

Comment No.

Letter 29

Response



“Sportsmen Serving Sportsmen”

Jackson Bison and Elk Management Planning Office
Attn: Laurie Shannon
PO Box 510
Jackson, Wyoming 83001

29-1

After careful review of the Jackson elk and bison EIS, on behalf of over 10,000 paid and active members of Sportsmen for Fish and Wildlife in Utah, we support **Alternative 5** for the Bison and Elk Management Plan and Environmental Impact Statement.

Many of our members enjoy hunting the public lands around Jackson for elk and deer, and if they ever get lucky bighorn sheep. Many of us also enjoy coming to the National Elk Refuge during the winter to look at the elk and other wildlife.

29-2

Eliminating feeding seems to be going in exactly the wrong direction. There is nothing sacred about natural feed versus artificial feed. Perhaps the artificial feeding programs could be done in a better manner to spread elk out and move them around. There is a lot less wildlife winter range around Jackson today than there was in 1912. If anything, the Service should find more ways to sustain large and abundant game herds, not less.

29-3

The myths about hunting being a dying sport are just that. The main problem is, as the west continues to grow exponentially, there is more downward pressure on game herds, yet more and more Americans want to come out west and enjoy a hunt on our wonderful public lands. The combined effects are it is very hard to draw good permits.

29-4

Management actions should be taken to increase wildlife herds to meet the high public demand. Alternative 4 will reduce elk herds, and will also put more elk out on winter ranges surrounding Jackson which will hurt mule deer, moose, and bighorn sheep herds. Alternative 4 is not acceptable.

29-5

For many reasons, SFW Utah supports Alternative 5.

I would like to be on your mailing list for this project.

Thanks you,

John Bair
President Sportsmen for Fish and Wildlife
352 West 850 North
Springville, Utah 84663



Sportsmen for Fish and Wildlife

29-1. Thank you for your comments.

29-2. The U.S. Fish and Wildlife Service and the National Park Service believe that reducing supplemental feeding would be the most effective solution to the disease and habitat concerns that have resulted and that doing this would be possible if the agencies worked closely to prevent and alleviate conflicts. The refuge feeding program already attempts to separate elk as much as possible by moving feeding sites and feeding in more than one area each day.

Wildlife winter range is limited, but it was limited in 1912 also. Although fewer people lived in Jackson Hole during the early 1900s, settlers “homesteaded the finest elk winter range in the valley” and displaced the elk (Boyce 1989). Also according to Boyce’s book, there were an estimated 20,000–30,000 elk attempting to survive the winter of 1909. These numbers included what is now known as the Jackson elk herd and part of the South Park herd. Compared to the estimated 13,500 elk in the 2005, Jackson herd numbers were undoubtedly larger. With winter range essentially locked up, supplemental feeding was used to prevent large-scale elk deaths. Currently, feeding maintains brucellosis prevalence that cannot be lowered by the ineffective vaccines available and it maintains the potential for other diseases to seriously impact and threaten the area’s “large and abundant game herds.”

29-3. Thank you for your comment.

29-4. The Jackson elk herd is currently above the WGFD objective of about 11,000 animals, and the agencies are working with the state to achieve that objective. The agencies believe that managing elk numbers in ways that would address habitat and disease concerns is paramount. Increasing the herds would thwart these efforts.

29-5. Thank you for your comments.

Comment No.	Letter 30	Response
	<div data-bbox="262 248 443 431" data-label="Image"> </div> <div data-bbox="499 305 1083 337" data-label="Section-Header"> <p>Sportsmen for Fish & Wildlife of Wyoming</p> </div> <div data-bbox="472 337 1100 401" data-label="Text"> <p>Mission Statement: To promote the protection and enhancement of wildlife habitat, the quality of wildlife management programs, and America's family heritage of hunting, fishing, and trapping.</p> </div> <div data-bbox="594 430 743 451" data-label="Text"> <p>November 3, 2005</p> </div> <div data-bbox="329 493 688 576" data-label="Text"> <p>Bison and Elk Management Planning Office P.O. Box 510 Jackson, Wyoming 83001 ATTN: Laurie Shannon</p> </div> <div data-bbox="329 618 483 639" data-label="Text"> <p>Dear Ms. Shannon:</p> </div> <div data-bbox="329 662 1001 855" data-label="Text"> <p>Sportsmen for Fish & Wildlife, Wyoming (SFW) is a non-profit corporation duly organized under the laws of Utah. The SFW's mission is to protect the heritage of hunting, fishing, trapping, and to ensure the proper management and protection of wildlife. SFW's members have significant interests in the proper management and control of Wyoming's wildlife. SFW currently has over 15,000 members nationwide. The SFW of Wyoming has eight Wyoming Chapters with membership of over 3,000 members and friends. SFW would like to voice its concerns regarding the proposed action for the U.S. Fish and Wildlife Service's draft Environmental Impact Statement (EIS) regarding its Bison and Elk Management Plan.</p> </div> <div data-bbox="329 875 1008 1156" data-label="Text"> <p>SFW has concerns over the jurisdiction of the actions, general agency direction and specific concerns about the welfare and management decisions being taken by the USFWS. SFW cannot support the proposed action (Alternative four) as it suggests drastic and unnecessary changes to the National Elk Refuge's (NER) successful winter-feeding program, which has been effectively operated since 1912. SFW does not support the inclusion of the John D. Rockefeller Jr. Memorial Parkway as part of the EIS analysis. Alternative Four does not support or offer population management practices through hunting, but through natural causes. SFW is a group with a strong interest in hunting and simply cannot support reducing wildlife populations through starvation and natural means. In order to have thriving wildlife populations and a successful hunting industry, Wyoming wildlife must be managed in ways that promote both wildlife and hunting opportunities. Elimination of supplemental feeding on the NER will reverse the efforts of ninety-three years of managing a healthy Wyoming elk population.</p> </div> <div data-bbox="329 1175 995 1263" data-label="Text"> <p>After review and analysis of the EIS, SFW strongly supports Alternative Five. It is the only alternative that aims to continue supplemental feeding on the NER while maintaining and sustaining population management through hunting opportunities. Alternative Five seeks to alleviate the true concern and reason for the EIS: bison</p> </div> <div data-bbox="657 1302 672 1321" data-label="Page-Footer"> <p>1</p> </div>	<div data-bbox="1136 776 1484 802" data-label="Text"> <p>30-1. Thank you for your comments.</p> </div> <div data-bbox="1136 1193 1932 1295" data-label="Text"> <p>30-2. Alternative 5 is the most similar of any other alternative to the status quo management found in Alternative 1, particularly in terms of elk management, and it would likely be the most acceptable to members of the public who wish to continue current elk management.</p> </div>

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	<p>population reduction. We ask the USFWS to remain focused on the need and reason for this environmental analysis. The bison population has been a concern and increasing problem in the GTNP since the 1980's. Since that time, the bison population has continued to grow with no management focus on reduction of bison numbers. When USFWS attempted to reduce population number in the 1990's it was met with a lawsuit and challenge for its efforts. Alternative Five seeks to reduce the bison population without making drastic and unnecessary changes to the management of Wyoming's elk population.</p> <p>SPECIFIC COMMENTS</p> <p>A. <u>The Need for Analysis</u></p>	
30-3	<p>SFW has serious concerns regarding the role litigation has played in altering USFWS management decisions and focus. USFWS cites, on page 8, that the need for the EIS stems from a 1998 Lawsuit titled <u>Fund for Animals v. Clark</u> (D.C. Circuit 1998). The lawsuit dealt with <u>Fund for Animals</u> challenge of an organized bison hunt on federal lands planned by the USFWS, the U.S. Park Service, and National Forest Service along with a cooperative effort with the Wyoming Game and Fish Department. The proposed hunt's goal was to reduce the rising population of buffalo in the GYNP.</p>	<p>30-3. Although litigation stimulated reassessment of the plan, it did not change USFWS management decisions or focus. The U.S. Fish and Wildlife Service and the National Park Service expanded the analysis after determining that was needed to fully examine the complex management issues.</p>
30-4	<p>The D.C. Circuit Court held that the National Environmental Policy Act (NEPA) required an Environmental Analysis of the feeding grounds on the bison population. It further concluded that the National Elk Refuge's elk feeding plan needed similar analysis under NEPA. Yet after the preparation of the EIS to fulfill the court's holding, the focus of this EIS is on both elk and bison feeding without emphasis on the bison problem. <u>Fund for Animals</u> arose because of the USFWS plans to manage and reduce bison numbers on the NER. Yet the current EIS seems to lose the focus of its original intent-Bison Management. Instead, the EIS focuses on a population reduction and drastic reduction of its supplemental feeding program for elk and bison. The EIS aims to alter a program that has been successfully managing elk populations since 1912. The D.C. Circuit Court did not require a drastic alternation of the NER and its feeding program; it simply required that an environmental analysis be conducted in order to comply with NEPA. "The real issue, however, is not how the herd size is to be reduced or even if it should be reduced at all. Rather, the question before this court is whether the federal defendants have followed the proper procedures in permitting an organized hunt to reduce the number of bison in northwestern Wyoming." <u>Fund for Animals</u> at 8. The Introduction section of the EIS implies that an overhaul of its feeding program was required from the opinion issued in <u>Fund for Animals</u>, but this simply is not the case and we encourage the USFWS to regain its focus on reduction of the bison herd population.</p>	<p>30-4. The agencies were required to analyze the effects of refuge supplemental feeding on bison. They decided to include management of both elk and bison in one plan because any change in the refuge feeding program would affect both species (see p. 8 in the Draft Plan/EIS).</p>
30-5	<p>SFW would like the USFWS to revisit its original goal of bison management more clearly and strongly throughout the EIS. Chapter 1 of the introduction needs additional analysis of <u>Fund for Animals</u> and its reasons to broaden its scope to both bison and elk feeding programs. After the EIS is completed, one wonders if the USFWS will revisit its intent to reduce bison populations to a more manageable population. While</p>	<p>30-5. Bison management remains an integral goal of the plan, despite the expanded analysis. Chapter 1 adequately describes the legal decision following the 1998 lawsuit and reasons for expanding the management plan to include elk management.</p>

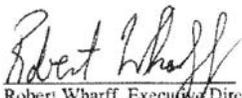
Comment No.	Letter 30 (cont.)	Response
30-6	<p>Alternatives three, four and five call for bison hunting on the refuge, their population objectives differ greatly. Alternative Five seeks to reduce bison number to a manageable level of 350-400 bison on the NER. Prior to the District Court holding in <u>Fund for Animals</u>, the USFWS was seeking to reduce bison populations in the area, which had already grown to 435 animals in 1996. At that time, the USFWS stated the bison hunt was necessary as the herd of 435 bison was posing several hazards within the area. Currently the bison population has reached over 800. It is troublesome the USFWS can cite 435 as a hazard in the 1998 litigation, but deem an ever-growing population of an estimated 800 bison more manageable than in 1998. Alternative Five is the only alternative that seeks to accomplish the 1996 goal of the USFWS, bison population reduction. Without aggressive management of this herd, the population will continue to expand and stretch the resources of the feeding grounds.</p>	<p>30-6. The Draft Plan/EIS presented six alternatives with several bison herd numbers. Although the 350–400 bison under Alternative 5 would be more “manageable,” this number of bison would be at the low end of, and sometimes would be lower than, the 400 recommended by Berger (1996) to maintain a genetically viable herd. Modeling by Gross et al. (2006) also found 400 to be the minimum herd size that would retain genetic variability. In order to manage conservatively, the agencies would prefer to keep numbers above the minimum necessary for a healthy herd. Numbers in the Final Plan/EIS reflect additional analysis and consideration of more recent research than what was used for the 1996 <i>Jackson Bison Herd Long-term Management Plan</i>.</p>
30-7	<p>B. Jurisdictional Concerns</p> <p>An area the EIS fails to accurately state Wyoming’s role in the management of wildlife in the Grand Teton National Park (GTNP). W.S. 23-1-103 states: “<i>all wildlife</i> in Wyoming is the property of the state. It is the purpose of this act and the policy of the state to provide an adequate and flexible system for control, propagation, <i>management</i>, protection and regulation of <i>all Wyoming wildlife</i>.” (emphasis added)</p> <p><u>Page 3, Purpose and Need</u></p> <p>The EIS explains the plan’s purpose is to provide six alternatives to managing bison and elk on the NER and GTNP as well as the John D. Rockefeller Jr. Memorial Parkway for a 15-year period. EIS at 3. The EIS does not explain Wyoming statutory and legal authority for wildlife management. The EIS only briefly mentions the Wyoming Game and Fish Department (WGFD) in this section by stating WGFD “manages resident wildlife species throughout <i>most</i> of the state.” EIS at 4 (Emphasis added). This statement does not accurately reflect the WGFD’s involvement and management of wildlife within Wyoming. Wyoming’s jurisdiction needs to be more effectively explained to assist the reader of Wyoming’s current management role and efforts to manage <i>all</i> wildlife in Wyoming. The uninformed reader can infer that the EIS is being conducted to provide management of bison and elk in Wyoming due to a failure of the State or WGFD. The State of Wyoming and WGFD have always and will always manage all of Wyoming’s wildlife and its authority needs to be properly explained and identified in the beginning section of the EIS.</p>	<p>30-7. Text in the Final Plan/EIS has been revised to clarify management jurisdiction.</p>
30-8	<p><u>John D. Rockefeller Jr. Memorial Parkway Inclusion in the Decision Area.</u></p> <p>The EIS does not identify Wyoming as the lead agency in managing wildlife within the Parkway. Rather, the State of Wyoming’s management is not recognized until page 153 of the EIS stating that hunting is authorized by the State of Wyoming. On page 15, Wyoming’s management jurisdiction is not accurately described. Yet the Parkway is incorporated as part of the EIS Decision Area as stated on page 23 and as shown on the</p>	<p>30-8. The John D. Rockefeller, Jr., Memorial Parkway is included in the decision area because Jackson elk summer in this area and it is generally managed by the National Park Service. The Wyoming Game and Fish Commission manages hunting and fishing in the parkway, excepting temporary, extraordinary situations. Text was added to the Final Plan/EIS to acknowledge this difference from the elk reduction program in the park.</p>

