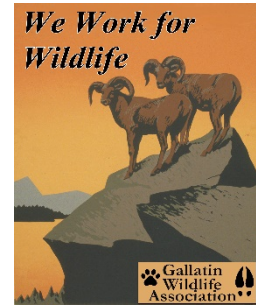


**GALLATIN WILDLIFE
ASSOCIATION**

P. O. Box 5317
Bozeman, MT 59717
(406) 586-1729
www.gallatinwildlife.org



August 16, 2023

Subject: Attn: FWS–R6–NWRS–2023–0062
U.S. Fish and Wildlife Service's Bison and Elk Management Plan

U.S. Fish and Wildlife Service,
MS: PRB/3W, 5275
Leesburg Pike, Falls Church, VA 22041–3803

Dear U.S. Fish and Wildlife Service

One hundred and eleven years (111) ago, Congress began the establishment of the National Elk Refuge (NER). Since then, there have been various acts of Congress and other executive actions to supplement the preservation and restoration of the lands south of Yellowstone National Park for the benefit of wildlife, not just elk, but for all species inhabiting this landscape. To place that action in perspective, NER was established even before lands were set aside for the origination of Grand Teton National Park. On August 1, 2023, the U.S. Fish and Wildlife Service (USFWS) announced a notice of intent to prepare an updated Bison and Elk Management Plan (BEMP) and an associated environmental impact statement (EIS). The USFWS has opened the public comment window for scoping during the month of August and the Gallatin Wildlife Association would like to provide these comments at this time.

Gallatin Wildlife Association (GWA) is a local, all volunteer wildlife conservation organization dedicated to the preservation and restoration of wildlife, fisheries, habitat and migration corridors in Southwest Montana and the Greater Yellowstone Ecosystem, using science-based decision making. We are a nonprofit 501 (c) (3) organization founded in 1976. GWA recognizes the intense pressures on our wildlife from habitat loss and climate change, and we advocate for science-based management of public lands for diverse public values, including but not limited to hunting and angling.

Historical Reference:

According to the background information stated on the Federal Register,

“The NER comprises approximately 24,700 acres. The Jackson bison and elk herds make up one of the largest concentrations of free-ranging ungulates in North America. Currently, these herds number about 450 bison and 10,600 elk. The herds migrate across several jurisdictional boundaries, including NER, Grand Teton National Park, southern Yellowstone National Park, Bridger-Teton National Forest, Bureau of Land Management resource areas, and State and private lands, before they winter primarily on the NER.”

The first BEMP was instilled into being in April 2007 with the following goals and missions. Again, from the records of the Federal Register.

“The 2007 BEMP outlined the desired future conditions, management goals, objectives, and strategies for managing the Jackson bison and elk herds on the NER and Grand Teton National Park for 15 years. The BEMP called for reducing the number of elk wintering on the NER to 5,000 and reducing the number of bison to 500. One of the goals was a sustainable population of elk and bison that are healthy and able to adapt to changing conditions in the environment and that are at reduced risk from the adverse effect of non-endemic disease.”

If we got any of this history wrong, please advise, but this is where we are today. Where do we go from here? That is the ultimate question. But before we can answer that, we need to know what is the exact mission of the NER, and according to NER’s website, it is thus.

The National Elk Refuge was established in 1912 as a “winter game reserve” to support the conservation of wintering elk and their habitat. Nearly a decade later, an Executive Order passed that expanded the purpose of the Refuge to include protections for bird nesting habitat. Today, the purpose has been broadened to include conservation of fish, wildlife, natural resources, and threatened or endangered species.

Whatever the NER becomes in the next century, the goals and missions of the NER hopefully will remain the same. There will forever need to be a home for native species of wildlife, and to manage them in the most scientific, humane, and conservation-minded approach which maintains species integrity, landscape biodiversity, and sustainability. And hopefully, the alternatives of this BEMP will do just that.

Alternatives:

Besides meeting the minimum requirements of NEPA, the BEMP and EIS need to present before the public a range of alternatives, alternatives that represent scenarios that present and implement the best scientific wildlife management practices. These alternatives should be free of political influence but be based upon sound conservation principles consistent with the mission of the NER.

Alternatives should **take into consideration climate change** and the cumulative effects of a warming world on resources of the NER landscape and adjacent National Forests lands of the Greater Yellowstone Ecosystem. Alternatives should address issues of how climate change may affect changes in vegetation cover, forage, and availability of

both. Drought and a warming climate will most likely impact forage production, and nutrient availability.

