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Working to protect and restore Western Watersheds and Wildlife since 1993

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Electronic scoping comments submitted at:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=60949>

Comments on the Dell Creek and Forest Park Elk Feedgrounds Draft Environmental Impact Statement on the Bridger-Teton National Forest: Long-Term Special Use Permits

Dear Forest Supervisor Hudson:

The following are the comments of Western Watersheds Project on the Draft Environmental Impact Statement (DEIS or Draft EIS) and Long-Term Special Use Permit to reauthorize use of Dell Creek and Forest Park feedgrounds for their long-term winter elk feeding activities.

Western Watersheds is a non-profit conservation organization founded in 1993 with the mission of protecting and restoring western watersheds and wildlife through education, public policy initiatives, and litigation. Headquartered in Hailey, Idaho, Western Watersheds Project has 12,000 members and supporters and field offices in Idaho, Montana, Oregon, Wyoming, Arizona, and California.

1. Background

Western Watersheds Project is the nation's foremost conservation organization working to sustain and recover healthy public lands from the impacts of private livestock grazing. We adamantly oppose the reauthorization of special use permits for the Dell Creek and Forest Park elk feedgrounds due to their detrimental ecological impact. We assert that the DEIS does not adequately:

- a) analyze the reduction of livestock grazing on USDA Forest Service lands
- b) highlight the crucial role of gray wolves as predators in managing elk populations and controlling Chronic Wasting Disease (CWD)
- c) underscore preventative action for disease transmission (notably Chronic Wasting Disease)
- d) thoroughly assess the condition of public land elk forage habitat

Our stance emphasizes the need for sustainable wildlife management practices that align with the ecological integrity of the Bridger-Teton National Forest and the Greater Yellowstone Ecosystem. We advocate for the No Special Use Authorization (NF)

alternative, and to a lesser degree, the Phase-Out (PO) alternative, which promote natural foraging and habitat conservation. The NF alternative is projected to result in the healthiest long-term outcomes for elk populations, with the highest numbers and the lowest rates of Chronic Wasting Disease (CWD), thereby supporting ecological balance and sustainable wildlife health.

WWP, dedicated to preserving natural ecosystems and wildlife, evaluated the potential environmental and social impacts of the proposed continuation of these elk feedgrounds within the Bridger-Teton National Forest. In this document, we present our assessment and recommendations, grounded in scientific research, ecological principles, and a commitment to sustainable wildlife management practices. Our comments reflect a comprehensive analysis, focusing on the urgent need to reconsider the Proposed Action (PA) and Emergency Feeding (EF) alternative to elk management in the region, especially considering increasing ecological challenges such as continued habitat disruption due to livestock grazing and Chronic Wasting Disease. We advocate for alternatives that prioritize the ecological integrity of the Greater Yellowstone Ecosystem and align with best practices in wildlife conservation.

Elk feedgrounds in Wyoming have a long history, originating in the early 20th century. Initially established to mitigate wildlife starvation during harsh winters and to reduce elk and livestock conflicts, these feedgrounds have since become a staple in Wyoming's wildlife management strategy. They were also used to manage elk populations for hunting and conservation. However, wildlife management in Wyoming and the Greater Yellowstone Ecosystem has since evolved significantly. Initially focused on population control and conflict mitigation, there was a gradual shift towards ecosystem-based management, emphasizing the importance of natural processes and habitats. Yet, the practice of winter feeding at elk feedgrounds has persisted, becoming a contentious issue due to its ecological implications.

Comparatively, neighboring states like Montana and Colorado have managed their elk populations without reliance on winter feedgrounds. They have successfully managed elk populations through a combination of regulated hunting, habitat management, and conflict mitigation strategies without resorting to artificial feeding, unlike Wyoming, which has maintained feedgrounds as a central part of its elk management strategy. Elk feedgrounds in Wyoming have significant effects on the health of elk populations and their natural selection processes, altering their genetic diversity. The unnatural clustering also affects normal migratory behaviors and survival skills necessary for wild elk.

The USDA Forest Service should utilize the extensive, undeveloped areas of National Forests, National Parks, and other conservation lands around Wyoming's elk feedgrounds to rejuvenate elk habitat. This can be achieved by diminishing livestock grazing in elk winter habitats, thus enhancing the natural forage availability for elk. This approach would contribute significantly to the ecological health and sustainability of these vital wildlife areas.