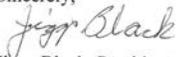
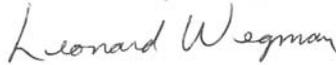
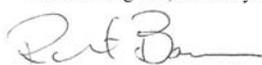
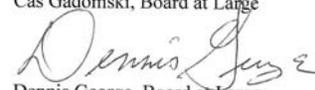
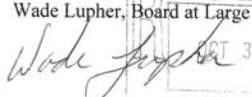
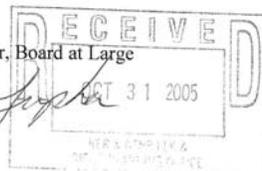
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30-9	<p>map on page 24. It is through the efforts of the WGFD that wildlife is managed in this area. It should not be included as part of the EIS decision area as it oversteps Wyoming's jurisdiction for wildlife management.</p> <p><u>The WGFD should set herd size for bison-population objectives</u></p> <p>The EIS explains, "The bison herd size is being revisited through this planning process." EIS at 34. This statement oversteps the analysis and scope of the EIS. It is the WGFD that ultimately determines the bison herd size. The EIS statement is overly broad and attempts to oversimplify the WGFD's role in managing wildlife in the state, including the bison herd in the GTNP. While we applaud the EIS' intent to reduce the bison herd size, the plan itself does not take a wide focus on bison management and its effect on the NER. The entire EIS needs to take a larger look at bison management and remember its initial 1996 goal of bison population reduction. The intent of a reduced bison population in the GTNP needs to be more specifically identified and described throughout the EIS.</p>	<p>30-9. The main purpose of the EIS is to evaluate bison and elk management issues and to present a variety of management actions, which cannot be narrowed to the single focus of reducing bison numbers. Bison and elk herd sizes vary within the range of the alternatives. The agencies recommend objectives in the Final Plan/EIS but acknowledge that ultimately the bison herd size will require public review and final approval by the Wyoming Game and Fish Commission.</p>
30-10	<p><u>C. Disease Transmission</u></p> <p><u>Page 9. Issues Related to Ungulate Concentrations</u></p> <p>The EIS cites "the increased risk of serious disease impacts and habitat damage have the greatest potential to hinder the ability of both the U.S Fish and Wildlife Service and the National Park Service to meet its purposes and missions." Yet the EIS fails to analyze the risks and increase in disease transmission if supplemental feeding were to decrease.</p>	<p>30-10. The analysis describes in detail the impacts of reducing the refuge supplemental feeding program, including risks to livestock (Draft Plan/EIS pp. 487-503), disease in elk (pp. 264-66, 276-78, 285-88, and 300-301), and disease in bison (pp. 320-21, 325-26, 330, and 338).</p>
30-11	<p><u>Brucellosis Transmission Concerns</u></p> <p>The decrease in supplemental feeding will not result in a direct decrease in brucellosis transmission. Brucellosis has been successfully managed by the WGFD for twelve years prior to any livestock transmission. Since brucellosis transmission has been identified in Wyoming livestock, the WGFD has effectively altered their current feeding management plans to prevent future outbreaks based on recommendations from the Brucellosis Task Force. In addition, the WGFD is going to try some of the test-and-slaughter techniques that have been successful in Idaho to determine if that technique is helpful in removing brucellosis from the population.</p>	<p>30-11. Reducing supplemental feeding and associated elk and bison concentrations would directly decrease brucellosis transmission because the opportunities for animals to contact fetal materials/fluids from late-winter abortions would decrease (Smith 2001; Thorne 2001; also see Draft Plan/EIS, pp. 126-29, 264, 276, and 300).</p>
30-12	<p>It is difficult to determine if elk would be less concentrated if winter feeding operations were not conducted. Elk are herding animals and would likely remain in close proximity whether on the feeding grounds or if feeding on private land.</p>	<p>30-12. After the fall migration and prior to supplemental feeding each year, elk disperse over a wide area. Although they are herding animals, they would not naturally concentrate as they do on feedgrounds. Thousands of elk would not feed head to head and linger in small wintering areas under natural conditions.</p>
30-13	<p>Eliminating the winter feeding operations to prevent future brucellosis outbreaks is devising a cure that is worse than the problem it is attempting to address. The plan does not address situations that are likely to occur if winter feeding is reduced as</p>	<p>30-13. The Draft Plan/EIS analyzed this subject and acknowledged that the transmission risk for brucellosis could increase to some extent. Mitigation to reduce management conflicts during reduction of supplemental feeding would occur. Alternative 4 (the Preferred Alternative) in the Final Plan/EIS was changed to include a budget estimate for minimizing landowner conflicts and to emphasize that the agencies would work with the Wyoming Game and Fish Department and landowners, including the local livestock community, to coordinate actions that would prevent conflicts and to defray costs of managing potential conflicts.</p>

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<p>30-13 (cont.)</p>	<p>suggested in Alternative Four. Elk seeking additional forage will increase livestock and wildlife interactions and possibly increase the risk for brucellosis transmission and destroying the efforts of the WGFD and Brucellosis Task Force.</p> <p><u>Chronic Wasting Disease</u></p>	<p>30-14. The word “rapidly” has been deleted on page 132. Although chronic wasting disease is typically a slow-spreading disease under natural conditions, it is rapidly transmitted in captive deer herds (Miller and Wild 2004) and is likely to spread more rapidly in the Jackson elk herd, which is concentrated on feedgrounds for several months each winter, than in non-fed herds. Researchers agree that transmission occurs through animal-to-animal contact or contact with contaminated environments. Eliminating or reducing feeding operations may not prevent chronic wasting disease, but these actions would decrease the potential for major impacts.</p>
<p>30-14</p>	<p>The EIS indicates reduced feeding in the NER will assist in the reduction of Chronic Wasting Disease (CWD). Statements contained on pg. 132-133 of the EIS take broad assumptions and observations about CWD. The EIS explains that CWD would spread rapidly among the elk herd. While CWD is an infectious and contagious disease, it is not a quick spreading disease as suggested in the EIS. In fact, there is no evidence of CWD in the current elk and bison populations or that eliminating or reducing winter feeding operations will prevent CWD.</p>	<p>30-15. The Draft Plan/EIS acknowledged that there is no current evidence that chronic wasting disease can infect humans, although ongoing research is attempting to definitively determine this. The risk appears to be low (Belay et al. 2004). The Draft Plan/EIS noted that potential impacts were discussed because of health concerns generated by similar diseases. Chronic wasting disease is in the same family of diseases as bovine spongiform encephalopathy, which has infected humans with variant Creutzfeldt-Jacob disease through consumption of infected meat. Recent reports that highlight the need to know more about this disease include (1) the September 2005 finding of an infected moose (Colorado Division of Wildlife 2005) because no cases had previously been found despite surveillance, and the species was generally thought to be immune); and (2) the January 2006 discovery of CWD prions (the CWD infective agent) in deer muscle. To be safe, the Centers for Disease Control and Prevention and wildlife officials in a number of states recommend that hunters do not consume meat from animals that appear sick or that test positive for the disease.</p>
<p>30-15</p>	<p>The EIS also creates a sense of urgency and panic related to possible transmission to humans, which has not been scientifically supported within the document. “Currently there is no evidence that humans can contract chronic wasting disease, <i>but it has not been shown that humans cannot contract the disease.</i>” EIS at 170 (Emphasis added). Statements such as this help create additional reader confusion. The EIS needs to accurately reflect and state what is known about CWD and its transmission to humans...relatively little.</p>	<p>30-16. The Final Plan/EIS includes the most recent information on chronic wasting disease. Studies of infection in captive cervids have provided strong evidence for transmission through animal-to-animal contact or contact with contaminated environments. Contamination with the CWD agent persists for years in the environment and has caused infections despite efforts to “disinfect” the areas. Solid scientific evidence about certain aspects of the disease supports statements in the EIS about herd risk.</p>
<p>30-16</p>	<p>The analysis also identifies certain criteria leading to CWD transmission. We encourage the USFWS to review its transmission factors included in the EIS. Little is known about the transmission factors and the disease itself. Many assertions on CWD are stated as fact in the EIS when they are mere opinions and speculations.</p>	<p>30-17. The Draft Plan/EIS text discussed by the commenter used the word “adverse” to mean “negative”; “adverse” was not used to indicate the extent of the effect. Chronic wasting disease has no known benefit to affected animals, and the only known consequence is debilitation and death. Such effects are adverse. To go into further discussion of the possible effects on an affected animal would not provide any useful information.</p>
<p>30-17</p>	<p>The document also contains speculation regarding CWD’s impacts within the Jackson Hole Area’s mule deer population. EIS at 364. The EIS states that CWD introduction in the area’s mule deer herd “would have an adverse effect on the population.” As explained above, little is known about CWD and its effects. To broadly state “adverse effects” will occur to the deer populations does not accurately explain what little information is scientifically known about the disease. While effects may occur with CWD introduction, it is unknown what the effects will be. It would be appropriate to replace “adverse effect” with terminology that accurately describes the unknown effects, impacts, and findings of the disease.</p>	<p>30-18. Scientific evidence on transmission and environmental contamination indicates that chronic wasting disease could adversely impact Wyoming wildlife, particularly elk fed in northwestern Wyoming. The Wyoming <i>Chronic Wasting Disease Management Plan</i> (WGFD 2006) acknowledges the potential health threat to Wyoming deer and elk. The agencies also believe that the potential impacts of a disease expected to infect local herds cannot be ignored and that management plans should attempt to prevent impacts when possible.</p>
<p>30-18</p>	<p>While relatively little is known about CWD, the EIS continues to take broad statements including identifying CWD transmission factors; indicating possible human transmission; and adverse effects as fact without stating the true scientific findings concerning the disease. The emphasis on CWD suggests the EIS is aimed to persuade readers to fear possible disease transmission and supporting any alternative that aims to reduce, if not eliminate, possible CWD transmission to Wyoming wildlife or humans.</p>	<p>The Draft Plan/EIS clearly stated that transmission to humans is not known but is discussed because the disease is related to bovine spongiform encephalopathy. See response 30-15.</p>

Comment No.	Letter 30 (cont.)	Response
30-19	<p><u>D. NER Supplemental Feeding Reduction</u></p> <p><u>Feeding should not be based on only “above average winters.”</u></p> <p>Alternative Four aims to reduce feeding on the NER only on “above average winters.” This Alternative suggests supplemental feeding would only occur every 4-5 years out of 10. Alternative Four further seeks to reduce the feeding after 10-15 years of plan implementation. Such a feeding reduction cannot be achieved without a significant and unwanted elk population reduction. The Refuge has effectively and successfully managed supplemental feeding based upon weather conditions seen on the grounds and population numbers. Setting a standard of feeding only in severe winters is quite a lofty goal. A formula cannot be successfully applied without on site observations of both wildlife and weather conditions. Refuge officials have delayed supplemental feeding based on weather conditions, wildlife populations, and professional determination for nearly ninety-five years. Managers cannot determine on one day in January if the area is facing an average or above average winter. Basing determination of winter severability on an arbitrary day could be disastrous to Wyoming’s elk population. The managers should continue to rely on factors such as current weather conditions, elk and bison population trends and distribution, and on-site field experience to assist in supplemental feeding decisions. Managers should not be expected to assume the role of a meteorologist at the expense of Wyoming’s wildlife. Drastically reducing NER supplemental feeding would reduce wildlife populations through starvation and malnourishment rather than through hunting efforts. SFW cannot support Alternative Four or its attempt to drastically reduce supplemental feeding with its current determination criteria.</p> <p><u>The use of mortality rates will reduce elk populations beyond projections</u></p> <p>SFW also is concerned with the use of elk mortality rates in the EIS. Delaying the supplemental feeding until mortality rates have reached the target 5% level is not a solution to effective wildlife management. The 5% level is based on detectable levels. Even if the mortality rate is detected immediately and supplemental feeding commences immediately upon reaching the rate, the elk population will not react immediately. Once the mortality rates reach the 5% level, additional deaths will continue and exceed the 5% mortality rate. Once the elk begin to become malnourished, the weakened animals will be more susceptible to predation, diseases, and winter storms or conditions and could possibly result in significant losses before animals recover.</p> <p><u>Wildlife drifting and other wildlife impacts</u></p> <p>If the Final EIS implements a reduced pattern of feeding, the area’s elk population will develop adaptive feeding behaviors. Without a more consistent supplemental feeding pattern, the elk will leave the NER when feeding does not occur. The elk will seek additional forage from nearby ranches and landowners without remaining on the NER. Problems will arise when the elk seek additional feed from private landowners and homeowners. The elk will damage forage grounds and hay supplies from livestock</p>	<p>30-19. The agencies believe that reducing the feeding program could be achieved without a “significant and unwanted elk population reduction,” particularly if monitoring, adaptive management, and conflict mitigation are relied upon. Under Alternative 4 (the Preferred Alternative) feeding reductions would occur gradually while forage was being enhanced and while bison and elk numbers were being reduced until they were more in balance with available forage. Winter feeding would continue to be initiated after assessment of various factors, including forage production during the growing season, the amount of forage offtake, temperature, snow levels, snow condition, and ungulate body condition and behavior. The January 1 Index of Winter Severity measurement could be one of the factors used in evaluating when to feed. Adaptive management on the refuge would be applied to best manage the herds. Hunting would continue to be the primary elk management tool. The intent of reducing supplemental feeding under Alternative 4 in the Draft Plan/EIS was not to reduce the herd by starving elk, and this is not an objective under any alternative (under Alternative 2, hunting would not be used, and there could be greater fluctuations in the herds).</p>
30-20	<p><u>Wildlife drifting and other wildlife impacts</u></p> <p>If the Final EIS implements a reduced pattern of feeding, the area’s elk population will develop adaptive feeding behaviors. Without a more consistent supplemental feeding pattern, the elk will leave the NER when feeding does not occur. The elk will seek additional forage from nearby ranches and landowners without remaining on the NER. Problems will arise when the elk seek additional feed from private landowners and homeowners. The elk will damage forage grounds and hay supplies from livestock</p>	<p>30-20. A mortality threshold would not trigger supplemental feeding under any alternative. Text has been added in the Final Plan/EIS to clarify feeding criteria.</p>
30-21	<p><u>Wildlife drifting and other wildlife impacts</u></p> <p>If the Final EIS implements a reduced pattern of feeding, the area’s elk population will develop adaptive feeding behaviors. Without a more consistent supplemental feeding pattern, the elk will leave the NER when feeding does not occur. The elk will seek additional forage from nearby ranches and landowners without remaining on the NER. Problems will arise when the elk seek additional feed from private landowners and homeowners. The elk will damage forage grounds and hay supplies from livestock</p>	<p>30-21. The refuge is winter range and would provide forage for elk whether supplemental feeding occurred or not. Although some elk would leave the refuge in years without supplemental feeding, enhanced forage both on and off the refuge would provide additional food and encourage more elk to stay in these areas.</p> <p>Alternative 4 (the Preferred Alternative) in the Final Plan/EIS was changed to include a budget estimate for minimizing landowner conflicts and to emphasize that the agencies would work with the Wyoming Game and Fish Department and landowners, including the local livestock community, to coordinate actions to prevent conflicts and to defray costs of managing potential conflicts.</p>

