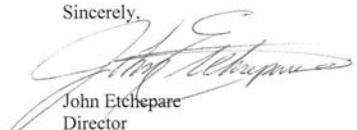


Comment No.	Letter 6	Response
	<div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="text-align: center;">  <p>Wyoming Department of Agriculture 2219 Carey Ave., Cheyenne, WY 82002 ■ Phone: 307-777-7321 ■ Fax: 307-777-6593 E-mail: wdal@state.wy.us ■ Website: wyagric.state.wy.us</p> </div> <div style="text-align: right;"> <p>Dave Freudenthal, Governor John Etchepare, Director</p> </div> </div> <div style="margin-top: 20px;"> <p>September 26, 2005</p> <p>Bison and Elk MP/EIS Laurie Shannon, Project Manager National Elk Refuge PO Box 510 Jackson, WY 83001</p> <p>Dear Ms. Shannon:</p> <p>Following are the comments from the Wyoming Department of Agriculture (WDA) on the Draft Bison and Elk Management Plan and Environmental Impact Statement.</p> <p>Our comments are specific to our mission within state government which is to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal will have major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, we believe it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.</p> <p>We appreciate the opportunity to comment on the Bison and Elk Management Plan (Plan). We understand the difficulty creating a plan to manage the existing elk and bison populations, manage the future herds, and maintain a brucellosis free status. We commend the U.S. Fish & Wildlife Service (USFWS) and the National Park Service (NPS) for their efforts and proposals provided in the Plan. We offer the following comments and recommendations on population, migration routes, and disease transmission.</p> <p>Reducing Elk and Bison Populations The current elk and bison populations on the National Elk Refuge (NER) are exceedingly higher than natural population levels. We support the USFWS and the NPS decision for the Proposed Action—Alternative 4, Restore Habitat, Improve Forage and Phase Back Supplemental Feeding. Alternative 4 will accomplish the Wyoming Game and Fish Department's (WGFD) elk herd objective of 11,029 head, which we view as an acceptable level.</p> <p>Hunting is an important tool in managing elk populations. We strongly urge the USFWS and NPS to work more closely with the WGFD on hunting regulations. We remain unclear of the WGFD Commission's recommendation and choice of alternatives for the Plan. The WGFD receives a substantial amount of money from elk hunters. For that reason, the WGFD</p> <hr style="width: 50%; margin: 20px auto;"/> <p style="text-align: center; font-size: small;">The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.</p> </div> <div style="margin-top: 20px; font-size: small;"> <p>Board Members</p> <p><i>District 1</i> Lee Otto</p> <p><i>District 2</i> Meghan Lally</p> <p><i>District 3</i> James S. Mickelson</p> <p><i>District 4</i> Helen Jones</p> <p><i>District 5</i> Spencer Ellis</p> <p><i>District 6</i> David J. Graham</p> <p><i>District 7</i> Glenn "Gene" Hardy</p> </div>	<p>6-1. Thank you for your comments.</p> <p>6-2. Thank you for your comment.</p> <p>6-3. Thank you for your comment.</p> <p>6-4. The National Park Service and the U.S. Fish and Wildlife Service agree that hunting is an important tool in managing bison and elk populations, and they continue to emphasize cooperation with the Wyoming Game and Fish Department and others in the Final Plan/EIS.</p>

Comment No.	Letter 6 (cont.)	Response
6-5	<p>9/26/2005 USFWS—Bison and Elk Mgt. Plan and EIS Page 2</p> <p>Commission may choose to allow an increase in elk and bison populations, which we highly discourage. The increase in elk populations will not meet the goals of the USFWS or NPS on the Plan.</p> <p>The emphasis and trend for many hunters is to harvest a bull elk versus a cow elk. We emphasize the implementation of a plan to reduce cow elk versus bull elk in the Jackson herd. The WGFD must consider methods to increase the harvest of cow elk. We recommend the following methods to obtain the goal of 11,029 head.</p> <ul style="list-style-type: none"> • <u>Reduce fee for licenses:</u> We recommend the elk license fee for in-state and out-of-state hunters be reduced or removed all together. This fee change would be for cow tags specifically in the Jackson herd. Many out-of-state hunters required to pay the \$400 license fee want to shoot a large bull and cannot justify harvesting a cow elk. This incentive will create a demand for meat hunters in the Jackson area. • <u>Implement new regulations:</u> We recommend the WGFD implement regulations similar to the “point system,” where an individual hunter can gain preference for an area, bull tag, etc. This regulation would require elk hunters to take cow elk prior to the issuance of a bull elk tag. We strongly urge the conversion from head hunting to meat hunting. The hunter must exhibit physical evidence of a successful cow elk hunt to the WGFD. • <u>Export live elk and bison:</u> States surrounding Wyoming are involved in exporting wildlife such as elk and bison to other states like Kentucky. Wyoming was not included in this project. We highly recommend the state of Wyoming become involved in the export of disease free animals to increase genetic diversity, while also reducing the Jackson herds. 	<p>6-5. Thank you for your comments. The agencies work cooperatively with the Wyoming Game and Fish Department to implement the elk reduction program in Grand Teton National Park and the harvest on the National Elk Refuge. License fees, point systems, and transporting of wildlife across state lines are outside the scope of this environmental impact statement.</p>
6-6	<p>Considering Migration Routes</p> <p>The Plan addresses the migration of elk and calls for a reduction in supplemental feeding on the NER to make elk and bison seek other winter forage. The result is either elk starving or migrating to private and state lands outside of the Jackson area. We cannot support the Plan if the WGFD does not have strong support and understanding by private landowners and the public of the additional elk inevitably migrating to state feedgrounds. We question the ability for the state to take on the increased cost and burden of feeding thousands of additional elk. We believe the USFWS needs to work closely with WGFD to take a more proactive approach to resolve issues on private and public lands in the Plan. We suggest the following to alleviate the NER herd relocating to the twenty-two state feedgrounds and private ranch lands.</p> <ul style="list-style-type: none"> • <u>Work with WGFD to set population standards:</u> Each state feedground must have a population maximum limit. The WGFD will monitor winter feedground populations and harvest elk when standards exceed. • <u>Provide incentives for private landowners:</u> Private landowners are stewards of the land who provide critical wildlife habitat. We encourage the USFWS and WGFD to work with landowners to provide incentives for providing grass banks or additional forage in strategically placed areas for wintering elk. • <u>Work with private landowners with new calving plans:</u> Private landowners may benefit from altering calving locations as elk begin to migrate outside the Jackson area and onto private lands. Altering calving grounds may reduce the habituation of elk to return year after year to the same calving grounds in search of supplemental feed. 	<p>6-6. Thank you for your comments. In the Final Plan/EIS, the Preferred Alternative (Alternative 4) includes a greater emphasis on working with the Wyoming Game and Fish Department to minimize conflicts with adjacent landowners, in addition to improving forage on the refuge and reducing the number of elk.</p>

