Data Submitted (UTC 11): 9/6/2025 10:44:41 PM
First name: Clinton
Last name: Nagel
Organization: Gallatin Wildlife Association
Title: President
Comments: Dear Reviewing Official:

Please accept the comments below as representing those of the Gallatin Wildlife Association.

Thank you.

(See attached pdf for original formatting and pictures.)

GALLATIN WILDLIFE

ASSOCIATION

P. O. Box 5317

Bozeman, MT 59717
(406) 600-1792

www.gallatinwildlife.org

September 6, 2025

Subject: Dell Creek and Forest Park Elk Feedgrounds DEIS
Long-Term Special Use Permits #60949

Objection Reviewing Officer Christopher Carlton
Dell Creek and Forest Park Elk Feedgrounds Project
USFS Intermountain Regional Office,
Room 4403,
324 25th Street, Ogden, UT 84401

Dear Officer Carlton:

The Gallatin Wildlife Association submitted comments dated January 15, 2024, on the subject matter proclaimed above. A pronouncement in the Casper Star-Tribune on August 2, 2025, by the Bridger Teton National Forest proclaimed the completion of the Final Environmental Statement and the Draft Record of Decision (ROD). In short, as stated in that very paper, the decision states the following.

"The selected alternative in the draft ROD would authorize the proposed action for a short-term, through September 30, 2028, and entails the Wyoming Game and

Fish Commission's continued use of the Dell Creek and Forest Park feedgrounds for their elk management activities and facilities".

The comments below will be part of that official record. First, a reminder as to the Gallatin Wildlife Association's purpose for commenting and objecting to this decision.

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
1

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.

Contact Information:

Contact Person: Clinton Nagel,
President of the Gallatin Wildlife Association
clint_nagel@yahoo.com
406-600-1792

The Premise of Our Objection:

GWA will open our objection comments the same way we concluded our prior comments, nearly a year and half ago. We are doing so because they establish a premise committed to the highest standards of morality and science, a premise based upon care and stewardship of our natural systems. Unfortunately, it is a premise that seems to be ignored and discounted by both Wyoming Game and Fish Department (WGFD) and Bridger Teton National Forest (BTNF). These comments are addressing the ROD as determined by the U.S. Forest Service (USFS) and BTNF.

GWA knows there is much more to be said, more science to show, more evidence to bring forth to the decision makers. But the point here is to highlight our objection to the continued operation of artificial feeding of elk and to address the reasons why. We believe we have done that. Much of what we said, we have said before. At some point, state and federal agencies must take responsibility for their own actions and for what they know or don't know, both as an agency in terms of the latest science and its application and on a personal level as wildlife managers.

GWA would like to see a sense of morality come into play in all wildlife management decisions. Not only here, but everywhere. That should not be a high bar to reach, but currently where everything seems to become political, that seems unfathomable. Trying to get decision makers to adhere to the North

American Model of Wildlife Conservation has even turned controversial in many corners of the political spectrum. GWA does believe that morality, ethics, the sense of good vs evil, whatever people want to call it; should work hand in hand with science. We believe they can be a strong force when they work together. When they diverge, then we know we have a problem, and we have seen that here in this example of wildlife management.

2

Science and common sense should tell us that attracting wildlife in a congregate setting is bad for their welfare and their health. Science has shown us that and life itself has shown us that for us humans. It was that way during the Covid pandemic, and to some extent, still is. If there is a disease that is highly infectious, we should know that congregational settings are not a healthy condition.

GWA finds the feeding of wildlife is objectionable under most circumstances. But to conduct such an action as a pretense for something else, when the real rationale is to protect the cattle industry or private stockholders, is grotesque. We would hold true to the same opinion, no matter what the industry. We say that for that tells us, we are then willing to sacrifice our intrinsic inheritance for a special interest group, for a self-serving interest. We have already seen the dangers of spreading disease upon the feedgrounds, hoofrot being a good example and one that is totally underestimated by wildlife and forest managers. That aspect needs to change soon.

Disease is already in the vicinity of the feedgrounds. Harm has already come to the ecological balance of landscapes in the vicinity of the feedgrounds. The feedground of Forest Park has already had the ecological balance altered because of 25 years of supplemental feeding. Disease is on the landscape as in the case of CWD prions will be there for several more years. The soil, the water, the vegetation are all resting places for prions to become attached to future individuals and spread the disease into populations of the future. Noxious weeds have come into play on the feedgrounds of both Dell Creek and Forest Park. We cannot deny that ecological harm has already come to the feedground landscape of public lands.

