



Janet Milek <janet.milek@wyo.gov>

Fwd: Feedground Comment

1 message

Brandon Scurlock <brandon.scurlock@wyo.gov>

Tue, Sep 5, 2023 at 12:45 PM

To: Brad Hovinga <brad.hovinga@wyo.gov>, John Lund <john.lund@wyo.gov>, Janet Milek <janet.milek@wyo.gov>, Cheyenne Stewart <cheyenne.stewart@wyo.gov>, Tara Kuipers Consulting LLC <tara@tarakuipersconsulting.com>, Mark Gocke <mark.gocke@wyo.gov>

FYI, see comments from Dee Morris on the fg plan in the fwd...

----- Forwarded message -----

From: **DeWitt Morris** <dmorris@mtnspringsllc.com>

Date: Tue, Sep 5, 2023 at 6:23 AM

Subject: Feedground Comment

To: John Lund <john.lund@wyo.gov>, Brandon Scurlock <brandon.scurlock@wyo.gov>

I sent the following comment thru the Stakeholder link and did not get confirmation that it was received. Please let me know if it went thru. Thanks.

Thank you for the opportunity to comment. Having thoroughly reviewed the "Draft" plan and listened objectively to the August 30th Stakeholders comments, it's clear that Chronic Wasting Disease (CWD) is the primary focus of these meetings and of this committee. Brucellosis, Necrobacillosis and Mange must also be considered, as must the interest of all Stakeholder groups. This means that the solution(s) will recognize political (ongoing litigative) as well as social, biological and technological factors. The plan as drafted allows for all of this to occur in between the sideboards. Now those factors, expertly presented in the draft, must be gathered into FMAPs. In doing so, all interests must recognize that it is the disease that is the enemy. To defeat the enemy, the source of transmission must be minimized asap while long term remedies are sought. All stakeholder groups, the public, WYGF, and federal partners agree that the unnatural congestion of elk on feedgrounds has the potential cause more rapid spread of CWD. This congestion can be easily eliminated while still operating feedgrounds, by distributing the same amount of feed over greater distances, thus affording elk the opportunity to graze as they would naturally on winter range, in the absence of feedgrounds. By adopting this strategy, elk bearing Brucellosis can still be discouraged

from comingling with nearby cattle operations and at the same time encouraged to broaden their winter range w/o disturbing Mule Deer and Antelope migrations. Over some period of expanded feeding (6 - 8 generations?), elk will become habituated to this broadened winter range and artificial feeding may then be eliminated.

Referencing Muddy, Scab Creek, Fall Creek and Soda, "Maloney" states that, *(1) elk in this area are likely to be some of the first in the GYE to encounter CWD and (2) wolves are not present in large numbers.* This statement establishes the front line of WYGF' battle. There may be other objectives and considerations however, when determining initial FMAP areas, the best science should confront CWD here on the western front of the Bridger Wilderness where it is most likely to occur with greater prevalence. Because there are private or state lands adjacent to these four feedgrounds, within a distance of 1320' to 2,640', elk can be enticed to spread out over their natural winter range grazing distance, while leading them to greater abundance of winter feed than is available on +/- 40 acres of feedground. To accomplish this, elk feeders will need to spread flakes or pellets from existing feed grounds to new areas where adjacent forage can, by lease agreement, be left for winter grazing. Federal partners (BLM and USFS) can approve this action without lengthy NEPA, NHPA, ESA analysis. No new roads need be built and all travel will occur over snow and frozen ground. Thus, the undertaking can be approved as "Casual Use."

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