Comment No.	Letter 6 (cont.)	Response
	<p>9/26/2005 USFWS—Bison and Elk Mgt. Plan and EIS Page 3</p> <p>Preventing Disease Transmission The recent decision for the WGFD to capture and test elk for brucellosis is a positive step towards controlling the spread of the disease. We are actively involved in the Brucellosis Task Force and strongly support the capture of elk. As long as there are elk and bison fed on feedgrounds, they will transmit diseases to livestock. The state of Wyoming and the ranchers must achieve brucellosis free status in the near future to offset the fear from cattle buyers outside of Wyoming. We offer the following ideas to reduce disease transmission between elk, bison, and cattle.</p> <ul style="list-style-type: none"> • <u>Provide fencing to private landowners:</u> Landowners willing to allow elk on private lands and grass banks during the winter could be provided eight-foot fencing surrounding their calving grounds to prevent commingling of elk and cattle during the calving season. The USFWS, WGFD, or other wildlife supporting groups could supply the fence and assist ranchers with this expense. • <u>Capture and test elk on NER:</u> The NER is an ideal location for capturing, testing, and vaccinating elk and bison for brucellosis. Testing in early winter to prevent cows from aborting calves and passing on the disease is encouraged. <p>6-7</p> <p>6-8</p> <p>We sincerely appreciate the efforts of the USFWS and NPS in the approach to manage elk and bison on the NER and in Grand Teton National Park. The decreased populations are an important step in reducing brucellosis and other diseases such as chronic wasting disease. We encourage a collaborative, proactive approach with the WGFD, private landowners, and state agencies, such as the WDA, to guide in the management of elk and bison as they migrate outside of the Jackson area.</p> <p>Thank you for the opportunity to comment.</p> <p>Sincerely,</p>  <p>John Etchepare Director</p> <p>JE/jw</p> <p>Cc: Governor's Planning Office Wyoming Stock Growers Association Wyoming Wool Growers Association Rocky Mountain Farmers Union Wyoming Association of Conservation Districts Wyoming Farm Bureau Federation Wyoming State Grazing Board Wyoming Game and Fish Department</p> 	<p>6-7. See response 6-6 about minimizing conflicts on adjacent lands. As a point of clarification, test and slaughter is not an option being considered in this document.</p> <p>6-8. Thank you for your comments.</p>

Comment No.

Letter 7

Response



IDAHO FISH & GAME
600 South Walnut
P.O. Box 25
Boise, Idaho 83707-0025

Dirk Kempthorne / Governor
Steven M. Huffaker / Director

October 31, 2005

Bison and Elk MP/EIS
Ms. Laurie Shannon, Project Manager
National Elk Refuge
P.O. Box 510
Jackson, WY 83001

RE: **Bison and Elk Management Plan and Environmental Impact Statement (Plan/EIS):**

Dear Ms. Shannon:

7-1

Idaho Department of Fish and Game (IDFG) has reviewed the above referenced Plan/EIS. Our interest in the project is in seeing Idaho wildlife and their habitats in Idaho protected and to reduce the danger of transmission of disease to other wildlife and to domestic animal stocks in Idaho. IDFG is the state agency entrusted with statutory authority to preserve, protect, perpetuate, and manage fisheries and wildlife resources in the State of Idaho (Idaho Code 36-103(a)).

The Plan/EIS seeks to analyze options for the management of bison and elk herds residing primarily in western Wyoming including Yellowstone National Park, Grand Teton National Park (GTNP) and the National Elk Refuge in Jackson, Wyoming (NER). Over-riding plan goals which are analyzed in each alternative are: (1) habitat conservation; (2) assuring sustainability of elk and bison; (3) determining appropriate herd sizes for both species; and (4) managing disease prevalence within the herds and its transmission. The six alternatives presented describe various strategies to achieve each of the four goals. Options range from "no action" or a status quo process maintaining current practices through various alternatives proposing differing numbers of each species, differing methods to maintain or enhance natural ranges and conditions, various big game winter supplemental feeding practices including cessation of feeding, and various strategies for disease control including utilization of wildlife vaccines.

Introduction

IDFG supports the analysis of alternatives that address these important goals. In addition to the 4 goals listed above, IDFG supports a management plan that achieves the following components included at various points throughout the Plan/EIS: (1) transition of elk from being fed on the NER to being sustained on native winter ranges; (2) improvements to native forage and range conditions throughout the analysis area; (3) an adaptive management approach that will enable GTNP/NER to modify strategies based on monitoring; (4) utilization of regulated public hunting and harvest to control and manage elk and bison numbers; (5) restoring and maintaining natural

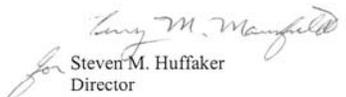
7-1. Thank you for your comments.