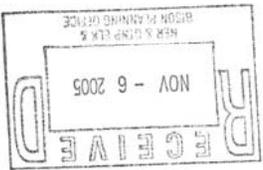
Comment No.	Letter 30 (cont.)	Response
<p>30-21 (cont.)</p>	<p>producers and landowners. Without a consistent feeding pattern, it will be necessary to feed the elk earlier than usual to keep the animals on the refuge lands and from seeking additional forage. Should elk be forced to seek available feed, co-mingling with livestock will likely increase, resulting in an increased risk of future brucellosis outbreaks, something the USFWS states they are trying to avoid.</p> <p><u>Private landowners concerns</u></p>	
<p>30-22</p>	<p>SFW has concerns regarding the natural regulation approach taken in Alternative Four. While a reduction of winter feeding on the NER is aimed at reducing population numbers, the feeding reduction will also increase private property damage and costs. Displaced elk will seek feed on private lands including pastures, forage lands, and livestock feeding grounds. Private landowners will face hay losses, increased wildlife and livestock interaction, and property damage from increasing wandering elk in surrounding areas where the elk and bison are accustomed to feeding. One success of the NER supplemental feeding program has been a decrease in private landowner damage. Alternative Four will increase private property damage as well as increase wildlife/livestock interaction and commingling</p> <p><u>Competition with other wildlife</u></p>	<p>30-22. See response 30-21.</p>
<p>30-23</p>	<p>The EIS does not consider the impacts of reduced supplemental feeding on the NER to the areas other wildlife populations. Winter feeding operations on the NER prevent impacts to other wildlife outside of the Park including mule deer, big horn sheep and moose. By reducing the supplemental feeding, elk will seek limited available forage and increase their competition with other wildlife species. The area's mule deer population would be displaced from their specific population habitat. The area's moose populations are already facing significant decreases. Increased forage competition may hinder moose population growth and/or recovery. The area moose populations cannot sustain additional forage competition created by the displaced elk without drastic effects. Big Horn Sheep populations will also face increasing competition from the elk seeking and depleting grazing lands historically utilized by the Big Horn Populations in the area. Reducing the feeding on the NER only creates more problems and impacts outside the NER at the expense of Wyoming's wildlife populations.</p> <p><u>Closure of additional hunting areas</u></p>	<p>30-23. Under the Preferred Alternative in the Final Plan/EIS many elk would continue to forage on refuge winter range and on refuge cultivated areas, where improved techniques would provide better quality forage than does current cultivation. 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 needs to be done to determine the cause of these population declines.</p>
<p>30-24</p>	<p>The hunting industry in Wyoming assists wildlife management through population reduction and hunter license fees. The alternatives describe closing additional lands from hunting in the GTNP. In the summary of alternatives on page 79, Alternative Four seeks to add criteria to reduce hunting in the GTNP including eliminating elk hunting on the northern fifth of the refuge and elk herd reductions on the Blacktail Butte and Kelly hayfields. SFW opposes any type of land closures or reduction in hunting opportunities as suggested in Alternative Four. Closing any current hunting areas will increase the difficulty of effectively managing the elk population to a desired level as is currently and successfully done through hunting.</p>	<p>30-24. This statement in the Draft Plan/EIS table was in error and has been deleted in the Final EIS. For the Final EIS the agencies modified Alternative 4 to clarify specific actions, including (1) identifying criteria for beginning and ending feeding each year in consultation with the Wyoming Game and Fish Department, and (2) developing a structured framework for adaptively managing the bison and elk populations, in addition to other actions. Although the comment revealed an error in the Draft Plan/EIS table (Alternative 4 did not close any hunting areas), if the park and the Game and Fish Department determined that park areas were no longer needed to manage the elk population, they could be closed (the legislation that established Grand Teton National Park authorizes elk herd reductions when necessary). Close cooperation between the agencies and the Wyoming Game and Fish Department, along with the goal of achieving and maintaining WGF D herd objectives, would continue.</p>

Comment No.	Letter 30 (cont.)	Response
30-25	<p><u>Water Resources</u></p> <p>Table 4-3 of the EIS describes the NER flood irrigates, on average 930 acres of forge lands each year. Historically, forage in this area has been produced and should continue to be irrigated in order to sustain additional forage for the wintering elk herds. Utilizing and implementing the <u>Irrigation System Rehabilitation Plan Environmental Assessment (USFWS 1998)</u> would assist in more efficient and sound irrigation practices to develop additional forage lands, which would allow the irrigation of nearly 1200 acres. While the EIS states a lack of funds has halted developing irrigation efficiency, SFW believes that working to develop more sustainable practices could produce more natural forage, which would reduce the amount of winter supplemental feeding and costs. By increasing irrigation efficiency, the NER would be able to increase forage production, which would assist in delaying supplemental feeding as late as possible.</p>	30-25. The agencies agree that improving irrigation techniques would enhance efficiency and forage production.
30-26	<p><u>E. Conclusion</u></p> <p>Alternative Five is the best option because it maintains the current elk population while reducing the bison population through hunting, not "natural regulation". SFW members simply cannot support excessive starvation as a population control method when hunting opportunities would benefit the local economy and reduce the suffering of animals. Alternative Five is also preferable because it provides winter feeding operations nearly every winter as determined by weather conditions, animal movements and forage availability. The definition of winter severity in the EIS is simply too difficult to determine. Experienced professional judgment remains the best way to determine when winter feeding operations are necessary. Delaying supplemental feeding until elk mortality rates are at the 5% mortality rate will certainly result in a mortality rate that exceeds 25% because it will be too late to save many malnourished elk. Also, there is no evidence that disease threats and transmission would be decreased, let alone eradicated, if winter feeding operations are reduced or eliminated.</p> <p>Thank you for your consideration,</p>  <p>Robert Wharff, Executive Director Sportsmen for Fish and Wildlife of Wyoming</p> <p>cc: Wyoming Game & Fish Commission Wyoming Governor's Office Senator Craig Thomas Senator MikeEnzi Representative Barbara Cubin</p>  <p>8</p>	30-26. Thank you for your comments. Individual points have already been addressed in these responses, except the final comment about disease and feeding. Research clearly links infectious disease prevalence and transmission with a high population density. Brucellosis in northwestern Wyoming elk is a good example. High feedground densities for several months per year have fostered high brucellosis transmission and prevalence in northwestern Wyoming, compared to levels in free-ranging elk (Smith 2001; Thorne 2001; also see the Draft Plan/EIS, pp. 126-29, 264, 276, and 300).

Comment No.	Letter 31	Response
	<p>Sportsmen for Fish and Wildlife of Wyoming Fremont County Chapter P.O. Box 591 Riverton, Wyoming 82501</p> <p>October 19, 2005</p> <p>Draft Bison and Elk Management Plan National Elk Refuge P.O. Box 510 Jackson, Wyoming 83001</p> <p>Re: Draft Bison and Elk Management Plan</p> <p>The Fremont County Chapter of the Sportsmen for Fish and Wildlife of Wyoming is strongly in favor of keeping the feed grounds open. We support Alternative 5 in that Elk numbers should remain at their current levels or higher. We also feel the future feeding should not be reduced until an alternative feeding system is developed.</p> <p>The flood irrigation system needs to be studied and possibly upgraded to raise more feed for winter requirements. A sprinkler irrigation system will achieve the same feed results, however it is not as good of an alternative as flood irrigation.</p> <p>The Bison population needs to be reduced to 400 animals in line with the state Game and Fish Department guidelines. We also feel Bison hunting should be permitted on the refuge. The vaccination program to control brucellosis should be continued.</p> <p>All alternatives are of supposition, not scientific fact. Studies by Federal officials are not truthful or of correct science, i.e. the Lynx study where lynx hair was planted by researchers in order to get an Endangered Species listing, thus locking us out of more Forests and Parks.</p> <p>Sincerely,  Jiggs Black, President</p> <p> Kirk "Tater" Koch, Vice President</p> <p> Leonard Wegman, Secretary/Treasurer</p> <p> Robert Baumann, Board at Large</p> <p> Cas Gadomski, Board at Large</p> <p> Dennis George, Board at Large</p> <p> Wade Luper, Board at Large</p> <div style="text-align: center;">  </div>	<p>31-1. Thank you for your comments.</p> <p>31-2. Irrigation methods were studied and presented in the <i>Irrigation System Rehabilitation Plan Environmental Assessment</i> (USFWS 1998). The primary benefit of sprinkler irrigation systems is that water is used more efficiently than flood irrigation methods.</p> <p>31-3. The agencies will recommend objectives to the Wyoming Game and Fish Department based on recent publications on recommended minimum viable populations.</p> <p>31-4. The agencies based their analysis on scientific research (including published and peer-reviewed articles and books, the professional judgment of various experts, and on-the-ground personnel) and modeling efforts, which provided an estimate of conditions under various scenarios based on recorded data.</p>

Comment No.	Letter 32	Response
	<p>Don't Expand  eric adams <feduptwo@yahoo.com> m> 11/06/2005 07:15 PM</p> <p>To: bisonelk_planning@fws.gov, Laurie_Shannon@fws.gov cc: Subject: Re: Management plan.</p> <p>I'm writing these comments as the representative for Sweetwater Chapter of Sportsmen for Fish and Wildlife. We have 300plus members in Sweetwater County, Wyoming.</p> <p>We can not support Alternative 4 because of the following reasons</p> <p>We believe that everything has run semi smoothly since 1912 there is no reason to radically change the way elk are managed on the refuge. The only way to not feed these elk is tear all the houses down in Teton County, and return the 2/3 of the traditional winter range that has been lost.</p> <p>We believe that if elk are not feed they will move off the refuge to areas that are traditionally used for other wintering wildlife. This will cause intense competition with these other species and will result in more stress on wintering wildlife in and around the refuge.</p> <p>We believe that forcing elk off the refuge will also cause more encounters with cattle on private lands and diseases can become more of a problem.</p> <p>We believe that initaly alternative 4 may add hunting opportunity but in the long run will hurt "our" hunttable populations of wildlife. We cannot support anything that will lead to a decrease in long term hunting opportunity.</p> <p>Sportsmen can also not support alternative 4 because a supplemental feeding plan that is triggered by a mortality rate is nonsense.</p> <p>At this time the Sweetwater chapter of Sportsmen for fish and Wildlife and our 300+ members support alternative 5 because it does not reduce winter feeding and keeps elk numbers at what they are presently.</p> <p>Sincerly Eric Adams Chairmen, Sweetwater Chapter Sportsmen for Fish and Wildlife</p> <p>Yahoo! FareChase: Search multiple travel sites in one click. http://farechase.yahoo.com</p> 	<p>32-1. Thank you for your comments.</p> <p>32-2. The refuge supplemental feeding program has created and maintains high brucellosis prevalence in the Jackson elk herd compared to prevalence in non-fed herds. This program also creates the risk of potentially major impacts to the herd if and when chronic wasting disease infects Jackson elk. The agencies believe that management strategies that enhance forage on the refuge, as well as off the refuge through interagency efforts, and that also reduce elk concentration and disease transmission risks, would maintain a healthy elk herd better in the long term.</p> <p>32-3. Although competition off the refuge would increase to some extent, decreasing refuge elk and bison numbers and increasing available forage on and off the refuge would prevent major conflicts.</p> <p>32-4. Alternative 4 (the Preferred Alternative) in the Final Plan/EIS was changed to include a budget estimate for minimizing landowner conflicts and to emphasize that the agencies would work with the Wyoming Game and Fish Department and landowners, including the local livestock community, to coordinate actions to prevent conflicts and to defray costs of managing potential conflicts.</p> <p>32-5. The Draft Plan/EIS assessed potential impacts of the various alternatives on hunting opportunities and found that these opportunities would remain abundant because the Jackson elk herd would be managed at the state objective of 11,000 elk. The herd would likely be lower in some years under Alternatives 2, 3, and 6, with conservative low estimates of 8,100, 7,900, 9,300, respectively. Bison hunting opportunities would greatly increase.</p> <p>32-6. A mortality threshold would not trigger supplemental feeding under any alternative. Winter feeding would continue to be initiated after assessment of various factors, including growing season forage production, amount of forage offtake, temperature, snow levels, snow condition, and ungulate body condition and behavior.</p> <p>32-7. The U.S. Fish and Wildlife Service and the National Park Service believe that Alternative 5 would not be sustainable over time because of disease issues.</p>

