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Public Comments Processing
Attn: FWS-R6_NWRS-2023-0062
U.S. Fish and Wildlife Service
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RE: Docket No. FWS-R6-NWRS-2023-062

To whom it may concern:

Please accept the following scoping comments from Montana Fish, Wildlife and Parks in the preparation of an updated Bison and Elk Management Plan (BEMP) and associated Environmental Impact Statement (EIS) for the National Elk Refuge (NER) in Wyoming.

The State of Montana has great concerns about artificial feeding programs in Wyoming leading to unnaturally high concentrations of elk and bison. These concentrations increase transmission and prevalence of disease, including brucellosis and chronic wasting disease (CWD). The NER sustains a reservoir of brucellosis that spreads outward to other elk herds and livestock throughout the Greater Yellowstone Ecosystem. Research by Kamath et al. (2016) found that the disease largely branched out from the NER and other Jackson Hole elk feed grounds.

This is a concern for Montana, as NER animals intermingle with elk and bison on summer grounds that then migrate into Montana. This increases disease transmission among elk and bison in Montana, as well as to domestic livestock. This chain reaction of transmission, beginning at the NER, jeopardizes Montana's wildlife and threatens Montana's brucellosis "Class Free" status with the United States Department of Agriculture's Animal and Plant Health Inspection Service.

As noted by the National Academy of Sciences (NAS) in their 2020 publication *Revisiting Brucellosis in the Greater Yellowstone Area* (p. 173), "it is widely accepted that feed grounds promote transmission of *B. abortus* among elk and are likely responsible for causing and maintaining elevated seroprevalence in those areas." The NAS publication concluded that "the weight of evidence" suggests "that reduced use or incremental closure of feed grounds could benefit elk health in the long term and could reduce the overall prevalence of brucellosis in elk on a broad population basis" (p. 175).

CWD is another disease, if allowed to gain a stronghold in the NER, that will significantly impact Montana elk and other cervids and their management. To date, CWD detection in NER elk has been minimal, but the high concentration of elk at the feed grounds has potential to significantly amplify and spread the disease (Galloway et al., 2021), both via direct contact between infected and susceptible animals, and also by creating a major "hot spot" for indirect transmission for years to come through prion contamination of the environment.

Montana appreciates the current plan's objective to reduce the number of elk wintering on the NER to 5,000, and to reduce reliance on supplemental feeding. While these goals have not been met (as the current estimated population is greater than 10,000 elk), Montana strenuously encourages the Service to hold fast and redouble its efforts.

Recommendation 3 of the 2020 NAS publication states that:

Use of supplemental feed grounds should be gradually reduced. A strategic, stepwise, and science-based approach should be undertaken by state and federal land managers to ensure that robust experimental and control data are generated to analyze and evaluate the impacts of feed ground reductions and incremental closure on elk health and populations, risk of transmission to cattle, and brucellosis prevalence. (p. 175)

As such, Montana recommends the updated BEMP phase out the supplemental feeding program entirely, with a goal of completion within the next five years. Montana also recommends setting a population objective consistent with the potential of the NER to support both bison and elk without supplemental feeding. This may require increased harvest to bring population levels down to that capacity, which may be unpopular, but is necessary. This approach may also require methods to mitigate the financial impact of brucellosis on livestock producers, at least in the initial stages (Maloney et al., 2020).

To ensure positive movement towards the goal and timeline of five years, Montana recommends that specific, incremental implementation goals and metrics be set. These metrics would break down, on an annual basis, the number of animals to be removed (including where, when, and by what method) and describe the extent to which supplemental feeding and other activities (e.g., vaccination) would occur. Montana also recommends an annual audit so that the agencies can assess progress made, and plan/adjust for the following year.

Montana also recommends that the Service explore specific disease management or research actions, such as vaccination, in its review of tools. Vaccination should be assessed for both 1) its potential long-term use and 2) any specific, short-term use in mitigating disease transfer to area livestock as the Service ramps down supplemental feeding and reduces the elk population.

Sincerely,


Dustin Temple, Director

Galloway, N. L., Monello, R. J., Brimeyer, D., Cole, E. K., and Hobbs, N. T. 2021. Supporting adaptive management with ecological forecasting: Chronic wasting disease in the Jackson Elk Herd. *Ecosphere* 12(10):e03776. [10.1002/ecs2.3776](https://doi.org/10.1002/ecs2.3776)

Kamath, P., Foster, J., Drees, K. *et al.* 2016 Genomics reveals historic and contemporary transmission dynamics of a bacterial disease among wildlife and livestock. *Nat Commun* 7, 11448 (2016).

Maloney, M., Merkle, J. A., Aadland, D., Peck, D., Horan, R. D., Monteith, K. L., Winslow, T., Logan, J., Finnoff, D., Sims, C., and Schumaker, B. 2020. Chronic wasting disease undermines efforts to control the spread of brucellosis in the Greater Yellowstone Ecosystem. *Ecological Application* 30(6):e02129. [10.1002/eap.2129](https://doi.org/10.1002/eap.2129)

National Academies of Sciences, Engineering, and Medicine. 2020. Revisiting Brucellosis in the Greater Yellowstone Area. Washington, DC: The National Academies Press. <https://doi.org/10.17226/24750>.