Comment No.	Letter 7 (cont.)	Response
<p style="text-align: center;">7-2</p>	<p>Ms. Laurie Shannon October 31, 2005 Page 2</p> <p>structure and composition of native habitats for bison and elk; (6) reducing the prevalence of brucellosis in bison and elk; (7) maintaining vigilance over other diseases likely to be introduced to bison, elk, or other wildlife; and (8) reducing or removing circumstances contributing to disease spread among wildlife, particularly creation of high densities of wildlife such as occurs at winter feeding sites.</p> <p>As presented, IDFG believes that no alternative currently presented addresses all these issues. However, alternative 6 (referred to in earlier drafts as the 'environmentally preferred alternative') contains the best combination of management directions that are likely to achieve most of the above-stated outcomes. The greatest effects likely to be felt in Idaho by implementing one of the alternatives of the Plan/EIS are related to prevalence and transmission of wildlife diseases that frequently cross state lines. Therefore, IDFG's primary interest in the Plan/EIS is development and support of alternatives that reduce the existing reservoir of brucellosis and the likelihood of its transmission between Idaho and Wyoming.</p> <p>Effects to Idaho</p> <p>Although the management plan and EIS deals most directly with GTNP/NER, the outcomes of these actions have great potential to impact Idaho and our wildlife resources. IDFG feels it is appropriate to offer comment and suggestion on the Plan/EIS in light of the following concerns:</p>	<p>7-2. Alternative 4 (the Preferred Alternative) was modified in the Final Plan/EIS to emphasize adaptive management in order to achieve desired conditions over time. (Desired conditions were also added to the Final Plan/EIS.)</p>
<p style="text-align: center;">7-3</p>	<ol style="list-style-type: none"> 1. Interstate wildlife movements and migrations - IDFG has been capturing and radio-collaring mule deer and elk for several years in eastern Idaho. We have data showing young mule deer captured north of St. Anthony, Idaho, often travel to, and summer in, GTNP. We have similar radio telemetry data for deer captured near Heise along State Highway 26 that spend summers near Jackson, Teton Village, and Wilson, Wyoming. Elk trapped in Swan Valley, Idaho, and affixed with radio collars have been tracked to near Jackson and Wilson, Wyoming. Earlier elk studies have shown radio-collared elk frequently traveling from Sand Creek in eastern Idaho into Wyoming from West Yellowstone south through Jackson, Wyoming (Brown 1985). IDFG strongly feels that elk and deer interchange between eastern Idaho and GTNP/NER occurs routinely and that genetic exchange, disease issues, and even wildlife population levels between the 2 areas are linked. 2. Potential for disease transmission between Wyoming and Idaho wildlife - With populations of elk and mule deer frequently inter-mingling across the state line, the transmission of diseases is not unlikely. IDFG concurs with USDA/APHIS that protection of "economic interest and viability of livestock and wildlife in states surrounding NER/GTNP" are likely to be affected by the outcome of the EIS decision (USDA/APHIS letter dated May 20, 1995 pertaining to the Draft EIS). Disease issues at stake in this Plan/EIS will be felt in Idaho as well as in Wyoming. 3. Potential effects to Idaho elk herd numbers - As depicted in the EIS, historical migratory patterns of elk from southern Yellowstone National Park, GTNP, and Jackson, Wyoming, most likely resulted in elk entering Idaho at 3 locations (EIS Map pg 119). Additional 	<p>7-3. Thank you for your comments and the information on radio-collared deer and elk in Idaho. Some interstate movements were expected, but the degree was unknown without data. The National Park Service and the U.S. Fish and Wildlife Service agree that the potential for disease transmission exists. Information about elk and deer interchange has been added to the Final Plan/EIS.</p>

Comment No.	Letter 7 (cont.)	Response
4-3 (cont.)	<p>Ms. Laurie Shannon October 31, 2005 Page 3</p> <p>elk herd migrations into Idaho (along Warm River toward Sand Creek Wildlife Management Area, over Targhee Pass, and along the South Fork of the Snake River) under certain outcomes of the Plan/EIS would cause IDFG to adjust harvest management strategies and possibly increase disease surveillance in these areas.</p>	
7-4	<p>Although the analysis area doesn't extend into Idaho, we encourage your acknowledgement that the outcomes of the record of decision of this EIS will affect Idaho's interests.</p> <p>Affected IDFG plans and policies</p> <p>IDFG has several policies and management plans that relate to the Plan/EIS and potential effects of its implementation to Idaho wildlife. These include:</p>	<p>7-4. The agencies acknowledge the outcomes from the record of decision for this EIS could affect Idaho's interests. Major movements into Idaho from the Jackson elk herd are not expected.</p>
7-5	<ol style="list-style-type: none"> 1. Our Big Game Feeding Policy (Policy No. FW-10.00, adopted April 30, 1996). This policy addresses our mandate to only use supplemental feed for big game animals under emergency circumstances and to prioritize management of herd numbers commensurate with the biological carrying capacity of our winter range. 	<p>7-5. Thank you for your comment.</p>
7-6	<ol style="list-style-type: none"> 2. IDFG elk management plan (July 1, 2003 – June 30, 2004). This plan adopts goals for elk populations in stated elk management zones throughout the state including those zones adjacent to Wyoming. Effects of increased migration of elk into Idaho dependent upon outcome of the Plan/EIS will affect our harvest levels and strategies. 	<p>7-6. The agencies do not expect major movements into Idaho from the Jackson elk herd. Numbers of elk wintering on the refuge would be reduced, forage would be enhanced, and elk that do migrate from the refuge may be stopped at feedgrounds operated by the Wyoming Game and Fish Department.</p>
7-7	<ol style="list-style-type: none"> 3. IDFG's wildlife brucellosis task force report and recommendations to the Governor (September 1998). This report states our findings pertaining to brucellosis in free-ranging elk of eastern Idaho and outlines our strategies to eliminate the low likelihood of transmission of brucellosis from elk to livestock. 	<p>7-7. Thank you for your comment.</p>
	<p>Primary Plan/EIS Goals and Review of Alternatives</p>	<p>7-8. Thank you for your comment.</p>
7-8	<p><u>Goal 1: Habitat Conservation</u></p> <p>IDFG supports providing ecologically secure, sustainable ungulate grazing of habitats of primarily native composition. Our big game feeding policy recognizes that "...winter forage must be maintained if these animals are to prosper and propagate" (IDFG policy no. FW-10.00, April 30, 1996). Alternatives 4, 5, and 6 appear to address this issue similarly and produce increased natural forage on NER with the addition of irrigation.</p>	<p>7-9. Supporting more historically normal migrations out of the National Elk Refuge in winter is not a specific part of goal 2 in the Draft Plan/EIS; hence, it was not included in Table 2-7. Supporting migrations would entail public education, cooperation among wildlife agencies, and acceptance within the Wyoming Game and Fish Department that this action is desirable. The Draft EIS analyzed the effects of potential migration under Alternatives 2 and 3. Widespread migration would not be expected under the other alternatives for various reasons, including forage enhancement on the refuge as well as fewer elk and bison wintering on the refuge. Under Alternative 4 supplemental feeding on the refuge, although at a reduced level, would continue to attract elk and discourage wider movements by many elk that traditionally winter there.</p>
7-9	<p>The second goal of supporting more historically normal migrations out of NER in winter is critical to re-establishing a more natural function of elk herds in their ecosystem. This is left out of your goal matrix (EIS table 2-7, pg 82). Cooperation among wildlife agencies, including public education and technical input provided by the National Park Service and U.S. Fish and Wildlife Service (NPS/USFWS), would be critical to achieving this. "Teaching" elk to migrate beyond NER into more suitable winter range is critical to long-term success of the management plan should wholesale winter feeding on NER be reduced or eliminated. Effects to the public of re-established elk migration routes must be reviewed and analyzed as a part of the EIS. IDFG</p>	<p>Alternative 4 (the Preferred Alternative in the Final Plan/EIS) has been modified to emphasize adaptive management. It does not specify the number of years that feeding would take place nor that it would be eliminated. Instead, it focuses on achieving the desired conditions for sustaining bison and elk populations over time. Working in close cooperation with the Wyoming Game and Fish Department, the U.S. Fish and Wildlife Service would decrease the need for supplemental feeding on the refuge based on existing conditions, trends, new research findings, and other changing circumstances. The agencies do not expect major elk movements with these changes. See also response 7-6.</p>

