available in an area that is below the herd objective for that big game species. If that is not feasible, an alternative solution for areas with a high percentage (>40%) of landowner licenses would be: If the number of landowner licenses in a given year exceeds 40% of the licenses available, reduce the landowner licenses to one license for each qualifying landowner.

4. Area-Specific Context Our property is in elk area 7, where the elk herd is over the WG&F objective. The available licenses under the current regulations are 1500 any elk and 350 type 2 (5 point or less) and unlimited cow tags. Therefore, it is not necessary to limit the current number of landowner tags for this area. There are only a few areas and game species that have a high percentage of landowner tags (>50%) so, address those areas.

5. Corporate Ownership Reforms I support efforts to end the abuse of the landowner licensing system by large corporations by requiring an individual own 20% or more of the corporation. However, family trusts, family LLCs and family corporations should be explicitly excluded from this requirement. An applicant should qualify if the applicant is an "Immediate Family Member" of the individual, family trust, or family LLC that owns the land regardless of percentage ownership. This preserves the intent while protecting legitimate family operations.

6. Grandfathering Provision At a minimum, if modifications to landowner acreage requirements are implemented (e.g., increasing from 160 to 640 acres), existing landowner license holders should be grandfathered in under the current rules. This would ensure a smooth transition and recognize the investments current landowners have made in wildlife habitat improvement based on existing regulations.

7. Economic and Conservation Considerations The proposed changes fail to recognize that many smaller landowners are the backbone of wildlife conservation in Wyoming. These properties often provide critical migration corridors, winter habitat, and water sources that are disproportionately important to their size. Penalizing these stewards could lead to:

- Loss of wildlife-friendly land management practices
- Conversion of habitat to development
- Reduced cooperation with wildlife management agencies

Background and Stewardship Record Our family has owned 202 acres in Converse County and qualified for a landowner tag for the past 25 years. Our property provides critical habitat for elk, deer, and wild turkeys and is located in an elk calving area at the headwaters of La Prele Creek.

Habitat Improvements:

- Enrolled in a Forestry Stewardship Program involving habitat improvements, including thinning trees removing deadfall, beetle kill trees, and slash from previous logging operations
- Currently thinning lodgepole pines in two old clear cuts as an ongoing conservation effort
- Annual management and control of noxious weeds to preserve natural biodiversity
- Development of natural springs and construction of a permitted pond providing reliable water for wildlife during drought conditions
- Maintenance of native brook trout population through ongoing stewardship

Community Benefit:

- Providing catch-and-release fishing opportunities for children, friends, and neighbors
- Offering hunting access for youth, friends, and neighbors
- Active participation in local conservation efforts

Our property features an expansive meadow that serves as vital feeding ground for elk and deer year-round. This demonstrates how smaller properties can provide outsized conservation benefits when properly managed.

Conclusion The current landowner license framework—granting licenses to those who own at least 160 contiguous acres and provide 2,000 days of annual animal use appropriately balances wildlife management objectives with recognition of private landowner contributions to habitat conservation. The proposed changes lack justification and could undermine the conservation goals that they are intended to serve. I respectfully urge the commission to maintain the current regulations with respect to the acreage and use days requirements that have proven effective for decades.

Final Comment

Fanto, John J.

Castle Rock , CO

6/10/2025 4:19:00 PM

302

John Alexander Fanto Additional Public Comments to the Wyoming Game & Fish Commission 6/10/2025 I submitted my initial comments on the Wyoming Game & Fish Department's website on May 8, 2025, regarding the proposed revisions to Chapter 44, Section 8: Landowner Licenses. Since then, I have participated in the public meeting held on June 3 and the landowner meeting on June 4 at the WG&F office in Casper, where the proposed changes to the landowner license system were further discussed. Based on the insights gained from these meetings, as well as my continued research, I offer the following additional comments for the Commission's consideration:

1. Opposition to Increased Acreage and Animal Use Day Requirements I strongly oppose the commission's proposal to increase the

qualifications to 160 acres cultivated or a minimum of 640 acres and increasing the animal use days to 3000. • Lack of justification: There is no explanation or science to support the proposed changes in the minimum acres and animal use days in the Statement of Reasons for Chapter 44. The commission should provide clear data and reasoning for these specific thresholds. • No Task Force recommendation: The 2021-2022 Wyoming Wildlife Task Force did not make a recommendation to change the minimum acreage or animal use days required to qualify for a landowner license. • Solution in search of a problem: What specific problem is this trying to solve? Under the current regulations, the 160-acre to 320-acre landowners are not subdividing their property to get more landowner licenses. The current system is functioning as intended. • Unintended consequences: Many smaller landowners have indicated they would have financial incentive to subdivide their properties into 40-acre tracts and sell them if these changes are approved. This would fragment critical wildlife habitat - the opposite of what these regulations should encourage. • Economic impact on rural families: These changes would disproportionately affect smaller family operations that have been responsible stewards of wildlife habitat for generations.

2. Support for Current Regulations
 I support keeping the current regulations in which landowner licenses are issued to those landowners who own land which provides habitat for antelope, deer, elk, or wild turkeys and meet the requirements of 160 contiguous acres and 2000 animal use days in the 12-month period prior to the date of application. This system has proven effective and should be maintained.

What Problems with Landowner Licensing that the Commission is Trying to Solve? I have watched minutes from the past Commissioner meetings, read the 2021 -2022 Wyoming Wildlife Taskforce Report, read the Statement of Reasons for the proposed changes to the Landowner Licensing System, and attended the two meetings regarding landowner licensing in Casper. The problems that I was able to tease out are as follows:

1. Corporate Ownership Abuse of the landowner license system by corporations owning large ranches by allowing employees to have a small ownership of the ranch in order to obtain a landowner license. Purchasing and subdividing properties to obtain landowner licenses. • I support an effort to end the abuse of the landowner licensing system by large corporations by requiring an individual own 20% or more of the corporation. However, family trusts, family LLC's and family corporations should be excluded from this. An applicant should qualify if the applicant is an "Immediate Family Member" of the individual, family trust, or family LLC that owns the land regardless of % ownership. • The current regulations already address purchasing and subdividing properties for a landowner License. It just needs to be enforced. Chapter 44, Section 8: Any lands purchased or subdivided for the primary purpose of obtaining landowner licenses shall not be eligible for landowner licenses.
2. Alternative Solutions for Areas with High Landowner Tag Percentages -The problem in a few big game species areas where landowner licenses are a high percentage of the available licenses. • I would support a cap of 30% on the number of landowner tags available in an area that is below the herd objective for that big game species. If that is not an option, an alternate solution to the problem of a high percentage (for example >30%) of landowner licenses for some big game species in a few select areas would be as follows: If the number of landowner licenses in a given year exceeds 30% of the licenses available, reduce the landowner licenses to one license for each qualifying landowner. • Area-Specific Context- Our property is in elk area 7, where the elk herd is over the WG&F objective and the number of landowner licenses are not a high percentage of the available licenses. Therefore, it is not necessary to limit the current number of landowner tags for elk in area 7.

Problems mentioned at the June 4th Landowner Meeting I want to thank commissioner Masterson for attending both landowner meetings on June 3rd and 4th at the Casper WG&F office. I appreciate that he made the effort to meet with us, listen, and answer questions. I asked Commissioner Masterson what the three main problems with the current Landowner License System were. Following are the problems he mentioned:

- 1st Problem - Diminishing resource and increasing demand. The question was asked what resource he was referring to and he replied mule deer. This is a game management issue of a specific big game animal and area. A solution would be to address the specific mule deer areas that are a problem and not change the landowner licensing regulations for all areas and big game species. The mule deer are under the WG&F herd objective. The alternate solution proposed above could be applied for the mule deer areas that have a high percentage of landowner tags.
- 2nd Problem - Advertising and selling properties for the landowner licenses. As mentioned previously this is addressed in the current regulation and needs to be enforced.
- 3rd Problem – Fragmentation of habitat. Increasing the acreage qualifications to 160 acres cultivated or a minimum of 640 acres and increasing the animal use days to 3000 is not a solution to the 3 problems mentioned and will exasperate the fragmentation of habitat problem.
- 4th Problem – Social pressure was mentioned by someone in the audience and that he thought may be the reason for some of these proposed changes regarding landowner licenses. I was surprised that there was only one non-landowner that attended the public meeting on June 3rd in Casper. It has been mentioned a number of times that the total number of landowner licenses is only about 2% of the total available licenses. Does the public have a misconception that all the available licenses are going to landowners? If this is a problem, it would

be beneficial for the WG&F to provide facts regarding the landowner licenses for areas of each big game species. Grandfathering Provision - At a minimum, if modifications to landowner acreage requirements are implemented (e.g., increasing from 160 to 640 acres), existing landowner license holders should be grandfathered in under the current rules. This would ensure a smooth transition and recognize the investments current landowners have made in wildlife habitat improvement based on existing regulations. Conclusion I strongly urge the Commission to reject the proposed amendments to Chapter 44, Section 8, that would alter landowner acreage eligibility. This change does not address or solve any of the problems discussed. The current landowner license framework—granting licenses to those who own at least 160 contiguous acres and provide 2,000 days of annual animal use appropriately balances wildlife management objectives with recognition of private landowner contributions to habitat conservation. The proposed changes lack justification and could undermine the conservation goals that they are intended to serve. I respectfully urge the commission to maintain the current regulations with respect to the acreage and use days requirements that have proven effective for decades.

Final Comment	Fanto, John A.	CASPER, WY, WY	6/10/2025 4:29:00 PM
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303 Hello Janet...I apologize for this being at the last minute...I just recently found out about the proposal to change the current rule to 640 acres to be able to obtain a land owner license in WY...I currently own just 240 acres...and eventually I believe that I may possibly be able to qualify for landowner tags...(There is live water...lots of grass and trees for protection...prime elk habitat)I have five boys that will eventually want to harvest at least one elk in their lifetime....and at this point in time it's highly unlikely that we will be buying any more acreage...thank you for your consideration... Monte Howrey

Final Comment	Howrey, Monte	VALE, SD	6/10/2025 4:32:00 PM
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304 I oppose the transfer of landowner tags to non qualified family members for what I believe are obvious reasons. I strongly believe it flies in the face of the North American wildlife model of wildlife management, wildlife being held in public trust is critical to this model. I do not believe we need another policy that goes against this wonderful idea (wildlife management) we have enough absurd policies as it is.

Final Comment	Loughery, Thomas	Riverton, WY	6/10/2025 4:34:00 PM
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305 I am writing to strongly oppose allowing landowners to sell landowner tags. Wildlife is held in public trust and tag allocation should not skew towards those with deep pockets.

Final Comment	Knapp, Kyler	Moran, WY	6/10/2025 4:35:00 PM
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306 This would severely hurt the ability of individuals from other states to be able to come enjoy your state and provide income to your areas local economy. Since most I Out of statera do not have the finances to have base camps and high end hunting rigs and equipment that we oils allow them to stay out and camp. So allow hunters the ability to spread the money around the area instead of going into one individuals pocket. Thank you

Final Comment	Gothard, William	Dayton, TN	6/10/2025 4:44:00 PM
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307 I submit the following comments as a landowner in Natrona and Carbon Counties, a nearly lifelong WY resident, and avid sportsman. I am OPPOSED to the proposed Chapter 44 Landowner changes. The proposed changes provide a blanket solution in an attempt to solve a few localized issues. While the changes will alleviate some public pressure and reduce the amount of landowner tags in limited quota areas, they also create numerous other problems and inequities. I urge the commissioners to leave the Chapter 44 landowner regulations as they are with respect to landowner qualification and ownership interest. At the landowner meeting held in Casper, Commissioner Masterson presented 3 problems these proposed changes are attempting to solve. 1. Diminishing resources and increasing demand, specifically for mule deer. I don't believe that removing landowner tags by way of qualification will solve this stated problem in a meaningful and manageable way. There are numerous general, unlimited quota, deer areas throughout Wyoming. It occurs to me that proper wildlife conservation management would involve applying quotas to effectively manage diminishing deer herds. What do the biologists and deer task force report regarding this issue? I suppose removing landowners from the quota has much more public support than placing quotas on current general

area/seasons. However, whether the issue has or doesn't have public support does not constitute sound wildlife management. 2. Stop landowners from subdividing land to gain more landowner tags and marketing the landowner tags for increased value. We are a free market and therefore can't dictate how a landowner divides his property nor the value someone is willing to pay for it. I understand that distribution of land ownership results in numerous landowner tags in some areas. The commission should be addressing those specific units, not the entire state. If it is not yet clear how this can be done, please don't make changes without properly and thoroughly researching the possible solutions that can be applied specifically where they are needed. 3. Fragmentation of wildlife habitat. I assume that the concern here applies to landowners subdividing their land. I believe this will become an even bigger concern if the currently qualified landowners no longer qualify for tags because of these proposed changes. Many of these landowners may subdivide their land to recapture lost value. Landowner tags account for less than 2% of the overall WGFD licenses issued. Yet landowners provide ground for all of Wyoming's wildlife all year round. Their stewardship of their land provides food, water, and habitat. Landowners partner with the WGFD to improve food, water and habitat. Landowners partner with the WGFD to provide hunter management and walk-in areas. I fear the passage of these changes will damage these important relationships, creating less public access and resulting in unmanageable herds. We, as landowners, participate in the Access Yes hunter walk-in area program. Our ranch provides public hunting access to 4,000 deeded acres. We have communicated to the coordinator that we will not sign the 2025 contract until we see how the commission votes on these proposed changes or potential amendments. Requiring 20% ownership or interest in an entity which owns real property may solve the "Pathfinder Ranch" issue, but it will be devastating to many family-owned, generational ranches. Through proper estate planning, some of these family-owned ranches don't have a member or owner with at least 20% interest. Yet, these ranches have been in the family for decades, passed down generation to generation all while being stewards of the land and wildlife. Please consider how this may affect many great Wyoming family ranchers like Charlie Scott and his family. Again, please thoroughly research and provide a solution that resolves the "Pathfinder Ranch" issue while not taking tags away from Wyoming family ranchers. An increase from 2000 to 3000 animal use days is a 50% increase. What data supports this? What is "adequate documentation verifying that they meet...." and how does the landowner develop and provide this documentation? Is the documentation verified by the WGFD? What must be documented and is the landowner qualified to document it? The WGFD biologists most certainly are more qualified to verify animal use than landowners. The proposed changes will also impact veteran hunter organizations such as Hunting with Heroes. Many of the tags hunters of this program receive are from donating landowners. These changes could result in reduced opportunities for our great veterans. As landowners, we have donated tags to this organization for veterans. These are great organizations, and we hope to donate more tags in the future. Again, I urge the commissioners to leave the Chapter 44 landowner regulations as they are with respect to landowner qualification and ownership interest. If the commissioners feel compelled to make changes, please consider the following. Grandfather existing, qualifying ranches Reduce the 20% requirement to 3%-5% Granting more landowner tags per qualified species for larger quantities of land ownership. (i.e. 25,000 acres = 6 tags/species) Thank you for your consideration. Regards, Brendan Bummer

Final Comment	Bummer, Brendan	Casper, WY	6/10/2025 4:46:00 PM
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308

I strongly appose the increase of acreage required to get a land owners permit. I currently have 200 acres and this change is very unfair for us with under 600 acres. I feel with the water and amount of grass I could qualify. My son and I hunt and would love to get a land owners permit. I strongly encourage you to leave as is. Thank you, Marvin Howrey

Final Comment	Howrey, Marvin	Chandler , AZ	6/10/2025 4:49:00 PM
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309

To the Wyoming Game and Fish Commission, I appreciate the Commission's commitment to maintaining the integrity of the landowner license program. However, I respectfully urge you to reject the proposed amendments—specifically, raising the minimum contiguous acreage from 160 to 640 acres (or requiring 160 acres of cultivated land) and increasing the annual wildlife use-day threshold from 2,000 to 3,000 days. These changes, though well-intentioned, would have unintended consequences that undermine both private-land conservation and equitable access. 1. Program Focus and Eligibility Safeguards The program already includes robust safeguards to verify genuine land management: • Contiguous-acre verification prevents artificial subdivision. • Ownership interest requirements ensure legitimate landowner involvement. • Use-day documentation ensures actual wildlife use. Imposing a 640-acre

minimum or requiring cultivated land excludes responsible land stewards who actively manage their land for habitat but do not operate commercial farms. The result is an unfair disqualification of legitimate participants. 2. Subdivision and Permit-Stacking Concerns A small number of landowners may have subdivided to gain additional tags, but this problem can and should be addressed directly—through rule changes that clarify and enforce contiguous-acre definitions—not by raising acreage thresholds for all. A blanket increase penalizes the vast majority of honest participants, including those with mid-sized properties who play no role in these abuses. 3. Habitat Stewardship vs. Cultivated Land Requiring cultivated acreage as a standard for landowner licenses overlooks the fact that meaningful wildlife habitat is often found on rangeland, not row crops. Responsible grazing, hay cutting, water development, and weed control are essential practices that support healthy ecosystems and robust wildlife populations. Under the new rule, none of these efforts would qualify unless the land is plowed—despite their conservation value. That sends the wrong message to landowners working to preserve habitat. 4. Wildlife Use-Day Threshold Raising the threshold from 2,000 to 3,000 use days may disproportionately impact landowners in lower-density areas where wildlife presence varies seasonally or year-to-year. The current threshold is already effective at demonstrating meaningful wildlife use. Rather than raising the bar across the board, a more flexible or tiered approach should be considered. 5. Equity and Conservation Partnerships These changes would shift landowner licenses disproportionately to the largest acreage holders—undermining opportunities for smaller, long-standing landowners to participate in conservation efforts. Families managing 200–600 acres represent a significant portion of Wyoming’s rural landscape and have been critical partners in wildlife stewardship for generations. Excluding them diminishes the spirit of the program and weakens its reach. Conclusion and Request I respectfully ask the Commission to: 1. Maintain the current 160-acre minimum (regardless of land type) and the 2,000 use-day requirement. 2. Reject the proposed 640-acre and 160-acre cultivated land thresholds. 3. Directly address subdivision abuses with targeted rule language. 4. Broaden the recognized habitat stewardship practices beyond cultivated land. Thank you for considering this comment and for your continued work to ensure that Wyoming’s wildlife management programs remain fair, inclusive, and grounded in real stewardship.

Final Comment	Howrey, Colton	Payson, AZ	6/10/2025 4:52:00 PM
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310	<p>We have owned 160 acres in the Bighorn Mountains since 2004 and are against any change to the non-resident land owner tags minimum acreage. I have a masters degree in wildlife and did my thesis on white-tail deer so I am very knowledgeable of habitat and good stewardship of our land. We have shot many nice bulls and several mule deer over the years, we have an excellent relationship with the larger ranches around us and lease our land to one of them for grazing. The proposed change to 640 acres to qualify is an arbitrary number pulled out of someones hat to appease larger land owners and guides. The amount of game on a 40 acre plot some places could be much larger than on many 1000 plus acre pieces, so this number seems picked just to squeeze most land owners who are not rich out. Any change to the amount of acreage to qualify should come with a waiver for anyone currently qualifying at 160 acres or more. Without doing this you are completely changing the intrinsic and monetary value of the land overnight. I hope the commission reconsiders this change and allows those of us who made sacrifices to buy, maintain and use land in the beautiful state of WY to continue to enjoy the traditions we have in hunting. Thank You, Derrik Duchesneau</p>
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Final Comment	Duchesneau, Derrik	Lodi, WI	6/10/2025 4:56:00 PM
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311	<p>I believe this rule will kill big game hunting around the Natrona, converse county area. As many of the landowners have said, relationships will crumble, land will be locked out to non landowners. I don't think it's right that us landowners make up 2% of all licences and they are trying to be ripped from us. And as I said before, which is most important, this rule will kill big game hunting in our area. I hope whomever is reading, sees and hears these feelings everyone has, and will fight for this to not go through.</p>
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Final Comment	Hershman, Tyler	Casper, WY	6/10/2025 4:56:00 PM
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Game and Fish Commissioners,

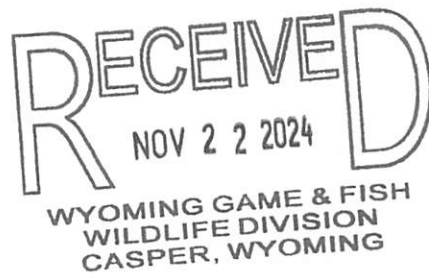
It has come to my attention that the commission is moving to draft new rules for the issuing of Landowner hunting licenses in the State of Wyoming. From my understanding the new rules would require 640 acres to be eligible or 160 acres of land that is farmed and 3000 AUD!!!. The old rules being 2000 AUD and 160 minimum acres to be eligible. It is unfortunate that the commission has decided to increase AUD requirement and draw the line in the sand at 640 acres. I can tell you right now that anyone that has 100 acres or 40 acres of alfalfa, getting destroyed by elk, deer or antelope deserves a landowner license!!! In my opinion the AUD should be the only requirement for a landowner to protect his or her crops and provide conservation at the same time. The smaller the land amount the less AUD required!! The larger the landowner the more AUD that should be required!! That's common sense. Larger landowners have less damage per acre from wildlife than smaller acreages. This can be proven legally. Any landowner, no matter the amount of land, that has the required AUD, deserves a landowner license. If this is the road the Game and Fish Commission wants to go down then the smaller landowners will be forced to band together and just simply sue the State of Wyoming and the Wyoming Game of Fish for compensation for feeding the States wildlife. It's that simple, Wyoming law and case law in Wyoming supports landowner's rights to compensation for the loss of habitat due to wildlife damages.