Comment No.	Letter 33	Response
	 <p data-bbox="422 245 1102 378"> Wyoming Office PO Box 1160 Pinedale, WY 82941 Tel: (877) 746-3628 Fax: (707) 597-4058 Email: Wyoming@WesternWatersheds.org Web site: www.WesternWatersheds.org </p> <p data-bbox="747 358 1102 378"><i>Working to protect and restore Western Watersheds</i></p> <p data-bbox="873 483 1014 505" style="text-align: right;">November 6, 2005</p> <p data-bbox="331 524 596 545">Dear Interagency Working Group,</p> <p data-bbox="142 570 1008 609">33-1 Thank you for this opportunity to comment on the draft Bison and Elk Management Plan and EIS.</p> <p data-bbox="142 633 1014 738">33-2 In reading through the documents, we noticed that the analysis of real solutions was greatly constrained by the lack of full participation by the Forest Service. The Forest Service is key to effectively dealing with the disease and migration issues. We understand interagency politics can be difficult, but we urge a more complete participation in this process in order to implement obvious, effective and realistic solutions.</p> <p data-bbox="142 763 1003 974">33-3 We are very disappointed by the lack of serious effort to deal with the looming CWD issue or a thorough analysis or modeling of CWD dispersal and infection or likely scenarios. As of a few days ago CWD was located only 35 miles from Refuge and it is clearly only a matter of a few years before it spreads to the Refuge. If feeding operations have not been eliminated before this contamination occurs, it will, most likely, be the worst wildlife crisis we have ever faced. But the Plan's lack of implementable solutions is very disheartening. Further, the reliance on WGFD's CWD Management Plan as the cornerstone of CWD management on the Refuge and Park is extremely dangerous. This CWD Management Plan is exceptionally poor and will be totally ineffective for feedlot situations.</p> <p data-bbox="327 998 1003 1063">We enclose our comments on this CWD Management Plan as part of our comments. The response to CWD in the Bison and Elk Management Plan needs to be greatly strengthened in order to be effective.</p> <p data-bbox="142 1088 999 1177">33-4 We are concerned by the way Alternatives were laid out. The similarity between actions in each alternative was confusing. In addition, the spreading out of useful actions among many of the alternatives, yet combining these with poor or clearly undesirable actions lead to a muddling of the alternatives so that none were good choices.</p> <p data-bbox="142 1201 989 1282">33-5 WWP supports a quick phase out of feeding along with a strong effort to reestablish migration patterns, eliminate farming and irrigation, expansion of protected areas and major efforts to improve crucial winter range conditions throughout the entire planning and analysis area.</p>	<p data-bbox="1140 237 1482 259">33-1. Thank you for your comments.</p> <p data-bbox="1140 280 1942 483">33-2. The U. S. Forest Service chose to participate as a cooperating agency from the perspective of a sister agency wishing to support management of elk and bison on the refuge and in the park through complementary management on forest lands. Representatives were involved in the planning process from its earliest stages, attending interagency meetings and assisting in the early analysis of the issues and the development of alternatives. An example of the agency's participation is the continued support for the Jackson Interagency Habitat Initiative, which aims to identify and enhance areas of critical elk winter range.</p> <p data-bbox="1140 505 1955 836">33-3. The agencies discussed what is known about chronic wasting disease in the Draft Plan/EIS in Chapter 3 and Chapter 4; this information was updated in the Final Plan/EIS. The disease's exact mode of transmission is unknown (Williams, Miller, et al. 2002), although transmission appears to be related to the density of susceptible hosts and environmental contamination. Because the exact means of transmission and other critical factors in predicting dispersal and infection rates are not well understood, risk was only presented in relative terms (see Table 4-6 in the Final Plan/EIS). Prevalence and mortality would likely be highest under Alternatives 1 and 5, lower under Alternatives 3 and 4, and lowest under Alternatives 2 and 6 after supplemental feeding was phased out. The Preferred Alternative was modified to include the development of a structured framework of adaptive management actions that would include criteria to progressively transition from intensive supplemental feeding to greater reliance on free-standing forage based on a number of conditions, including wildlife diseases.</p> <p data-bbox="1140 857 1942 1060">If chronic wasting disease was found, strategies from the state's <i>Chronic Wasting Disease Management Plan</i> (WGFD 2006) would be implemented to reduce transmission. Plans to follow the state's management plan have been made in deference to the state and could change if the National Park Service and/or the U.S. Fish and Wildlife Service adopted servicewide management requirements that differed from what is currently being done. Potential changes would be communicated to the state. (See Chapter 1, "Factors Considered in Developing the Plan: Other USFWS Legal Policy Constraints," and Chapter 2, "Introduction: Elements Common to All Alternatives.")</p> <p data-bbox="1140 1081 1955 1333">33-4. The U.S. Fish and Wildlife Service and the National Park Service presented a range of alternatives in the Draft Plan/EIS and tried to combine actions within each alternative so that each could work as a whole plan with impacts that could be analyzed. Actions were necessarily similar given the management issues and the focus on bison and elk management, including issues of whether or not to hunt, vaccinate, etc. Opinions vary considerably on whether particular actions would be "useful" or "poor or clearly undesirable." The final decision-makers have the flexibility to choose actions from one alternative and add them to another. The format used was consistent with other EIS formats, and every effort was made to consolidate and present the information in an understandable format.</p> <p data-bbox="1140 1354 1482 1377">33-5. See response on the next page.</p>

Comment No.	Letter 33 (cont.)	Response
<p>33-6</p>	<p>Dealing with these disease issues will require a much more holistic approach with all affected agencies fully participating in a real manner. Management that limits itself to man-made administrative boundaries and fails to fully take into account the needs of the wildlife will be doomed to fail. The issues at hand are far too important to allow this to happen.</p> <p>I look forward to working with you in improving the Management Plan and EIS,</p>  <p>Jonathan B Ratner Director – Wyoming Office</p> <p>Attachments: WWP's comments on the WGFD's CWD Management Plan</p> 	<p>33-5 (cont.), Thank you for your comments. Establishing migration remains beyond the agencies' jurisdiction, and opposition by the Wyoming Game and Fish Department would prevent it from happening to any great degree. Cultivation and irrigation would provide additional forage to prevent higher elk mortality and would be needed, at least in the short term, under any alternative that reduced refuge supplemental feeding for elk, particularly one with a quick phaseout of supplemental feeding. Efforts would continue to be made to improve critical winter range (see response 33-2).</p> <p>33-6. The agencies agree that these important issues cross jurisdictional boundaries and will continue to work with all agencies.</p>

Comment No.	Letter 34	Response
	 <p data-bbox="474 256 1052 293">WYOMING FARM BUREAU FEDERATION</p> <p data-bbox="604 297 919 337">P.O. Box 1348 Laramie, Wyoming 82073 • (307) 745-4835</p> <p data-bbox="638 396 764 415">October 6, 2005</p> <p data-bbox="354 461 617 570">Bison and Elk MP/EIS Laurie Shannon, Project Manager National Elk Refuge PO Box 510 Jackson, WY 83001</p> <p data-bbox="354 591 506 610">Dear Ms. Shannon:</p> <p data-bbox="354 634 1041 784">The Wyoming Farm Bureau Federation would like to provide the following comments to the US Fish and Wildlife Service's Bison and Elk Management Plan and EIS for the National Elk Refuge and Grand Teton National Park. The Wyoming Farm Bureau Federation represents agricultural producers throughout the state of Wyoming. Many of these producers are located in areas that will be affected by any management decision made through the development of this Plan. As such, we ask that the Service consider the following comments as a final decision is contemplated.</p> <p data-bbox="354 808 1041 958">Several events have transpired over the past 40 years that have resulted in hardships for the agricultural community in this portion of Wyoming. Grizzly bears have been listed under the Endangered Species Act as a Threatened species, wolves have been introduced to the area, Wyoming has lost its brucellosis-free status, and urban sprawl has devoured much of the historical rangeland in the region just to name a few. There are components and omissions in alternatives listed under this plan that have the potential to further impact the industry.</p> <p data-bbox="354 982 443 1002">Herd Sizes</p> <p data-bbox="354 1006 1041 1222">We appreciate the belief that no alternative would directly impact cattle grazing allotments in the region. However, it is mentioned on pg. 490 that a revision to allotments may be required under certain alternatives. Reading a bit deeper it is clear that a "revision" entails several things, none of which has a positive result for agricultural producers in the region. With a greater dispersal of elk and bison over a larger area there is going to be increased competition for forage with livestock. The revision would likely require that in order to support these animals in new areas without supplemental feeding the number of cattle grazing each allotment would have to decline. Farm Bureau requests that any alternative considered for adoption should be certain that no grazing allotments would have to be adjusted negatively toward agricultural producers.</p> <p data-bbox="354 1247 1041 1310">Farm Bureau has no position as to what the specific number of bison should be in the herd; although they should be the lowest genetically viable population. What that number is may be debatable, but the most reliable current science says genetic viability</p> <p data-bbox="533 1398 831 1417">In Wyoming call 1-800-442-8325</p>	<p data-bbox="1142 656 1478 675">34-1. Thank you for your comment.</p> <p data-bbox="1142 781 1478 800">34-2. Thank you for your comment.</p> <p data-bbox="1142 1032 1913 1133">34-3. None of the alternatives proposes to change cattle grazing allotments in the region. The text on page 490 of the Draft Plan/EIS that indicated adjustments to grazing allotments outside the decision area could occur was deleted in the Final Plan/EIS. Those types of decisions are outside the scope of this EIS.</p> <p data-bbox="1142 1252 1961 1401">34-4. The U.S. Fish and Wildlife Service and the National Park Service believe that the bison herd should not be managed to the lowest genetically viable population; other big game species are not managed this way. In the Final Plan/EIS Alternative 4 (the Preferred Alternative) recommends a population objective of approximately 500 bison to maintain genetic diversity. Ultimately, the Wyoming Game and Fish Commission sets population objectives following public review.</p>

Comment No.	Letter 34 (cont.)	Response
34-4 (cont.)	<p>may be threatened if numbers drop below 400 animals. It would then seem consistent to manage toward the goal of 400 bison, with the flexibility to decrease that number if it is determined that a viable population would not necessitate such a large number. Since the herd originated from 11 animals that escaped from a fenced-in wildlife park it would be appropriate to greatly limit their numbers.</p>	
34-5	<p>Elk numbers have exceeded Wyoming Game and Fish Department objectives for years. To this end, Farm Bureau supports reducing the elk herd to meet the objective. However, consideration should be given to the effects of predation prior to setting the herd objective. Wolves in the area have been found to consume 1.8 elk per 30 days. With their likely population expansion as well as increased grizzly bear numbers, a severe decline in elk numbers could lead to increased predation on livestock and economic harm to the agricultural community. Knowing the point at which predation may shift from elk to livestock in any significant amount is an important component that should be addressed in any alternative.</p>	<p>34-5. The agencies understand the concern over wolf and grizzly predation on livestock, but the Jackson elk herd continues to remain well above the state's objective of 11,000 animals, despite the growing presence of wolves within Jackson Hole. Since the Wyoming Game and Fish Department determines harvest levels, that agency has the flexibility to adjust harvest levels to reflect changing conditions. In addition to predation by wolves and grizzlies, there are many other factors that affect elk cow/calf production that are not well understood. The introduction of a non-endemic disease in the elk herd could also lead to a severe decline in elk numbers.</p>
34-6	<p>Farm Bureau supports the reduction of both the bison and elk herds through hunting, and not through the reduction of supplemental feeding programs. Hunting is a humane method of herd management as well as a recreational activity that delivers a great amount of positive economic impact to the region. Reducing supplemental feeding programs as described in the preferred alternative has a minimum of two negative impacts.</p>	<p>34-6 and 34-7. The agencies support the use of hunting to manage harvest levels, and starvation is not a management objective under any alternative. The agencies acknowledge that a reduction in supplemental feeding could increase the average winter mortality by 3%–4% in some years compared to baseline conditions, but this would be a very small number of animals given the size of the herd. The public is not likely to care for images of large numbers of elk dying from a non-endemic disease, and the agencies remain deeply concerned over the potential for such a disease to be established in the herd due to the high densities found on the feedgrounds.</p>
34-7	<p>First, animals will die of starvation. Due to the high profile of the National Elk Refuge nationally, the images of starving bison and elk at the hands of the USFWS will not be well received by the general public. While starvation is a natural part of life cycles in big game herds across the west, this could be portrayed as an unnatural event brought about by the actions of the USFWS.</p>	<p>Alternative 4 in the Final Plan/EIS was modified to clarify the desired conditions for this planning process. It does not identify a timeframe for phasing out feeding, nor how many years feeding would occur. Existing trends, new research findings, and other changing conditions would provide the basis for developing a dynamic framework for decreasing the need for supplemental food on the refuge. The framework would be developed in cooperation with the Wyoming Game and Fish Department, and it would identify the steps and criteria for achieving desired conditions and goals.</p>
34-8	<p>Second, many animals will be forced to search for new food sources to survive the winter. Invariably, these animals will cause increased losses of forage and stored hay on private land. While the Plan mentions a current Wyoming Game and Fish Department program that reimburses agricultural producers for losses of stored hay and crops due to elk and bison damage, it gives no indication that the Department would continue the program to cover increased losses from animal dispersal. Ensuring that the agricultural community would not suffer economic hardship should be a priority in any adopted alternative.</p>	<p>34-8. The agencies acknowledge that conflicts occur when elk leave the refuge in search of forage. The Preferred Alternative in the Final Plan/EIS 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 numbers of elk (also see the Draft Plan/EIS, p. 66).</p>
34-9	<p>Disease Management The Wyoming livestock industry has continually gone to great lengths to eradicate brucellosis from our domestic cattle herds and achieve a brucellosis-free status for Wyoming. Unfortunately, because of the high rates of infection in both elk and bison the industry has lost its brucellosis-free status in Wyoming. Much as it is the responsibility of agricultural producers to maintain a brucellosis-free herd, it should be the responsibility of state and federal agencies to do the same in wildlife populations of the state through various methods of disease control.</p>	<p>34-9. As stated in the Draft Plan/EIS (p. 127), brucellosis transmission is largely influenced by the high concentration of elk associated with winter feeding programs. Without feeding, the prevalence of brucellosis in elk in the Greater Yellowstone Area averages 1.65%, whereas prevalence in refuge elk averages 28.56%. No elk population outside the Greater Yellowstone Area is known to be infected with brucellosis.</p>

Comment No.	Letter 34 (cont.)	Response
<p>34-10</p>	<p>The reduction in supplemental feeding could cause delay in the re-classification of Wyoming as a brucellosis-free state. Bison and elk may seek food elsewhere, including private lands, and come into contact with livestock more frequently. Due to the timing of brucellosis induced abortions there is the potential for greater risks of transmission to livestock. In a time when we are diligently seeking to regain brucellosis-free status, improper management could seriously injure the agricultural producers of Wyoming. Solutions should be identified under alternatives of the Plan that would minimize the opportunity for transmission among elk, bison, and livestock if a reduction in supplemental feeding were adopted.</p>	<p>34-10. See responses 34-7 and 34-9. In order to reduce the risk of transmission to livestock over the long term, the agencies believe actions that would reduce the prevalence of brucellosis in bison and elk would provide the best solution. These actions include reducing the amount of supplemental feeding in order to reduce high elk densities, improving the amount and quality of forage, increasing harvest efficiency, working cooperatively with adjacent landowners to reduce conflicts, and using vaccines when it is cost-effective, logistically feasible, and safe for wildlife.</p>
<p>34-11</p>	<p>We appreciate the time and effort that has been put into developing a bison and elk management plan for the National Elk Refuge and Grand Teton National Park. Addressing the need of reducing the bulging elk and bison numbers has been necessary for many years. The Plan that has been developed, and the alternative identified is certainly a positive step in a long process of proper wildlife and disease management.</p> <p>Thank you for the opportunity to comment.</p> <p>Respectfully,  David Willms Director of Government and Legal Affairs</p>	<p>34-11. Thank you for your comments.</p>
<p>Cc: Board NER Committee General Issues Committee</p>		



Dave Freudenthal
Governor

Wyoming Livestock Board

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Dr. Dwayne C. Oldham
Chief Executive Officer
State Veterinarian

Dr. Walter E. Cook
Assistant State Veterinarian

October 31, 2005

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

Ref: DCO-05-034

Dear Ms. Shannon:

35-1

Thank you for the invitation to respond to your draft of the Bison and Elk Management Plan for the National Elk Refuge and Grand Teton National Park. The amount of information you compiled and the alternatives you developed are impressive. I appreciate the opportunity to review and comment on your draft.