Comment No.	Letter 7 (cont.)	Response
	<p>Ms. Laurie Shannon October 31, 2005 Page 4</p>	
7-10	<p>supports the goal of more widespread elk and bison winter distribution to reduce animal crowding and to effect sustainable habitat management. However, habitats to winter these animals must be available in proportion to the number of wintering animals expected to use them.</p>	<p>7-10. Forage enhancements and reductions in the number of elk wintering on the refuge would occur as supplemental feeding was gradually reduced. Wintering habitats should be available in proportion to animal numbers, but because amounts of accessible forage would vary depending on snow conditions, achieving this goal in all years would require forage management based on the worst winter scenario. Conservative management that pairs large amounts of available habitat with lower bison and elk numbers would sustain the herds in the long term.</p>
7-11	<p>Woody vegetation, particularly riparian vegetation, benefits most from implementation of alternative 6 via lowered elk and bison numbers on NER in the winter coupled with rotational use of aspen enclosures. We recommend that NPS/USFWS be adaptable with aspen and willow restoration as emerging techniques become proven. We urge NPS/USFWS to review and adopt the criteria for identifying risk factors to aspen and for determining an integrated series of treatments for aspen as provided by Campbell and Bartos (2000).</p>	<p>7-11. The agencies agree that woody vegetation would benefit from adaptive management and the use of emerging techniques as they become available.</p>
7-12	<p><u>Goals 2, 3: Sustainability of populations and elk/bison population objectives</u> IDFG recognizes that the authority and responsibility for management of wildlife populations, including elk and bison, throughout Wyoming rests with the Wyoming Game and Fish Department (WGFD). As such, we believe that NER/GTNP should take all available opportunities allowed by your mandates to adopt population goals commensurate with those prescribed by WGFD.</p> <p>WGFD has chosen an elk population goal in their Jackson herd management unit of 11,029 elk. Alternatives 1 and 5 most closely meet this objective. Alternative 6 has an upper maximum goal of 11,000 elk (the same as alternatives 1 and 5) but has a lower range of 9,300 elk.</p>	<p>7-12. The agencies would cooperate with WGFD personnel to help achieve management goals.</p>
7-13	<p>We concur with EIS analysis presented in Tables 2-5 and 2-6 (page 81) that mandates of the National Wildlife Refuge System, NER, and GTNP enabling legislation best address sustainable populations and ecosystems by alternatives 2 and 6. However, we believe alternative 2 is not a preferable alternative as there are no population goals and no maximum numbers for elk and bison. We believe population goals, monitoring, and management are essential components of any alternative in the EIS.</p> <p>IDFG considers responsible wildlife population management to include the opportunity for regulated harvest via sport hunting by the public whenever feasible. Regulated public hunting bolsters local economies and provides quality outdoor recreation for thousands of sportsmen each fall. We support continued use of sport hunting for its positive effects on the economy, its recreational value, and its wildlife management utility. As such, management of elk numbers should continue via WGFD-regulated harvest by the public. Expansion of sport hunting harvest on GTNP of elk and bison to meet wildlife population goals should be considered and reviewed as a portion of the EIS. Similarly, if numbers of bison need to be reduced to maintain populations below the stated maximums, we recommend controlled public harvest strategies developed in consultation with WGFD.</p>	<p>7-13. Thank you for your comments.</p>
7-14	<p>IDFG does not support fertility control of public, free-ranging wildlife in lieu of controlled sport harvest by the public. That portion of alternative 2 should not be carried forward into any chosen alternative.</p>	<p>7-14. The elk reduction program in Grand Teton National Park would continue under all alternatives except Alternative 2. NPS and WGFD personnel will discuss ways to increase the program's effectiveness in reaching wildlife population goals.</p>
7-15	<p>IDFG does not support fertility control of public, free-ranging wildlife in lieu of controlled sport harvest by the public. That portion of alternative 2 should not be carried forward into any chosen alternative.</p>	<p>7-15. Thank you for your comments.</p>

Comment No.	Letter 7 (cont.)	Response
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7-16	<p>The IDFG position on big game winter feeding is that “the big game population should be maintained under natural conditions and by naturally available forage” (IDFG Policy No FW-10.00, April 30, 1996). We feel that only alternatives 3 and 6 encompass this overall philosophy. We recognize that WGFD policies and direction may differ from those of IDFG on this issue.</p>	<p>7-16. Although Alternatives 2 and 6 would maintain the big game populations with “naturally available forage,” Alternative 3 would do so during all but severe winters. Irrigation and cultivation would continue on parts of the refuge under both Alternatives 3 and 6. Methods would be enhanced under Alternative 6.</p>
7-17	<p><u>Goal 4: Disease Management</u> IDFG practices and fully supports active surveillance of wildlife diseases, its prevalence, transmission, and effects to big game populations. We routinely test cervids through blood sample kits distributed to hunters and active trap-and-test programs where elk are fed in winter. We are actively managing the prevalence of brucellosis in wild elk along the Idaho/Wyoming boarder. We further find that in Idaho</p>	<p>7-17. Thank you for your comments.</p>
7-18	<p>“Brucellosis persists in elk only where elk are concentrated and artificially fed. The elimination of feed grounds and the establishment of winter range for elk are the keys to eliminating the threat of brucellosis.” (Wildlife Brucellosis Task Force Report and Recommendations to the Governor, IDFG, September 1998).</p>	<p>7-18. The Draft Plan/EIS also noted the relationship between supplemental feeding, high elk concentrations, and higher brucellosis prevalence.</p>
7-19	<p>Generally, we support both disease management goals in the EIS: (1) to maintain or improve health of elk and bison populations; and (2) to minimize risk of brucellosis transmission to livestock. IDFG recognizes the value of continuing to use strain 19 in elk feed ground settings on NER as the best currently available technology in vaccination of wild elk to reduce transmission of brucellosis in a herd that is already infected. Further, we also recognize the limitations of strain 19 in terms of its efficacy in protecting elk against brucellosis (our experience shows its efficacy in prevention to be between 20% and 30%).</p>	<p>7-19. Strain 19 is the best currently available vaccine for elk. Efficacy has been determined to be 25%–30%; however, recent high prevalence levels (51% in 2002–2003) in one of Wyoming’s longest-vaccinated feedgrounds have caused even this low level of efficacy to be questioned. Comparison of prevalence from 1998 through 2005 at the long-vaccinated Greys River feedground and the Dell Creek feedground, where no vaccination has been done, showed only a 3% difference (30% and 27%, respectively) (WGFD 2005).</p>
7-20	<p>IDFG always strives to maintain separation of elk and domestic livestock, particularly in winter supplemental feeding situations, and urges adoption of this principle into your chosen alternative. It appears that Alternative 6 best incorporates these practices.</p>	<p>7-20. Thank you for your comments.</p>
	<p>Summary</p>	
7-21	<p>Because the greatest and most direct effects of the Plan/EIS to Idaho will likely be the treatment and reduction of wildlife diseases including brucellosis, we support the alternative most directly reducing this risk. IDFG believes that alternative 6 incorporates the best overall combination of actions to achieve habitat conservation goals and best manages wildlife disease and its transmission. Alternative 6 also best applies the principles of adaptive management. However, alternative 6 does not achieve WGFD’s overall goal for elk populations and their herd composition. We urge modification of alternative 6 to include:</p>	<p>7-21. Thank you for your comments.</p>
7-22	<ol style="list-style-type: none"> 1. Work cooperatively with WGFD to establish more historically ‘normal’ migratory patterns of elk and bison to appropriate and available habitats beyond the NER while accepting no increase in elk depredations or conflicts. 	<p>7-22. The agencies work cooperatively with the Wyoming Game and Fish Department to achieve herd management objectives, but they disagree on this topic. The Wyoming Game and Fish Department does not believe that migrations beyond the National Elk Refuge are desirable. Efforts to make this happen would require their involvement.</p> <p>Mitigation, including financial assistance, would be included in Alternatives 4 and 6 to prevent increases in elk depredations and conflicts.</p>