In my opinion the system Wyoming has currently in place is the fairest system of any State. We are the only State that requires AUD that I could find. Some states do require a certain amount of farmed land of no more than 40 acres. Also, a 640-acre requirement would put Wyoming along with Utah at the top of the list for the most acreage required, regardless of AUD. The Commission has lost its common sense and reasoning of why the landowner license system is in place to begin with. It exists for rewarding landowners for conservation of wildlife and for the States wildlife using and consuming the vegetation owned by the landowners. The SIZE OF THE LAND SHOULD NOT MATTER as long as the land meets the AUD, period. Every landowner has a right to protect his land from over usage by the States' wildlife, especially when and if the State refuses to compensate or allow the landowner to hunt that wildlife. Taking that right away from smaller Landowners is treading on their rights and will come with huge negative consequences for the State and the Wyoming Game and Fish.

Fix what needs fixed, don't "throw the baby out with the bathwater". The current system is fair and works, we just need to fix the abuse of the system that's currently in place. For example, many larger landowners have set up same ownership LLCs with different names and subdivided accordingly to fleece the system out of more landowner licenses than what's deserved or fair under the current system. This is a setting up for future selling and transfer of landowner licenses. If this is not fixed this problem will get out of control as it somewhat already is. This needs addressed primarily and immediately! Make a percentage of ownership requirement to be eligible for a landowner license. Use common sense to fix a common sense problem. DO NOT TAKE AWAY the individual rights of ANY landowner no matter how big or small! I trust that common sense and fairness to the smaller landowners will prevail in the end, hopefully the right decision can be made by all of you.

If this draft proposal goes forward the fight has just begun for the small landowners' rights being infringed upon. This fight will not end here!

Respectfully,
Rory Shogren

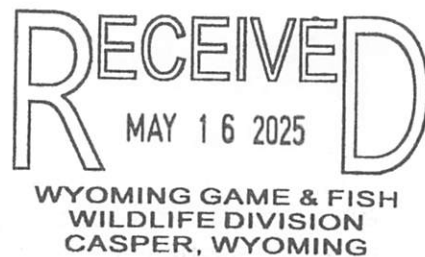


May 13, 2025

Wyoming Game & Fish Public Comment
Attn: Regulations
3030 Energy Lane
Casper, WY 82604

I'm in favor of Wyoming landowner permits in limited quota areas, But what I'm not in favor of is letting the landowner hunt the entire area every single year. People are buying parcels of land just for the sole purpose of being able to get tags every year. I believe the landowner should have to hunt their own land and not the entire hunt area, Unless they enter the draw like everyone else. This is NOT fair to all the folks that might hardly ever draw a tag, And when they do there is one less Trophy bull or buck due to seasoned landowner hunters that know the whole area well. The game and fish give the landowner tags out to compensate the owner for damages and feed loss, So it's not right that the landowner can hunt several drainages away from their land and harvest a trophy animal that has never set foot on their property every single year. This proposal would be easy to enforce these days with satellites and the wardens all having cell phones to check property boundaries. If landowners want to hunt the entire area they should have to draw a tag like the rest of us to harvest a trophy bull or buck or possibly they should only be able to hunt antlerless game on the whole area. Casper news just released a Wyoming G&F video that says elk numbers are now too high in 2025 and they want to issue more elk tags to the landowners, This is NOT right unless the tags are for antlerless elk. I'm trying to give everyone a fighting chance at a trophy animal. Bill Mathews Thermopolis Wy. Wyoming native for 63 years.

Bill Mathews





Wyoming Game and Fish Department Comment Form

The Department welcomes comment regarding proposed changes to regulations. Questions about the proposed regulation changes should be directed to Department Regional Offices for clarification. No individual Department response will be generated from questions submitted through this comment form. Written comments shall be accepted by standard mail at the address below, or on the WGFD website at <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>. Comments will not be accepted via email, fax or telephone. **All written comments must be received at the below address no later than 5:00 p.m. June 10, 2025.**

Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604

Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

*I agree with the proposed changes for landowner license
issuance. I believe that many members of the hunting public
are not in favor of the previous regulation.*

(Please use reverse for additional comments.)

Duane Kerr

Printed Name

06/04/2025

Date

4/2025

To Whom It May Concern,

This letter is in strong opposition to the proposed changes to the landowner license section of Chapter 44. As a longtime Wyoming residents and landowner, my family and I are firmly against raising the minimum acreage requirement from 150 to 640 acres. These changes, as proposed, are deeply flawed and will cause lasting harm to the very people who have worked for generations to support wildlife and steward this land.

Increasing the acreage requirement will directly strip many responsible landowners of a privilege they have held for decades. These are not outside developers or speculators, they are Wyoming families who have contributed to the state's ranching legacy, managed wildlife habitat, and partnered with the Wyoming Game and Fish Department in good faith. This proposal alienates those partners and undermines the trust and cooperation that have taken years to build.

We understand the concern about developers subdividing land to exploit the current rules. But punishing all landowners for the actions of a few is unjust. If the true intent is to address new development abuses, then the regulation should apply going forward — not retroactively. A forward-looking rule that limits eligibility based on future sales, elk use days, or habitat criteria would be far more fair and effective than blanket disqualification.

If a landowner currently meets the 2,000 elk use days under existing regulations, they have clearly provided substantial wildlife value and deserve a landowner license. Removing that recognition sends a message that the Department no longer values the critical role private landowners play in managing elk populations and providing essential habitat.

Our property lies within Elk Area 7, where the Game and Fish Department has openly acknowledged the need to reduce elk numbers , even going so far as to issue Type 8 tags with nearly year-round seasons. In light of this overpopulation, it is completely counterproductive to now push landowners away from participation. You cannot reduce elk herds effectively while simultaneously alienating those who host them on private lands.

This proposal will hurt more than it helps. It will not solve the development issue, and it risks irreparably damaging the relationship between Game and Fish and landowners who are vital to achieving wildlife management goals. We urge the Commission to listen to those of us who live here, who work this land, and who have proven our commitment to conservation.

Do not move forward with this change as written.

Respectfully,

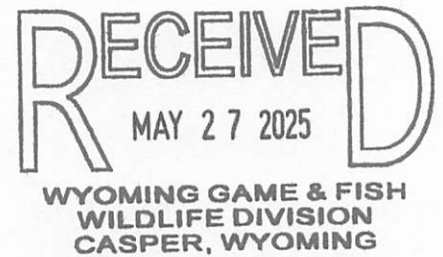
Chuck, Lisa, Jessica, Ben, Brooke Mangus



Donald Oakes
6753 Poison Spider LN
Casper, WY 82604
307-258-0604

Roakes8277@outlook.com

May 25, 2025



Wyoming Game and Fish
3400 Energy Lane
Casper Wyoming 82604

RE: Landowner Licenses

Dear Commissioners:

We own 185 acres of which 45 acres are irrigated hay, which is located next to approximately 4500 acres of BLM and State land (some small parcels of private mixed in). We have demonstrated approximately 1800 animal use days, AUD, per MONTH July through November. During draught years there has been as many as 200 animal use days per day. Under the current draft proposal our property would not qualify for any landowner licenses. There needs to be some provisions for the above condition. I don't have a problem with the 3000 AUD provision. **In any case, 2000 or 3000 AUD must be demonstrated and verified annually.**

More importantly, **ONLY** Wyoming resident landowners should qualify for landowner licenses and only for immediate family members. Hunting in Wyoming should not be a "Rich Man's Sport" whereby rich **NON-RESIDENTS** buy land specifically for hunting with landowner's licenses. Its Wyoming's Wildlife and Wyoming **RESIDENCES** should be the primary benefactors of our resources.

R/

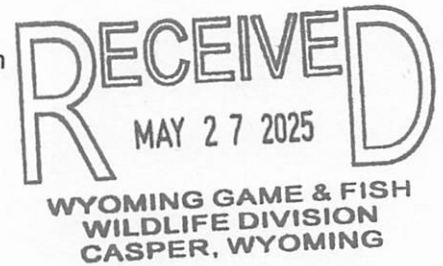
A handwritten signature in black ink, appearing to read "Donald E. Oakes", written over a horizontal line.

Donald E. Oakes

Rachel Oakes
6753 Poison Spider LN
Casper, WY 82604
307-258-0604

Roakes8277@outlook.com

May 25, 2025



Wyoming Game and Fish
3400 Energy Lane
Casper Wyoming 82604

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R/

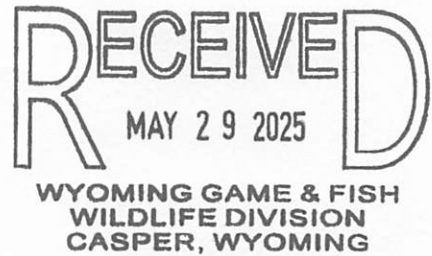
A handwritten signature in black ink, appearing to read "Rachel E. Oakes", written over a horizontal line.

Rachel E. Oakes

Patterson Schmotzer
6753 Poison Spider LN
Casper, WY 82604
307-258-8883

Pschmotx@asu.com

May 25, 2025



Wyoming Game and Fish
3400 Energy Lane
Casper Wyoming 82604

RE: Landowner Licenses

Dear Commissioners:

ONLY Wyoming resident landowners should qualify for landowner licenses and only for immediate family members. Hunting in Wyoming should not be a "Rich Mans Sport" whereby rich NON-RESIDENTS buy land specifically for hunting with landowner's licenses. Its Wyoming's Wildlife and Wyoming RESIDENCES should be the primary benefactors of our resources. Landowner licenses should be valid on private land only.

R/

A handwritten signature in cursive script, appearing to read "P. Schmotzer".

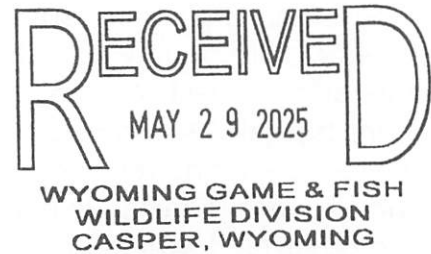
Patterson Schmotzer

PETER C. NICOLAYSEN

P.O. Box 0007
Casper, WY 82602
307-259-3055

May 23, 2025

Wyoming Game and Fish Commission
c/o Wyoming Game and Fish Department
Wildlife Division
Attn: Regulations
3030 Energy Lane
Casper, WY 82604



RE: Opposition to Proposed Changes to Landowner License Allocation (Ch.44)

Dear Commissioners,

I appreciate your efforts in conservation and management of Wyoming wildlife and habitat. **I submit this letter in opposition to the proposed changes to landowner licenses because they are arbitrary and work against conservation and management goals.**

My family owns mountain land in elk area 7, primarily in Converse County, near its boundary with Albany County. My father purchased approximately 4000 acres in 1990 and for many years our family brought sheep and cattle up to this land in the summer. For point of reference, this land is generally along the Converse County and Albany County boundary where Little Medicine Road (Albany County) meets the Cold Springs Road (Converse County). Elevations are roughly 8,100-8,700 feet.

Around 2005, my father had to sell most of this acreage due to financial hardship and the difficulties in running cattle and sheep on these lands. Those difficulties included constant fencing, lost cattle, and predation. My family kept approximately 480 acres and the grazing lease on a school section for recreational and cattle grazing.

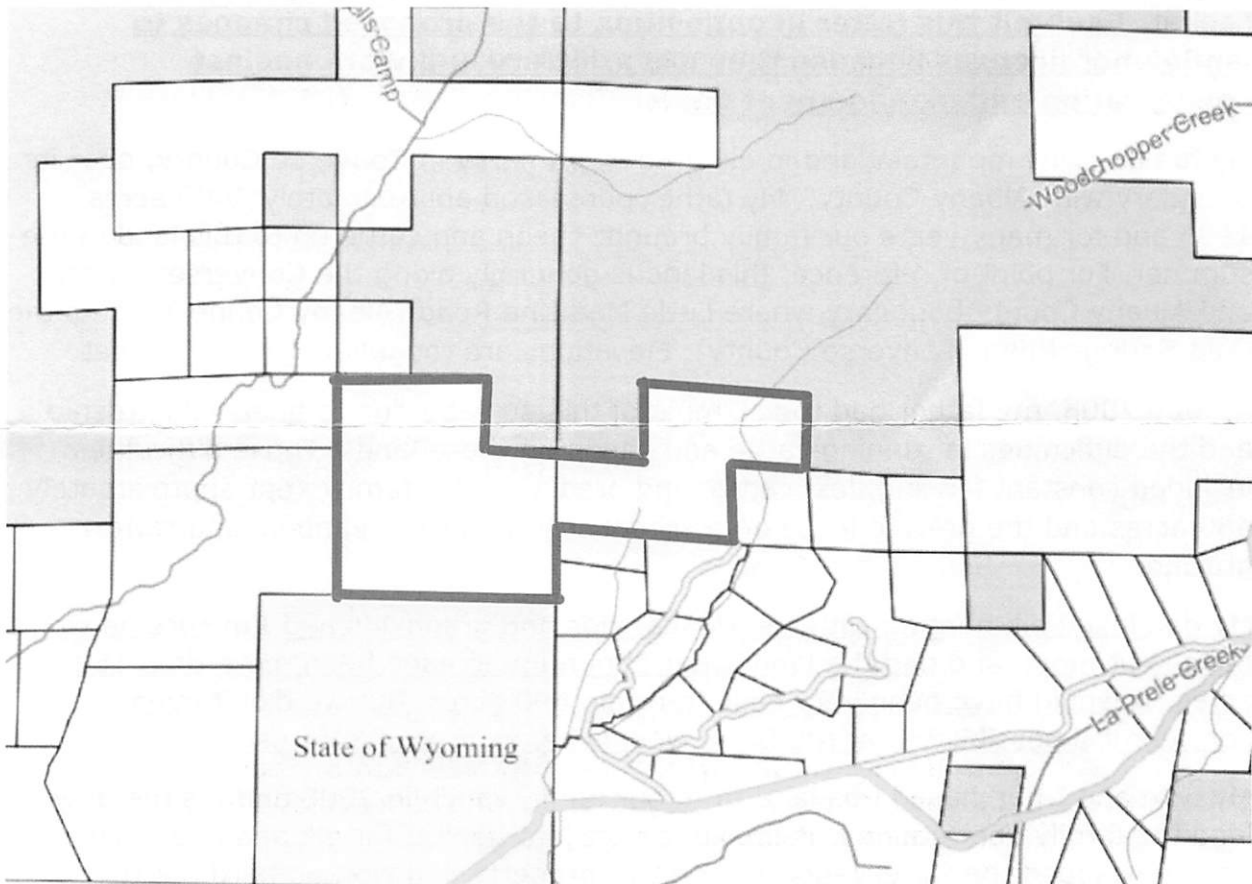
My dad loved elk hunting with his friends, kids and grandkids and I'm sure he would have kept more land had the landowner minimum acreage been more than 160 acres. It would have been very easy to retain 640 acres, but we didn't even consider it a possibility that the State would change the rules on us.

My wife and I purchased this land from our family ranch in 2008 and it's the only land the family has retained. It provides excellent habitat for elk and deer. We have developed the water resources on this property and worked hard not to

overgraze the land. Elk are present on the property year-round, except, perhaps, during the deepest part of winter.

Elk certainly reduce the available forage and water, and they damage trees and impact riparian and other areas where we don't want any impact and where we choose not to place livestock. The elk obviously cannot be managed and moved like livestock. They go where they want, where they feel protected, and where the habitat's the best. And the more we conserve the habitat, the more wildlife impact there typically is in those locations. Damage to improvements, especially as it relates to elk and fencing, causes significant annual maintenance and repair time and expense. Fencing is not a choice when you are in the livestock business, so we and other landowners have determined to adapt our fencing to the extent we can with a mind toward facilitating big game crossing. This includes lowering the top wire, using three or four strands of wire instead of four or five, using more wood posts, and using smooth wire in some places.

Deer and Elk benefit a lot from our management and this 480 acre block of land, since it's located between subdivisions on the east and west sides of our property and acts as a wildlife corridor, connecting a large block of forest service land (green) to the north and a school section and a large ranch to the South. The school section is accessible to the public, so elk hunters can be very successful. Below is an image of our land (red outline) and the general vicinity, which also shows the smaller adjacent land parcels:



Landowner efforts and the habitat and water we provide benefit every hunter and every non-hunter that values the outdoors and wildlife. The work we do, the habitat we provide, and the impacts and damage we experience are compelling reasons to have landowner licenses. I believe the Wyoming Game and Fish Department recognizes the part landowners play in supporting and improving Wyoming wildlife and benefitting this generation and future generations of outdoor enthusiasts.

As you know, Landowner licenses may be allocated to parcels of land that are at least 160 acres in size. I strongly support keeping the minimum number of acres at 160. This is only fair as many landowners, including my family, have for decades reasonably relied on this benchmark for their purchase and other land ownership decisions. If change to the minimum acreage is to occur, then it should occur only based on science and not politics. Again, to my knowledge, there have been no science-based studies that would support a wholesale change to minimum acreage requirements.

Furthermore, if an increase in acreage is adopted then it should only apply on a prospective, rather than retroactive, basis.

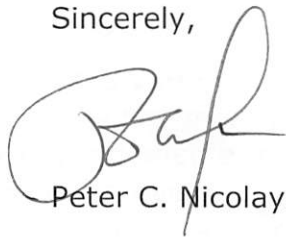
I acknowledge these are complex issues and also that there are, at least at times, loud voices telling you to allocate more licenses to "sportsmen" and fewer to landowners. Balancing these interests is not easy. But if you focus more on science and less on politics, these interests don't have to be viewed as competing. I hope that all thoughtful people recognize that landowner licenses truly benefit sportsmen.

Finally, if the minimum acreage is increased to 640 acres, then my family will have to decide if the realtor's suggestion of "highest and best use" (i.e. subdivision into 40 acre tracts) is our best course of action. That would be financially beneficial for us, but it would sadden me because it would fundamentally alter the excellent habitat and permanently change the character of the lands. From a wildlife and wildlife management perspective, it would certainly be bad for the elk and bad for hunters, including those hunting the state land and the forest land adjacent to our 480 acre property. The elk would be pushed somewhere else, likely to the larger, publicly inaccessible tracts.

I'm sure you recognize that you risk impacting far more than elk and elk hunters. Increasing the minimum acreage to 640 acres would accelerate the further fragmentation of land parcels smaller than that minimum, which would be counter to your Department's goals and objectives and negatively impact hunters and any wildlife that benefits from larger tracts of land and travel corridors.

Please don't increase the minimum acreage of 160 acres. Thanks for your consideration and please let me know if you or anyone connected with the Wyoming Game and Fish Department would like to visit further.