35-1. Thank you for your comment

35-2

Of the wide range of issues your draft addresses, my primary interest as state veterinarian lies in reducing brucellosis in wildlife; particularly minimizing the risk of transmission to livestock (goal 4). I am also concerned with the impact the plan will have on the state's economy. It appears you have considered these issues and others in developing your alternatives and determining your proposed action.

35-2. Thank you for your comment.

35-3

After review, I believe that a good solution for the state of Wyoming might be your Alternative 4 combined with some aspects of Alternatives 5 and 6. In addition, I ask that you consider other strategies not yet included in any of your alternatives. I support your proposed action (Alternative 4) in that it allows for Strain 19 vaccination of elk, and it permits vaccination of both elk and bison with a more efficacious vaccine if and when one is developed. However, I believe the proposed action should include Strain RB51 vaccination of bison (until a better vaccine is developed) as stated in Alternative 5. Furthermore, bison vaccination should not be limited to adult cows; calves should be vaccinated as well. While Strain RB51 is far from a perfect vaccine, particularly in bison, there is good evidence that it will increase herd immunity. Strain RB51 vaccination is and has been practiced on private and public bison herds. Alternative 4 states that you will only vaccinate bison when a vaccine with 50 percent or greater efficacy is developed, but it does not say who will determine when a vaccine has attained that threshold. Some scientists would argue that the field effectiveness of Strain RB51 is already greater than 50 percent.

35-3. The Preferred Alternative in the Final Plan/EIS (Alternative 4) clarifies specific actions and incorporates more adaptive management actions for the bison and elk herds. Because Strain 19 and RB51 are considered safe for non-target species, and may reduce brucellosis transmission to some degree, the Preferred Alternative could incorporate vaccination as long as it is logistically feasible. Management would not be designed or changed specifically to facilitate vaccination.

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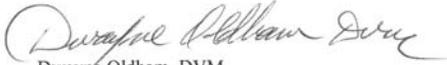
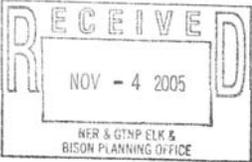
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Comment No.	Letter 35 (cont.)	Response
	<p>Dwayne Oldham's Comments on Draft Plan/EIS</p>	
35-4	<p>Probably the best approach to controlling and preventing diseases in wildlife is to phase out supplemental feeding, as in Alternatives 2 and 6, but in the short to medium term, this could cause co-mingling problems that would actually increase the likelihood of brucellosis transmission to cattle. Also, these alternatives do not permit vaccination, which I strongly endorse. Some feeding will be needed to conduct a meaningful vaccination program. Furthermore, it might be unrealistic to hope for complete elimination of feeding; Alternative 3 is more realistic in this regard-the public would likely disapprove of the occasional large-scale starvation that would result from Alternatives 2 and 6.</p>	<p>35-4. Alternative 6 would be less likely than Alternative 2 to result in large-scale starvation due to forage improvements and reduced numbers of elk. Based on the mortality estimates for the northern Yellowstone herd, the U.S. Fish and Wildlife Service and the National Park Service believe that mortality would likely be less than 22% (ranging from 7% to 22%) during a severe winter and could average about 17%. However, controlling and preventing serious diseases in wildlife could offset higher mortality rates during severe winters. The Preferred Alternative in the Final Plan/EIS incorporates aspects of adaptive management, along with other changes.</p>
35-5	<p>The use of adaptive management in Alternative 6 is commendable, and I encourage you to incorporate adaptive management in your final plan. Along those lines, none of the alternatives considers a brucellosis test and removal program. If the WGFDP pilot project were deemed successful in reducing the prevalence of brucellosis, it would be prudent adaptive management to try a similar pilot project on the NER.</p>	<p>35-5. Thank you for your comment. A test-and-slaughter program is not being considered as an action in any of the alternatives.</p>
35-6	<p>Another form of adaptive management worth considering is to develop a way to feed up off the ground. I am confident that long troughs could be developed that would be safe and would greatly reduce the potential for feed contamination with reproductive products. These troughs would be particularly practical with the use of pelleted feed.</p>	<p>35-6. The agencies believe using a trough system would not be practical given the large numbers of elk that are being fed on the National Elk Refuge. To ensure that all elk obtain some food, long lines are used, which are moved everyday to minimize the spread of diseases; this would not be possible with a trough system. Further, the potential for serious environmental contamination from diseases such as chronic wasting disease would only be amplified using troughs.</p>
35-7	<p>I strongly support the use of a public (and tribal) bison hunt as a means to reduce the population of bison in the Park and on the NER and appreciate that Alternative 6 emphasizes the removal of adult female bison, i.e., those most likely to transmit the disease. I believe this strategy should be included in the final plan.</p>	<p>35-7. Thank you for your comment. In the Preferred Alternative in the Final Plan/EIS the agencies would work cooperatively with the Wyoming Game and Fish Department to determine the harvest ratios for bison.</p>
35-8	<p>Mentioned in all alternatives as a strategy to control and prevent disease is to, "eliminate the use of all equipment that has been used in areas and facilities with known occurrences of non-endemic invasive diseases." This approach may be overly restrictive and unnecessarily costly. There are excellent disinfectants for even the most devastating diseases. As long as equipment is adequately disinfected, there is little risk in its use.</p>	<p>35-8. Thank you for your comment.</p>
35-9	<p>A strategy mentioned in Alternative 5 is to use vaccination and antibiotics if an exotic disease were introduced. It may be necessary to use other available tools as well, depending on the disease. The response may need to include testing and slaughter, or depopulation of part of the herd. Incidentally, you state on page 490 that, "There would probably not be any livestock impacts associated with vesicular stomatitis, . . . foot and mouth disease, or rinderpest." This is incorrect. At present, vesicular stomatitis causes significant hardship to livestock producers, even to those without the disease in their herds. Any foreign animal disease, even if limited to wildlife, will immediately shut down all animal movements.</p>	<p>35-9. See response 35-5.</p>

Comment No.	Letter 35 (cont.)	Response
	<p>Dwayne Oldham's Comments on Draft Plan/EIS</p> <p>I appreciate that all alternatives express a willingness to work with livestock permittees to maintain separation of livestock and elk and bison. This is an important strategy to incorporate and one that will continue to be necessary. As long as brucellosis is endemic in these wildlife populations, all of us must work together to reduce the risk of transmission.</p> <p>35-40</p> <p>35-41</p> <p>Finally, although diseases limited to wildlife are outside my jurisdiction, I want to commend you for Chronic Wasting Disease surveillance in all of your alternatives (at particularly high levels in Alternative 6). I still have concerns about the ability to adequately respond if CWD were found in the NER. You state that you would follow the WGFD feedground response plan. Given the size of the NER and the number of elk, this plan may not suffice. For example, removing 50 animals from a 50-mile radius might not provide sufficient indication of the prevalence of the disease on the NER, and clearly would do little to control it. I would suggest that the NER have its own CWD response plan; probably developed in conjunction with WGFD and other CWD experts.</p> <p>Thank you for considering my comments. If I can be of further assistance, please feel free to contact my office at 307.777.6443.</p> <p>Sincerely,</p>  <p>Dwayne Oldham, DVM Wyoming State Veterinarian</p> <p>DCO:cs</p> <p>cc: Walter Cook, DVM Assistant State Veterinarian</p> <div data-bbox="800 1127 1052 1289" style="text-align: center;">  </div> <p style="text-align: center;">3</p>	<p>35-40. Thank you for your comment.</p> <p>35-41. Thank you for your comments. The Preferred Alternative in the Final Plan/EIS incorporates increased surveillance for a 99% confidence level. As stated in the Draft EIS (p. 14), the U.S. Fish and Wildlife Service will prepare a step-down plan for chronic wasting disease to provide more specific details and would be based on the Preferred Alternative as selected in the Record of Decision.</p>

Comment No.	Letter 36 (cont.)	Response
36-3 (cont.)	<p>100 miles away from the NER/GTNP project area, but Jackson elk migrate even closer to the CWD outbreak on Owl Creek. If elk are still being fed when CWD makes its way west, the disease could have devastating consequences to the area's big game herds. Scientists and managers alike know that animals are healthier and have lower disease incidence if they have the ability to disperse across the land. Indeed, Teton County has made feeding wildlife illegal and game farms are prohibited in Wyoming due to the problems they cause with transmission of disease to wildlife.</p>	
36-4	<p>Bison management - WOC agrees that bison should be managed like other big game species according to acceptable principles of wildlife management and ecology. WOC recommends that the Jackson Hole bison herd should be hunted on all available refuge, state and public lands with a herd objective of 500 animals at carrying capacity of the available habitat and for the herd's long-term genetic viability .</p>	<p>36-4. In the Final Plan/EIS Alternative 4 (the Preferred Alternative) recommends a population of approximately 500 bison to maintain genetic diversity in the herd. The U.S. Fish and Wildlife Service and the National Park Service will make recommendations to the Wyoming Game and Fish Department regarding herd objectives. Ultimately, the Wyoming Game and Fish Commission approves objectives after public review.</p>
36-5	<p>Habitat conservation and connectivity - Big game migrations between seasonal ranges should be protected and restored to ensure that wildlife can disperse across their native habitat. Restoring historic and prehistoric migratory behavior should receive the highest priority in management decisions. The various wildlife agencies managing wildlife should work on cooperative programs such as the JIHI (Jackson Hole Interagency Initiative) to continue to allow connectivity of wildlife movement between critical habitat areas.</p>	<p>36-5. As stated in the Draft Plan/EIS, the agencies will continue to participate in the Jackson Interagency Habitat Initiative regardless of the alternative that is selected in the Record of Decision for implementation. Seasonal migratory behavior within the primary analysis area is likely to continue under all alternatives, but the possibility of migratory corridors outside the analysis area was only considered under Alternatives 2 and 3. Also see response 36-20.</p>
36-6	<p>Vaccination - No effective vaccines for protection against brucellosis or chronic wasting disease have been developed yet; therefore vaccines should not be administered to big game in Grand Teton National Park or the National Elk Refuge. To do otherwise, only concentrates the animals for increased disease transmission and stresses the elk and bison unnecessarily for no benefit.</p>	<p>36-6. Under the Preferred Alternative in the Final Plan/EIS, the Wyoming Game and Fish Department would continue to use Strain 19 for elk vaccination until logistics prevented such use or other effective vaccines were found. While the efficacy of Strain 19 is low, it appears to be safe for wildlife, and it would reduce the prevalence of brucellosis to some degree. It would only be administered on cow elk on the National Elk Refuge.</p>
36-7	<p>Wildlife-dependent recreation - Elk, bison and other species on the NER and GTNP are important to both the health of the GYE and the local economies in and near Jackson Hole. There is an ever-increasing number of natural history guides and outfitters who are promoting non-consumptive wildlife opportunities for education and recreation. WOC supports that use with proper management to help people understand the importance of wildlife and habitat conservation.</p>	<p>36-7. The agencies are committed to working cooperatively within the communities in and near Jackson Hole to ensure that opportunities for wildlife-dependent recreation continue. Following completion of the Bison and Elk Management Plan, the National Elk Refuge will begin a subsequent planning process to develop a comprehensive conservation plan. Compatible public use activities will be fully addressed at that time.</p>
36-8	<p>Alternative selection - With this improved management plan of Alternative 6 in place, Wyoming may actually be able to have its cake and eat it too. That is, livestock is currently safe from Brucellosis in non-feedground areas. However, where the elk feeding has concentrated the disease, Brucellosis has been transmitted between livestock and wildlife causing Wyoming to have lost its Brucellosis-free status for almost two years now. Without the eventual phase-out of feeding elk, we are destined to carry this burden from one fairly innocuous disease issue to another very serious disease problem when CWD arrives in Jackson Hole.</p>	<p>36-8. Thank you for your comment.</p>
36-9	<p>Legal requirements</p> <p>Particularly relevant to this process are the FWS mission, planning requirements,</p>	<p>36-9. Thank you for your comment.</p>