Comment No.	Letter 7 (cont.)	Response
<p>7-23</p> <p>7-24</p> <p>7-25</p>	<p>Ms. Laurie Shannon October 31, 2005 Page 6</p> <p>2. Work closely with WGFD and make every attempt to integrate their herd management objectives for elk and elk distributions into alternative 6 without compromising the habitat conservation and disease surveillance and management aspects of the alternative.</p> <p>3. Continue to use strain 19 as a vaccine for elk on NER, if numbers of wintering elk and prevalence of brucellosis remain high, until a more efficacious vaccine is developed.</p> <p>Thank you very much for the opportunity to comment on your management plan and EIS. If you have questions, please contact Environmental Staff Biologist Gary Vecellio of our Upper Snake office at (208) 525-7290.</p> <p style="text-align: center;">Sincerely,</p> <div style="text-align: center;">  for Steven M. Huffaker Director </div> <p>SMH:gmv:gs</p> <p>cc: Debbie Mignogno, USFWS-Chubbuck Idaho Department of Agriculture Gary Vecellio, Upper Snake Region, IDFG</p> <div style="text-align: center; margin-top: 20px;">  </div>	<p>7-23. The agencies work closely with the Wyoming Game and Fish Department to achieve herd management objectives.</p> <p>7-24. Vaccination with Strain 19 (or a more efficacious vaccine when available) would be used under the Preferred Alternative as long as logistically possible. Management would not be designed or changed specifically to facilitate vaccination.</p> <p>7-25. Thank you for your comments.</p>

Comment No.	Letter 7 (cont.)	Response
	<p data-bbox="296 215 464 282">Ms. Laurie Shannon October 31, 2005 Page 8</p> <p data-bbox="296 329 432 350"><u>Literature Cited:</u></p> <p data-bbox="296 375 1031 420">Brown, Cecil. 1985. Sand Creek Elk. Idaho Department of Fish and Game, Federal Aid in Wildlife Restoration Report, Job Completion Report. November 1985, Boise Idaho.</p> <p data-bbox="296 444 1045 490">Cambell, Robert B., and Dale L. Bartos. 2000. Aspen Ecosystems: Objectives for Sustaining Biodiversity. USDA Forest Service Proceedings, RMRS-P-0.</p>	

Comment No.	Letter 8	Response
<p>8-1</p>	<div data-bbox="436 224 583 354" data-label="Image"> </div> <div data-bbox="604 246 934 341" data-label="Section-Header"> <p>Montana Fish, Wildlife & Parks</p> </div> <div data-bbox="844 354 1060 495" data-label="Text"> <p>P. O. Box 200701 Helena, MT 59620-0701 406-444-3186 FAX:406-444-4952 Ref:DO0629-05 December 21, 2005</p> </div> <div data-bbox="319 565 688 685" data-label="Text"> <p>Bison and Elk Management Planning Office National Elk Refuge PO Box 510 675 E. Broadway Jackson, WY 83001</p> </div> <div data-bbox="319 730 940 755" data-label="Text"> <p>SUBJECT: EIS PROJECT MANAGERS AND RALPH MORGENWICK:</p> </div> <div data-bbox="319 803 1060 990" data-label="Text"> <p>The Montana Department of Fish, Wildlife & Parks (FWP) has examined the Draft Bison and Elk Management Plan and Environmental Impact Statement (EIS) for the National Elk Refuge and Grand Teton National Park. This document represents a monumental effort by the cooperating agencies and partners to carefully and thoughtfully examine important issues relative to the management of bison and elk in this region of Wyoming. Although Montana has no direct borders with the analysis area it certainly will be affected by the recent public discussions and agency decisions relative to this EIS and Management Plan.</p> </div> <div data-bbox="382 1015 1060 1372" data-label="Text"> <p>Montana has long held the belief that feeding wildlife would not serve its constituents well. Montana has passed legislation in past legislative sessions that discouraged and eventually prevented the feeding of wild animals. By avoiding feeding of wildlife FWP has prevented the artificial concentration of wild animals and have minimized the risk of disease transmission among wild animals and to livestock. The benefits have been immense and today there are robust populations of wild elk and bison that are increasingly valued by the public. In addition, through habitat management programs, as opposed to feeding programs, have improved cooperation with agricultural partners and have encouraged greater tolerance for the presence of wildlife resources on private and adjacent public land. FWP's efforts to minimize the transmission of brucellosis due to the concentration of elk or bison on feedgrounds have protected Montana's livestock industry from disease while efforts to conserve intact habitat upon which elk and bison can freely range (through conservation easement, block management, lease or purchase) has ensured their long term survival.</p> </div>	<p>8-1. Thank you for your comments.</p>