Sincerely,



Peter C. Nicolaysen

Cc:

Hon. Mark Gordon, Governor State of Wyoming
Wyoming Game and Fish Commission

Mark Jolovich, District 1

mark.jolovich@wyo.gov

Bill Mai, District 2

wmai@uwyo.edu

Kenneth Roberts, District 3

kenneth.roberts@wyo.gov

Rusty Bell, District 4

rusty.bell@wyoboard.gov

Ashlee Lundvall, District 5

ashlee.lundvall@wyo.gov

Carlisle "Fonzy" Haskell, District 6

fonzy702@hotmail.com

John Masterson, District 7

john.masterson@wyoboard.gov



Wyoming Game and Fish Department Comment Form

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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604

RECEIVED
MAY 30 2025

WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

Chapter 44, Regulation for Issuance of Licenses, Permits, Tags, Preference Points and Competitive Raffle Chances

Comments:

Our Family has Ranched on this property for almost 100 years. We have been issued Landowner Licenses for over 40 years. It's not so much about the acres as it is about the use days. We have 520 acres of prime Elk and mule deer habitat that has well over 3000 Elk use days. In the 1970's mule deer use days were about the same, now mule deer days are probably less than 2000. We have 100 acres of Hay meadow and creek bottom that has 10 to 20 whitetail every day and more in the winter. Wildlife and Habitat change over the years and so will the use days. My guess is if you change it to 640 acres and 3000 use days you will have people getting Licenses that don't really have the days and people with the use days will not be getting a Landowner License. My opinion is Landowners need to be re-evaluated on use days. Land doesn't have to be continuous. 160 acres has been working good for a number of years why change it. ~~We thought~~. Our local game wardens and Biologists know

(Please use reverse for additional comments.)

(over)



Wyoming Game and Fish Department Comment Form

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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604

Chapter 44, Regulation for Issuance of Licenses, Permits, Tags, Preference Points and Competitive Raffle Chances

Comments:

who meets the 3000 use days and who don't. So by Re-evaluate the Landowner in their area would be a good thing to do for Landowner and game + Fish employees. We Harvest 5 to 10 Elk every year on our 520 Acres. We let others Hunt, We try to manage running Cattle along with Elk, Deer, Bear, mountain lion, turkey, pronghorn and all other Wyoming wildlife. I know several Landowners that will stop participating in Hunter Management and other programs. I worry about some Landowner might decide to break up their Land ~~into~~ into smaller acreages because they won't qualify anymore and this won't be good for wildlife. Some will quit letting others Hunt on their Land. Thank for letting me respond to proposed changes in Chapter 44. I really believe is Truly about Land Use Days not Not Acreage

(Please use reverse for additional comments.)

Mike C Stephens
Printed Name

5-28-2025
Date 4/2025

Joshua Oakes
6753 Poison Spider LN
Casper, WY 82604
307-258-8883

Joshuae@outlook.com

May 25, 2025

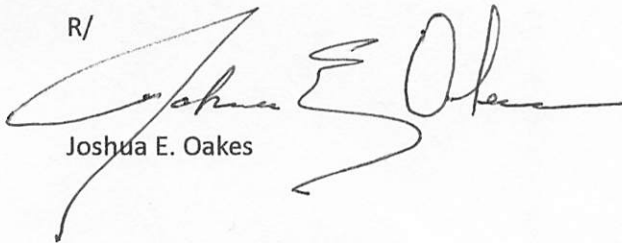
Wyoming Game and Fish
3400 Energy Lane
Casper Wyoming 82604

RE: Landowner Licenses

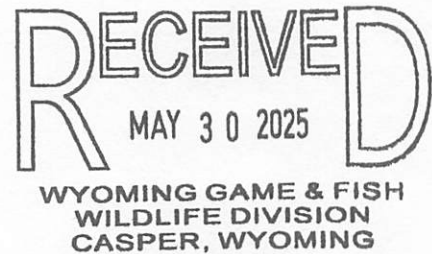
Dear Commissioners:

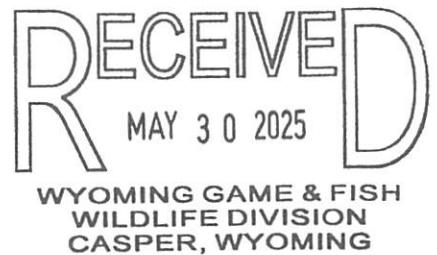
ONLY Wyoming resident landowners should qualify for landowner licenses and only for immediate family members. Hunting in Wyoming should not be a "Rich Mans Sport" whereby rich NON-RESIDENTS buy land specifically for hunting with landowner's licenses. Its Wyoming's Wildlife and Wyoming RESIDENCES should be the primary benefactors of our resources. Landowner licenses should be valid on private land only.

R/



Joshua E. Oakes





Wyoming Game and Fish Commissioners,

I am writing in response to the proposed changes to Chapter 44, the issuance of landowner licenses, and the historic problems associated with implementing this regulation.

First and foremost, for the past 30-40 years, most of the problems with the issuance of these licenses falls squarely on Wyoming Game and Fish Department personnel, specifically Game Wardens. Many years ago, when these licenses started becoming very popular and valuable, local Game Wardens were approving these licenses as a sort of appeasement, or a way to "get along" with their local landowners. Most of the time, the land in question was not at all verified as meeting the "use" specified in regulation. Prior to 1990, I had only heard of one instance where Department personnel used scientific methods to verify a parcel of land that needed to meet the 2000 days use. In my professional opinion, I believe that 70-80% of smaller parcels (lands under 200 acres) that have been "qualifying" for landowner permits DO NOT actually meet the requirements specified in the landowner regulation, and this falls on Department personnel.

One proposed change to the regulation states that the landowner is solely responsible for "qualifying" his property. This has always been the case, and Wardens have uncovered many instances where landowners have falsified information, including pictures taken, not on their property, but miles away, passing these off to their local Game Warden. Additionally, Landowners have falsified daily use by animals on their property to receive these valuable licenses. There MUST be some language in this regulation, where Department personnel may verify actual use through scientific methods. There has been much confusion among Department personnel on what exactly is "days use." Whether it's 2000 or 3000 days use, it doesn't matter if personnel don't even know what a "days use" is. The regulation should define a "days use" as a "24- hour period." If animals are using a parcel of property for food, water, shelter and space, then they are using it for an extensive period of time, not just a few hours a day.

Example:

A herd of 500 elk may cross several smaller parcels of lands (160 acres), while moving to and from feeding or bedding grounds, only spending an hour or two a day crossing those smaller parcels, but spending most of a 24- hour period at their final destination. If one or all of the landowners with the properties where the elk merely crossed, showed the local Game Warden pictures of 500 elk on his/her property for four consecutive days, his or her lands may be permitted for a landowner license, yet these elk have only spent a total of 4-8 hours crossing these properties. This is NOT the intention of this regulation and has been mis-interpreted by Department personnel for many years. A "days use" is a 24- hour period. This scenario has been caused the majority of the problems associated with landowner licenses for many, many years,

Again, Department personnel MUST be able to verify a parcel of land that may be in question. I am not advocating that Department Wardens need to verify all lands in their districts that qualify

for these licenses, as some may be more than obvious as to meeting the "use" required by regulation. I would put the onus on landowners to initially show the "days use", but understand that there is and will always be some fraudulent evidence, which should be countered by Department verification.

If the Commission decides to increase the amount of land needed to qualify, which I am in favor of, I do not believe that smaller parcels that have been receiving licenses in the past, should be "grandfathered in", this defeats the purpose of changing the acreage at all.

As far as wildlife management, especially pertaining to elk. I believe, especially in the eastern part of the state, that landowner licenses are one of the major reasons Department personnel are struggling with overpopulation of elk on private lands. Since these licenses have become so popular and valuable, many landowners who allowed cow hunting to anyone who would ask 30 years ago, now have used these "bull" tags as an excuse to not allow any hunting or at least very little hunting until bull tags have been filled. This is especially true with non-resident landowners who have bought and subdivided large ranches to gain additional licenses who have completely hamstrung Department personnel in the management of these herds.

The section of the regulation that states lands can not be subdivided or split up to acquire additional licenses is unenforceable. If a person can show up with a deed there is absolutely nothing the Department can do to deny a landowner license to that landowner. This has to be changed.

Sincerely,

Jim Seeman



Wyoming Game and Fish Department Comment Form

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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604

RECEIVED
JUN 02 2025

Please use a separate form for each of the categories below:

WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

May 25, 2025
Please find attached statement against all
proposed Chapter 44 regulation changes.

The proposed changes defy reason, miss the
mark for smart preservation, fail to acknowledge
landowner support of wildlife, and should be
fully opposed.

(Please use reverse for additional comments.)

D. HAYLOE
Printed Name

5/25/2025
Date 4/2025

Wyoming Game and Fish Department
Game and Fish Commissioners
5400 Bishop Blvd.
Cheyenne, Wyoming 82006

May 25, 2025

RE: Landowner AGAINST Proposed Changes to Landowner Licensing
Process, per Chapter 44

Thank you for the opportunity to address the proposed changes to the established and well-recognized provisions for landowner licensing, under Wyoming Game and Fish Department Chapter 44 regulations.

Although appropriate inclusionary notifications were provided via USPS mail service to some qualifying landowners with the proposed alterations noted in red and blue edits, it is unduly burdensome for any individual to find "the reason" for the proposed alterations, as the packet provided does not include the foundational premise for reviewing the established regulations or a conclusionary report from any sanctioned committee or panel to outline the rationales. Presumably a "task force" was responsible for creating the impetus for proposed changes; however, references to readily-available public websites hosting sequential information, meeting minutes, or conclusionary reports were absent and / or incomplete and once again, several critical links were inoperable on the Wyoming Game and Fish website / portal. If the Wyoming Game and Fish Department deems it appropriate to take the time and expense to provide notice to affected landowners, a completely transparent and sequential recordation of the entire process is both reasonable and more appropriate for the sake of public transparency.

To the wrong-headed issues of the proposed regulatory changes:

1. A state-wide "blanket approach" changing landowner licenses is wrong.
 - a. Wyoming has a long-established history of treating individual regions / hunt areas with individual attention, to the extent of promulgating complex and specific maps for species, regions, and residency status of hunters. There is no reason provided or even plausible for approaching a many-faceted issue such as population management with a blanket, heavy-handed, and far-reaching tactic such as "statewide revision," when more biologically and end-user oriented approaches, based on specie populations, regional demographics, habitat carrying capacity, and utilization of licenses may be seamlessly employed, in accordance with the very methods already in use by the Wyoming Game and Fish Department. In fact, such a regional-specific approach is reasonably expected and deserved.

2. Wyoming elk populations are growing; the proposed changes will not facilitate landowners in managing growing elk populations effectively and disregard the significant importance of landowner contributions to wildlife management throughout the state.
 - a. Wyoming has a growing issue with burgeoning elk populations, accompanied by increased damages to legitimate agriculture operations, public safety, and specie health / welfare. The proposed edits to Chapter 44 reduce the ready access of the majority of highly-invested landowners in the management of elk populations. Simply put, there are increasing numbers of elk in many regions and increasing the hurdles to access established processes to pay for and utilize landowner licenses is contrary to good management practices and fails to acknowledge the necessary cooperation from the majority of vested landowners in cooperative wildlife management.
3. The State of Wyoming utilizes a metric for animal use days on landowner property that negates acreage limitations.
 - a. The established process of biologically-based "animal use days" stands on it's own legs. The number of acres a landowner possesses is wholly immaterial to the use by animals, given a herd of 100 elk may use, even decimate, a bona fide agricultural crop field in 20 days, thereby meeting the benchmark of 2,000 animal use days. Given elk naturally tend towards herding and a hayfield of 50 acres, for example, would easily support the animal use metric, it is patently unnecessary consider acreages as a criteria, and increasing the parameters for acreage ownership past the established animal use days is punitive to landowners, unless the Wyoming Game and Fish Department is pressing into the equation elements of social engineering, which is blatant departmental over-reach and inappropriate territory to legislate.
4. Tampering with criteria focused on acres of land ownership gives smacks of "social engineering" for the landowners of Wyoming.
 - a. If the Wyoming Game and Fish Department seeks to socially or culturally engineer access to the resources of game animals, which belong, in trust, to the people of Wyoming, and advocates for broad over-reach of authority and function, increased consideration should be paid to the *resident landowners*, based on the increased likelihood of active stewardship of the habitat and increased resident investment in the welfare of the regional wildlife resources.
 - b. Upholding the time-proven baseline for access to landowner licenses (currently at a statutory 160 acres), allowing resident landowners to work diligently towards providing, either intentionally through active habitat management or coincidentally through bona fide agricultural practices, then "moving the finish line" by changing criteria impacting limits on acreage owned is a bad faith approach presented by the Wyoming Game

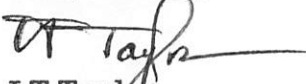
and Fish Department and misses the mark for acknowledging active stewardship practices by legions of landowning Wyomingites.

5. Developing arbitrary, new landowner acreage requirements in an effort to socially engineer access to shared wildlife resources has potentially unintended consequence of supporting a changed mindset toward Wyoming hunting ethics and land legacies.
 - a. Changing the established criteria demonstrates significant potential for additional social skewing of the historical Wyoming hunting ethic and land legacies. The irrational, enormous, and unfounded shift in acreage requirements proposed represent an immediate denial of nearly half of all landowners their right to apply for and receive licenses, effectively making the opportunity to continue the Wyoming hunting ethic and legacy in the land a "rich man's game" with increased tract size and access to the resource maintained and supported by neighboring ranches.
 - b. Worse, large-tract landowners may not be supportive of the Wyoming hunting ethic and land legacy, creating the unintended consequence of creating vast areas of "no hunting mentality" and contributing to a more liberally-bent human population in Wyoming...further drifting the State of Wyoming from the heritage it proudly deserves to continue.
6. It is concerning the State of Wyoming fails to consider the effective management processes of other states, pushing further away from proven wildlife management practices with landowner participation and access opportunities representative of honoring the hunting ethic, stewardship, and legacy of Wyoming landowners.

Please vote AGAINST ALL the proposed Chapter 44 changes.

A vote AGAINST ALL the proposed changes continues Wyoming's appropriate acknowledgement of landowners and their part in wildlife management, allowing no amendments or compromises which represent further erosion of the essential conservation ethic and land legacies which are part of being an active and supportive landowner family in Wyoming.

Respectfully,



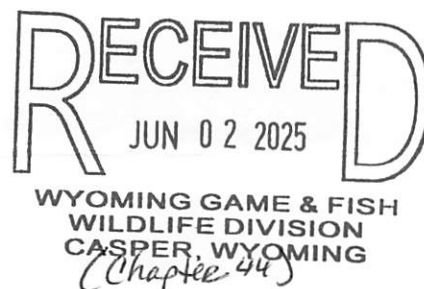
LT Taylor



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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604



Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

(Re: Chapter 44 Proposal)
Comments:

This proposal does not indicate in any way the value of the partnerships between Wyo Game & Fish & landowners nor does it show any appreciation for the continuous efforts many landowners make to provide a healthy wildlife environment for future generations. This proposal appears to be a reaction to a small fraction of complaints about the availability of licenses. This proposal does not address the availability issue as landowner licenses only represent approximately 1% of the total granted by the state.

Landowners continue conservation stewardship proudly over many years & seasons while enduring damages by wildlife whether it is on 160 acres or 6400 acres from 1 night, 1 month or 2000 days of their presence.

This Proposal penalizes those licensed landowners & eliminates a benefit to many who work to create a productive environment.

This Proposal also encourages a more elitist way of thinking by denying opportunities for the average landowner.

I respectfully request for the commissioners to vote against any changes to the current regulations regarding landowner licenses (Chapter 44).

(Please use reverse for additional comments.)

Stephanie Taylor
Printed Name

5/30/2025
Date 4/2025

(1.44) TO the WYOMING GAME AND FISH.

I feel a landowner who has 640 acre or 160 acre in a hunt area has the right to a landowner's tag. Why would it matter if the land is contiguous or cultivated, it is still land. This land still grows grass or crops that these animals eat. Maybe the game and fish should be paying the landowners for there grass or crops that these animals eat. just like the rancher does from BLM or State to run there cattle on. I estimate these animals consume about 66 tons of feed per year at a cost around 10,000.00 so you think two to four landowner tags is to much to pay for the free feed. I still have to pay full price for the tags. I have around 753 acres some in hay some Mountain some range land. This land has good grass, water, cover is this doesn't

Ch. 44

Qualify Then the WGF CAN
get all those animals off my
land or Pay for the grass AND
hay they eat. Maybe just leave it alone.

Robert McMillin
General Manager/Owner
McMillin Cottonwood ent.

Land owner tag changes Ch. 44

We've had over 800 acres in our family for over 60 years. I do not agree with the proposed changes because our property is in three different pieces in the same hunt area. And we have elk, deer + Antelope eating our horse + cattle feed. I also believe that we should be able to hunt the entire area since we are paying for the tag the same as everyone else.

some other ideas I've had is.

1. 640 Acres in the area split or not.
2. Land owner must reside on one piece of property all year. If it's split up
3. Land must produce a crop or graze livestock.

We loose thousands of dollars on hay alone.

Based on the research we've done with the number of animals and use days we personally have. we loose roughly 40-60 ton of hay to elk, deer + Antelope every year. And 30+ Acres of pasture that ~~we~~ we graze our horses + cattle on. And also some of the land we can't cultivate we only spread range land seed because it's too steep for a tractor. So I don't believe the cultivated land should matter. Slade Daley.

Public Comment in Support of Proposed Changes to Chapter 44 Section 8 - Landowner Licenses

To the Honorable Wyoming Game & Fish Commissioners,

As a Wyoming resident of over 20 years, I strongly support the proposed changes to Chapter 44 Section 8 regarding Landowner Licenses. I urge the Commission to vote in favor of these changes, which are both necessary and long overdue. A vote in favor is a vote in support of fairness, responsible wildlife management, and the vast majority of Wyoming hunters--most of whom are not landowners.

The current system has been repeatedly abused, and resident hunting opportunities for elk, deer, and antelope have steadily declined. Meanwhile, landowners continue to receive guaranteed tags--often without any meaningful reduction in their hunting access or license availability. As a homeowner and taxpayer, I pay significant property taxes--often more than many landowners receiving these benefits--yet I am being asked, like many other resident hunters, to accept reductions in general hunting opportunities, particularly in areas like Sunlight, the Beartooths, and the North Fork. These areas have transitioned to Limited Quota due to concerns such as depredation, winterkill, and habitat degradation.

Despite these cutbacks to public access, landowners have not shared in the sacrifice. That is neither fair, equitable, nor in line with the public trust doctrine that Wyoming's wildlife is managed for the people, not for the privileged few. As currently written, Chapter 44 Section 8 enables landowners with as little as 160 acres to receive up to six tags--two each for elk, deer, and antelope--in Limited Quota units. Many of these individuals are not actively engaged in agriculture or ranching. They have no fuel, irrigation, weed control, or fertilizer costs, yet they benefit from a licensing system intended to support legitimate agricultural producers.

This outdated law distorts our wildlife management system. Landowners often use these highly coveted tags not even on their private land, but on public lands such as Hunter Management Units, Walk-In Areas, National Forests, and BLM lands. They enjoy consistent, high-quality hunts every year, while the average resident hunter may wait a decade or more for a single tag. My last Limited Quota elk tag was in 2016--a tag I used to draw with 50% odds every three years. Today, those odds have dropped to 13% or lower in many units, pushing dedicated resident hunters out of meaningful participation in the hunting heritage we cherish.

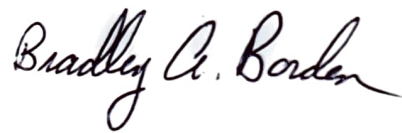
Furthermore, current enforcement of landowner license requirements is lax. There are no standardized inspection forms to document Animal Use Days, and landowners are rarely held accountable for proving they provide food, water, and cover for the wildlife they profit from. The proposed minimum of 3,000 Animal Use Days is both reasonable and necessary to ensure these licenses go only to those who genuinely support wildlife on their property.