Comment No.	Letter 36 (cont.)	Response
<p>36-9 (cont.)</p>	<p>ecosystem approach policy and biological integrity requirements and the NPS emphasis on natural processes. In total, these various guidelines compel the agencies to craft creative solutions to the current management problems that rely on the best scientific information, which account for historic migratory behavior and conditions of elk and bison their habitats, and which emulate natural processes.</p>	
<p>36-10</p>	<p>U.S. Fish and Wildlife Service The primary law governing the FWS in this case is the National Wildlife Refuge System Administration Act (RAA), as amended (16 U.S.C. 668dd). According to the RAA, in administering the Refuge System, the Secretary of the Interior, acting through the FWS must:</p> <ul style="list-style-type: none"> * provide for the conservation of fish, wildlife, and plants, and their habitats within the System; * ensure that the biological integrity, diversity, and environmental health of the System are maintained for the benefit of present and future generations of Americans. * prepare a comprehensive conservation plan for each refuge 	<p>36-10. The legal directives as laid out in the Draft Plan/EIS (pp. 11–16) are cited to specific laws or policies. Copies of these laws or policies can be obtained at the National Elk Refuge headquarters in Jackson, Wyoming; at Grand Teton National Park headquarters in Moose, Wyoming; or at <www.fws.gov/policy> or at <www.nps.gov/applications/npspolicy/index.cfm>.</p>
<p>36-11</p>	<p>Conservation of Wildlife and Wildlife Habitats “Conservation” in the RAA is defined “to sustain and, where appropriate, restore and enhance, healthy populations of fish, wildlife, and plants utilizing... methods and procedures associated with <u>modern scientific resource programs</u>” (emphasis added). This emphasis on modern scientific resource programs has clear implications for the management of bison and elk in Jackson Hole. As eloquently stated by the NER’s own biologist, Bruce Smith, in his paper published in the scientifically peer reviewed <i>Journal of Wildlife Management</i>:</p> <p style="padding-left: 40px;">Winter feeding of elk can be viewed as a means of conflict resolution, generally spawned by intense public pressure. It is not based on scientific principle and sustainable resource management... [W]inter feeding fits comfortably into the context in which wildlife management developed as an agricultural paradigm that employed simplified concepts of ecosystems in an effort to produce abundant numbers of certain species for harvest.</p> <p style="padding-left: 40px;">The potential for spread and maintenance of epizootic disease in artificially crowded elk populations... argues for a shift from a production-consumption model of elk management toward an ecological paradigm advocated for the wildlife profession. Leopold’s (1966) philosophy of conservation matured from the production of preferred species to an appreciation of the land as a complex organism of interdependent and necessary components. This shift moved the wildlife profession beyond single-species management to embrace conservation for all species, maintenance of ecosystem functions, and sustainability of resources. (Smith 2001)</p>	<p>36-11. The reference for Bruce Smith’s paper can be found in the Draft Plan/EIS (p. 588).</p>
<p>36-12</p>	<p>The current management of the elk and bison in Jackson Hole began decades ago, before modern scientific resource management programs. The BEMP/EIS process is an</p>	<p>36-12. Thank you for your comment.</p>

Comment No.	Letter 36 (cont.)	Response
36-12 (cont.)	<p>opportunity to update management of elk and bison “beyond single-species management to embrace conservation for all species, maintenance of ecosystem functions, and sustainability of resources.” We are pleased that review and use of scientific literature was done in the preparation of the BEMP/EIS as we submitted in the scoping process.</p>	
36-13	<p>Biological Integrity, Diversity, and Environmental Health</p> <p>Maintaining “the biological integrity, diversity, and environmental health” of the Refuge System is one of the most important goals of the RAA. In fact, the FWS Compatibility Policy directly relates this directive to upholding the refuge system mission. The FWS Biological Integrity, Diversity, and Environmental Health Policy (“Integrity Policy”; FWS Manual 601 FW 3; printed 66 Federal Register 3809) provides very specific guidance for the BEMP/EIS decision.</p>	36-13. See responses 36-10 and 36-17.
36-14	<p>The Integrity Policy requires that through “the comprehensive conservation planning process, interim management planning, or compatibility reviews, determine the appropriate management direction to maintain and, where appropriate, <u>restore</u>, biological integrity, diversity, and environmental health, while achieving refuge purpose(s)” (Sec. 3.9G, emphasis added). The BEMP/EIS is an “interim management plan”, which, as will be explained below, is also an essential part of the future comprehensive conservation plan of the NER, compelling the FWS to incorporate the Integrity Policy into the BEMP/EIS.</p>	36-14. See response 36-17.
36-15	<p>According to the Integrity Policy, biological integrity is evaluated by examining the “extent to which biological composition, structure, and function has been altered from historic conditions” (Section 3.10A(1)). Biological structure includes the social structure of populations and food webs of species, and importantly, biological function includes population migration. The assessment of <i>historic conditions</i> is to “include the opportunities and limitations to maintaining and restoring biological integrity, diversity, and environmental health” (Sec. 3.9C, emphasis added) and is defined as:</p> <p style="padding-left: 40px;">Composition, structure and functioning of ecosystems resulting from natural processes that we believe, based on sound professional judgement, were present prior to substantial human related changes to the landscape.</p> <p>(Section 3.6D). Historic conditions is a key concept in the Integrity Policy, providing “a benchmark of comparison for the relative intactness of ecosystems’ functions and processes” (Sec. 3.9C).</p>	36-15. See response 36-17.
36-16	<p>As demonstrated below, the principles driving the Integrity Policy are the maintenance and restoration of biological integrity, diversity, and environmental health, the evaluation of historic conditions and multiple landscape scales, the use of sound science, and management that restores or mimics natural ecosystem processes or function:</p> <p style="padding-left: 40px;">[W]e will restore lost or severely degraded elements of integrity, diversity, environmental health at the refuge scale and other appropriate landscape scales</p>	36-16. See response 36-17.

Comment No.	Letter 36 (cont.)	Response
<p>36-18 (cont.)</p>	<p>where it is feasible and supports achievement of refuge purpose(s) and System mission.</p> <p>When evaluating the appropriate management direction for refuges, refuge managers will consider their refuges' contribution to biological integrity, diversity, and environmental health at multiple landscape scales.</p> <p>Refuge managers will use sound professional judgement... [incorporating] field experience, knowledge of refuge resources, refuge role within an ecosystem, applicable laws, and best available science including consultation with others both inside and outside the Service.</p> <p>We favor management that restores or mimics natural ecosystem processes or function to achieve refuge purpose(s). (Sec. 3.7).</p>	
<p>36-17</p>	<p>Finally, the Integrity Policy provides specific requirements for population management that are directly applicable to the BEMP/EIS. The Integrity Policy, in no uncertain terms, states:</p> <p>We formulate refuge goals and objectives for population management by considering <u>natural densities</u>, social structures, and population dynamics at the refuge level...</p> <p>We manage populations for <u>natural densities and levels of variation</u>...</p> <p>We do not..., allow densities to reach excessive levels that result in adverse effects on wildlife and habitat. The effects of producing densities that are too high may include disease, excessive nutrient accumulation, and the competitive exclusion of other species. We use planning and sound professional judgement to determine prudent limits to densities.</p>	<p>36-17. The U.S. Fish and Wildlife Service certainly concurs with the philosophy stated in the Integrity Policy, and those requirements were considered and adhered to in the development of the alternatives and the analysis in the Draft Plan/EIS. A key element in the Integrity Policy is to maintain existing levels of biological diversity and wherever possible to restore the natural processes. At the same time, the refuge manager must strike a balance between achieving refuge purposes, listening to stakeholder viewpoints, and working cooperatively with other agencies, including state wildlife agencies. The agencies believe that the Preferred Alternative in the Final Plan/EIS would enable them to adaptively manage the bison and elk populations in a manner that would achieve the principles of the Integrity Policy and the other legal directives of both agencies.</p>
<p>36-18</p>	<p>(Sec. 3.14, emphasis added). The current management of the NER fails on all of these counts.</p> <p>In light of the Integrity Policy, the BEMP/EIS decision must 1) meet the requirements of the Integrity Policy; 2) including the historical presence, abundance, structure and functioning of elk and bison populations and past migration patterns within the Jackson Hole area; 3) acknowledge the current conditions of elk and bison populations and the NER ecosystem, including the effects current management has on NER vegetation and other species; 4) identify opportunities for restoring the biological integrity, diversity, and environmental health of elk and bison populations and the NER ecosystem; and 5) choose a management direction that restores or mimics natural ecosystem processes or function, including natural population densities and levels of variation, particularly to avoid the effects of disease.</p>	<p>36-18. Thank you for your comment. See response 36-17.</p>

Comment No.	Letter 36 (cont.)	Response
36-19	<p>Refuge Planning</p> <p>The National Wildlife Refuge System Improvement Act required for the first time that each refuge prepare a comprehensive conservation plan (CCP). Each CCP is to identify:</p> <p style="padding-left: 40px;">the distribution, migration patterns, abundance of fish, wildlife, and plant populations and related habitats within the planning unit;</p> <p style="padding-left: 40px;">significant problems that may adversely affect the populations and habitats of fish, wildlife, and plants within the planning unit and the actions necessary to correct or mitigate such problems.</p> <p>(16 U.S.C. 668dd, emphasis added). The NER will be preparing a CCP, currently scheduled to begin in 2006 (FWS National Planning Coordinator, personal communication). The management of elk and bison is central to the management of the NER and will be a major component of the CCP. Typically, population management plans are step-down plans from an approved CCP, but according to conversations with FWS personnel, the BEMP/EIS will be rolled into the NER's CCP. The BEMP/EIS should thus include the many FWS planning requirements in order to be incorporated into the CCP, otherwise the entire BEMP/EIS process will be lost when FWS prepares the NER's CCP.</p> <p>The purposes and goals of comprehensive conservation planning include 1) to maintain, and where appropriate, restore the biological integrity, diversity, and environmental health of each refuge and the Refuge System; 2) to encourage use of an ecosystem approach when conducting refuge planning, considering the broader goals of the refuges' ecosystem and watersheds when developing management direction (see below); and 3) to support management decisions and their rationale by using a thorough assessment of available science derived from scientific literature, on-site refuge data, expert opinion, and sound professional judgement (FWS manual 602 FW 3, printed 65 Fed. Reg. 33910).</p> <p>Related to the assessment of available science, the FWS Planning Policy (FWS manual 602 FW 3.1) requires the FWS to identify and describe the following conditions and their trends for the planning area:</p> <ul style="list-style-type: none"> * Context of the planning unit in relation to the surrounding ecosystem. * Structures, components, and functions of the ecosystem(s) of which the planning area is a part. * Natural and historic role of fire and other natural occurrences affecting ecological processes. * Past land use and history of settlement, including a description of any changes in topography, hydrology, and other factors. * Current and historic description of the flora and fauna and the diversity of habitats and natural communities. * Distribution, migration patterns, and abundance of fish, wildlife, and plant populations, 	<p>36-19. In general, the U.S. Fish and Wildlife Service's planning policies were followed in the development of the Draft Plan/EIS, and the format requirements for comprehensive conservation plans were followed in terms of goals, objectives, and strategies, in addition to the extensive discussion of the affected environment. Currently, the comprehensive conservation planning process for the National Elk Refuge is scheduled to begin in 2007. The goals, objectives, and strategies of the Final Plan/EIS will be folded into the comprehensive conservation plan. (Also see the discussion in the Draft Plan/EIS, pp. 8, 14).</p>

Comment No.	Letter 36 (cont.)	Response
<p>36-19 (cont.)</p>	<p>including any threatened or endangered species, and related habitats. * Fish, wildlife, and plants and their habitats and communities that are rare and/or declining within the ecosystem. * Significant problems that may adversely affect the ecological integrity or wilderness characteristics and the actions necessary to correct or mitigate the problems. * Identify opportunities to improve the health of habitats or the functioning of ecosystems. * Significant problems that may adversely affect the populations and habitats of fish, wildlife, and plants (including candidate, threatened, and endangered species) and the actions necessary to correct or mitigate the problems. * Habitat management practices. (Sec. 3.4B(1)(e)) This analysis should guide decision-making of the BEMP/EIS.</p>	
<p>36-20</p>	<p>Ecosystem Approach Years prior to the enactment of the National Wildlife Refuge System Improvement Act, the FWS adopted an Ecosystem Approach to Fish and Wildlife Conservation (Service Manual FW 052). The policy lays a visionary foundation for managing refuges and their surrounding ecosystems for improved ecological integrity. The goal of the Service’s Ecosystem Approach is “the effective conservation of natural biological diversity through perpetuation of dynamic, healthy ecosystems.” The document characterized the primary goal of the Ecosystem Approach as “conserving natural biological diversity and ecosystem integrity” and states that management decisions are to be based on “natural, ecologically defined boundaries.” The policy defines an Ecosystem Approach as:</p> <p style="padding-left: 40px;">Protecting or restoring the natural function, structure, and species composition of an ecosystem, recognizing that all components are interrelated. Management of natural resources using system wide concepts to ensure that all plants and animals in ecosystems are maintained at viable levels in native habitats and that basic ecosystem processes are perpetuated indefinitely.</p> <p style="padding-left: 40px;">The Ecosystem Approach established an ecosystem planning framework which was to include goals that incorporated the following:</p> <ol style="list-style-type: none"> 1. perpetuation of natural communities of plants and animals; 2. maintenance of naturally-occurring structural and genetic diversity; 3. needs of rare and ecologically important species; 4. minimization of habitat fragmentation; 5. maintenance of uncontaminated land and water; 6. continued role of natural processes; 7. control of undesirable exotic species <p>In preparing these goals, the FWS is to identify natural resource needs in all decisions. “This involves examining important ecosystem components from a historical perspective, how they have changed over time, and why. It is important to understand the status and trends of fish and wildlife and their habitats, and relationships and processes within and</p>	<p>36-20. The agencies believe that the Draft and Final EISs identify natural resource needs and analyze bison and elk management from a landscape scale. The primary analysis area is the primary boundary of the Jackson elk herd, and it stretches well beyond the boundaries of both Grand Teton National Park and the National Elk Refuge. Additionally, a secondary analysis area was identified for the purposes of looking at elk migration outside the primary analysis area. It is believed that under Alternatives 2 and 3 the potential would be greatest for elk migration outside the primary analysis area, and the agencies would support others in their efforts to establish migratory patterns to other areas. As stated in the Draft Plan/EIS, the agencies do not have the legal jurisdiction to require other agencies or landowners to support migration. The Wyoming Game and Fish Department, which is responsible for managing the state’s wildlife populations, has legitimate concerns about this issue. With respect to bison, with the exception of a few bison that have migrated from Yellowstone, there is not much likelihood of migration into other areas.</p>

