

Shane Moore comments on draft Wyoming Elk Feedgrounds Management Plan  
September 5, 2023

I read the draft "Wyoming Elk Feedgrounds Management Plan" with great optimism. I had hoped that now is finally the time that the Wyoming Game and Fish Department is ready to take meaningful actions that will fundamentally change the practice of concentrating elk on feedgrounds, bringing both disease risk and shame to Wyoming - especially in the face of imminent disease threats.

The purpose of this undertaking, according to the opening statement is: "... *to create the framework for future analyses, discussions and decisions.*" That's a sad mandate that surely dooms this plan to almost inevitable inaction. Wyoming is staring down the barrel of wildlife disaster and our response is "*to create a framework for future analyses.*" Heaven help us!

The time for action is now - before elk feedgrounds become highly contaminated with infectious CWD prions. Not only is this plan kicking the proverbial can down the road, it doesn't prepare us for the Mack truck barreling toward us. If nothing more than this plan is implemented, disaster is almost certainly coming to Wyoming's elk feedgrounds in the years and decades ahead.

This plan should formally support an effective stepdown plan on the National Elk Refuge (NER). Ending feeding on the NER is the low hanging fruit that should be done relatively quickly and it would solve a large percentage of Wyoming's elk feedground problem. If the wintering population on the NER is brought down to 5,000 elk as the stepdown plan dictates, and the handful of adjacent haystacks and winter-feeding areas for livestock are fenced, the NER could be a showcase for free-ranging elk wintering on native habitat.

Other feedgrounds that could be phased out relatively quickly include those in the Gros Ventre River drainage and most of those along the Wind River front. Some feedgrounds would be more challenging to close, either because they were created in areas of deep snow that were not near historic elk winter range (Upper Hoback) or because of current threats from vehicle traffic (South Park, Dog Creek, Alpine, Camp Creek, Horse Creek). It seems logical to start by first closing the feedgrounds that are currently near suitable winter range and where vehicle collisions could be mitigated with wildlife fencing.

The most outrageous statement I've ever read in a WGFD publication is on page seven of the draft plan: "*This plan was developed under the North American Model of Wildlife Conservation tenant that scientific management is the proper means for wildlife conservation. The best available science relevant to the topic is voluminous and generally corroborative with existing management.*"

I have a degree in wildlife biology and follow the peer-reviewed literature and professional groups closely on topics of wildlife diseases and modeling, especially those relevant to elk

feedgrounds. I can assure you, the best available science is **not** "*corroborative with existing management*" on Wyoming's elk feedgrounds. In fact, exactly the opposite is true. Wyoming is the poster child for problems associated with large scale feeding of wildlife. These sentences deserve to be stricken from the plan.

If WGFD would reallocate the millions of dollars it's spending annually on elk feedgrounds to fencing the relatively small number of remaining livestock winter feeding operations and haystacks where comingling is still a concern, the disease risks to elk and livestock would both be dramatically reduced.

I've met people in Canada who dealt with the outbreak of bovine tuberculosis in elk near Riding Mountain National Park and, frankly, they made the solutions seem quick and easy. NGOs and government paid for fencing of relatively small winter-feeding areas for livestock and haystacks in the afflicted area and the problem was quickly solved. To them, our lack of action is baffling.

The Feedground Management Action Plans (FMAP)s are inherently doomed to fail due to the overly restrictive sideboards that will prevent meaningful actions being taken. The proposed plan discusses the need for change and admits that the status quo is unsustainable, then sets out criteria that actually makes change impossible.

The terms used in the sideboards of the FMAP should be changed. The current wording states **any** increase in damage to private property, **any** increase in disease transmission to livestock, **any** increase in interspecies competition with other wildlife species is unacceptable. This standard is impossible to achieve and would doom wildlife managers to maintaining the status quo. I suggest changing the word "*any*" to "*minimize*" in each of these instances to increase the opportunity for WGFD personnel to take meaningful actions in the future.