In addition, I call attention to a serious issue with how draw odds are reported. Though not directly part of Chapter 44 changes, the Game & Fish Department currently includes landowners with 100% draw odds in the public draw odds data. This creates a false picture of availability for the average applicant. These guaranteed landowner tags should be removed from the odds tables, and the Department should disclose how many tags are being withdrawn from the general draw for landowners each year. This is a basic transparency issue--not a statutory change--and I urge the Commission to direct the Department to correct this immediately.

Wyoming's wildlife belongs to all of us, and the management of hunting opportunities should reflect that. The proposed changes to Chapter 44 Section 8 are a step toward restoring balance and integrity to our system. I thank the Commission for its work and urge a strong vote in favor of these necessary reforms.

Sincerely,

Bradley A. Borden
Powell, WY

A handwritten signature in black ink that reads "Bradley A. Borden". The signature is written in a cursive style with a large, stylized 'B' and a long, sweeping underline.

bbbirdog@yahoo.com



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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604



Please use a separate form for each of the categories below:

- ☐ Watercraft ☐ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

I Feel like by increasing the land size to qualify for landowner tags will not improve habitat or benefit wildlife in any way. It's hard to imagine who would like to make this change and for what real reason. I feel like it's about the money for larger landowners & the people with special interest. The smaller real sportsman will not benefit from these actions. If the changes are made it should at least be where the current landowners should be grandfathered in perhaps. A lot of people have worked hard to get what they got and for someones idea to wreck it all seems very unfair.

(Please use reverse for additional comments.)

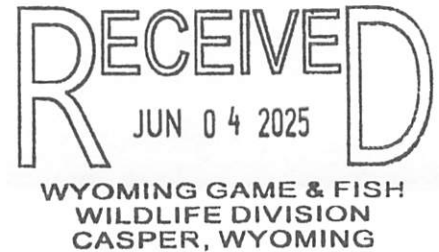
would have liked. Justin Wood 3-20-25
to visit w ? ~~comment~~ Printed Name Date 4/2025
Call me 307-290-2269



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☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

If changes are made to the land owner tags you will no doubt see an increase in damage claims. These game the owners at least a license without having to change the draw.

One problem now is the sub-dividing of land and thinking they qualify for a land owner tag. If new regs are enacted would disqualify most of these applications.

2) Grandfather existing land owner applications as a large percentage wouldn't qualify if changes are made.

3) Possibly more no hunting allowed on affected areas and less of walk-in areas that are being allowed by land owners now.

(Please use reverse for additional comments.)

Steph R. Jackson
Printed Name

5-28-25
Date

4/2025



Wyoming Game and Fish Department Comment Form

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Wyoming Game and Fish Department
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Casper WY 82604

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JUN 04 2025

WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

Please use a separate form for each of the categories below:

- ☐ Watercraft ☐ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

Game & Fish are here to manage the wild life.
I feel that nothing should change in chapter
462.

There are better solutions.

Please work at controlling animal populations

WHO & WHY the proposed change

Its not Brake Dont Fix it.

(Please use reverse for additional comments.)

James Wood
Printed Name

5/28/2025
Date 4/2025



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ATTN: Regulations
3030 Energy Lane
Casper WY 82604

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JUN 04 2025

WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

Don't change anything with landowner tags!

(Please use reverse for additional comments.)

Doug Watson
Printed Name

5-28-25
Date 4/2025



Wyoming Game and Fish Department Comment Form

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Wyoming Game and Fish Department
Wildlife Division
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Casper WY 82604

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Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

I oppose the Acreage Change on the Landowners tag.
I currently own 300 Acres and use them for my sole
living with cattle. I have also had problems with
problem elk

(Please use reverse for additional comments.)

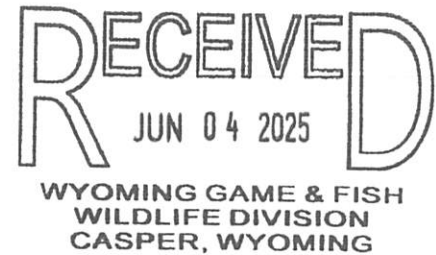
JW Moore
Printed Name

5/28/2025
Date 4/2025

Senator Charles K. Scott
Education Committee Chairman
Wyoming Senate Senate District 30



address 13900 State Highway 487
Casper, WY 82604
home (307) 473-2512



June 2, 2025

Comments on Game & Fish proposed changes to the Landowner License Section of Chapter 44

I am commenting both as the Senator elected to represent Senate District #30 which includes most of the rural acreage in Natrona County and as a landowner, the largest shareholder in the Bates Creek Cattle Company with over 30,000 acres deeded land mostly in Natrona County but some in Carbon, Converse, and Albany Counties — the four corners where these Counties come together is in one of our pastures.

1. I am a long time advocate of allowing the public to hunt on private land. About 2/3rds of our ranch is in the Muddy Mountain Hunter Management area where Game & Fish controls the hunter access and allows general public access. I held our home ranch winter range and irrigated fields out of this because we are too close to town and would get overrun in the hunter management area, but we normally allow hunting in that area with a modest trespass fee.
2. The proposed changes will greatly restrict the number of landowner tags issued. They may essentially eliminate the landowner tag as a practical matter. It is not clear to me whether or not this was the intent of the regulation drafters, but if it was, they did a skillful job. Three provisions will eliminate many of the landowner tags: This is bad because the landowner tag system has been useful in preserving cooperation between landowners, the hunting public, and the Game & Fish.
3. The change in the number of acres that have to be owned from 160 acres to 160 acres cultivated ground or 640 of non-cultivated: This will eliminate a number of landowners including some in this area who own key elk habitat, but it will not affect too much acreage.
4. The increase in the animal use days from 2,000 to 3,000 and the new requirement that the landowner prove the usage: Depending on how this requirement is administered, the landowner proof requirement may be the key problem here. Landowners are not trained game biologists and we do not know the techniques used to prove usage. We might have to hire the work done and this would be expensive.
5. The requirement for individual ownership of 20% or more of a landowning corporation etc.: This is important because most ranch land is owned by some form of a corporation or similar entity. The 20% rule will be hard to achieve because there are two factors reducing the percentage of individual ownerships. First is equity among family members. Many families, when passing ownership to the younger generation will treat all children as equals, thus spreading the ownership "fairly" to the next generation. Second, and more importantly, estate planning to avoid excessive federal inheritance taxes is essential—with the increase in land values the family that neglects it will be forced to sell to pay the estate taxes when a larger owner dies. Classic estate planning strategies are to divide the ownership equally among family members and to use trusts to avoid paying estate taxes twice on the

ownership of the first member of a couple to die. The net effect is that once ownership has spread to 6 individuals—e.g. a founding couple and two married children—it may well be that nobody individually owns as much as 20%. That is true in our operation. I am the largest shareholder and I own significantly less than 20%.

6. Consequences: Some landowners will not care. They are not interested in hunting themselves and do not use landowner tags. They may have already restricted hunting on their land to avoid the nuisance of dealing with the public or have signed up with an outfitter to make money. These regulations will not change that. However, other landowners are taking serious offense. I am hearing too much of "If they will not let me hunt on my own place, neither will anyone else." I think enactment of these proposed regulations will significantly reduce the opportunity for the public to hunt on private land in Natrona County. I suspect specifically that it may end the Muddy Mountain hunter management area. I suspect some of this feeling will not result in permanent closures, but landowners may well go from closure to exclusive leases to outfitters to earn more. I do not know how our ranch will react—my generation will probably defer to the recommendations of the younger generation on this issue and I know their feelings are currently mixed.

SUGGESTIONS

1. If landowner tags are too high a percentage of the total species tags available in particular hunt areas (more than 50%?) switch these landowner tags to every other year. This does not involve any kind of lottery or drawing for the landowner tags so it does not raise that issue and is clearly within G & F powers legally. Landowners may not like it, but the do nothing alternative is not fair to the hunting public and this is a compromise.
2. If game use days are used, the Game & Fish has to determine the numbers actually used. Landowners do not know how to do this work; making them responsible will lead to endless disputes and hard feelings. If the landowner has to hire the work done, I think the cost will result in a prohibition of the tag and all the problems that brings.
3. For larger acreage landowners give the local game and fish offices the ability to accept, in place of the animal use criteria, landowner participation in any access yes program like the Muddy Mountain Hunter Management area. This may not work for smaller acreage landowners who do not have enough land to meaningfully participate unless they adjoin a large area that is already participating.
4. I do not like grandfathering, but it may be useful here in implementing an acreage size change for program participation. If it is used, I suggest a time limit in the 20 to 30 year range so future generations are not stuck with this and we do not excessively affect the value of grandfathered acres.
5. In certain situations getting access from a landowner to otherwise isolated and inaccessible public land could count as participation in an access yes program, but local Game and Fish discretion would be needed. Not all public land is worth accessing.
6. I assume that the new 20% ownership requirement is designed to prevent any abuse of selling very small shares of the property to get landowner tags. If this really is a problem I suggest going to a 5% figure—10% would also be a possibility that would fix most of the problem. Given current land values either figure should prevent the feared abuse.
7. Get a compromise on these issues that removes most impetus for a legislative solution. I fear that other little tweeks with unintended consequences might come with a legislative solution.

Charles H. Scott



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Wildlife Division
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3030 Energy Lane
Casper WY 82604

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JUN 04 2025

WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

THESE COMMENTS PERTAIN TO THE PROPOSED CHANGES TO THE
QUALIFICATION CRITERIA OF LANDOWNER LICENSES, CHAPTER 44,
SECTION 8.

I AM THE OWNER OF A 514 ACRE RANCH THAT HAS BEEN IN
MY FAMILY SINCE 1952. THRU THE YEARS SINCE THEN WE HAVE
NEVER CLAIMED GAME DAMAGES ON THE PROPERTY. WE HAVE ALSO
GRANTED PUBLIC ACCESS TO A LIMITED NUMBER OF DEER AND ELK
HUNTERS AT NO CHARGE.

THE PROPOSED ACREAGE INCREASE FROM 320 TO 640 ACRES AND
THE INCREASE OF 1000 ADDITIONAL ANIMAL USE DAYS WILL DENY
US THE ABILITY TO OBTAIN TWO ELK LICENSES IN AN AREA THAT
HISTORICALLY HAS HAD AN ELK ~~HERD~~ HERD THAT IS OVER THE OBJECTIVE.

IF OUR PROPERTY DOES NOT QUALIFY FOR LANDOWNER PERMITS ~~WAY~~ REGULATIONS,
WE PROVIDE ACCESS TO OTHER HUNTERS?

OUR PROPERTY IS LOCATED IN AN AREA THAT HAS A GENERAL

(Please use reverse for additional comments.)

ROSS BILLINGSLEY
Printed Name

6/2/25
Date 4/2025

DEER LICENSE, SO A LANDOWNER DEER APPLICATION IS NOT APPLICABLE, HOWEVER ALONG WITH HAVING ELK BACK AND FORTH ON THE RANCH DURING THE YEAR, WE ALSO FEED FROM 25 TO OVER 50 HEAD OF DEER ALL YEAR LONG, I THINK THE REQUIRED ANIMAL USE DAYS SHOULD INCLUDE ANY GAME ANIMAL THAT LIVES ON THE PROPERTY. THE DEER POPULATION EATS ABOUT THE SAME TYPE FORAGE AS ELK, SO I THINK THEY SHOULD BE INCLUDED, REGARDLESS OF NOT HAVING LIMITED QUOTAS DURING BIG GAME SEASONS.

I AM AWARE THAT HUNT AREAS IN OTHER PARTS OF THE STATE ARE DIFFERENT THAN THE NORTH END OF THE BIG HORN MOUNTAINS. I DO NOT THINK A SINGLE QUALIFICATION CRITERIA IS APPLICABLE TO THE ENTIRE STATE.

I AM PROPOSING THAT A PROPERTY SUCH AS OUR RANCH, THAT HAS BEEN OWNED BY A SINGLE FAMILY FOR OVER 70 YEARS, AND HAS PREVIOUSLY QUALIFIED FOR LANDOWNER PERMITS BE GRANDFATHERED UNTIL IT IS SOLD OR SUBDIVIDED.

SINCERELY

Ross Billingsley

DAYTON WY.

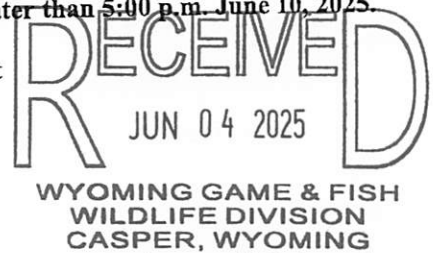
82836



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Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604



Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances

Comments:

I am opposed to the proposed changes of increasing the minimum size from 160 acres up to 640. As well as increasing the animal use days from 2,000 up to 3,000. This will disqualify many generational Wyoming Families damaging relationships with the Department. These relationships are critical to properly manage wildlife and provide access and habitat. I also fear that 20% ownership does not do enough to protect the succession of family ranches. I urge you to consider a grandfather clause for the above reasons if these changes are made. Lets work together to implement the landowner cap which will help make sure tags are available to both landowners and the public in every hunt area.

(Please use reverse for additional comments.)

D. Porter
Printed Name

6/4/25
Date 4/2025



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Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604

RECEIVED
JUN 04 2025

WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

I have an objection to the 3000 animal use days. Or the 2000 use days for that matter. Elk move too much. I have cattle pastures that don't receive that kind of pressure from my cattle. I find it to be unrealistic. My recommendation is to leave the 160 and ~~not~~ amend or drop the use day system.

Also consider allowed access by landowner when evaluating eligibility. Maybe if access is allowed the landowner should get 2 tags. If they don't allow just one.

(Please use reverse for additional comments.)

Wes Stewart
Printed Name

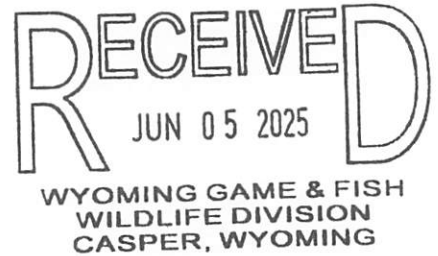
June 4-2025
Date 4/2025



Wyoming Game and Fish Department Comment Form

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Wildlife Division
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Casper WY 82604



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☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

I think this Proposed change is a great idea.
I know the game Warden can handle any
Short Comings that follow.

Thanks!

Ken Keller

701-220-2750

(Please use reverse for additional comments.)

Ken Keller
Printed Name

6-5-25
Date

4/2025



Wyoming Game and Fish Department Comment Form

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WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

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- ☐ Watercraft ☐ Licenses, permits, stamps, tags, preference points and competitive raffle chances
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Comments:

Hello my name is Zachary W Amen,

I feel these proposal in chapter 44 is not fair to be blanket across the state. Some areas this may be needed of for a species. My area in 7 for elk we need more kills so why take away? I think there is no benefit to anything in chapter 44 should be sent back for complete overhaul.

To stop further subdivision please grandfather us in!! Moving forward want to change grandfather in existing property. The Game warden in the field make the decision case by case.

(Please use reverse for additional comments.)

Zachary W Amen
Printed Name

5 June 2025
Date 4/2025

RECEIVED
JUN 02 2005
WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

Sean Lovelace

1-307-267-1878



Wyoming Game and Fish Department Comment Form

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Wildlife Division
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Casper WY 82604

RECEIVED
JUN 05 2025

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WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

- ☐ Watercraft ☐ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

I do not agree with the fact that it affects the whole
State by Animal Units... I think it should be by region & species
hundreds
It affects maybe 1% of the total picture.
In general I think it should be left the old way.
I do think it should be left up to the local game warden & biologist
to determine the acreage & land over tags
I do believe that you should be able to give Veterans & war heroes.
I do not agree with a group of people that does
not listen to your local wardens

(Please use reverse for additional comments.)

TRAVIS WILLS
Printed Name

6-5 25
Date 4/2025

Definitely by Species and Area
Do like the step ~~see~~ siblings

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WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING



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☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

~~640~~ 640 acres is way too much it will take out some of the most wildlife advocates we have - the larger the landowner is the less they protect and provide Habitat - water, timber, grass, crops protection.

I think 160 Acres is about Right if it has the right Habitat - Habitat and Use Days is the most important.

Suggestions ① Stay Just Like it is, and re evaluate all Land owner qualifications - "start over"
② Do not let corporations split up there Land for Landowner Tags without being a bonafide Rancher, Farmer - that means there Land is Taxed agriculture and Being 1/2 their Income.

(Please use reverse for additional comments.)

Mike C Stephens
Printed Name

6-5-2025
Date 4/2025

3. Contiguous acres causes problems when there is
a conflict on property line - State land price
Runs through the middle will get split in half
a 640 Turns : ~~into~~ 2-320's Not good
~~IF~~ IF you must change it grandfather all
the ones you have now and reevaluate
the use days but \$3000 is too much
\$2000 is just right

WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING



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- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

proposed changes to Chapter 44 - Landowner Licenses
Please Leave the Land owners License system
the same as it is its a small privilege
to get a Landowner License for what us
smaller Land owners DO to help wildlife and
their Habitat IF theres a problem with land
owners cheating the system - then work to
Fix the problem there not make a one
size rule that ruins it for the legit
people -

1. grandfather people now that get one ~~and~~ it
your going to change it.

2. Make everyone re-evaluate their usedays

3. Must be a legit Farmer or Rancher - TAX base

(Please use reverse for additional comments.)

Tel Stephens

Printed Name

5-30 2025

Date

4/2025

4. Let Local Game and Fish personal
Decide who ~~can~~ has the use days
5. continues Don't work because there are
lots of place broke in to with State
Federal - privit Land in between
wild life Don't use Boundry s
6. Ranchs use LLC and Such to
Keep there place together so they won't
Lose it - Some Ranch have many
Kids Grand kids ~~and~~ that are part of the
LLC if there is more the 5 they
would be out - Don't want Ranchs
and Farms changing this and Letting
Ranchs get bought up by Big Corp.

Thank you for listening

Al Stephens



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WILDLIFE DIVISION
CASPER, WYOMING

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

Proposed changes to chapter 44, landowner licenses.
Please leave the landowner licenses system the same as it is. It's
small privilege to get a landowner license for what us landowners do to
help wild life and there habitat. If there's a problem with landowners
cheating the system then work to fix the problem there not make a
one size rule that ruins it for the legit people. it has nothing
to do with Accus just use Daps and Habitat

(Please use reverse for additional comments.)

Joel Williams
Printed Name

6/5/2025
Date

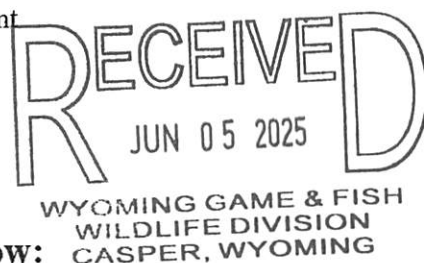
4/2025



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- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

Propose Changes to chapter 44 - land owner
licenses
Please leave the landowners licenses system
the same as it is. its small
privilege to get a land owner licenses
for what user smaller landowners do to help
wildlife and their habitats. if theres a
problem with landowners cheating the system
then work to fix the problem there not
make one size rule fit ruins it for
the 100% people.

(Please use reverse for additional comments.)

Emery stephens
Printed Name

6/5/2025
Date 4/2025



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☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

I do like making more acres for a land owner license.
license. maybe a middle ground is only one
license for land parcels under 640.

I think it should stay at 2000 use days.

I think you should be at 5% ownership.

(Please use reverse for additional comments.)

Monte Reed
Printed Name

5/5/25
Date

4/2025



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☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

He has 630 acres, he does not like the new proposal. His proposal is to have different requirements for Non Resident Landowners as compared to Resident Landowners. NR landowners acre requirement around 1000 - 2500 acres al Resident lower amount or base it on usage of animal being applied for.

Again, he is very opposed to the new proposal and requirements.

(Please use reverse for additional comments.)