Comment No.	Letter 36 (cont.)	Response
36-20 (cont.)	<p>between ecosystems.”</p> <p>A number of points are clear from an Ecosystem Approach. First, to be effective and rational given the migratory nature of bison and elk, the FWS must examine and plan how elk and bison management will affect areas outside the boundaries of the NER. Second, because a historical perspective of the natural resources of the area are essential in understanding the current and future status and management direction, migration routes historically used by bison and elk between summer and winter range must be included in the decision. Third, the functioning of the entire ecosystem must be taken into account when the bison and elk management decision is made, including the needs of other species and communities.</p>	
36-21	<p>The National Park Service</p> <p>It is the duty of the National Park Service to manage the natural resources of parks to maintain them in an unimpaired condition for future generations (1916 NPS Organic Act). In keeping with this duty, the 2001 NPS Management Policies for Natural Resource Management states: “Activities that take place outside park boundaries and that are not managed by the Service sometimes have profound effects on the Service’s ability to protect natural resources inside parks” (Chapter 4).</p>	36-21. Thank you for your comment.
36-22	<p>The management of elk outside the boundary of Grand Teton National Park has had a profound effect on the natural resources and hence the management of these resources within the park. The annual elk hunt within park boundaries is a management anomaly in the Park Service and has effects on the migration and concentration of the GTNP elk herd, which subsequently affects vegetation and habitat within and outside of the park. Elk numbers are artificially high as a result of supplemental feeding on the National Elk Refuge and on state feedgrounds within and surrounded by the Bridger-Teton National Forest.</p> <p>Park Service management policies state:</p> <p>The Service must act to protect natural resources from impacts caused by external activities by working cooperatively with federal, state and local agencies; native American authorities; user groups; adjacent landowners; and others to achieve broad natural resource goals.</p>	36-22. Thank you for your comment.
36-23	<p>The Bison and Elk Management Plan provides the Park Service an ideal opportunity to work cooperatively to change management techniques outside of park boundaries that nonetheless have a profound effect on resources in the park and overall park management.</p> <p>Again, the opportunity to change the current management direction using the best scientific information available is supported by the Service’s management policies:</p> <p>Biological or physical processes altered in the past by human activities may need to be actively managed to restore them to a natural condition or</p>	36-23. Thank you for your comment.

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<p>36-23 (cont.)</p>	<p>to maintain the closest approximation of the natural condition in situations in which a truly natural system is no longer attainable. The extent and degree of management actions taken to protect or restore park ecosystems or their components will be based on clearly articulated, well-supported management objectives and the best scientific information available.</p>	
<p>36-24</p>	<p>Finally, the ability to implement new and innovative alternatives is outlined in Park Service management policies:</p> <p>Therefore, the Service will develop agreements with federal, tribal, state, and local governments and organizations, and private landowners, when appropriate, to coordinate plant, animal, water, and other natural resource management activities in ways that maintain and protect, not compromise, park resources and values. Such cooperation may include park restoration activities, research on park natural resources, and the management of species harvested in parks. Such cooperation also may involve coordinating management activities in two or more separate areas, integrating management practices to reduce conflicts, coordinating research, sharing data and expertise, exchanging native biological resources for species management or ecosystem restoration purposes, establishing native wildlife corridors, and providing essential habitats adjacent to, or across, park boundaries.</p> <p>NEPA Compliance</p> <p>In the <i>Fund for Animals v. Jamie Rappaport Clark</i>, the U.S. District Court found that the Department of Interior agencies failed to comply with the National Environmental Policy Act in their Jackson Hole bison management plan because they did not analyze a full set of alternatives. This lawsuit precipitated the BEMP/EIS. Given the agencies' mandates to conserve multiple resources, to protect and restore ecosystem functioning, and to use sound science, clearly the BEMP/EIS alternative decided upon must try to meet the letter of the law. Avoiding more lawsuits is the one thing everyone involved in the BEMP/EIS planning meetings seemed to agree on and is one of the main reasons the current process is taking place.</p> <p>The Fish and Wildlife Service and the National Park Service are the premiere federal agencies dedicated to conservation and should be model land stewards. The legal and policy mandates of the two agencies are powerful tools for accomplishing wildlife conservation and innovative science-based management. The BEMP/EIS process has articulated the goals and mandates to show the conservation leadership the American public expects of them. We hope that through the process the FWS and NPS will demonstrate their leadership and stewardship of the public trusts under their jurisdictions. Our organizations and our memberships are eager to see a sound, rational elk and bison management plan for the benefit of present and future generations of Americans.</p> <p>Economy</p>	<p>36-24. Thank you for your comment.</p>
<p>36-25</p>		<p>36-25. Thank you for your comment.</p>
<p>36-26</p>		<p>36-26. Thank you for your comment.</p>

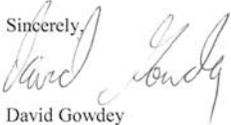
Comment No.	Letter 36 (cont.)	Response
36-27	<p>Elk and bison are important to local economies in and near Jackson Hole and Grand Teton National Park. While outfitters are concerned that phasing out artificial feeding will affect the success of their hunts and livestock producers are concerned free-ranging elk will compete for forage and spread disease to their herds, the irony is that these interests support the same status quo feeding that jeopardizes wildlife population numbers and have lost Wyoming's brucellosis-free status.</p>	36-27. Thank you for your comment.
36-28	<p>There are some legitimate concerns raised by the public, but they can be addressed by the following measures. A more natural management system that allows elk to range in their natural habitat would still produce healthy herds and high-quality animals to hunt. Healthy, free-ranging elk herds in GYE will still number in the thousands, and high-quality hunting opportunities will still abound. If the agencies make the correct decision and phase out feeding of bison and elk, wildlife and livestock can be managed so that there is native winter range forage to sustain livestock and healthy elk and bison populations as has been done in the rest of the state. The alternative is to continue artificially feeding wildlife and wait for disease to devastate both wildlife and livestock.</p> <p>Conclusion</p>	36-28. The agencies believe that the Preferred Alternative in the Final Plan/EIS would provide for habitat conservation for all wildlife, as well as for sustainable bison and elk populations. At the same time, the agencies would work cooperatively with others to minimize conflicts and provide for opportunities for wildlife-dependent public uses, such as hunting on the refuge and herd reductions in the park when necessary.
36-29	<p>WOC urges the National Elk Refuge and Grand Teton National Park managers to make the only decision that we can see is compliant with the above-stated laws - an improved Alternative 6. Alternative 6 promotes free-ranging, healthy wild elk and bison, not game ranch elk and bison sustained on artificial feed. The millions of dollars saved from not feeding or vaccinating elk and bison would be better spent on acquiring or improving habitat ensuring the future sustainability of Wyoming's wildlife.</p> <p>Sincerely,</p> <p>Meredith Taylor Wyoming Outdoor Council Wildlife Coordinator</p> <p>6360 Hwy 26 Dubois, WY 82513 metaylor@wyoming.com 307-455-2161</p> <div data-bbox="842 1219 1102 1385" style="text-align: center;"> </div>	36-29. Thank you for your comment.

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	 <p data-bbox="508 295 877 316">Working Today for Wildlife's Tomorrow!</p> <p data-bbox="310 441 457 462">November 4, 2005</p> <p data-bbox="310 511 613 597">Ms. Laurie Shannon, Project Manager U.S. Fish & Wildlife Service 134 Union Boulevard Lakewood, CO 80228</p> <p data-bbox="310 620 961 641">Subject: Draft Bison and Elk Management Plan/Environmental Impact Statement</p> <p data-bbox="310 662 466 683">Dear Ms. Shannon:</p> <p data-bbox="310 711 1066 928">The Wyoming Wildlife Federation respectfully submits the following comments on the <i>National Elk Refuge and Grand Teton National Park Draft Bison and Elk Management Plan and Environmental Impact Statement</i> prepared by the U.S. Fish & Wildlife Service (USFWS) and the National Park Service (NPS). The Wyoming Wildlife Federation (WWF) is Wyoming's oldest and largest statewide sportsmen's conservation organization. The mission of the Wyoming Wildlife Federation is to work for hunters, anglers, and other wildlife enthusiasts to protect and enhance habitat, to perpetuate quality hunting and fishing, to protect citizen's rights to use public lands and waters, and to promote ethical hunting and fishing. Since 1937 we have been a strong advocate for the conservation of Wyoming's wildlife and wild lands, and for the science-based management of Wyoming's wildlife.</p> <p data-bbox="310 954 1066 1107">The Wyoming Wildlife Federation has been involved in issues regarding the management of elk and bison on what is now the National Elk Refuge (NER) and Grand Teton National Park (GTNP) for nearly seventy years. During that time period we have consistently taken a moderate position grounded in our strong support for the management of wildlife based upon the best available science. We therefore place great value on the development of the best possible science-based plan because we understand that this plan will dictate how those populations will be managed for the next 15 years.</p> <p data-bbox="310 1133 1066 1307">At the same time, WWF also appreciates the difficulties involved in managing such large herds of elk and bison –and the diversity of interests and points of view that must be accommodated for successful management of these populations in particular. We recognize that social considerations also must be successfully addressed in this plan if it is to create a workable management regime. However, we also believe that the interests of tourists and wildlife watchers, hunters, landowners, the residents of Jackson and other local communities, the citizens of Wyoming, and the Wyoming Game and Fish Department will be best served by an approach that emphasizes collaboration and cooperation, and which has its foundation in solid science.</p> <p data-bbox="373 1409 1003 1430">P.O. Box 106 • Cheyenne, Wyoming 82003 • Phone 307-637-5433 • Fax 307-637-6629</p>	 <p data-bbox="1138 738 1486 760">37-1. Thank you for your comments.</p> <p data-bbox="1138 987 1486 1008">37-2. Thank you for your comments.</p> <p data-bbox="1138 1156 1486 1177">37-3. Thank you for your comments.</p>

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37-4	<p>General</p> <p>In evaluating the plan proposals outlined by USFWS and NPS, the board of WWF identified a number of overriding concerns that we believe must be addressed in any plan adopted.</p> <p>One such concern was the issue of “natural attrition”. The WWF strongly opposes “natural attrition” being used as a way to achieve any significant adjustments to the elk and bison population on the NER and GTNP. Starving numbers of elk and bison as a result of any management regime adopted, or actions taken, by the USFWS and NPS would be simply unacceptable to WWF. We believe that whatever adjustments to Elk and Bison populations on the NER and GTNP that are eventually adopted in the management plan should be achieved through managed harvest, not through “natural attrition” or by pushing animals out of the area (which would just shift the burden of feeding animals in the winter to private landowners or the WGFD). In this regard, we believe that the limitations on hunting on both the NER and GTNP have been overly restrictive in the recent past, and one of the reasons that the populations have increased to the point that managers are now arguing that population adjustments are required. We recommend that hunting opportunities on the NER and GTNP be expanded and that managed hunting be the primary management tool for making whatever short and mid-term population adjustments to elk and bison populations need to be made.</p>	<p>37-4. Alternative 2 in the Draft Plan/EIS is the only alternative that would not allow hunting for achieving population objectives. Some “natural attrition” is a part of life-cycles in big game herds across the West. As stated for Alternative 4 in the Draft EIS (p. 289), the gradual reduction in supplemental feeding could result in an increase in average winter mortality by 3% to 4% in some years compared to baseline conditions; however, this is not the objective. This is still a very small number of animals given the size of the herd. As a comparison, if a disease such as chronic wasting disease was introduced into the herd, the prevalence likely would fall within the range seen in free-ranging elk (about 4% on average) and confined elk (potentially 59% and higher; Draft EIS, p. 288). Other serious non-endemic diseases such as bovine tuberculosis could also have far-reaching consequences to the herds and the general public if such diseases became established. Further, brucellosis transmission is considered to be largely influenced by high concentrations of elk associated with winter feeding programs (Draft EIS, p. 127); brucellosis accounts for up to 5%–7% of calf losses on the refuge.</p>
37-5	<p>Another issue of concern to the WWF is that no adjustment to elk populations on the NER and GTNP take place that would drop the overall population of the Jackson elk herd below the population objective level set by the Wyoming Game and Fish Department. WWF has long supported the position that the management of wildlife is a state responsibility and that the Wyoming Game and Fish Department has primary responsibility for the management of ALL of Wyoming’s wildlife –whether on federal, state, or private land. As a consequence of that position, we strongly believe that any management plan adopted by the USFWS and NPS must be congruent with, and integrated into, WGFD plans for the management of the larger Jackson elk herd, and the management of neighboring wildlife populations. In this respect, we see collaboration and cooperation between the federal agencies and the WGFD as critical, and would strongly urge that steps be taken to improve the working relationship and cooperation between the various agencies and WGFD.</p>	<p>As stated in the Draft Plan/EIS, hunting would be the primary tool to achieve population objectives for bison and elk. The agencies would continue to work cooperatively with the Wyoming Game and Fish Department to manage harvest levels.</p> <p>37-5. The U.S. Fish and Wildlife Service and the National Park Service concur that the final plan should be congruent with the Wyoming Game and Fish Department’s population objectives for the Jackson bison and elk herds. As stated in the Draft Plan/EIS (p. 39), under all alternatives (except Alternative 2) the agencies would continue to work cooperatively with the Wyoming Game and Fish Department and others to achieve population objectives, including managing the harvest levels on the National Elk Refuge and in Grand Teton National Park. However, the agencies also have the authority and jurisdiction to manage wildlife within their respective boundaries to meet the purposes of the refuge and the park, in addition to the mission of each agency and other policies.</p>
37-6	<p>In examining the alternatives proposed by the USFWS and the NPS in the Elk Management Plan we did not find any one alternative that we felt that we could support without reservation. Many had good elements and ideas, but did not fully address the range of concerns that we have. As a consequence, we have therefore decided to submit our specific comments on the goals and issues addressed in the outlined alternatives, including additional measures that we feel should be undertaken to ensure the successful long term management of Elk and Bison in Grand Teton National Park and on the National Elk refuge. We hope that you will find these useful.</p>	<p>37-6. Thank you for your comments.</p>
37-7	<p>Goal 1- Habitat Conservation</p> <p>In regards to habitat conservation, we favor the approach outlined in Alternative 4, which includes the irrigation of up to 1,600 acres, including 1,100 sprinkler irrigated. However, we believe that these measures are not likely to be sufficiently effective in and of themselves. These</p>	<p>37-7. The agencies concur that a number of tools could be used to improve winter forage, including prescribed fire or other strategies.</p>