Comment No.	Letter 8 (cont.)	Response
8-2	<p>Nat'l Elk Refuge – DO0629-05 December 21, 2005 Page 2 of 2</p> <p>Montana is directly and indirectly impacted by many of the decisions of the USFWS National Elk Refuge and the Grand Teton National Park. It is often difficult to explain to our Montana constituents why FWP would not feed wildlife in Montana when other federal or state agencies are doing so in adjacent states. Furthermore, it is well established that these animals do move across jurisdictional and state boundaries routinely bringing with them the diseases that they may have acquired as a result of these management strategies. As a result, FWP will be affected by decisions resulting from this EIS.</p> <p>FWP encourages the USFWS and NPS to select management alternatives that eliminate or severely reduce feeding. It would be in the best interest of Montana if elk and bison feeding were gradually discontinued as is suggested in alternative six of the EIS. This alternative is consistent with FWP's management philosophy and would better integrate regional management of wildlife within the Greater Yellowstone Area especially for species affected by brucellosis. Furthermore, alternative six would emphasize habitat restoration and management, which is a central pin to the existing management programs in Montana and one that has been supported by FWP's constituents for many decades. FWP encourages the cooperating agencies and partners developing this management plan to work diligently with the landowners, sportsmen, and other affected publics in the Jackson area to conserve the integrity of the remaining wildlife habitats and to adaptively manage elk and bison populations ensuring the long term conservation of these species.</p> <p>Sincerely,  M. Jeff Haggner Director</p> 	<p>8-2. Alternative 4 (the Preferred Alternative in the Final Plan/EIS) has been modified to emphasize adaptive management. It does not specify the number of years that feeding would take place nor that it would be eliminated. Instead, it focuses on achieving the desired conditions for sustaining bison and elk populations over time. Working in close cooperation with the Wyoming Game and Fish Department, the U.S. Fish and Wildlife Service would decrease the need for supplemental feeding on the refuge based on existing conditions, trends, new research findings, and other changing circumstances.</p>

Comment No. Letter 9 Response

BOARD OF COMMISSIONERS



October 31, 2005

Laurie Shannon, Project Manager
c/o Draft Environmental Impact Statement
Bison and Elk Management Planning Office
National Elk Refuge
PO Box 510
Jackson, WY 83001

RE: Comment on Draft Bison and Elk Management Plan and Environmental Impact Statement (EIS)

Dear Ms. Shannon:

The Teton County Board of County Commissioners commends the National Elk Refuge and Grand Teton National Park for undertaking the difficult effort to revisit the strategies for managing bison and elk on the National Elk Refuge and in Grand Teton National Park. The wildlife of Teton County are an immense asset to both residents and visitors, and are an integral part of the area's community character, economy, and role in the Greater Yellowstone Ecosystem.

The Board of County Commissioners supports the efforts of the National Elk Refuge and Grand Teton National Park to manage these magnificent herds in a way that fulfills their mandates and respects the community and state voice. We appreciate the opportunity to comment and look forward to partnering with you in support of our mutual goals.

Respectfully,
Larry Jorgenson, Chairman



9-1

9-1. Thank you for your comments.



OFFICE OF THE FREMONT COUNTY COMMISSIONERS

Fremont County Government: Working To Best Serve You.

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LANDER, WYOMING
82520
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FAX (307) 332-1132

October 18, 2005



U.S. Department of the Interior
U.S. Fish & Wildlife Service
National Elk Refuge
P.O. Box 510
Jackson, WY 83001

DOUGLAS L.
THOMPSON
Chairman
378 Grahams Road
Lander, WY 82520

Subject: Draft Bison and Elk Management Plan & EIS

LANNY APPLGATE
Vice-Chairman
975 Diane Court
Lander, WY 82520

Dear Sirs:

We, the residents of Fremont County, are very concerned with your proposed changes to the management of elk and bison in the National Elk Refuge (NER) and Grand Teton National Park (GTNP). Any changes to the management of the NER will affect northwestern Wyoming, not just Teton County, for years to come.

JANE ADAMSON
P O Box 177
Shoshoni, WY 82649

Fremont County has a Land Use Plan (LUP), dated Sep 2004 which spells out the requirements for coordination with State and local governments as federal laws mandate. Any decisions and/or changes to the NER operation will impact Fremont County residents, both economically and our customs and culture.

Your agency has put forth a lot of effort to get public involvement and comment. Please take the time to brief the Fremont County Commissioners at your earliest convenience and coordinate any action you plan to take in the future with regard to the operation of the National Elk Refuge. We, as elected Fremont County officials, may be able to provide insight which will assist in developing a *management plan* for the future.

JULIE A. FREESE
County Clerk
and
Clerk of the Board

Sincerely,

BOARD OF FREMONT COUNTY COMMISSIONERS

JUDY J. CAMERON
Deputy Clerk

Douglas L. Thompson, Chairman

Lanny Applegate, Vice-Chairman

Pat Hickerson

Gary Jennings

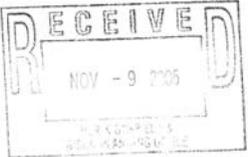
Jane Adamson

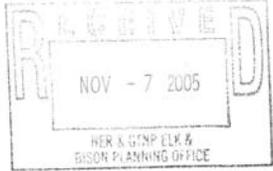
10-1

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10.1. Thank you for your comments. The National Park Service and the U.S. Fish and Wildlife Service provided information about the planning process through news releases, planning updates, and the plan website, as well as public meetings after the Draft Plan/EIS was released to the public. Attempts to contact the Office of the Fremont County Commissioners were unsuccessful. NPS and USFWS representatives will gladly brief the county commissioners on EIS issues in the future.