Pete Haman

Printed Name

6-5-25

Date

4/2025

June 3, 2025

Please accept these comments on the Chapter 44 recommended changes to landowner licenses.

1) Loss of wildlife habitat: I know of a landowner on the Greybull River who in past years has received landowner licenses, but if this is approved will be a few acres short. He plans on subdividing into 3 housing plots and taking the profit and getting bigger. He is not the only one in this situation.

2) I understand that about 2% of big game licenses go for landowner licenses. No matter what the % is it's a very small price for the benefit our states big game receives from private ownership.

3) The wording changes from "The landowner applicant shall demonstrate that the species of wildlife for which the license application has been made utilized the described land...." TO "The landowner applicant shall be solely responsible to provide adequate documentation verifying that they meet all Commission regulation requirements governing landowner licenses." This change is quite profound. I asked what this meant at the Cody Chapter 44 changes meeting and as was told don't worry we will still be there to help you! Words have meaning! This does not look like things are going to stay the way we have worked in the past. I do not have time to do what I feel is the game wardens job. I will just stop allowing hunting access.

3)Looking at the past we have gone from having the warden come to the ranch fill out the application for us with a cup of coffee and discuss the wildlife situations TO get the form fill out and get it to the warden for approval and turning in to Cheyenne TO we want you to fill out on line, if you have problems the warden will help TO DON'T lose the code we sent you in December and you must fill it out on line. These new regulations seem just another step making it to the point it's just too big of a hassle I am no longer going to apply.

4) If you are going to predicate the license on animal use then you should not have an acreage limit. If someone has 20 acres and has 3000 animal use days they should get a land owner license.

5) What is cultivated? If dry ground was farmed 20 years ago, there is no doubt it was cultivated. Native meadows that have never been plowed but been hayed for the last 100 years?

6) With this issue now on the schedule of the WY Legislature TRW Committee there is a good chance if the G&F commission acts on these proposals the Legislature will take up this topic and I am not sure that will be an outcome that is preferable.

Suggestion: This landowner license legislation is 75 years old and has been simmering that long. Don't change anything. If it ain't broke don't fix it!

Jim Collins

6-9 Ranch

Thermopolis, WY





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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604



Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

Chapter 44 Sec 8 Landowner licenses

(Please use reverse for additional comments.)

Printed Name

Date

4/2025

Comments on proposed Landowner License changes

Dear Commissioners,

- 1) I believe that the proposals are largely an attempt to respond to demand of the general sportsman-population's clamoring for more licenses and (unjustly) blaming landowner permits as the reason more licenses are not available.
 - a. Since landowner licenses account for only about 2+% of all licenses issued, the proposal does nothing to solve this issue. These "hunter's rights" groups **would be better served by your educating them to the facts including:**
 - i. "Even if all landowner licenses were returned to the pool, the "public's" chances of drawing a license would only increase 2+%. Thus, Landowners are not the problem.
 - ii. The majority of landowners are not stuffed white shirts, but rather normal people who are good stewards of the land and the game animals. It is ridiculous to ask them to own/live on/work the land every day (not just during hunting season) see the animals, repair the damage they do, create and/or improve habitat for the animals, and then not be guaranteed the right to hunt them.
 - iii. The landowners are bearing the cost of taxes, repairing game damage to facilities and lost production of pasture feed and/or crops. Without landowner support and habitat management and putting up with damage, the game populations would decrease and there would be drastically fewer animals, thus fewer licenses available to everyone.
 - iv. Most hunters are supportive of landowners, and vice versa. The loud minority activist so called "sportsmen advocate groups" that demand more access, and demand more licenses should stop trying to be at war with landowners and be more supportive. They need your guidance and education to do this and to be more satisfied with Game and Fish.
 - v. Remind these loud activists that about 10% of all landowner tags are donated back to charitable causes (largely challenged veterans) with no monetary benefit to anyone. Do they want to rob these charities of permits so that there will be a tiny quantity more of permits in the public pool?
 - vi. Nothing you do regulatory wise will satisfy these noise groups. ***The only way the noise groups will go away is with education; and you are the most likely and effective source of that education.***

2) I believe that the other item of contention is the commercial subdivision and sale of properties "with a landowner license guarantee attached" as the primary purpose of the sale. This is likely a very small factor in affecting the number of licenses available in the general drawings; however, it is a very, very contentious topic that both "normal" landowners and general sportsmen vehemently dislike. More importantly, it also adversely affects habitat and makes game management more difficult. Thus, it does need to be addressed.

- a. The language in the proposed revisions shows that the commission is aware of and wants to act on this problem, but the proposed changes would likely have little or no effect on the problem, while simultaneously hurting many historically "friendly-to game" land owners. Perhaps a grandfather clause protecting rights of landowners who are already accustomed to working with Game and Fish and purchasing landowner licenses would help. New landowner license applicants would have to meet a more stringent set of guidelines to be successful in their application. I believe that the proposed guidelines, even though in the correct direction, are not rigid enough in themselves to actually have the desired effect of stopping subdivision for the sake of obtaining licenses. The current proposal is a middle ground, 50% measure that will not satisfy anyone on either side of the argument, and will only do harm. I suggest you make the requirements for obtaining new landowner permits much more strict than those proposed.
- b. Private property rights is a basis of our free society and regulating what one does with or on his private property, or how one disposes of all or part of that property is, also a contentious topic. A private property rights discussion is a hornet's nest that the commission should not have to take on. However, we all know that property rights have some limits, such as imposed by zoning or when others could be damaged by your actions on your land. Game and Fish and other agencies already limit personal property rights where the welfare of the public or in this case the game animals are concerned. Therefore, you would not be breaking new ground by coming up with a set of regulations that discourage or prevent the commercial subdivision of land for the purpose of obtaining guaranteed landowner hunting permits. This is not a simple nor easy task, but I believe you have the resources within the ranks of your Game Wardens to come up with workable plans that would be more effective than the current proposals.

- c. Please do not take a shotgun approach to try to fix what is a smaller specific problem with just a few specific types of properties.

3) I am in favor of your expanded definition of "immediate family member."

My wife and I are owners of a larger property that would not be affected by the implementation of the proposed changes to Chapter 44 section 8. We more than meet the size and usage guidelines. We have no children nor extended "blended" family as described in the proposed changes, and have no intention of selling off small "hunting parcels." Thus, I hope you find my opinions unbiased and helpful.

Respectfully,

Charles Putman
Pine Mountain Ranch
PO BOX 2020
Mills, WY 82644

Hunt areas Elk 23

Dear 89

Antelope 71



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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604

RECEIVED
JUN 06 2025

WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

LAND OWNER PERMITS SHOULD BE GRAND FATHERED
PERMIT CHANGES SHOULD BE APPLIED TO NEW LAND
PERCHASES
NON RESIDENT PERMITS SHOULD BE PHASED OUT

(Please use reverse for additional comments.)

JOE VOILES
Printed Name

6-6-25
Date 4/2025



Wyoming Game and Fish Department Comment Form

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- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

PROPOSED CHANGES TO THE LANDOWNER LICENSES
IN CHAPTER 44, SECTION 8

SEE ATTACHED

(Please use reverse for additional comments.)

DAN CURRAH
Printed Name

6/6/25
Date

4/2025

June 6, 2025

Dear Wyoming Game & Fish Department,

I attended the public meeting hosted by the Wyoming Game and Fish Department in Casper on June 3, 2025, regarding the proposed changes to Chapter 44, as well as the landowner-focused meeting the following evening.

As a representative of the disabled veteran community and founder of Hunting with Heroes Wyoming, a nonprofit organization that serves disabled veterans through hunting opportunities, I would like to emphasize the real-world impact these proposed changes will have. Our organization currently utilizes a significant number of licenses generously donated by landowners—many of whom would be directly affected by the revisions under consideration.

With that in mind, I respectfully offer the following recommendations:

- **Acreage Requirement:**
Do not change the current minimum of 160 acres of property ownership to qualify for landowner licenses. If the WGFD implements changes to the acreage threshold going forward, I recommend all current landowners utilizing landowner licenses should be grandfathered in to preserve their eligibility.
- **Animal Use Days:**
Please keep the number of allowable animal use days at 2,000. Rather than increasing this limit, I recommend fostering cooperative efforts between game wardens and landowners to determine parcel qualifications more effectively.
- **Entity Ownership Requirements:**
I encourage the removal of the proposed 20% ownership for Corporations, Partnerships, Trusts, and LLCs. This provision could have unintended consequences, particularly in light of IRS estate tax rules.
- **Steering Committee Formation:**
I strongly recommend the formation of a steering committee composed of landowners, Wyoming Game & Fish Department staff, Wyoming sportsmen, disabled veterans, and WGFD Commissioners to guide the development of thoughtful, inclusive revisions to Chapter 44, Section 8.

Thank you for your time and consideration. I hope these suggestions contribute to a balanced and equitable outcome that supports landowners, sportsmen, veterans, and the broader Wyoming community.

Sincerely,

Dan Currah

Founder, Hunting with Heroes Wyoming

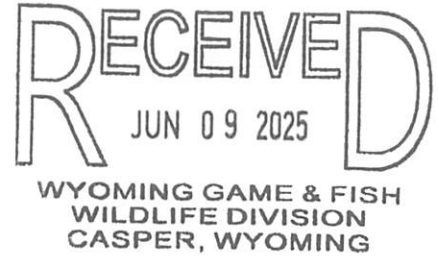
dan@huntingwithheroes.org | 307.258.5880



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☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

Proposed changes to the Landowner Licenses in Chapter 44 Section 8

SEE ATTACHED COMMENTS

(Please use reverse for additional comments.)

Printed Name

6/9/25
Date

4/2025

Brian L. WAGNER

June 9, 2025

1. The proposed rule requires 160 acres of cultivated land to qualify for landowner tags. It does not take into consideration that same amount of land with a water source on it is more valuable to wildlife in our arid environment than cultivated land. Keeping this in mind, the proposed rule should include other types of land that are valuable to wildlife.
2. The proposed rule requires 640 contiguous acres or more of land to qualify for landowner tags. This leaves out small ranchers who may own 640 or more acres that are not contiguous. They may meet the wildlife requirements, but not be eligible for landowner tags due to their land not being contiguous. The proposed rule should take into consideration these types of land ownership.
3. The proposed rule considers changing the required animal use days from 2,000 to 3,000. There is no proven method to verify the exact animal use days. Wyoming Game and Fish personnel will spend an extensive amount of unnecessary time and money to reevaluate land that has been receiving tags for years under current rule. The existing system has been working since 1991 and should remain unchanged.
4. A large percentage of landowner tags that are donated to veterans come from small landowners. The proposed rule would reduce the number of eligible small landowners, thus reducing the number of available landowner tags that can be donated to veterans programs.
5. Walk-in lands now enrolled by small landowners, including my family, may be affected by the proposed rule. Small landowners may remove their land from access programs if they are no longer eligible to receive landowner tags for their families. This will likely result in less access to private lands for all sportsmen to enjoy.
6. The proposed rule revises immediate family to include stepfamily members. This is a positive change as families are made up many different ways, not always blood-related, but family just the same.

Changes to the existing rule may be necessary, but not by penalizing small landowners who have qualified for these tags for many years. Grandfathering in existing qualified landowners and changing the landowner tag rules for new landowner applicants is a more realistic approach.

Thank you for your time and consideration.

Brian L. Wagner

June 3, 2025

Please accept these comments on the Chapter 44 recommended changes to landowner licenses.

1) Loss of wildlife habitat: I know of a landowner on the Greybull River who in past years has received landowner licenses, but if this is approved will be a few acres short. He plans on subdividing into 3 housing plots and taking the profit and getting bigger. He is not the only one in this situation.

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Suggestion: This landowner license legislation is 75 years old and has been simmering that long. Don't change anything. If it ain't broke don't fix it!

Jim Collins

6-9 Ranch

Thermopolis, WY





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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604

RECEIVED
JUN 09 2025

WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

Chapter 44 Land Owner Permits

- The proposed changes do NOT effect my Landowner Tags because I have more Land & Animal Use & ownership to quality. Not sure there are any existing problems that require any changes.
- I do think its not fair that big ranches ^(Like the Wagon House) get the same number of tags as a 160 acre owner
 - I think that if you get a Landowner License you should be required to hunt on your owned or leased Land (Not the accessible public lands)
 - Also not sure why it matters who actually gets the tags to hunt if the property qualifies for the 2 tags. Family - friends etc.

Richard A. Bonander

(Please use reverse for additional comments.)

Richard A. Bonander 6/5/2025

Printed Name

Date

4/2025

Bonander Ranches / Windy Peaks
(Laramie Peak area)



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Casper WY 82604

RECEIVED
JUN 09 2025

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WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

☐ Watercraft

☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances

☐ Mountain lions

☐ Gray wolves

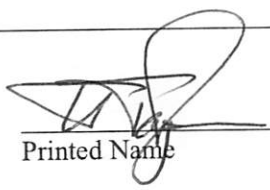
☐ Fishing

Comments:

Against Chapter 44 Changes

Please vote no to any landowner license changes and keep the habitat a priority for rural landowners by giving appropriate incentive to maintain suitable food, cover, and water in 160 acre parcels through the State of Wyoming.

(Please use reverse for additional comments.)


Printed Name

6/2/25
Date

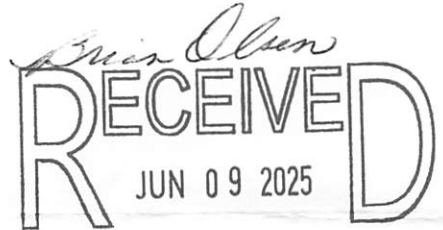
4/2025



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Casper WY 82604



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WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

☐ Watercraft

☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances

☐ Mountain lions

☐ Gray wolves

☐ Fishing

Comments:

No Changes to Chapter 44 Regulations

Game and Fish Commissioners please vote NO to my charges and any statewide modification of regulations. Insufficient attention is included in sweeping elimination of landowner licenses and the motivations are political/financial, not biological or wildlife oriented.

(Please use reverse for additional comments.)

Printed Name

TS Taylor

Date

6/5/25

4/2025



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☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

Concerned w/ development of large parcels down to small parcels and allowing land owner tags for each of those smaller parcels. Shouldn't what was allowed for the area be all allowed

for that area → subdivided buyers should have to draw for the 2 permitted tags.

Grandfathering parcels under section size could be a possibility

(Please use reverse for additional comments.)

Eugene Taylor
Printed Name

5/20/2025
Date 4/2025



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- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

Please see attached letter:

- Landowner License

(Please use reverse for additional comments.)

Dustin Ewing
Printed Name

6/9/2025
Date

4/2025

Dustin Ewing
324 Esterbrook Road
Douglas, WY 82633
dewingwyo@gmail.com
307-351-0315

June 9, 2025

Wyoming Game and Fish Department
Wildlife Division
Attn: Regulations
3030 Energy Lane
Casper, WY 82604

RE: Opposition to Proposed Landowner License Regulation Changes

To whom it may concern,

I am writing to respectfully voice my strong opposition to the proposed changes to the Landowner License Regulations, specifically the increase from 160 deeded acres and 2,000 Animal Use Days (AUDs) to 640 deeded acres and 3,000 AUDs.

As a 40-year Wyoming resident married to a fourth-generation Wyomingite, and as parents of four children who we hope will choose to build their lives in this great state, these changes strike deeply at our family's values and aspirations. I did not inherit my 440-acre property, which currently qualifies for an elk license in Area 7. Instead, I worked tirelessly throughout my professional career to acquire this land, not just for recreational purposes, but as a way to contribute meaningfully to Wyoming's wildlife and natural heritage.

This proposal disproportionately impacts individuals like myself — hardworking Wyoming residents who have invested our resources and energy

into acquiring land under the current rules. Jumping the requirement from 160 to 640 acres creates a massive financial barrier, one that could prevent many future landowners from pursuing their dream of owning property and participating in Wyoming's wildlife stewardship traditions.

My property serves as critical summer elk calving and breeding ground. We exceed the current 2,000 AUD threshold and would continue to meet or surpass the proposed 3,000 AUD level. Over the years, we've taken meaningful action to enhance wildlife habitat — thinning overgrown forested areas, restoring meadows, limiting vehicle access, and creating a thriving environment for elk and other wildlife. These changes were made with a long-term conservation vision, supported in part by the understanding of landowner license eligibility under current regulations.

Should these regulations change, the value of our property — both economically and ecologically — would be seriously diminished. I fear it will push landowners like myself to subdivide properties just to reclaim value lost by the new requirements. In my case, the property is bordered on nearly all sides by U.S. Forest Service land. Subdividing would be a regrettable outcome, dramatically altering the landscape and jeopardizing prime elk habitat that benefits both public wildlife populations and private land stewardship.

I understand that part of the rationale for these changes is to address concerns about absentee landowners or misuse of the landowner license system. While I recognize these issues exist, they likely represent a minority of cases. Sweeping regulatory changes that penalize all landowners — especially ethical, conservation-minded residents — are not the answer.

I encourage the Department to consider more targeted solutions. For example:

- Better management of the license program based on verified Animal Use Days, regardless of whether the land is 160 or 640 acres.

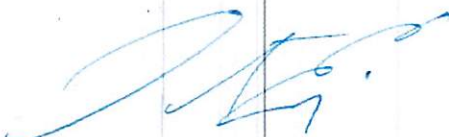
- Establishing performance-based eligibility that rewards landowners for active wildlife stewardship.
- Promoting conservation practices such as riparian restoration, wildlife fencing, and habitat improvement as part of the licensing criteria.
- Offering tiered or conditional landowner licenses based on conservation contributions and AUD benchmarks.

These approaches would support wildlife management goals while also maintaining fairness and opportunity for responsible landowners who are invested in Wyoming's future. They would also help foster the kind of strong, cooperative relationships between private landowners and the Wyoming Game and Fish Department that are critical to long-term wildlife success.

Lastly, I urge you to consider how this change might affect future generations. Many young Wyomingites dream of staying in this state, owning land, and participating in our outdoor traditions. We should not make it harder for them to achieve this by eliminating incentives tied to achievable land stewardship goals. A 160-acre tract, well managed, can be just as impactful to wildlife as a 640-acre one. Let's preserve that dream for those who are working hard to be part of Wyoming's future.

Thank you for considering my comments.