Alternatives should address the **issue of disease**, both on lands inside and outside the NER. Contagious diseases have already impacted management decisions in and around the GYE and bordering states. Diseases including CWD, brucellosis, those transmitted from other endoparasites, and ectoparasites should not be exacerbated by anthropogenic actions and decisions. Past actions of supplemental and artificial feeding have come under scrutiny in the last several years as they are considered an outlet for easy transmission of disease. This is especially true for elk and bison. How can disease be prevented or mitigated?

The **artificial or supplemental feeding of elk** has become very political and controversial in Wyoming. The actions of what happens in the NER will be on public display and segments of the public population will utilize the NER as an example of what is possible or not possible. The alternatives need to address this possibility and be prepared to answer questions on the morality, ethics, and the science of such action. Questions based on the philosophy of artificial feeding of wildlife should be analyzed and discussed and have answers based upon science. There should be an alternative or several alternatives that phase out the option of artificial feeding.

Alternatives **should address wildlife connectivity** and the ease to which elk, bison, and other wildlife have to the grounds at the NER. There needs to be an analysis of how elk and bison relate to surrounding herds and how those herds relate to the NER. An analysis should be done as to the potential of how the phasing out of artificial feeding would affect the nearby forest and range lands. How do predators play into managements decisions?

All analyses need to be cumulative in their impacts on biological diversity and integrity. There needs to be an analysis of how each alternative will impact native lands and other resources. This includes predator-prey relationships, sustainability of plants and soils, sensitive, threatened, or endangered species and interactions upon other resources.

Decisions must be made as to **what role or function is the NER** setting. Does the NER provide a natural setting, fulfill a natural role for wildlife wintering necessities; or is it a contrived man-made interference that imposes its will upon the landscape. In other words, does the NER need more or less management by man. What role does/has/ or is man play (ing) in the interference of the surrounding existing ecosystem of the GYE?

Finally, **how will the NER Comprehensive Conservation Plan complement the BEMP** or vice versa? Are the two documents going to be compatible with each other?

These are all critical questions and issues that should be addressed by the BEMP and the EIS should have the scientific data necessary to support the plan. There also needs to be

a plan to educate and inform the public and the state of Wyoming about the measures being taken to bring natural conditions to the NER. The NER gets into trouble and leaves science behind when it starts listening to politicians with an agenda. There needs to be a strong pushback from the agency and department to follow the best available science.

Serious Issues Need to be Addressed:

GWA has been advocating for the elimination of artificial feeding of elk in Wyoming for several years. We understand the issue and the politics. However, we are fraught to see the flagrant ignoring of science and conservation principles of corporate and self-interests. Perhaps that may be overstretching the reality of intentions but GWA, as an advocate of wildlife, are looking out for the health of the species within the GYE as well as the health of the habitat in which so many species depend.

The issue of disease needs to be addressed, pure and simple. And part of that discussion should include alternatives that phase out of supplemental feeding of elk during winter months. We need to analyze how and if this practice is exacerbating the conditions as we know them. The transmission of disease is not a practice that governments should find tolerable, let alone be responsible for. Yet this is the condition which man finds himself. What may have started with good intentions has become a habit over time to the point where it has weakened the independent thinking and habitual nature of certain species.

Of course, climate change has already and will continue to do so to exacerbate these conditions as far as available forage. Whether forage conditions are less available by means of drought or wet conditions cause infestations of other ectoparasites, climate change and a warming climate will directly or indirectly have a role. Cumulative impacts need to be assessed.

Finally, what role do management policies have on other species within the boundary of the NER. How are these impacts cumulative and how do they affect other species, especially predators?

The EIS needs to take and analyze concerns and threats as we know them now and try to anticipate threats of the future. We know that disease and climate change will forever be a part of that process, at least in the time to come. The EIS should look at potential changes to the local habitat and look at population dynamics as we move ahead in the 21st century. Will populations increase upon the NER, and if so, how will the conditions of wildlife habitat and wildlife connectivity change with them as we move forward. For we know in life, the more things change, the more things stay the same in our world. We need to adjust with the changing conditions.

Sincerely,

A handwritten signature in cursive script, reading "Clinton Nagel".

Clinton Nagel, President
Gallatin Wildlife Association