After all of this has been said, based upon what we have already seen, know, and what has been documented, where is the concern over cumulative impact? BTNF has already seen some of those cumulative impacts, but where is the concern? Is the USFS looking at those as compatible or acceptable?

This leads us to this most poignant question. We don't understand why the BTNF is so willing to become complicit in these actions, actions that truly do undermine the federal mission. By doing so, BTNF has made the ecological balance of the forest less strong, more weak, less resistant, and more susceptible to disease. Disruptions in migratory movement of elk and other cervids, not to mention the predatory-prey behavior relationships of elk and wolves have all been circumvented by manipulation of the natural process. Artificial or supplemental feeding has placed more elk on the landscape, more elk than the biological or ecological carrying capacity can justify.

Wyoming needs to strengthen the biodiversity of their portion of the GYE. Wolves should be part of that process as WGFD needs to understand and utilize the many biological and ecological tools available to them. Science management
3

needs to be redirected and refocused over the management decisions of the BTNF landscape and politics needs to bow out. When that happens then balance will regain control and the forest will become more sustainable and healthier, hopefully more resistant to strains of other diseases.

Just before our concluding remarks, we highlighted excerpts from an already adjudicated court decision. We believe those comments match what we bring to the table fairly closely. Our organization as well as others advocate for the wild condition, the right for wildlife to exist in their own natural world, much like we emphasize in our society about ourselves. That right symbolizes freedom, a freedom that even wildlife has an intrinsic right to experience.

We would prefer to have this issue settled as soon as possible, because it has gone on for far too long, yet we also are trying to give stockgrowers and cattle producers time to adjust. We understand that a century-long practice cannot end overnight, not without inherent problems. Hopefully two to three years will be sufficient time in minimizing those problems on the horizon, problems that we can't see or experience at this time. This is why we chose the Phase Out Alternative (PO). There are positive and negative aspects of all these alternatives, PO being no exception. But steps need to be taken toward that process. For if there are none, the same excuses will be given. "Phase out is possible in the future, but not presently" - we need to get beyond that argument.

We believe time is of the essence.

We will close our comments with a science article found on the Internet Center at the University of Nebraska published in February 2003. We do so as we believe these findings provide a good summary pronouncing the fallacies of supplemental feeding of wildlife. These findings and respective science have all been said before, but we highlight them here again as we urge that science be the driving force in the decision-making process. For if science doesn't change minds, then we really do have to look at ulterior motives. The following describes the article.

"This Article is brought to you for free and open access by the Wildlife Damage Management, Internet Center for at DigitalCommons@University of Nebraska - Lincoln. It has been accepted for inclusion in Canadian Cooperative Wildlife Health Centre: Newsletters & Publications by an authorized administrator of DigitalCommons@University of Nebraska - Lincoln."

18
Dunkley, L. and Cattet, M.R.L. produced the science journal entitled "A Comprehensive Review of the Ecological and Human Social Effects of Artificial Feeding and Baiting of Wildlife". The following paragraph was found on page 22 under the subtitle: "Conclusions Regarding the Ecological Effects of Artificial

Feeding and Baiting."

4

"Significant ecological effects of providing food to wildlife have been documented through observation and experimentation at the individual, population, and community levels. The increased potential for disease transmission and outbreak is perhaps of greatest and immediate concern; recent outbreaks of bovine tuberculosis and chronic wasting disease in Canada and the United States giving credence to this point. Nevertheless, even if disease is prevented, other significant ecological concerns exist. Disruption of animal movement patterns and spatial distribution, alteration of community structure with reduced diversity and abundance, the introduction and invasion of exotic plant species, and general degradation of habitat are all major negative effects that have been documented at different locations in North America. Further, it would appear the costs of such effects are unlikely to be outweighed by any long-term benefits. For example, the record of success for artificial feeding programs has been generally low (Carhart, 1943; Doman and Rasmussen, 1944; Dahlberg and Guettinger, 1956; Keiss and Smith, 1966; Lewis and Rongstad, 1998). In many instances, large-scale feeding efforts have created feed-dependent populations existing in numbers that exceed the carrying capacity of their environment (Ozoga and Verme, 1982;
Ontario Ministry of Natural Resources, 1997 - see
www.mnr.gov.on.ca/mnr/pubs/deer2.pdf; Williamson, 2000).