Kind regards,



Dustin Ewing

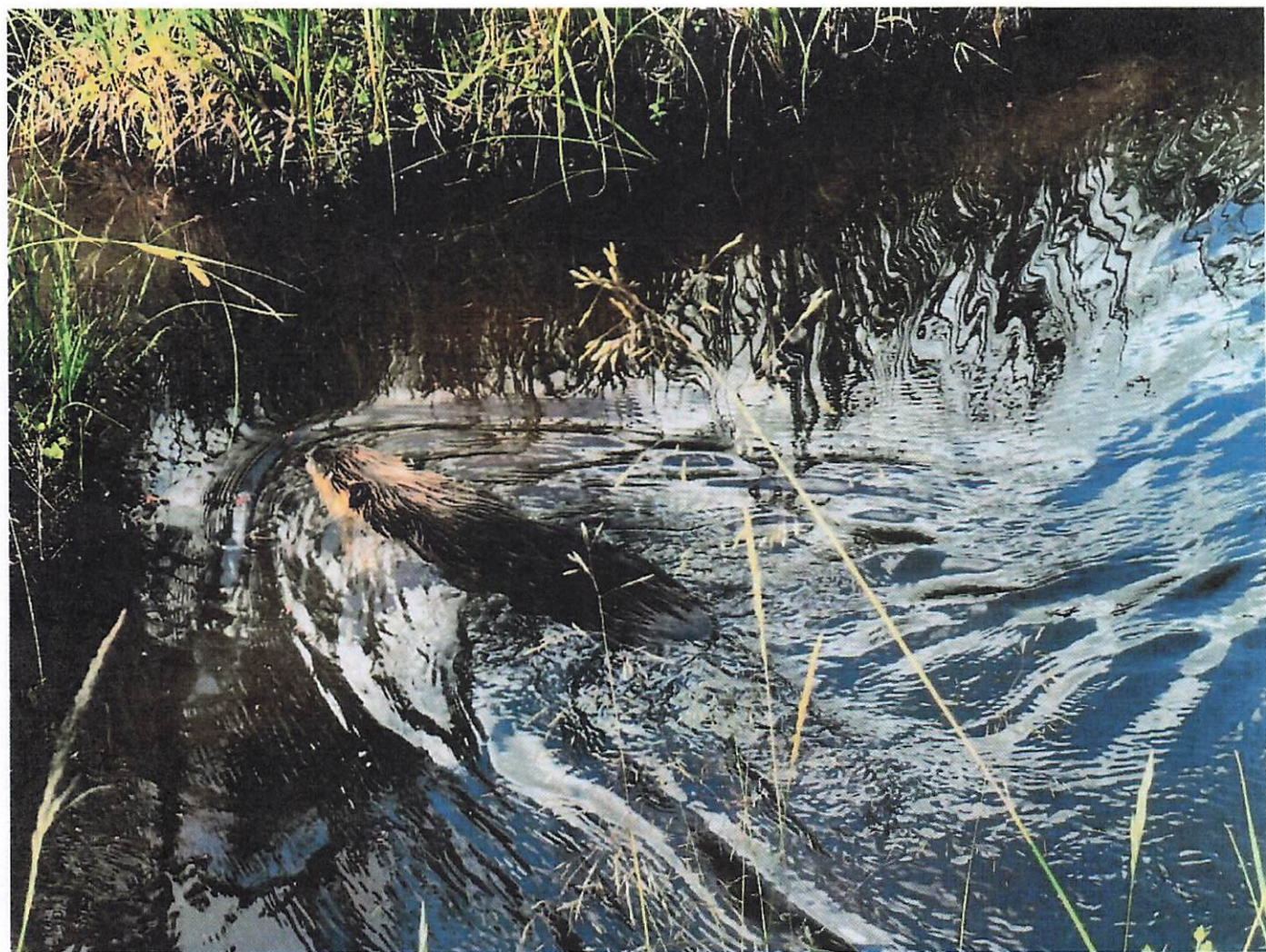


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09:17AM 10/15/2022 37 °F



STEALTH CAM





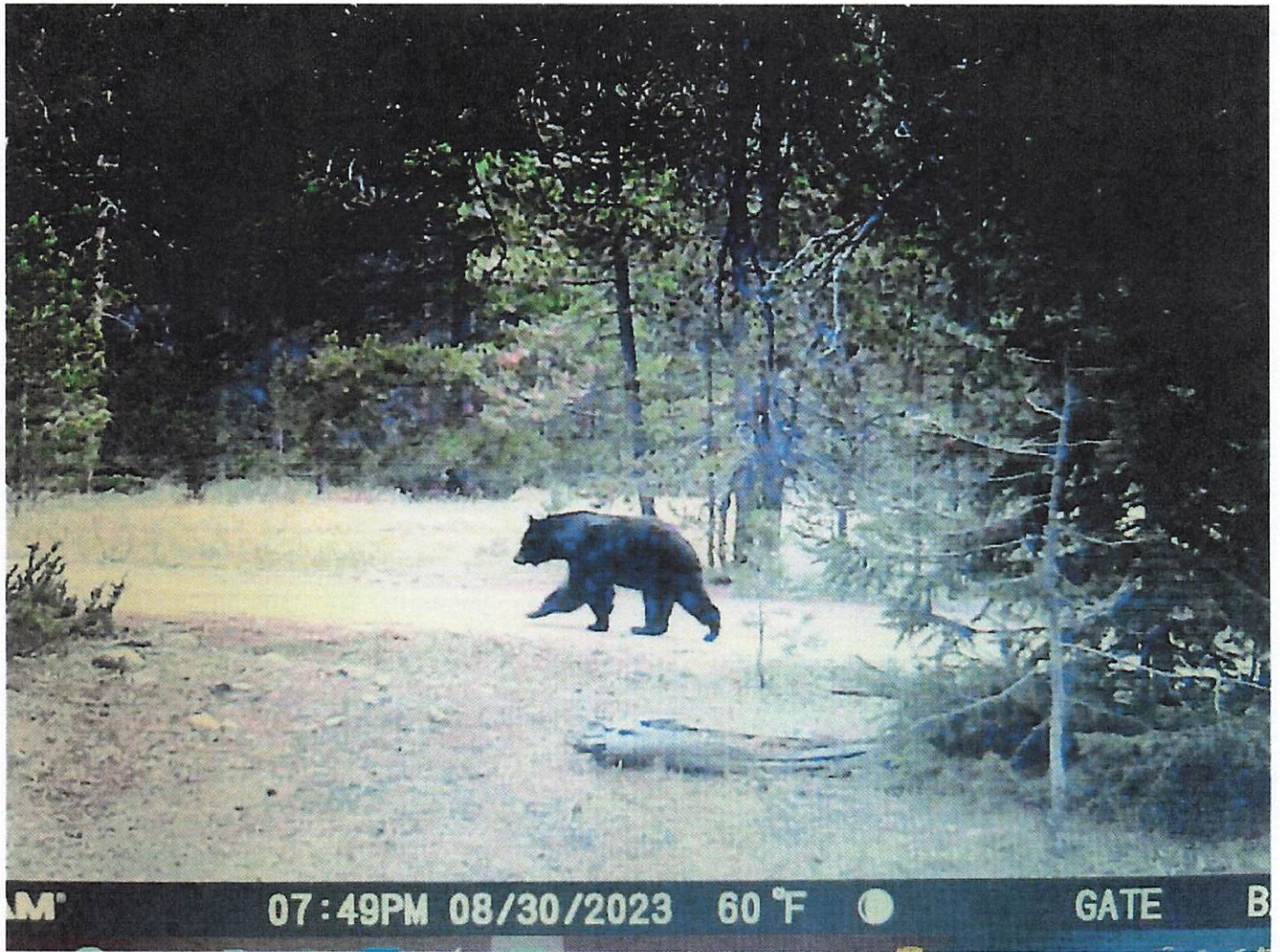


STEALTH CAM

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STEALTH CAM





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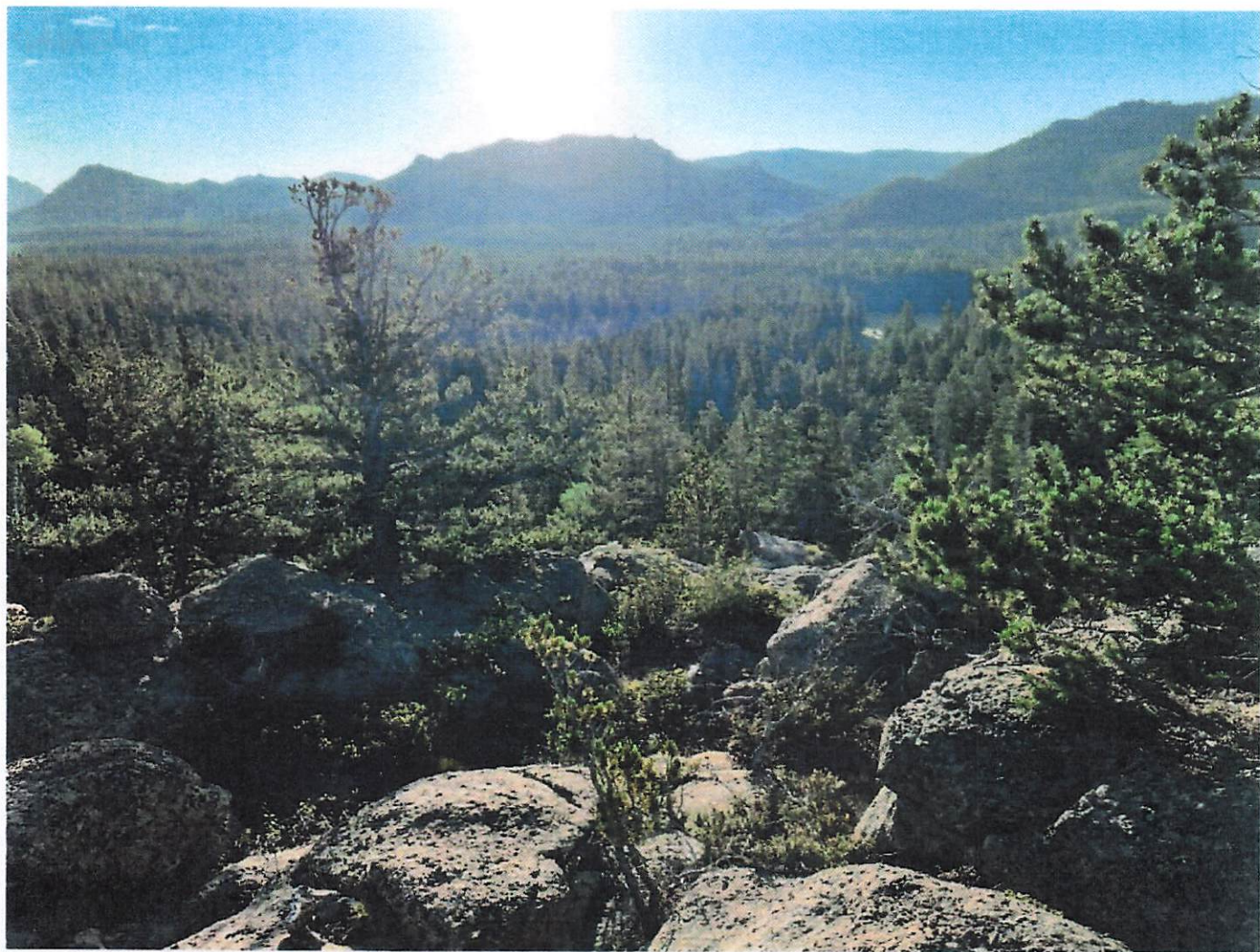














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☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

To Whom it may concern,
I am filling out this form in regards to the proposed amendment of landowner licenses in chapter 44 Section 8. I believe that this amendment will have major negative impact on both landowners and hunters alike. By increasing minimum contiguous acres of land I believe may lead many landowners to not want to open their lands to sportsmen to access. This may only affect small acreage properties which may lead to less access to private lands if the current legislation changes. I agree with your other two proposed changes but highly disagree with your first point on changing minimum acreage numbers of contiguous lands. Thank you for your time and ability to allow the public and sportsmen like myself to make comments. Take care!

(Please use reverse for additional comments.)

Aidan Murphy
Printed Name

6/10/25
Date

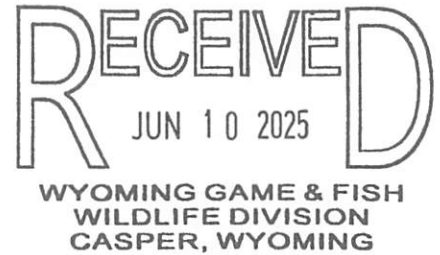
4/2025



Wyoming Game and Fish Department Comment Form

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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604



Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments: to whom it may concern

My name is Randy Murphy and I would like to add a few comments in regards to the proposed changes to the Landowner Regulations. I am a native Wyoming resident for the past 57 years and I am concerned that the proposed changes to the small acreage landowner, that they may no longer allow access to hunt or fish on their properties, as they have told me they will.

I do agree with your proposed change to your definition of immediate family.

Sincerely:

Randy Murphy
Randy Murphy

(Please use reverse for additional comments.)

Randy Murphy
Printed Name

6/09/2025
Date 4/2025

KEITH P. TYLER

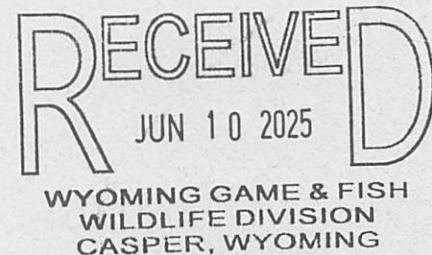
P. O. Box 2671
Casper, Wyoming 82602

(307) 266-0129

email: keithpt@earthlink.net

June 10, 2025

Wyoming Game and Fish Commission
Wyoming Game and Fish Department
Wildlife Divisions
3030 Energy Lane
Casper, WY 82604



Re: Second Comment

Dear Commissioners and Department Officials:

My name is Keith P. Tyler, and I am a landowner in Area 7. I co-own a 420 acre parcel that was previously subdivided into ten 40-acre tracts. My partner and I acquired this property with the express goal of preventing it from being sold off piecemeal - a process that would have resulted in increased cabins, fencing and other development, negatively impacting local wildlife.

This land is home to a small antelope herd each summer, and elk, deer, and even moose are regularly observed passing through or bedding on the property. We have seen bobcats, lions and bears as well. We paid a premium for this property due to the subdivision but did so willingly, largely because of the availability of landowner elk tags. Owning and preserving a mountain property that supports wildlife and hunting has been a lifelong dream - one I finally realized at age 69.

I am a Wyoming native, and my family shares my passion for responsible land and wildlife stewardship. My son, a fellow Wyoming native, is a Naval Academy graduate and former Marine Corps officer who served two deployments in Iraq. He now lives in Denver, and hunting with him and my stepson on our land has been one of the great joys of my life. While we may not immediately sell the property if we lose the landowner tags, I fear that without them, the long-term pressure to sell off in pieces will become overwhelming after I'm gone.

1. Lack of Supporting Data and Written Justification

One would expect a major regulatory shift of this kind to be based on solid data and careful analysis. In response to my request for supporting studies, I received older analyses focused on capping tag numbers and general trends in landowner tag issuance. What I did *not* receive was any analysis of how the proposed increases in acreage and animal use days would affect existing landowners, nor how those changes would address the actual problems identified with the current system.

The Wyoming Wildlife Task Force's letter makes several recommendations, but does not recommend increasing acreage or animal use day thresholds. I also reviewed the November 2023 Commission meeting, where the Department initially recommended raising minimum acreage to 320 acres and animal use days to

2,000. However, without any data or impact analysis, a commissioner unilaterally pushed that figure to 640 acres and 3,000 animal use days - based solely on anecdotal evidence.

2. Disproportionate and Arbitrary Impact on Small Landowners

As currently drafted, the proposed regulations would disqualify at least 34% of existing landowners based on acreage alone. The increase in required elk use days from 2,000 to 3,000 would likely disqualify additional properties-even those over 640 acres. These changes are not only arbitrary and capricious, but they disproportionately harm small landowners like myself.

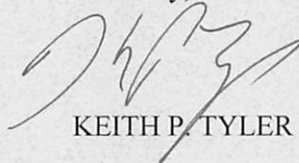
Many of us purchased and have carefully managed our land under the current regulations. These tags were an important factor in our decision to invest in the property and in how we maintain its wildlife value. The proposed changes feel like a targeted confiscation of those rights-rights we have relied on in good faith.

3. Untended Consequences

Small landowners-particularly those with parcels ranging from 200 to 640 acres-have often kept their land intact specifically because of landowner tags. We have been responsible stewards of the land and wildlife, collaborating with Game and Fish to improve the overall hunting and habitat experience. Eliminating our eligibility will likely push many to reconsider, leading to parcel sales and development-undermining the very conservation goals we all share.

I respectfully urge the Commission *not* to adopt the proposed regulations in their current form. If changes are deemed necessary, I strongly recommend considering alternative approaches-such as those I outlined in my previously submitted comments, which I am attaching again here for your convenience.

Sincerely,



KEITH P. TYLER

KPT/vlk
Enclosure

**WYOMING GAME AND FISH DEPARTMENT
COMMENT FORM**

Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper, WY 82604



Chapter 44 Regulation for Issuance of Landowner Tags

Dear Commissioners:

I would like to submit the following ideas for your consideration as a compromise/modification of your current proposed changes to Chapter 44 Landowner Requirements:

1. ALTERNATIVE SOLUTIONS AND RATIONALE

A. Minimum Acreage Requirements and Animal Days. I recommend the following: 160 contiguous acres cultivated, 320 contiguous acres of land, 2000 animal use days.

i) The rationale for this suggestion is as follows: While I am still skeptical of the underlying facts or scientific support for the proposed changes requested by the Commission, I am aware of the political pressure being exerted for increasing these requirements. I think that is especially true for future applications. This proposal comes directly from the Game & Fish Department's own recommendations to the Commission at the November 2024 meeting. The change to 640 acres and 3000 elk days came out of the blue from one of the commissioners with no facts to support the change. I prefer to put my faith in a recommendation coming from the Game & Fish Department than a single commissioner. From a fairness perspective the 320/2000 compromise seems far more reasonable.

ii) Possible additional compromise for existing tag holders with less than 320 acres would be to GRANDFATHER those properties if they can prove that their parcel existed historically as a stand alone parcel for at least 10 years. This requirement is intended to disqualify subdivision of parcels to qualify for more permits. Once grandfathered, the acreage qualification would run with the land but all other requirements would have to be met, for recertification. The grandfather concept is not new to this author. It was, in fact, first suggested by Commissioner John Masterson.

2. CAP ON LANDOWNER TAGS

A. Once again, I prefer to follow the recommendation that came from the Department and was presented at the November 2024 Commission meeting of a cap of 30% on allowance of landowner tags in any area. I understand there is an AG unpublished opinion that this could violate the statute which prohibits a competitive draw. However, nothing in the statute prohibits RATIONING tags. Instead of a competitive draw for landowners, this could be simply as a rationing of landowner tags using issuance of a certain number of licenses on a rotating basis. For example, for each hunt area give each qualifying property a number in numerical sequence. When the applications for any area exceed 30% the department would issue

permits to landowners using the property number starting with #1 and continuing in numerical sequence until 30% had been issued, and then in the following year starting with where the process ended the prior year. It would appear that using this process landowners would get their tags in every 2 of 3 years, except for those rare areas where landowner tags greatly exceed the 30% threshold.

3. SIGNIFICANT INTEREST

A. Again, I suggest following the Department's November recommendation of 10% with one caveat: That an exception be granted to family held properties where it can be shown that at least 2/3 of the owners are related family members. Family would be defined in the same manner as the regulations for landowners.

4. SUBDIVISIONS

A. To combat the abuses with subdivision of parcels to create additional landowner tags, I suggest that the burden be shifted to future applicants to prove that their property was not created by a recent (suggest a definition of 10 years for "recent") subdivision for the purpose of qualifying that property for landowner tags. The legal presumption would be that any such divided parcel would be disqualified. The presumption could be rebutted with proof that the primary purpose of the division was a legitimate business purpose such as a liquidation or dissolution of a corporation, partnership, or family business and not to create landowner tags. All such applications should be accompanied with a sworn and notarized affidavit.

5. PROOF OF COMPLIANCE AND RECERTIFICATION.

A. Existing permit holders would have to reapply for recertification of their property as meeting all of the Commission regulation requirements for landowner qualifications periodically starting in five years. To ease the administrative burden the permit holders could be broken into three or more groups with the first group qualifying in year 5, next in year 6, and the final in year 7.

As for the requirement to prove 2000 animal use days, the Game & Fish Wardens should be given the flexibility to determine compliance. For some properties compliance would be obvious based on simple observation. For other properties where in the Warden's absolute discretion actual proof is required, the landowner should be given the option of providing approved third party documentation or paying Game & Fish to perform a review.

These recommendations are submitted for your consideration as an attempt to offer reasonable solutions to the many objections of landowners to the proposed regulations as currently drafted.

Respectfully,

Keith P. Tyler
Landowner in area 7 of 429 acres
P.O. Box 2671
Casper, WY 82602
keithpt@earthlink.net
307-262-1603



Wyoming Game and Fish Department Comment Form

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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604

RECEIVED
JUN 10 2025
WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

I am 72 years old and have been on this ranch my entire life. I have watched the fluctuating game populations and I have watched and have been a loyal cooperater in hunting, allowing the harvest of antelope, deer, small games and fur bearers. I will tell you that if you adopt all or part of the new landowner license proposals this ranch will be closed to all hunting and hunting access to our lands and to properties west of my ranch. I'm certain that sportsmen can find and access the much longer route to ranches and lands west of me but they will not cross my private land. I have tolerated the Game and Fish in many of their further endeavors but this is the last straw for me.

Innes Ranch

Bob Innes

Printed Name

Bob Innes

(Please use reverse for additional comments.)