Comment No.	Letter 37 (cont.)	Response
<p>37-7 (cont.)</p>	<p>lands have lost biomass to grazing and fire suppression for many decades, and we believe that their ability to generate sufficient winter forage has been diminished over the years. We therefore believe that action must be taken as well to restore the fertility of these irrigated lands. We believe the best way to accomplish this would be through a carefully managed regime of prescribed warm season burning –though we recognize the problems that the close proximity of Jackson and inhabited areas would impose. We would therefore be open to other proposals in this regard as well, but we believe that some steps to enhance soil fertility and restore nitrate levels should be part of the restoration plan.</p>	
<p>37-8</p>	<p>We also support the use of fenced exclosures along riparian areas to restore woody plants and native vegetation as outlined in the preferred alternative. However, we believe that these exclosures must be rotated periodically and gaps left for wildlife movement in order to prevent unacceptable habitat fragmentation. In this respect we would probably support an alternative that was a blend of those proposed actions contained in Alternative 4 and Alternative 6.</p>	<p>37-8. Thank you for your comment. Alternative 4 (the Preferred Alternative) was modified in the Final Plan/EIS to use rotating exclosures if habitat conditions allowed. Unless there was a substantial reduction in the amount of feeding on the National Elk Refuge and numbers of elk wintering on the refuge, it would take significant resources to rotate exclosures, with little benefit.</p>
<p>37-9</p>	<p><u>Goal 2/3 – Sustainable Populations/Jackson Elk Numbers to Meet State Herd Objective – 11.029</u></p> <p>ELK: As noted above, WWF would support adjustments to populations of elk in the NER and GTNP only to the point that they meet the herd objective identified by WGFD. WWF will not support any adjustment of elk populations in the NER and GTNP that would bring the Jackson herd below objective. In that regard, we support the population objectives for elk outlined in Alternative 4 (4,000-5,000). However that support is based upon three factors – again that the overall Jackson herd not be brought below objective; and that displacement of elk from the feedground not result in adverse impacts to other species and additional burdens to landowners and WGFD, reductions in the NER and GTNP be achieved primarily through ethical recreational hunting.</p>	<p>37-9. Under all alternatives except Alternative 2 the agencies would work cooperatively with the Wyoming Game and Fish Department to achieve population objectives (Draft Plan/EIS, pp. 33, 39). The agencies recognize the burdens and conflicts with adjacent landowners and will continue to work through the Jackson Interagency Habitat Initiative and other partnerships to identify opportunities to improve habitat for bison and elk. The Preferred Alternative in the Final Plan/EIS includes a greater emphasis on minimizing conflicts on adjacent lands.</p>
<p>37-10</p>	<p>BISON: Bison have greatly exceeded population objectives on the NER and in GTNP and we believe that populations need to be reduced. The WWF favors reducing the Bison population on the refuge to 400 animals in a phased-in manner. Thus we would support the population objective proposed in Alternative 5. We favor a phased-in adjustment to the size of the herd to the target population over five to ten years achieved primarily through ethical recreational hunting. We also believe the bull/cow ratio of 1:1 identified as desirable in EIS is questionable. We believe that a healthy bull to cow ratio would include significantly fewer bulls –and should be adjusted accordingly to reflect best current science and management.</p>	<p>In the Preferred Alternative adaptive management and monitoring of elk numbers, their distribution, winter conditions, and forage availability are designed to prevent negative impacts in the long term. Habitat enhancements on winter range and species preferences for different types of habitat would also decrease competition. Although competition with other species could occur in some localized areas, many elk would continue to winter on refuge winter range and cultivated areas. Text has been added to better address this issue in the Final Plan/EIS.</p>
<p>37-11</p>	<p>HUNTING: WWF believes some significant modifications to existing hunting regulations will be needed to ensure responsible management of both the elk and bison populations into the future. Hunting regulations on the NER and GTNP are too complicated and are not properly designed to meet target population objectives. Too much of the NER is currently off limits to hunting and animals have been conditioned to stay in areas where hunting is not permitted, making it difficult to achieve harvest objectives. Hunters need more access to areas in GTNP and the south end of the NER. In this regard we would recommend the Park and NER consider a “rotating” system where different parts of the refuge and GTNP would be opened every couple of years on a rotating basis to keep the elk and bison from habituating to staying in areas where</p>	<p>37-10. The Preferred Alternative in the Final Plan/EIS recommends a bison population of approximately 500 animals to maintain genetic variability (Berger 1996; Gross et al. 2006). Modeling by Gross et al. (2006) found that an even sex ratio would retain higher genetic diversity. The agencies would make recommendations to the Wyoming Game and Fish Department. Ultimately, the Wyoming Game and Fish Commission would approve objectives after public review.</p> <p>37-11. The agencies agree that strategies need to be implemented to move elk out of safe areas on the National Elk Refuge to increase harvest levels and meet population objectives; therefore, opening the southern portion of the refuge to an early season hunt was proposed. The agencies believe that flexibility is important in managing hunt areas on the refuge and park in cooperation with the Wyoming Game and Fish Department, and unless specified in the Final Plan/EIS, they have not identified specific access points or regulations. (See comments and responses to letter 5 from the Wyoming Game and Fish Department regarding concerns on identified access points.)</p>

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37-11 (cont.)	<p>harvest can not occur –while at the same time meeting the needs of tourists and other users. In addition there needs to be better access to the National Forest through both the GTNP and NER, and we urge the agencies to work towards this.</p>	
37-12	<p>WWF would also object to any effort to assert greater GTNP management over hunting in the Rockefeller Parkway sections where hunting is currently managed by WGFD. We believe that the clear intent when this area was turned over to the federal government was that hunting be widely permitted and that it be done, as in other parts of Wyoming, under the supervision of the Wyoming Game and Fish Department and in accord with Department regulations. We believe that steps proposed in the EIS in regard to establishing greater GTNP authority and administration over this area are misguided – and that we should move to make hunting and access easier in this area, not more difficult.</p>	<p>37-12. The language on hunting in the John D. Rockefeller, Jr., Memorial Parkway has been clarified in the Final Plan/EIS.</p>
37-13	<p>We do not have any objection to a small number of bison permits being reserved for Native Americans as proposed – as long it does not significantly reduce the opportunity for other citizens of Wyoming to also participate in such hunts. In that regard, we would prefer to see the system for allocating non-Native American permits administered under an open lottery system as is run currently by the WGFD. We would oppose any special requirements that hunters hunting for bison on the NER or GTNP be required to hire guides or outfitters.</p>	<p>37-13. Thank you for your comment. Alternative 4 was modified in the Final Plan/EIS to clarify that a public bison hunt would be implemented to reduce the population to objective levels in accordance with Wyoming’s licensing regulations and an approved refuge hunting plan. The U.S. Fish and Wildlife Service could potentially allow for American Indian tribes to remove a small number of bison for ceremonial purposes.</p>
37-14	<p>WINTER FEEDING: The WWF would support reductions in the amount of winter feeding only under certain criteria. The first of these is that reductions in winter feeding be offset by improvements in winter range forage so that there is no significant increase in elk mortality caused by the transition. The second is that hunting be used to achieve adjustments to elk herd size so that the population is in balance with the amount of forage available, both natural and through winter feeding. The concern in this regard is that we don’t want to see elk pushed off the refuge by an abrupt cessation in winter feeding only to wind up in the haystacks of private landowners and on nearby WGFD feed grounds – merely transferring the cost and responsibility of feeding these animals to, ultimately, the state of Wyoming. The third criteria is that decisions to feed elk should be taken on the basis of forage studies, climate predictions, and range analysis—not on the basis of mortality. We strongly oppose any mortality trigger for feeding and would request that any language that implies such an approach be eliminated from the plan. Under these conditions, and only if it there is a high degree of certainty that such a regime could meet these conditions, the WWF would support the winter feeding regime proposed in Alternative 4.</p> <p>Goal 4 – Disease Reduction:</p>	<p>37-14. See response 37-4. As a point of clarification, the Draft Plan/EIS did not identify a “mortality trigger” under any alternative. It did analyze the potential consequences of each alternative, including what the expected mortality might be. The agencies agree that decisions to feed or not feed should be balanced with forage availability and other sound criteria. Alternative 4 (the Preferred Alternative) was modified in the Final Plan/EIS to include (1) defining criteria to be used in evaluating current conditions, (2) analyzing data, new research, and findings, and (3) establishing and acting on scientifically sound feeding criteria, along with an ongoing monitoring program. The agencies do not support an abrupt cessation in feeding under any alternative. In order to take the actions necessary to reduce the serious threats that diseases have to wildlife and the economy, to restore the degraded habitat conditions found on the National Elk Refuge, and to accomplish the goals stated in the EIS, there are tremendous challenges that will require flexibility and collaboration with state and federal agencies, stakeholder groups, and the public.</p>
37-15	<p>TRANSITION TO WINTER RANGE: WWF recognizes the problems posed by the persistent presence of brucellosis in both elk and bison populations in the GTNP and NER – and the threat that this poses to the livestock industry in Wyoming. We also recognize the potential impact of diseases such as Chronic Wasting Disease on deer and elk populations throughout Wyoming, and in particular in the Greater Yellowstone Area if the disease were to hit the feed grounds.</p>	<p>37-15. Thank you for your comment.</p>
37-16	<p>On the other hand, the system of feeding elk that Wyoming and the federal government developed over the last century, can not be turned off overnight without significant loss of wildlife, an increase in landowner/wildlife conflict, and tremendous social consequences. This</p>	<p>37-16. See response 37-14. No alternative calls for a sudden cessation in feeding.</p>

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37-16 (cont.)	<p>system was developed in the first place to compensate for the loss of winter range and to protect forage on private lands – a problem that has gotten worse over the intervening years. In Wyoming at the present time, neither closing the feed grounds nor leaving them open to continue as they have, seems to be an attractive, or feasible, option.</p>	
37-17	<p>The WWF feels that we need to tread cautiously between these two extremes. We need to move away from the current system of winter feeding in order to minimize the transmission of disease among wildlife herds, and between livestock and wildlife, while at the same time ensuring that sufficient winter forage and range exist to ensure that wildlife populations remain at or above objective. We also need to insist that safeguards are put in place by the livestock industry to reduce co-mingling of livestock and wildlife. Most of these suggestions were contained in the Wyoming Governor’s Brucellosis Coordination Team recommendations – which reflect a wide cross section of Wyoming society. We believe that the proposal contained in Alternative 4, under the conditions that we set, is a reasonable attempt to take the middle ground in regards to winter feeding, though we remain concerned that without sufficient oversight and flexibility, adverse consequences could ensue.</p>	<p>37-17. Thank you for your comment.</p>
37-18	<p>However, we do not believe that sufficient attention has been paid to actions that need to be taken in regards to livestock in the prevention of disease transmission. In order to prevent co-mingling of livestock and potentially infected wildlife, livestock grazing in GTNP needs to be phased out in this plan. A cooperative agreement with existing leaseholders needs to be worked out, appropriate compensation figures agreed upon, and a complete moratorium on any new leases put into place. In addition, work needs to be done with adjacent landowners to ensure that workable plans are in place to minimize co-mingling in the event that significant numbers of potentially infected elk are displaced during the reduction in winter feeding proposed.</p>	<p>37-18. The amount of cattle grazing within Grand Teton National Park is low and continues to decline, and overall grazing within the primary analysis area is on a downward trend (Draft Plan/EIS, p. 180). In 2005 and 2006 there were only 160 cow-calf pairs in the park, and some allotment acres were not used (Draft EIS, p. 180 and updated in the Final EIS). To reduce the potential for brucellosis transmission, cattle are not moved onto summer grazing allotments until approximately 95% of elk calving is finished. Eliminating grazing in the park would not address the core issues identified in the Draft EIS (pp. 9–10) — the lack of winter range for large numbers of elk and bison and the use of supplemental feeding to support those numbers. Eliminating grazing would not reduce the prevalence of brucellosis nor the risk for other diseases in the herd. The risk to cattle extends beyond park boundaries to wherever Jackson bison and elk ranges overlap with cattle.</p>
37-19	<p>VACCINATIONS: While the efficacy of current wildlife vaccines is still open to discussion, we believe that there is sufficient potential benefit to support the proposals contained in Alternative 5. We would also support the requirement that all cattle grazing in the Park be vaccinated until such time as grazing can be phased out completely.</p>	
37-20	<p>Thank you for your consideration of our comments. If you have any questions about this letter, please feel free to contact me at 307/637-5433 dgowdey@wyomingwildlife.org, or Ben Lamb, Western Wyoming Field Director, at 307/335-8633 or blamb@wyomingwildlife.org</p> <p>Sincerely,  David Gowdey Executive Director Wyoming Wildlife Federation 1921 House Ave Cheyenne, WY 82001 (307) 637-5433</p>	<p>37-19. The Preferred Alternative in the Final Plan/EIS would allow vaccination as long as it was logistically feasible. Management would not be designed or changed specifically to facilitate vaccination. Vaccination would continue to be required for all cattle grazing in the park.</p> <p>37-20. Thank you for your comments.</p>