2. The DEIS Should Consider Additional Alternatives

Livestock Grazing and Elk Forage

The Draft EIS should consider the potential for elk to meet their forage needs from natural landscapes, as evidenced by elk populations thriving without feedgrounds in eastern Wyoming and neighboring states such as Montana and Colorado. This discrepancy demonstrates that elk are capable of surviving and maintaining healthy populations through natural foraging and migration patterns. The existence and success of free-ranging elk herds in eastern Wyoming serves as a compelling example that artificial feeding is not a necessity for elk survival. This evidence supports the notion that

phasing out feedgrounds in favor of natural habitat conservation and management is a more ecologically sound and sustainable approach to wildlife management in Wyoming, including the western part of the state.

The potential for reducing livestock grazing to increase forage availability for elk on winter ranges is mentioned in the DEIS (p.110) but not thoroughly analyzed as an alternative management strategy. Ending elk feeding at the Dell Creek and Forest Park feedgrounds might initially reduce elk populations due to limited winter forage. Nonetheless, the availability of winter forage could be significantly improved by reducing livestock grazing, a factor that warrants more in-depth consideration.

Role of Gray Wolves

A thorough analysis should emphasize the critical role of predators in disease control within prey populations. The USDA Forest Service is encouraged to lead in wildlife and CWD research by enhancing the presence of large carnivores including gray wolves. Gray wolves are invaluable for maintaining herd health by naturally culling diseased animals, particularly in areas impacted by brucellosis and CWD. The BTNF must prioritize the conservation of gray wolves for their innate ecological benefits, especially given the current challenges with brucellosis and CWD in cervids around the Greater Yellowstone Ecosystem. The importance of predators, particularly gray wolves, in controlling elk populations and potentially influencing CWD prevalence, is overlooked in the DEIS. NEPA authorizes agencies to act beyond the authority of said agency, and in this case, a natural biological control of increasing carnivores is a preferred action the Forest Service should tackle.

3. The DEIS Should Include Additional Provisions for Disease Transmission

Chronic Wasting Disease (CWD) Prevention

The prevalence of CWD is increasing in Wyoming deer and elk herd units. Elk frequenting feedgrounds exhibit a faster rate of Chronic Wasting Disease (CWD) spread compared to elk not visiting feedgrounds. The dense grouping of elk in feedgrounds creates ideal conditions for the rapid spread of these diseases. CWD poses a significant risk as it is highly contagious among cervids and can lead to drastic population declines. Brucellosis transmission can affect both wildlife and livestock, leading to broader agricultural and ecological implications.

The increasing prevalence of CWD in deer and elk herds and the risk of prion transmission through contaminated hay highlight the urgency of re-evaluating feedground practices. The use of certified weed-free hay and proper maintenance of feedground structures are addressed in the Draft EIS, but the potential for disease transmission via hay from CWD-endemic areas is not adequately explored for alternatives that involve continued feeding (PA, EF, and PO).

Elk feedground positioning close to Grand Teton (GTNP) and Yellowstone National Parks (YNP) exposes the elk and deer populations of these parks to massive die-offs, primarily due to heightened risks of disease transmission. In such concentrated environments, diseases like CWD and brucellosis spread more rapidly among herds. This is of increasing concern as CWD moves closer and into GTNP and YNP, with CWD moving westward¹, and a the first case of a CWD infected mule deer found in Yellowstone National Park² in November 2023. This not only threatens the ecological

¹ <https://cwd-info.org/wy-cwd-positive-deer-near-bondurant/>

² <https://cwd-info.org/wy-mule-deer-tests-positive-for-chronic-wasting-disease-in-yellowstone-national-park/>

balance within the park but also poses significant risks to surrounding wildlife populations. Further Cumulative Impacts Analysis on elk feedgrounds and population sizes in Yellowstone and Grand Teton NP for a relevant and timely CWD analysis is warranted.

The projected prevalence of Chronic Wasting Disease (CWD) is expected to increase if the Dell Creek and Forest Park feedgrounds continue operating under the PA or EF, either regularly or on an emergency basis, over the next two decades. This anticipated rise in CWD cases will lead to a decline in elk populations. The decline in elk numbers due to increased disease prevalence underscores the importance of considering the long-term sustainability of these feedgrounds with both the NF and PO alternatives offering better CWD outcomes.