6-6-2025

Date

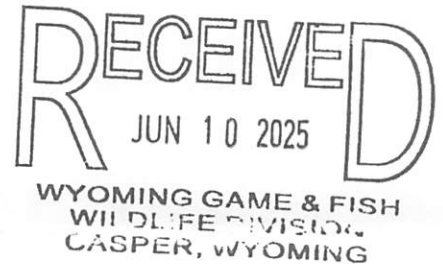
4/2025



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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604



Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

I am a Landowner and a hunter. The suggested landowner license changes are very detrimental to the relationship between landowners and the Wyo Game and Fish Dept and will do long term harm. I am opposed to these changes and truly hope these will be defeated when voted on. Do not approve of these changes.

Kyle E Innes

(Please use reverse for additional comments.)

Kyle E Innes
Printed Name

6-7-2025
Date

4/2025



Wyoming Game and Fish Department Comment Form

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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604

RECEIVED
JUN 10 2025

WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

I am a landowner and have applied for and received a landowner permit for elk. I am strongly opposed to the proposed changes in landowner license. This attempt to change landowner license will not be a long-term positive thing for the Game and Fish department. There are many landowners who have been allowing access to areas for harvesting elk and they tell me that they will change policy on hunter access if these new proposals are approved.

Thank you

Kirsten Innes

(Please use reverse for additional comments.)

Kirsten Innes
Printed Name

6-7-2025
Date 4/2025

Scott Legerski

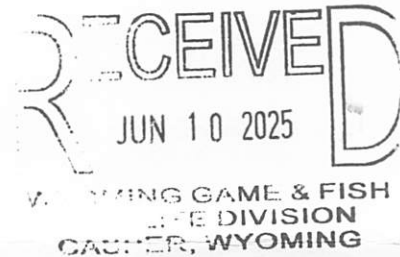
PO Box 50897 / Casper, WY / 82605

307-259-9532

Scottshotshot@gmail.com

June 10, 2025

Wyoming Game and Fish Department
Wildlife Division
Attn: Regulations
3030 Energy Lane
Casper, WY 82604



RE: Proposed changes – CH 44 Sec 8

Scotty & Stacy Legerski, owners of the Forgey Land & Livestock, a large ranch in Natrona County, are opposed to the proposed changes to CH 44 Sec 8. In our area there are many small landowners that are good stewards of the land. We all work together to maintain the area and keep it a favorable hunting area. Everyone is responsible and respectful of each other's property and hunting privileges.

We, along with several others in our area actively support veteran hunters by donating tags and guiding them for a successful hunting experience. Until you have seen the impact this program has on a vet, you cannot truly understand the importance of the program.

We appreciate your time to consider comments of opposition.

We respectfully ask you to NOT PASS the proposed changes to CH 44 Sec 8.

Sincerely,

A handwritten signature in cursive script, appearing to read "Scotty & Stacy Legerski".

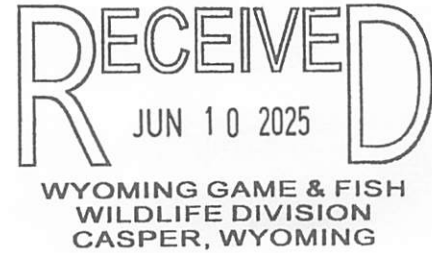
Scotty & Stacy Legerski
Landowner
Forgey Land & Livestock

Rick Legerski

PO Box 40 / Mills, WY / 82644
6000 Sego Lily Ct / Casper, WY / 82604
307-262-1960
RickLegerski@gmail.com

June 10, 2025

Wyoming Game and Fish Department
Wildlife Division
Attn: Regulations
3030 Energy Lane
Casper, WY 82604



RE: Proposed changes – CH 44 Sec 8

Please vote against the changes to CH44 Sec 8. The changes will adversely affect many hunters, not just landowners.

The change in acreage from 160 acres to 640 acres and the animal use days from 2000 to 3000 are not necessary to regulate the number of hunters or licenses. The changes are divisive and without merit. Further, the changes appear to limit the "little guy" from participating in the landowner program. WG&F is tasked with managing the program and creating FAIR regulations, not taking a position on the wealth of the participants. There is no substantiated reason to change the acreage and animal use days that are a material factor to warrant the change.

Will it reduce the number of hunters? – no

Will it reduce the number of animals? – no

Will it open more access to the public? – no (possibly reduce access to private land)

As to owning land specifically for the purpose of hunting because it is being abused, that doesn't even make sense. Why is it considered abuse to purchase property for the sole purpose of hunting? If landowners must have an alternate reason to buy/own land in a specific area, then the real abuse will be forced by the very department that is trying to prevent it! I expect a whole lot of property owners will expand or allow cattle to compete for the forage that was used to maintain game animals. Who gets to decide if a landowner owns land for the right reason? If the department has identified abuse of landowner licenses, deal with the abusers directly rather than punish everyone.

The landowners I have the privilege of knowing are everyday people that take pride in their property and community. They generously donate to Hunting with Heros and love to take veterans hunting. We care about Wyoming and desire to keep Wyoming free of burdensome regulations that hinder the Wyoming way of life.

I appreciate your time to consider my comments of opposition. I respectfully ask you to NOT PASS the proposed changes to CH 44 Sec 8.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rick Legerski".

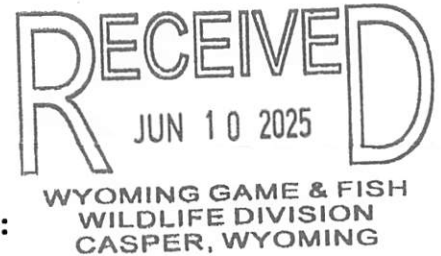
Rick Legerski
Landowner – 400 acres



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Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604



Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

SEE ATTACHED

(Please use reverse for additional comments.)

GREG POPE
Printed Name

6-9-25
Date 4/2025

1. My name is Greg Pope, and I am a resident of Bates Hole south of Casper. I have land in Natrona, Converse, and Crook counties and for over 40 years have provided habitat for deer, elk, antelope, wild turkey, mountain lions, black bear, and many other species. My family has received two landowner elk tags in area 7 for over 30 years, based upon approx. 1300 acres and the 2,000 animal use days criteria. I have selectively allowed hunting for many non-family members over the years but would most likely no longer allow any hunters if I lost eligibility for landowner tags. Having tags every year has allowed me to encourage a hunting and outdoors ethic for my daughter, her husband, and my two granddaughters. Watching my daughter and 10-year-old granddaughter get wide eyed and excited as a bull elk comes to the call is something that I cannot put a value on. It is something that has taken years to develop and would have been impossible to do without the landowner tags I share with the family. We, as sportsmen, need to continually develop the next generations of hunters or we all could lose the tradition so important to Wyoming's economy and way of life.
2. I oppose the changes proposed in section 44 for the following reasons:
 - a. The Wildlife Task Force, after many years of meetings and a lot of input, did not specifically recommend several of the items being included in the current Game and Fish Department proposal. Rejection of the results of that public process does not send good messages for any future task force work.
 - b. Changing the acreage to 640 acres is not dictated by science but is driven by some "big AG" interests as was apparent in the November 2025 Commission meeting. It does not really discourage the potential subdivision of large ranches. It just raises the prices and puts properties in the hands of more wealthy individuals. In addition, the "contiguous acres" wording is unfair for some landowners who, for example, might have two 320 acre parcels (or two 80 acre parcels under the current regulation) separated by some State of Wyoming leased grazing ground, but all within a single pasture. They are providing the habitat but would not qualify under the proposal if all the deeded property doesn't touch.
 - c. The change of 2,000 animal use days to 3,000 animal use days again is not science based, but just a method to disqualify existing landowners. This change would eliminate a lot of landowner tags for those landowners who have substantially more than the 640 acres, especially in the mountains. The 3,000 AUD proposal is much too high for a lot of the mountain elk areas. An elk AUD is not equivalent to an antelope AUD – one size doesn't fit all. Landowners with high mountain elk habitat provide critical habitat for large numbers of elk during calving and rutting activities but might not qualify since that usage is seasonal.
 - d. The landowners, large and small, who receive tags are more inclined to provide habitat for game through more selective grazing practices and more development and protection of water supplies than perhaps a larger operation might employ. Eliminating smaller landowners could result in decreased quality of habitat.

- e. There will most likely be a revolt of the smaller landowners if they can no longer receive landowner tags. Perhaps they will decide "if my family can't hunt my own property, I guess no one can hunt". In addition to the loss of access for non-landowner hunters, it would result in big game animals figuring out there is an island of refuge from hunting on that property which would further reduce availability to the public land hunters on adjacent lands. At least if the small landowner can hunt their own property, those animals will move off to provide opportunities for the other hunters.
 - f. The landowners who no longer are eligible may elect to subdivide their properties because of the large monetary investment they have. This would further fragment critical wildlife habitat. Or they could just sell their holding to the very large adjacent landowners to incorporate into their portfolio and "lock it up" to all but the deep pocketed non-resident hunter. Or they could just lease all the hunting on their property to an outfitter for an exorbitant amount. Net result either way would be a reduction in access and availability of critters for the non-landowning hunters.
 - g. The addition of section 8 (a) (iii) requiring the landowner applicant to solely provide the documentation of animal use days could be problematic. There is no outside entity in existence that could do all the animal usage surveys for every landowner applicant in the state in a timely manner. The type of documentation that is acceptable to Game and Fish needs to be defined. Perhaps local wardens or techs can do the animal use day surveys as per current practice and the landowner can reimburse the Department for the services rendered?
3. There was a suggestion made at one of the public meetings regarding making participation in the Access Yes program a requirement for receiving a landowner tag. I oppose this for the following reasons:
- a. This would be an excessive burden on the smaller landowners who do not really have enough acreage to allow unfettered public access and still have quality hunting for their family and quality of life conditions when they reside on the property.
 - b. The purpose of WS 23-1-302 in providing landowner licenses is "...promoting the maintenance of wildlife habitat...". The purpose is NOT to require public access.
 - c. Currently most landowners provide hunting access to friends and relatives. Forcing them to provide uncontrolled public access could backfire and result in landowners providing no access at all, and taking their chances in the limited quota drawings. This would be a net loss to the sportsmen.
4. On perhaps a worrisome note, both the TRW and Agriculture committees are in the process of taking testimony advocating for sale/transfer of landowner licenses – items strongly advocated for by the big ag interests – even after SF0118 was turned down last session. My common sense tells me that all of this could be part of a big plan along with the changes to chapter 44 to take over the landowner tag system

legislatively and concentrate all the tags with the largest landowners so they can be sold.

In summary I believe in the following solutions:

1. Perhaps an over-simplification is that the reason for changing a perfectly good system is primarily the quantity of tags. The PERCEPTION of sportsmen is that the landowners receive too many of the limited quota tags. The Game and Fish Department believes there is a perceived DECEPTION and abuse in "gaming the system" by some landowners doing excessive subdividing for the purpose of obtaining incrementally more landowner licenses and the formation of corporations or hunting clubs to issue the landowner tags received on a rotating basis to their members.
2. There is an acronym in the business world – KISS – keep it simple stupid. I believe these alleged abuses and sportsmen concerns do not justify the wholesale modifications to section 44 that are being proposed but rather can be solved by simply addressing the PERCEPTION and DECEPTION issues.
3. Address the PERCEPTION of sportsmen that too many tags go to landowners by a public relations effort:
 - a. Less than 2% of all tags go to landowners
 - b. Remind sportsmen that the landowners are providing habitat for game and the small percentage of tags that they receive is a fair compensation and acknowledgement of what they do for game animals
 - c. Most landowner tag recipients do provide some opportunity and access to sportsmen
 - d. Create a percentage cap on landowner tags in each area. A 30% cap as proposed in 4/24 commission meeting is acceptable and reasonable to address the concerns of sportsmen. With the caveat that if a drawing is needed among landowners, it be held early enough in the year to allow unsuccessful landowners to re-apply in the regular drawing. It will require some creative regulation-making to avoid opening the entire chapter to legislative revision, but common sense would indicate that G&F could create a percentage cap on landowner tags using the same authority that allows them to set seasons and quotas, an acreage requirement, etc.
4. Address the DECEPTION allegedly employed by some large entities that are increasing demand for landowner tags
 - a. Simply enforce the current language in section 8 chapter 44 which prohibits the purchase or subdivision of land for the primary purpose of obtaining landowner licenses. A little work on that clause might be required and some requirement for landowners to prove they comply inserted.
 - b. Put a 20% ownership interest requirement into Chapter 44 as is proposed. The minimum ownership interest requirement would be acceptable if it could be clarified so that lineal family members in a family corporation do not need

to have a 20% interest if they are related per the existing regulation with a family member that does have the 20% interest.

- c. The two items above would significantly reduce the number of landowner tags being requested and potentially solve the problem of "too many tags" without needing the wholesale changes proposed, including the need for a percentage cap on tags in each area.
5. If any changes are made, please consider protecting those landowners and their families who have made significant investments in their properties and have been in the program for many years. Leave the 160 acre and 2,000 animal use days as-is and grandfather the existing owners and properties. Require everyone within a reasonable amount of time to provide documentation of the animal use days to meet existing requirements of Chapter 44.

Do everything you can to work against the sale and transfer of landowner licenses. That truly would be contrary to the reason they were created in the first place and would exacerbate the problem with acceleration in demand for landowner tags.

Thank you for the opportunity to provide public input.

Dated June 9, 2025

Regards,



Greg Pope
16485 State Highway 220
Casper, WY 82604



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RECEIVED
JUN 10 2025

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WILDLIFE DIVISION
CASPER, WYOMING

Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

I disagree with the proposed changes. I
think everything should stay as it is.

(Please use reverse for additional comments.)

Julie Innes
Printed Name

6-7-25
Date 4/2025



Wyoming Game and Fish Department Comment Form

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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604

RECEIVED
JUN 10 2025

WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

Please see attached paper

(Please use reverse for additional comments.)

James Innes
Printed Name

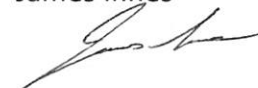
6-7-2025
Date 4/2025

1. I believe the amendment of the 160 acres to be cultivated land or a contiguous 640 is impractical when talking about elk as a species. The cultivated land that is damaged or used by elk, is often done in a short period of the year, and has mostly been used or harvested prior to being targeted by elk. The smaller parcels of land in the mountains that are from the original deeded land can hold elk throughout the year. They are used from calving season to summer grazing, and summer grazing to breeding season. There is a small acreage that we often use for recreational use and it also contains the corrals. After viewing the game cameras for a year, there are elk on it all year round and it is near Laramie peak. These animals are reliant on the feed that is located in these areas and fences are constantly being fixed. There are improvements to the land and water.

If these changes are granted there are multiple people who feel the same way and have agreed that they are not going to allow resident and nonresident hunters. I feel that these amendments will just cause more of a strain between landowner and Wyoming Game and Fish. I am speaking from two different families that have been landowners in Wyoming for over 100 years. They have put their blood, sweat, and tears in making quality land that can be used by wildlife and livestock. This will cause a large issue and will be backtracking from the good job that has been being done in working with landowners and trying to open up more public land through private land. There is already a huge adjustment landowners are facing with corner crossing and now this is going to put a lot of people over the edge.

2. Increasing the animal use from 2,000 to 3,000 seems petty. If there is a valid and scientific reason for this, than it needs to be publicized. The game wardens already have enough to do and to try and estimate what is on there is ridiculous and improbable. The 171 acres that I camp on have a large number of elk and small herd of deer and antelope that frequent it. I had to supply the game warden with my information from my pictures on my game camera to show that it was meeting the requirements.
3. By changing the definition of landowner applicants to require 20% interest is just going to make more dishonest people or people cheating or gaming the system. They will find a loop hole.
4. Expanding the definition of immediate family members appears that a certain individual is attempting to make themselves meet the requirements of a landowner license. We are getting stricter on multiple areas, but then going to allow possible undeserving people access to the licenses. If that is the case, the landowner should be able to do whatever they wish with the tags- donate to family friends or people they feel deserve it.
5. In conclusion, I believe we should be going the opposite direction as proposed here. We should be giving the landowner more leniency and privileges. Without the landowners being on board and supporting the efforts of the Wyoming Game and Fish (such as wildlife friendly fences and maintaining of wells during off seasons or when pastures aren't in use), we will see a decline in wildlife production and hunting access.

James Innes





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WILDLIFE DIVISION
CASPER, WYOMING

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☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

First of all: I can't even believe we have an attack on the qualifications of landowner coupon requirements when:

1. They only account for about 2% of all coupons.
2. When the Deeded lands (landowners) feed ALL of the States animals for FREE. There is no where else in any democracy (capitalistic system of Gov.) where you shouldn't get compensated (paid a lease or Aum fee) for someone else eating Your grass!!
3. When Wyo landowners are Already by Far way more regulated on coupons than Any other State in the Union. If this goes through, I'm sure there will be suits filed & I'm not sure that, if anything when the smoke clears that Wyo land owners will end up better than they are even NOW.
4. The private land feeds most of the wildlife because, The private land exists because it is where the water over

(Please use reverse for additional comments.)

Robert Christensen June 7, 2025
Printed Name Date 4/2025
J+R Christensen Land, LLC.
area 7 for elk. (307) 680-1294

and the best food was in the areas! A lot of the land that was left over, that's federal land is far less desirable. It's mostly dry + full of trees + rocks in my area of the mountain region where we are (Area 7).

One size does not fit at all for all coupons on all federal lands. You have to be kidding if you're requiring cultivated ground for the 160 acre ownership in the mountains!!!!

The requirement of "contiguous" acres is about as absurd as anything can be. If you own 3 lots in a city or 3 parcels in a county, since they're not contiguous does that mean that we should be credited for less taxes or something like that -- I haven't heard of any thoughts on that. -- You still own X number of acres NO matter how you want to slice it!!!

Increasing the number of animal days is like the communist form of Government trying to reach out + take anything + everything they can from you. We are already feeding your animals for FREE. How is anyone going to monitor that?? That's almost impossible -- If you want to raise to 3000 animal days, I think I just as well sign it over to the Communist state because I can't work it + pay taxes on ownership if you are taking all of the Aums that even exist for the ground I have. I can't believe my own Gov + it is supposed to be mine too, would even consider such an act. That's why the United States of America exists because our smart forefathers fled their oppressed countries to come to a new land + set up a Government where we had rights of ownership + the rights to protect what is ours too. Am I getting that with these new proposals?? NO - I didn't have much of that even with the old original laws especially when compared to the rest of the owners of the USA in all other states. This is the biggest misuse and blatant attempt of abduction (stealing) of land I've seen, maybe in my life time.

Wyoming Game + Fish Dept.

Comment form for:
Proposed changes to Landowner licenses in Chapter 44.

All other states already easily qualify landowners on parcels of 160 acres (of any condition) and most have programs where there are extra coupons given to Landowners for their sale in a gesture of fairness for their grass + nuisance + damage + extra time, etc. that is occurring on our lands for their endeavours + money making programs!!!

If it wasn't for us landowners allowing you to take what you already do, there wouldn't hardly be any way for the other 98% of coupons that pay for the agency expenses each year to operate. WAKE UP - you Idiots --!!!

There is a proposal to require 20% ownership in the properties + a total stop of subdividing lands. In today's world, partnerships, corporations, LLC's, LLP's and some other entities are the norm anymore. Almost all lands are being subdivided for Estate plans + ownerships are being spread thinner every day. This can not happen or there will be challenges in the courts too. Its not needed anyway!!! Its a redundancy thats not needed. It doesnt matter if there are 15 owners of a ranch (non contiguous) with 640 acres or more. They are still only allowed 2 permits. We are in the process of splitting up + Transferring now for Estate purposes + if you try to cut us out -- Im sorry but there will be WAR!! Im really getting tired of the HEAVY hand of Gov. which is exactly what our forefathers tried to set up against!!!

over

The last proposal of the immediate family, I'm actually going to go against the expansion of.

The step children should be included. I don't get the step-parents? You or your spouse are the parents if the kids are step children then it's because you are officially married which brings the spouse into the immediate family. Past that, the step grandparent and step siblings I don't think should still qualify.