There is no way that the current herd objectives are possible to maintain within the elk feedground complex without supplemental feeding. Herd objectives need to be quickly re-evaluated based on habitat conditions and carrying capacity. It is a given that if herd objectives remain unchanged, the problems associated with overcrowding on elk feedgrounds will inevitably remain unchanged.

The lack of a carcass disposal plan for CWD positive animals on feedgrounds makes the success of this plan dependent on some future process that may or may not happen. Why isn't CWD infected carcass disposal handled in this plan? It's going to be a huge issue for elk feedgrounds! The National Elk Refuge has planned for this need responsibly with an incinerator.

While it is true that no one knows what impacts CWD will ultimately have on elk feedgrounds, there are many other valid reasons to end the practice of artificially feeding elk. It's been said that "CWD is an epidemic on a protracted timescale," but other wildlife diseases looming on the horizon could be much more immediate. For nearly a century we've been able to have our cake and eat it too; we've overtaken critical winter range and severed migration routes while keeping

elk numbers artificially high by feeding them. Now disease risks are showing us that there is a price to be paid for our actions.

After reading this plan carefully from beginning to end, I can't find a single proposed practice that will actually reduce the threat that CWD poses to Wyoming's elk. CWD surveillance is important, but it will not stop the progression of this epidemic. It is not a solution.

The concept of "low-density feeding" has already proven to be impossible when an average of six-hundred elk are confined each winter on an average of seventy-acres on Wyoming's state run elk feedgrounds. These long-term densities are orders of magnitude greater than the highest ever observed with free-ranging elk. In fact, the elk densities on Wyoming's twenty-two state feedgrounds are even greater than densities found on most game farms where CWD transmission has been quite rapid.

Of course, elk are a herd animal and reach periodic high short-term densities in other locations. The long-term densities on elk feedgrounds, however, where animals remain for months on the same bedding and loafing areas, often feeding on more than one foot of accumulated feces, represents a completely different disease risk scenario than that faced by free-ranging elk herds that are constantly moving in search of food.

The proposed additional options of mobile feedgrounds, changing the gravel on feeding sites annually and manure management seem alarmingly like livestock operations! Please try to keep some of wild in wildlife. They're not cows.

Perhaps one of the most immediate and effective additions to the plan, while phasing out feeding, could be the provision that elk will only be fed on snow - preferably clean snow. This action would significantly reduce disease transmission risks and begin to move elk toward transition range sooner. Watching elk slog through mud and feces each spring while eating directly from this mire raises great concerns about disease transmission.

Would closing feedgrounds result in fewer elk for hunters? Yes. Would there be increased challenges at times from vehicle collisions and elk on private property? Yes. Would some elk die each winter if feeding ended? Yes. I don't want to minimize the challenges, but they're not insurmountable. Elk and people are adaptable, however, and within a few years both could adjust just as ranchers, the public and elk have done throughout the rest of Wyoming, the rest of the Rocky Mountains and Canada. Elk are capable of migrating, especially if we do our part to keep migration routes open. We don't need to reinvent the wheel here; we just need to quit clinging to outdated and dangerous practices.

I have been a lifelong hunter of elk and grew up in an outfitting family. I too greatly appreciate the opportunity to hunt elk each year and realize that closing feedgrounds may reduce my hunting opportunities in the future. I'm happy with that tradeoff, however, because having healthy elk is more important to me than having a full freezer each year. I want outfitters to prosper, but public lands and public wildlife resources don't owe anyone a living. Our highest

priority must first be the health of wildlife and habitat. Anyone who has witnessed the excruciatingly painful death of elk from hoof rot or hypothermia from mange realizes that there are plenty of challenges and problems with the status quo as well.

I understand the desire to feed elk. As a teenager I dragged hay for miles through snow to feed winter-trapped elk. I've come to realize, however, that we are not doing them a favor in the long term by feeding them. Hard winters created the amazing creatures that we all admire and hard winters are essential to keeping the herds strong. The focus of wildlife conservation today should be on maintaining quality habitat and migration routes.

Creating elk feedgrounds made sense a century ago. Closing elk feedgrounds makes sense now.