4. The DEIS should reassess elk forage habitat

The DEIS's method of evaluating brucellosis transmission risks from elk to cattle on private lands, using a subset of resource selection function (RSF) data (DEIS p. 41), may need further refinement. This model predicts the increased presence of elk on private lands following feedground closures (Maloney, 2020). However, research, such as Merkle et al. (2017), indicates that with access to suitable natural forage in the spring, elk have a significant increase of abortions (and thus, presence) on public lands, without detectable change on private lands. This suggests a need for more comprehensive research into elk behaviors in relation to the availability of natural forage on public lands. In addition, while Merkle et al. (2017) measure abortions directly via collared female elk, the model from Maloney (2020) is based on a resource selection function measured via collared elk (no mention of these elk being specifically female) and landscape attributes.

The DEIS's use of the Resource Selection Function (RSF) model, based on Maloney (2020), forecasts elk activity on private land using NDVI measures from livestock-grazed areas. This approach underestimates elk utilization of these lands by not accounting for reduced or ceased livestock grazing. Decreasing livestock grazing on public lands would lead to increased foraging by elk in these areas, providing elk with better nutrition and subsequently reducing their presence on private lands. This indicates a need for a detailed evaluation of the impact of livestock grazing on elk foraging habitats.

5. Conclusion

In response to the Draft EIS for the Dell Creek & Forest Park Elk Feedgrounds, Western Watersheds Project asserts our opposition to renewing special use permits for these feedgrounds. We contend that the Draft Environmental Impact Statement (DEIS) fails to adequately analyze the reduction of livestock grazing on USDA Forest Service lands; highlight the crucial role of gray wolves as predators in managing elk populations and controlling CWD; emphasize the need for proactive measures to prevent disease transmission, particularly CWD; and rigorously evaluate the impact of livestock grazing on USDA Forest Service lands on elk habitat conditions. We emphasize the need for sustainable wildlife management practices that respect the ecological integrity of the Bridger-Teton National Forest and the Greater Yellowstone Ecosystem. We advocate for strategies that promote natural foraging and habitat conservation to ensure the long-term health of elk populations and ecological balance.

Our analysis reveals that elk on the east side of Wyoming thrive without feedgrounds, suggesting that natural foraging and habitat conservation are viable management strategies. The Draft EIS does not adequately consider reducing livestock grazing to increase natural forage for wintering elk. Such an approach could alleviate the need for artificial feeding and contribute to healthier elk populations. The importance of natural predators, like gray wolves, in controlling elk populations and CWD is also

underemphasized. Moreover, the positioning of feedgrounds near Yellowstone National Park creates a substantial risk of disease transmission among wildlife populations, potentially leading to significant die-offs and resulting in ecological impacts. The Draft EIS's analysis of disease transmission risks associated with feedgrounds is concerning. The prevalence of CWD is expected to increase if these feedgrounds continue operating, leading to long-term declines in elk populations.

Finally, the Draft EIS should more thoroughly explore alternatives that leverage the natural habitat of the surrounding public lands to support elk populations. This includes considering the reduction of livestock grazing to boost natural forage availability, a critical factor in supporting healthy, self-sustaining elk populations.

In conclusion, the evidence and analysis presented highlight significant ecological and health concerns related to the continued operation of the Dell Creek and Forest Park elk feedgrounds in Wyoming. WWP advocates for the reduction of livestock grazing to increase natural forage for elk, underscoring the importance of natural habitat conservation. Because of this, we support the No Special Use Authorization alternative, and secondarily, the Phase-Out alternative. It is crucial that we transition towards sustainable wildlife management practices that prioritize the health and well-being of elk populations and the ecosystem at large. The spread of Chronic Wasting Disease (CWD) is notably faster among elk using feedgrounds, suggesting an urgent need for alternative management strategies beyond the Proposed Action. Implementing the No Special Use Authorization alternative is critical for the ecological balance of the region, an area that cannot afford two more decades of elk feedground use.

Thank you for considering these comments. Please keep Western Watersheds Project informed of all further substantive stages in this and related NEPA processes and documents via email at dagny@westernwatersheds.org.

Thank you,

A handwritten signature in black ink, appearing to read 'Dagny Signorelli'.

Dagny Signorelli
Wyoming Director
Western Watersheds Project

Literature Cited

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- Merkle JA, Cross PC, Scurlock BM, et al. Linking spring phenology with mechanistic models of host movement to predict disease transmission risk. *J Appl Ecol*. 2018;55:810–819. <https://doi.org/10.1111/1365-2664.13022>