

September 10, 2023

Wyoming Game and Fish Department

RE: TRCP Comments Regarding Draft Wyoming Elk Feedgrounds Management Plan

Dear Wyoming Game and Fish Department,

The Theodore Roosevelt Conservation Partnership is a conservation organization working to guarantee all Americans quality places to hunt and fish. With 130,000 members nationally, 3,000 members in Wyoming, and 63 organizational partners, the TRCP works closely with the hunting and fishing community to advance policies and funding that support fish and wildlife habitat and public access. We appreciate the opportunity to comment regarding the Draft Wyoming Elk Feedgrounds Management Plan and offer the following comments.

Move swiftly to mitigate the impacts of disease

The continued spread of Chronic Wasting Disease is an urgent issue that necessitates a swift and effective response to ensure healthy big game populations persist in the future. Current research suggests that elk populations will begin to decline at between 7%¹ and 13%² CWD prevalence. The research also shows that CWD prevalence is likely to reach 12% within 5 years of detection and could reach as high as 75% in populations that use feedgrounds within 20 years³ (Maloney et al., 2020).

We are concerned that the current proposal for “considering and evaluating the need to begin the process of closing” a feedground “once CWD prevalence reaches or exceeds 10% for three consecutive years” is an inadequate threshold that could preclude the effectiveness of efforts to minimize the spread of CWD and resulting population declines.

We encourage the WGFD to revise these thresholds using the best available science while also developing strategies which reduce the impacts of closing feedgrounds to livestock producers and other stakeholders.

Reduce disease transmission by expanding and improving winter range

Decreasing wintertime concentration of elk on feedgrounds is a key component of reducing disease transmission. We encourage the WGFD and stakeholders to prioritize the expansion and improvement of winter range through the following strategies along with others identified in the draft plan.

¹ Galloway, N. L., Monello, R. J., Brimeyer, D., Cole, E. K., & Hobbs, N. T. (2021). Supporting adaptive management with ecological forecasting: chronic wasting disease in the Jackson Elk Herd. *Ecosphere*. 12:e03776.

² Monello, R.J., Powers, J.G., Hobbs, N.T., Spraker, T.R., Watry, M.K., & Wild, M.A. (2014). Survival and population growth of a free-ranging elk population with a long history of exposure to chronic wasting disease. *The Journal of Wildlife Management*. 78:214- 223.

³ Maloney, M., Merkle, J. A., Aadland, D., Peck, D., Horan, R. D., Monteith, K. L., ... & Schumaker, B. (2020). Chronic wasting disease undermines efforts to control the spread of brucellosis in the Greater Yellowstone Ecosystem. *Ecological Applications*. 30:e02129.

1. Voluntary private land agreements – private landowners are crucial managers of winter range in many areas of Western Wyoming. The WGFD and other partners should actively pursue voluntary occupancy agreements that expand winter range for elk and other wildlife. The TRCP also encourages the use of conservation leasing, conservation easements, and other private land conservation strategies to expand and improve winter range on private lands. Funding for private land conservation may be available from numerous sources including Farm Bill conservation programs, especially through the USDA Big Game Conservation Partnership Pilot Program and funding from the Inflation Reduction Act.
2. State and Federal land winter range conservation – We encourage the WGFD and stakeholders to work with state and federal land agencies to prioritize expanding and improving winter range. Updating or amending Bureau of Land Management Resource Management Plans and Forest Service Forest Plans to expand winter range conservation is an important step to dispersing elk populations and reducing the spread of disease. Implementation efforts should include the development and implementation of seasonal closures to protect wintering wildlife, winter range improvement through conifer removal and invasive species mitigation, and connectivity improvements such as wildlife friendly fencing and wildlife crossings. We also support strategic fee title acquisition in areas of the highest importance.

Maintain elk and other wildlife populations

As outlined in the draft, Wyoming's elk populations are an important economic driver and core part of the way of life of many Wyomingites. We appreciate the commitment of the WGFD to manage elk populations and ask that the department work with landowners to improve public access to address over objective populations.

While the TRCP supports maintaining elk populations, we also recognize that the management and reduction of some elk populations to mitigate disease transmission and support other struggling wildlife populations such as mule deer⁴ may be necessary.

Thank you for the opportunity to provide comments regarding the Draft Wyoming Elk Feed Grounds, please contact me with any questions.

Regards,

Josh Metten
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Theodore Roosevelt Conservation Partnership

⁴ <https://wyofile.com/thriving-elk-struggling-deer-coincidence-new-research-suggests-not/>