Comment No.	Letter 11	Response
	 <p style="text-align: right;">VIA FAX November 7, 2005</p> <p>Laurie Shannon Jackson Bison and Elk Management Planning Office P O Box 510 Jackson, WY. 83001</p> <p>Dear Ms. Shannon,</p> <p>Please accept the following comments on behalf of the Jackson Town Council. We appreciate the responsibilities of the USF&W and the care with which they have approached this important issue and we offer our comments with just consideration of these responsibilities.</p> <p>11-1</p> <p>11-2</p> <p>We strongly support Alternative 5: <u>Restore Habitat, Improve Forage, and Continue Supplemental Feeding</u> as the preferred course of action. Maintaining a visible, healthy and active elk herd has been the primary goal of the National Elk Refuge and providing an adequate winter food supply has been an important goal to that purpose since 1912. We endorse improving the forage quality on cultivated lands through improved irrigation methods to support 5,000 – 7,500 elk and 400 bison through winters on the refuge, and 2,500 elk using the park units habitat during summer months.</p> <p>11-3</p> <p>Improving forage production through effective irrigation and continued feeding operations through the toughest winter months will enable not only a healthy elk and bison herd, but serves to support other wildlife including mule deer, moose and sheep. These other species may be negatively impacted if the elk herd is displaced from its winter feed grounds. Reducing the winter feeding program would only increase the competition for winter forage amongst these species on private lands and other federal lands where the elk would be forced to search for food. Alternative 5 affords supplemental feeding through average and above average winters, an estimated occurrence of roughly 9 of 10 years.</p> <p>11-4</p> <p>We recognize that the bison population, introduced in 1948 with a herd of twenty bison, has grown impressively through the decades largely due to the availability of supplemental food on the National Elk Refuge. State and federal managers have long recognized the need to aggressively address the management of the herd and reduce the size of the herd to a number that will allow the resources of the feeding grounds to support it. We agree.</p> <p style="text-align: center;">Box 1687 • Jackson, Wyoming 83001 • 307-733-3932 FAX 307-739-0919 www.ci.jackson.wy.us</p>	<p>11-1. Thank you for your comments.</p> <p>11-2. Thank you for your comment.</p> <p>11-3. While supplemental feeding certainly supports the bison and elk populations during the winter months at above natural levels, as compared to wild populations, the National Park Service and the U.S. Fish and Wildlife Service respectfully disagree that in the long term, feeding ensures healthy populations. The potential for non-endemic diseases, such as chronic wasting disease, to become established and spread is much greater in elk on feedgrounds and could substantially reduce the health and visibility of the herd.</p> <p>The Draft Plan/EIS acknowledged the likelihood of increased competition in some areas during some years, but it is difficult to predict the extent of impacts for several reasons. First, only some of the elk that have wintered on the refuge would disperse, and this number cannot be predicted. Second, ungulates often differ in habitat choices and may remain separate by choice in wintering areas. In addition, deer, moose, and bighorn sheep populations in this area have been declining for unknown reasons, while feedgrounds have restricted the winter distribution of Jackson elk. More research is needed to determine the causes of these population declines.</p> <p>11-4. The Preferred Alternative in the Final Plan/EIS identifies a population of approximately 500 bison to maintain genetic diversity, but it does not identify a maximum number. The actual population objective would be based on monitoring and available habitat. The National Park Service and the U.S. Fish and Wildlife Service would make recommendations to the Wyoming Game and Fish Department regarding herd objectives. Ultimately, the Wyoming Game and Fish Commission would approve objectives after public review.</p>

Comment No.	Letter 11 (cont.)	Response
11-5	<p>The Town Council and I support continued elk hunting on the refuge and, to the degree that is required and necessary, we support the elk reduction program in the park as outlined in Alternative 5 and in cooperation with the Wyoming Game and Fish Department.</p>	11-5. Thank you for your comment.
11-6	<p>We clearly recognize the importance of a healthy, visible elk herd on the National Wildlife Refuge to our local citizenry who take a great deal of home-town pride in the knowledge that Jackson Hole is the home of the largest elk herd in North America. Furthermore, we honor the desire and ability of the traveling public to see with their own eyes the grandeur of the elk herds, the powerful bison and other abundant wildlife on the National Wildlife Refuge.</p>	11-6. Thank you for your comment.
11-7	<p>We recognize and support the need for appropriate management planning that will result in the appropriate actions necessary to enable the healthy vitality of our wildlife for future generations. Alternative 5 is the preferred course of action.</p> <p>Sincerely,</p>  <p>Mark J. Barron Mayor</p> <p>CC: Jackson Town Councilmen</p> <div data-bbox="825 1143 1073 1300" style="text-align: center;">  </div>	11-7. Thank you for your comments.

Comment No.	Letter 12	Response
	<p>Date: November 2, 2005</p> <p>To: Laurie Shannon Bison and Elk Management Planning Office National Elk Refuge P.O. Box 510 675 East Broadway Jackson, WY 83001</p> <p>Re: Teton Conservation District Comments on the Draft Bison and Elk Management Plan and EIS</p> <p>Dear Ms. Shannon:</p> <p>Teton Conservation District (TCD), a subdivision of Wyoming State government since 1946, appreciates the opportunity to provide comments and recommendations concerning the Draft Bison and Elk Management Plan and EIS (hereinafter referred to as the "draft document").</p> <p>TCD is directed by a publicly elected five member Board of Supervisors and is funded by a publicly approved mil levy supplemented by additional partnering agency and grant funding. TCD boundaries include all of Teton County, Wyoming and the portion of Park County, Wyoming comprised of Yellowstone National Park. A one page summary of TCD is attached and a copy of TCD's five year plan is enclosed for your reference and familiarization with TCD.</p> <p>TCD's comments and recommendations regarding the draft document are enclosed following the TCD Summary page. TCD looks forward to participating in this planning process. Please contact Randy Williams, Executive Director at our office with regard to any questions or comments that you may have and if we may be of further assistance.</p> <p>Sincerely,  Randy Williams, Executive Director Teton Conservation District 230 East Broadway, Suite 2A P.O. Box 1070 Jackson, WY 83001 307-733-2110</p> 	<p>12-1. Thank you for your comments.</p> <p>12-2. Thank you for your comment. The attachment was received.</p> <p>12-3. Thank you for your comment.</p>