It was brought up at the meeting I attended (Casper on June 4) that the qualification for Land owner coupons only goes to 640 acres. If someone owns 2000 or 5000 or more acres they still only qualify for 2 coupons. I know you're not going to like this BUT this isn't really FAIR at all either. I'm not one of those guys either but it's not fair. These guys feed & provide water & access to many more of your animals & it should be recognized and acknowledged & considered!!! After all they provide a lot of habitat for your sportsman & sale of tags that comes into the agency and a lot from out of state. You should be thanking them for their contributions to our State!!

Here's a suggestion on a proposal I think could help make things a little more FAIR and rewarding for your biggest supporters of your agency & business (money taken in for costs to continue operating)

How about anything from 160 acres to 640 will be allowed 2 coupons (irregardless of ownership percentages) - - After 1280 acres there would be one additional coupon for a total of 3. After 2560 acres we should offer them 2 additional tags that they can sell (like most other states do).

over

comment form for chapter 44 changes! (4)

I know you don't want to hear something like this but it's hugely important that you keep the landowners reasonably happy and satisfied if you want to run good seasons + programs for the people coming to enjoy our state + spend some money here for our economy! You still get some money for the coupons, BUT it gives the BLG landowners a little sense of ownership or involvement (since they feed + taking care of your animals). The hunters will almost always be, out of state, deep pocket hunters that will help our state economy out a lot!! After 5120 acres of donated grass + habitat, give out another 2 licenses for them to sell. After 5120 acres, you now have given a possible 3 landowner licenses (which the landowners still pay for) and 4 additional licenses for them to sell making a total of 7 coupons spread out over 5120 acres. After 10240 an additional 2 licenses for them to sell. That's the maximum. Considering how much they feed + donate to your agency + the State I think it's still a small amount BUT would greatly improve your relations with the people that support you and pretty much pay the way for your agencies animals and keep the revenue rolling in!!!!

I understand that a lot of these proposals came about because of a big ranch that was bought + subdivided into 640 parcels for people to buy + qualify for landowner tags. I know you're not going to like this either but they have bought + paid for land, making them landowners now.

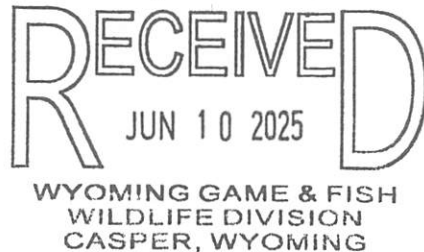
over



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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604



Please use a separate form for each of the categories below:

- ☐ Watercraft ☐ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

I am voicing my opposition to the CH44 Proposal. Our family has always maintained a great relationship with the Game & Fish and this would certainly change, also greatly impact the hunting experience for my grandchildren and generations to come.

(Please use reverse for additional comments)

Debra S. Porter
Printed Name

6/10/2025
Date

4/2025



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☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

I am opposed to the CH 44 Proposal due to the significant damage it would impose on myself, my family and especially my grandchildren. The Game & Fish has done a terrible job managing landowner licenses and has created the perceived problem they are now trying to fix. Landowners and the G&F will forever damage their joint efforts and relationships if this passes and public access to 100,000's of acres will be lost as a result. I ask that CH 44 not be approved.

(Please use reverse for additional comments.)

Dana Porter
Printed Name
Dana Porter

6/10/2025
Date

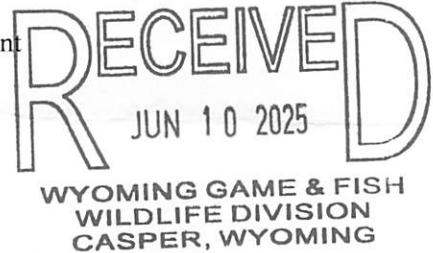
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☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

Commissioner MASTERSON, Thank You for attending the Casper L.O. Tag meeting.

Problems you mentioned - Declining Mule Deer and Antelope numbers - Possibly lower quotas (area by area) maybe eliminate Deer tags to L.O.'s - Leave Elk as is. Fracturing Land - this will only increase if tags are taken away

There were many ideas discussed - most of which were negative effects should the proposal go through.

- Deteriorating L.O. - G&F Relations

- many subdivisions

- loss of tags for charity hunters - "Hunters Lot + Heroes" Make a Wish - Catch a Dream - all very good causes

Please consider before making a decision

(Please use reverse for additional comments.)

Steve Steinle

Printed Name

6/9/25

Date

4/2025

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JUN 10 2025

WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

Wyoming Game and Fish, the Ag Committee and others,

The Chapter 44, Section 8 proposed regulation changes appear to be an outright attack on Wyoming landowners; a bullying attempt by vocal non-landowners who outnumber those who own land currently qualifying for landowner tags in Wyoming. The stated goal to open-up licenses to the public in specific units has turned into a greater assault on all units in Wyoming. This will come at great costs to those who live on currently-qualifying acreage and have chosen to own their land at least partly due to local game populations as it removes their big game tags and devalues their land.

I understand the proposed definition of "Significant Interest" and prohibiting subdivision for purposes of increasing landowner licenses.

Capping landowner licenses to 20% of available licenses clearly demonstrates the Game and Fish Department or State does not value those who have owned and lived in that unit, often for generations. Landowners with wildlife on their land should be prioritized, not penalized or shunned. Should they not be able to have a tag to more effectively help the Department reach its harvest goals than travellers would? Should they stay at home in the fall while travelling citizens hunt whatever public ground is available somewhere else in the unit? This is insane! 20% is too low! 50-75% or higher still allows tags to the public in largely private units, with many units currently falling below 50-75% eligible landowner enrollment.

The 160 acre minimum requirement was presumably chosen historically for logical reasons (as we used to make decisions more commonly), presumably recognizing the Wyoming families that even homesteaded this beautiful state, rewarding them if the original site had not been divided. The Department's or State's disregard for historically important families or logical former benchmarks to satisfy newcomers or vocal nonresidents is appalling.

While cultivated land can be damaged to a greater economic effect per acre by wildlife than rangeland, rangeland provides better habitat for wildlife. Increasing the minimum acreage requirement by 4 times for rangeland owners is oppressive and indicates the only apparent reason to award landowners any tags is to curb wildlife crop depredation, not to provide opportunity or priority to the people who live in those areas and enjoy hunting locally and effectively.

Increasing the minimum wildlife use days to 3,000 days annually would demonstrate the Department's priority is to reverse-engineer a target number to reach a political goal (satisfying a large vocal group) instead of creating a target number for scientific or population-control reasons. 2,000 land use days is a lot of days; enough to expect possible harvest, and presumably based on previous thoughtful consideration of what constitutes "significant use" to expect possible harvest. A 3,000 land use day target is reverse-engineered for political goals.

OVER →


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Requiring landowners to provide their own documentation of animal use days is absurd. Would this not likely be abused or "fudged" by some landowners? Is the documentation work that onerous for Game and Fish biologists? Can this work not be expected by Wyoming taxpayers or license buyers?

Requiring investigation for landowner license eligibility every 5 years could be instituted reasonably, but has the inherent possibility of becoming very bureaucratic or paperwork-intensive if not implemented in a respectful way to landowners.

It would be nice if the Department or State could just increase the number of game on the ground for everyone but since that is not possible, The Wyoming Game and Fish Department needs to decide where the finite number of tags will fall. Currently, many, many more tags go to non-landowners than to landowners each year. The proposed regulation changes go too far to further dump tags into the huge non-landowner tag pool. The Department needs to see that these regulation changes will transfer too many already limited tags out of landowner hands; estranging an unfortunately fewer number of people embedded in our landscape to the joy of the travelling masses. What will the Department do?

Concerningly,



Brent Carlson

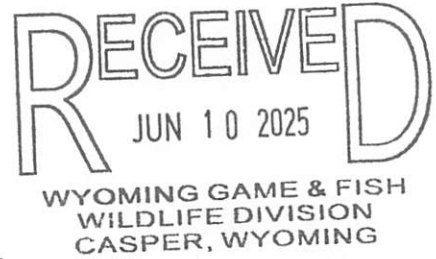
Meeteetse, Wyoming



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☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

Chapter 44 Sec 8 Landowner licenses

(Please use reverse for additional comments.)

Printed Name

Date

4/2025

Comments on proposed Landowner License changes

Dear Commissioners,

- 1) I believe that the proposals are largely an attempt to respond to demand of the general sportsman-population's clamoring for more licenses and (unjustly) blaming landowner permits as the reason more licenses are not available.
 - a. Since landowner licenses account for only about 2+% of all licenses issued, the proposal does nothing to solve this issue. These "hunter's rights" groups **would be better served by your educating them to the facts including:**
 - i. "Even if all landowner licenses were returned to the pool, the "public's" chances of drawing a license would only increase 2+%. Thus, Landowners are not the problem.
 - ii. The majority of landowners are not stuffed white shirts, but rather normal people who are good stewards of the land and the game animals. It is ridiculous to ask them to own/live on/work the land every day (not just during hunting season) see the animals, repair the damage they do, create and/or improve habitat for the animals, and then not be guaranteed the right to hunt them.
 - iii. The landowners are bearing the cost of taxes, repairing game damage to facilities and lost production of pasture feed and/or crops. Without landowner support and habitat management and putting up with damage, the game populations would decrease and there would be drastically fewer animals, thus fewer licenses available to everyone.
 - iv. Most hunters are supportive of landowners, and vice versa. The loud minority activist so called "sportsmen advocate groups" that demand more access, and demand more licenses should stop trying to be at war with landowners and be more supportive. They need your guidance and education to do this and to be more satisfied with Game and Fish.
 - v. Remind these loud activists that about 10% of all landowner tags are donated back to charitable causes (largely challenged veterans) with no monetary benefit to anyone. Do they want to rob these charities of permits so that there will be a tiny quantity more of permits in the public pool?
 - vi. Nothing you do regulatory wise will satisfy these noise groups. **The only way the noise groups will go away is with education; and you are the most likely and effective source of that education.**

- 2) I believe that the other item of contention is the commercial subdivision and sale of properties "with a landowner license guarantee attached" as the primary purpose of the sale. This is likely a very small factor in affecting the number of licenses available in the general drawings; however, it is a very, very contentious topic that both "normal" landowners and general sportsmen vehemently dislike. More importantly, it also adversely affects habitat and makes game management more difficult. Thus, it does need to be addressed.
- a. The language in the proposed revisions shows that the commission is aware of and wants to act on this problem, but the proposed changes would likely have little or no effect on the problem, while simultaneously hurting many historically "friendly-to game" land owners. Perhaps a grandfather clause protecting rights of landowners who are already accustomed to working with Game and Fish and purchasing landowner licenses would help. New landowner license applicants would have to meet a more stringent set of guidelines to be successful in their application. I believe that the proposed guidelines, even though in the correct direction, are not rigid enough in themselves to actually have the desired effect of stopping subdivision for the sake of obtaining licenses. The current proposal is a middle ground, 50% measure that will not satisfy anyone on either side of the argument, and will only do harm. I suggest you make the requirements for obtaining new landowner permits much more strict than those proposed.
 - b. Private property rights is a basis of our free society and regulating what one does with or on his private property, or how one disposes of all or part of that property is, also a contentious topic. A private property rights discussion is a hornet's nest that the commission should not have to take on. However, we all know that property rights have some limits, such as imposed by zoning or when others could be damaged by your actions on your land. Game and Fish and other agencies already limit personal property rights where the welfare of the public or in this case the game animals are concerned. Therefore, you would not be breaking new ground by coming up with a set of regulations that discourage or prevent the commercial subdivision of land for the purpose of obtaining guaranteed landowner hunting permits. This is not a simple nor easy task, but I believe you have the resources within the ranks of your Game Wardens to come up with workable plans that would be more effective than the current proposals.

- c. Please do not take a shotgun approach to try to fix what is a smaller specific problem with just a few specific types of properties.

3) I am in favor of your expanded definition of "immediate family member."

My wife and I are owners of a larger property that would not be affected by the implementation of the proposed changes to Chapter 44 section 8. We more than meet the size and usage guidelines. We have no children nor extended "blended" family as described in the proposed changes, and have no intention of selling off small "hunting parcels." Thus, I hope you find my opinions unbiased and helpful.

Respectfully,

Charles Putman
Pine Mountain Ranch
PO BOX 2020
Mills, WY 82644

Hunt areas Elk 23

Dear 89

Antelope 71



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WILDLIFE DIVISION
CASPER, WYOMING

Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances

Comments:

By changing the current Land owner License will take away our opportunity to have a Land owner License that our Ranch has been getting for over 40 years the perks on getting 2 Licenses for putting up with wild life Damages is a very small token - We have managed the Ranch operation for over 100 years running cows right along with wild life the things we do to improve our cattle habitat benefits all the wild life as well we let people hunt without charging and do everything we can to get a good ballgame

Dont change the current process we have now its been working for over 30 years at 160 acres 2000 use days. If you must change grandfather all before the changes

(Please use reverse for additional comments.)

Mike Stephens

Printed Name

6-6-25

Date

4/2025



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☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

To Whom it May Concern:

In reference to chapter 44. Your need to change does not seem to stem from the need to control animal population, but from some political pressure. Grandfathering land owners licenses and researching new application seems to be the best course of action. My family has obtained a landowners license since the 70's and as a landowner myself I feel the acreage rule does not necessarily determine elk/deer population usage. The percentage rule will take licenses away from long time Wyoming families that have created LLC's to protect their family ranches for posterity. Why does this seem like a good idea? Land owners care the best stewards and understand the need to preserve wild life and should not be punished.

(Please use reverse for additional comments.)

Nicole Williams

Printed Name

6-5-2025

Date

4/2025

June 9, 20025

Rob Shook

Shook Ranch Company

P. O. 51227

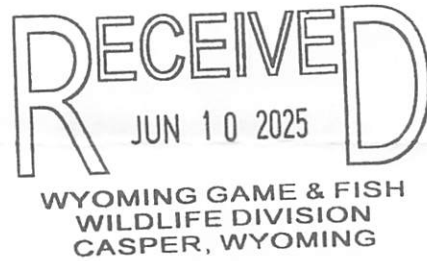
Casper, WY 82605-1227

Brian Olsen

Wyoming Game and Fish Department

3030 Energy Lane

Casper, WY 82604



Dear Brian,

Sorry I was unable to attend your meeting in Casper on June 4, due to work commitment.

Pursuant to your letter of May 12, 2025 regarding Landowner license requirements, I wish to add the following: If a Landowner License is issued to a Landowner, that License MUST be used on his/her ranch on Deeded Lands, State of Wyoming leased land or BLM leased land that he/she controls by grazing leases and NOT on adjacent ranches.

If he or she says they don't have animals during hunting season, better not apply for Landowner License or purchase additional land that does.

Thanks for accepting my comment.

Respectively submitted,

A handwritten signature in black ink, appearing to read "Rob Shook", written over a horizontal line.

Rob Shook

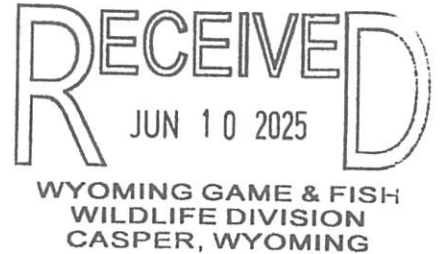
Deliver in person to Casper office, June 10, 2025



Wyoming Game and Fish Department Comment Form

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Wyoming Game and Fish Department
Wildlife Division
ATTN: Regulations
3030 Energy Lane
Casper WY 82604



Please use a separate form for each of the categories below:

- ☐ Watercraft ☒ Licenses, permits, stamps, tags, preference points and competitive raffle chances
☐ Mountain lions ☐ Gray wolves ☐ Fishing

Comments:

*Proposed changes to landowner licenses in Chapter 44
Section 8*

See Attached

(Please use reverse for additional comments.)

Shawn L. Wagner
Printed Name

6/9/25
Date 4/2025

6/9/25

- 1) In regards to the rule that a landowner must have 160 acres of contiguous land to qualify for landowner tags. Game & Fish has failed to consider the value of natural resources to wildlife such as a pond or spring providing fresh water for wildlife for many miles around.
- 2) I think it will be a huge waste of resources for the Game & Fish to try and reevaluate 3000 animal use days from the already current 2000 animal use days.
- 3) Many small landowners, myself included, have land enrolled for walk-in areas under the current rule. Putting more constraints on small landowners might affect current enrollment lands.

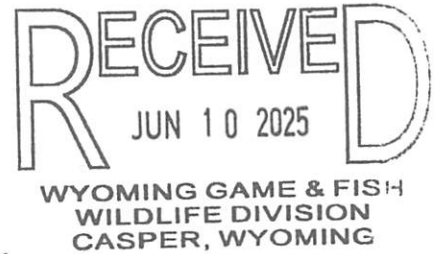
Shawn L. Wagner
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Comments:

Proposed changes to landowner licenses in Chapter 44 Section 8

Please see Attached

(Please use reverse for additional comments.)

Crystal Wagner
Printed Name

6/9/2025
Date 4/2025

6/9/2025

1) The proposed plan requires 160 Acres of Cultivated land to qualify for landowner tags.

A. This proposal does not take into account the value of natural water source to wildlife.

B. This proposal fails to recognize the value of natural habitat to wildlife.

2) The proposed rule requires 640 Contiguous acres of land to qualify for landowner ~~tags~~ tags.

A. This rule would exclude all small ranches. This rule is suggestive that only multi million dollar ranches are eligible for landowner tags.

B. Access to 640 Contiguous acres of land in Wyoming is a dream for many landowners. Simply put unattainable due to economic restraints.

C. "Legacy" ranches and generational hunting is at risk to become obsolete. Having access to landowner tags through smaller ranches ensures our "Wyoming way" of life continue with future generations. Guaranteed tags on ~~on~~ our own land to teach future hunters skills safely to secure animals. These same areas have 10% draw success rates with resident application.

D. Veteran donations will be affected as well. If. & as a landowners only have 10% draw success rate, rather than 100% landowner tag. I may be less inclined to donate a tag as it may be many years for successful draw.

3) The proposed modifications to landowner tags may affect small ranches enrolled in State Walk-in. Currently we have some lands enrolled in Public Access to promote the sport of hunting. With reduced tags available, landowners may consider removing these areas if landowner tags are no longer available.

4) The proposed rule revisions for "immediate family" to include step-family members is a welcome change. This change is imperative to continue success of hunting in our State. Families are comprised of various members and generations should not be excluded due to blood.

5) Animal use days.

A) Current rule states 2000 animal use days during 12 months.

B) Revised/proposed plan calls for 3000 animal use days in 12 month period. Game and Fish has spent millions of dollars researching animal use days for current rule. To send employees out to collect new data on animal use days would be a gross misuse of funds that could certainly be allocated to new research.

Thank you for your consideration)

Cristal Wagner
Cristal Wagner

1) ~~Current~~ rule proposed rule requires
160 acres of cultivated land to qualify

2) Requires 640 contiguous acres to qualify

Current 160 acres 2000 animal use days.

3) Veteran donations

4) walk in areas enrolled by small landowners

5) Proposed rule revises immediately family
to include

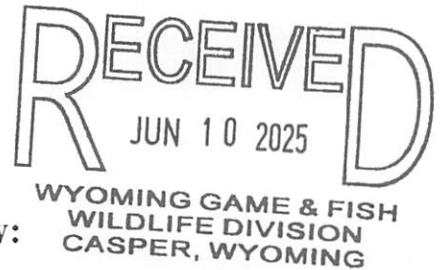
6) legacy hunting.



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Comments:

I think if the proposed changes are made to the land owner permit system, that there will be a massive loss of hunter access. If land owners can't hunt on their own property I believe they will shoot it off to the public. I agree that there is some abuse to the system, large corporations some 160 acre land owners where the land does not meet the 2000 use days. I would to see the Game & Fish target the problem areas and not take the blanket approach to solve these problems. I am in favor of changing to the 320 acre and staying with the 2000 day use option.

(Please use reverse for additional comments.)

Gene Fowler
Printed Name

6-10-25
Date

4/2025