Comment No.	Letter 12 (cont.)	Response
	<p style="text-align: center;">Teton Conservation District Summary</p> <p>Mission: The mission of the Teton Conservation District is to promote conservation and management of natural resources -- air, land, water, vegetation, and wildlife -- through watershed-based research, education, conservation practices, cooperative projects, and on-the-ground actions to ensure the health, safety and general welfare of the people and resources of this area.</p> <p>Authority: Teton Conservation District is a legally organized Wyoming Conservation District by Wyoming State Statutes (W.S. 11-16-101 through 11-16-134) as a legal subdivision of the State of Wyoming, Department of Agriculture. Teton Conservation District was originally formed in 1946 and is the only locally elected government board wholly and specifically charged with natural resource conservation.</p> <p>Statue Excerpt: <i>W.S. 11-16-103. Legislative Declarations and Policy:</i> <i>(a) It is hereby declared that the farm and grazing lands of Wyoming are among the basic assets of the state; that improper land use practices cause and contribute to serious erosion of these lands by wind and water; that among the consequences which would result from such conditions are the deterioration of soil and its fertility and the silting and sedimentation of stream channels, reservoirs, dams and ditches; that to conserve soil, and soil and water resources, and prevent and control soil erosion, it is necessary that land use practices contributing to soil erosion be discouraged and that appropriate soil conserving land use practices be adopted.</i> <i>(b) It is hereby declared to be the policy of the legislature to provide for the conservation of the soil, and soil and water resources of this state, and for the control and prevention of soil erosion and for flood prevention or the conservation, development, utilization, and disposal of water, and thereby to stabilize ranching and farming operations, to preserve natural resources, protect the tax base, control floods, prevent impairment of dams and reservoirs, preserve wildlife, protect public lands, and protect and promote the health, safety and general welfare of the people of this state.</i></p> <p>Overview of Teton Conservation District Services and Programs:</p> <ul style="list-style-type: none"> ○ Reviews <i>land subdivisions</i> and provides comment pertaining to natural resource conservation ○ Promotes and provides <i>natural resource education and information outreach</i> to students and adults ○ Conducts <i>watershed planning and management facilitation</i> according to WDA and DEQ Watershed Planning Guidelines and conducts <i>water quality monitoring</i> programs according to Wyoming Credible Data Legislation for chemical, biological, and physical parameters ○ Provides <i>technical assistance and cost-share programs</i> to assist landowners with pasture management, irrigation, soil productivity, stock watering, buffer strip, and water quality protection needs ○ Sponsors and facilitates <i>on-the-ground programs</i> to protect, enhance, and/or restore natural resources. ○ Provides <i>assistance to noxious weed control</i> and prevention including technical and financial support to the JH Weed Management Association ○ Provides <i>technical assistance to individual members of the public, non-profit organizations, and agencies</i>-normally at no cost, and provide project and research specific cost-share as approved by the Board of Supervisors ○ Supports <i>recycling and waste management</i> pro-active programs that help maximize the use of our natural resources and protect the natural environment ○ In conjunction with partnering agencies and the public supports <i>fish and wildlife enhancement and protection programs</i>. ○ Facilitates a <i>wildland/urban interface fire protection program</i> and an associated <i>compost and biomass utilization program</i> in conjunction with partnering agencies and organizations. <p>TCD Staff: Rachel Markko/Natural Resources Specialist; Currently Vacant/Water Resources Specialist; Emily Hagedorn/Administrative Manager; Randy Williams/Executive Director NRCS Staff: Jenny Castagno/District Conservationist TCD Board of Supervisors: Dave Adams, Bob Lucas, Bob Henry, Mike Taylor, and Blaine DeSpain TCD Associate Supervisors: Tom Breen, Kate Mead, Tom Segerstrom, and Boyd Knowles</p>	

Comment No.	Letter 12 (cont.)	Response
	<p style="text-align: center;">TCD Comments and Recommendations For the Draft Document and Proposed Action</p> <ol style="list-style-type: none"> 1. TCD supports Alternative 5 with consideration of TCD's comments and recommendations contained within this response. Alternative 5 provides a proactive management strategy striving to address the four goals of habitat conservation, sustainable populations, numbers of elk and bison, and disease management while providing for a balance of associated natural resource and human environment needs. 2. TCD feels that it is critical to maximize forage production on the NER in order to meet the original intent of the establishment of the NER. In order to accomplish this a proactive program of irrigation, noxious weed control, native vegetation enhancement including utilization of tools such as seeding and prescribed fire, and partition fencing to better manage forage utilization need to be implemented. 3. Winter range habitat management beyond the NER will also need to be much more actively managed to provide for a greater diversity of vegetative stages instead of the present preponderance of late seral stages. This is true of both the Grand Teton National Park and the Bridger-Teton National Forest. The massive bark beetle kill of forest stands is evidence of a lack of successional stage diversity in natural proportions. Landscape scale management of vegetation is needed to meet environmental prescriptions and provide needed habitat conditions to spread wintering ungulates out over the winter range. Fire fuel reduction thinning in forested stands, prescribed fire use, managed wildfire, aspen stand enhancement, aggressive noxious weed control, and other practices will be necessary on a much larger scale than in recent decades in order to adequately achieve winter range habitat needs. 4. A critical key to habitat quality will be the promotion and maintenance of an integrated pest management, noxious weed, and invasive plant control program. Federal budgets are currently strained and in recent years Grand Teton National Park noxious weed control efforts have diminished and increasing noxious weeds have significantly reduced available quantity and quality of forage. The NER and the BTNF also need enhanced budgets to deal with the onslaught of noxious weeds. Funding and other resources must increase in order to effectively control noxious weeds and enhance native species. 5. Winter range utilization by bison and elk from a spatial perspective is affected by management of land development and open space protection. TCD feels that a coordinated effort involving federal, state, and local land and resource management agencies and organizations such as the Jackson Hole Land Trust can benefit by working together with private citizens to protect our ranch and agriculture lands and provide reasonable options to development. 6. Recreational use incursions into winter range and related education, outreach, and enforcement affect winter range use by bison and elk. Again this will necessitate a coordinated effort of agencies, organizations, and the public. Current enforcement personnel are quite limited and this is one area that needs an increased presence from Teton County and state and federal agencies. 7. TCD considers wolf and grizzly bear predator populations and distribution to have a significant and increasing effect upon both elk populations overall and winter range distribution. Current and further studies should be supported to better understand predation effects and policies should be implemented that realistically balance endangered species presence and predator control. 8. Supplemental elk feeding programs, domestic livestock management, and ungulate disease management also will have a very important role in bison and elk populations and spatial distribution. An integrated management approach is needed on a more formal level to achieve objectives. 9. TCD recognizes and respects the long term role that hunting provides in managing elk and bison populations and the support that hunting organizations and the public provide to habitat and fish and wildlife sustainment as well as overall contributions to the economy. TCD supports hunting as a tool for managing bison and elk populations on the NER, GTNP, and the BTNF. <div data-bbox="835 1156 1058 1302" style="text-align: center;">  </div>	<p>12-4. Thank you for your comment. In the Final Plan/EIS the Preferred Alternative was modified to allow greater flexibility in management. It emphasizes collaboration with the Wyoming Game and Fish Department and would include development of a dynamic framework, which would be based on existing conditions, trends, new research findings, and other changing circumstances, for decreasing the need for supplemental feeding. It does not specify the number of years that feeding would take place. Instead, it focuses on achieving the desired conditions for sustaining bison and elk populations over time. These desired conditions have been clarified in the Final Plan/EIS.</p> <p>12-5. Thank you for your comment.</p> <p>12-6. Thank you for your comment.</p> <p>12-7. Thank you for your comment.</p> <p>12-8. Thank you for your comment.</p> <p>12-9. Thank you for your comment.</p> <p>12-10. Thank you for your comment.</p> <p>12-11. Thank you for your comment.</p> <p>12-12. Thank you for your comment.</p>