This paragraph basically summarizes everything that GWA has been trying to say over many years and through many efforts of litigation, but WGFD and BTNF seem to be reluctant to change. Scientists and wildlife advocates have been suggesting the state of Wyoming, and the federal government should cease the supplemental feeding of elk on all 23 feedgrounds, including that of the National Elk Refuge. We at GWA concur with that assessment.

This leaves us to ask the question: if not now, when? When do we restore ecological integrity to the southern regions of the GYE?

That was Then, This is Now: The proceeding narrative was our thought process then and after a year of submitting those comments and recently learning of the Record of Decision, it remains unchanged. GWA is extremely disappointed by the BTNF's decision "to kick the can down the road" for another 3 years. As previously stated, GWA believed then as it does now that time is of the essence. Another three years is a large unknown in determining how three additional years of cumulative disease on the landscape will change or alter the course of events. We simply ask, why is the USFS willing to take the chance?

We find it interesting to read "Reason for Decision" on page 2 of the ROD. The Forest Supervisor makes the following statement.

"This decision is difficult and complicated and is one that I have not taken lightly. Feeding as part of winter elk management in western Wyoming is an emotive and controversial issue, and for good reason. Elk are an iconic species that represents both the wildness of Wyoming and the role that humans have taken in managing that wildness. No alternative, with or without feedgrounds, is without tradeoffs and

consequences to wildlife, resources, and people. In spite of the impacts and tradeoffs,
5

I make this decision knowing that there is a concerted effort among local, state, and federal agencies, and the public they serve, to restore historic migration routes, ensure the production and availability of natural winter range, protect private land from elk damage, and to address current and emerging wildlife disease issues".

It is not up to us to judge whether the Forest Supervisor made a heartfelt decision or that he had a difficult time in making that decision. We do believe he was under extreme pressure to make the choice he made. But we also believe he made the wrong decision. At some point in time, the USFS is going to have to break out from underneath the perils succumbing to state pressure.

Perhaps, there is too much pressure to not break with history and not enough pressure to begin a new future. BTNF has had chances to change the course of history several times, but it chose not to do so. During our original comments, we were advocating for the phase-out option as the correct alternative. We say that based upon science and reality as it exists on the ground.

If Supervisor Hudson was as conflicted as he says he was, the Phase-out Option would have been the perfect choice to break out of this horrible cycle the BTNF finds itself. But it is obviously easier to take the safe choice in public opinion. However, this decision should not rest on public opinion or the safe choice. Science and ethics were and are in alignment on this issue and should have been the guiding light. Obviously, it was not.

Supervisor's Recognition of Impacts: The Supervisor's admission or recognition of impacts is disturbing in that the BTNF admits the negative impacts, as horrible as they are, but still decides to ignore the outcome. GWA believes that the BTNF is advocating cattle over indigenous wildlife. We highlight some of the Supervisor's admission from the ROD that allows us to make that decision.

1. I recognize the spread of disease transcends herd unit boundaries, and many of the differences among management alternatives become more substantial relative to uncertainty when the same actions are assumed to occur across all feedgrounds on NFS lands or all the feedgrounds within a herd unit. This decision provides time for more detailed analysis and management direction through the WGFD's FMAP process through the 2027-2028 feeding season; after which, all feedgrounds on the BTNF will be evaluated through the NEPA process.

2. I recognize that delaying any type of cessation of feeding could result in increasing CWD prevalence over the long-term.

6

3. The WGFD's elk feedground program supports the state and regional economy in a number of ways: (1) it prevents comingling of cattle and elk, (2) it reduces damage to private property, and (3) it maintains elk herd objectives.

These purposes provide economic benefits by reducing or offsetting losses due to potential disease transmission between elk and cattle as well as reducing crop losses.

4. Brucellosis is the primary disease concern for transmission from elk to cattle. If a cow becomes infected, the USDA requires that the entire cattle herd and all contact herds be quarantined or culled. Brucellosis outbreaks would occur more frequently with increased interaction between cattle and elk during the high transmission risk period, which could result from reduced feeding under NF or PO compared to the PA.

5. Wildlife depredation represents a cost for agricultural producers and depredation payments are a substantial budget item for the WGFD. If depredation were to increase under an alternative with less elk feeding in either or both Units (NF or PO), then efforts to prevent depredation, either by WGFD or by individual producer investment, may need to be implemented.

6. Continuing elk management activities (including feeding) at Forest Park and Dell Creek primarily affects only the fed-segment of the herd unit population, which on average is 20 and 12 percent of the total elk in their respective herd units. This relatively small proportion of elk affected results in modest differences for some of the performance metrics among management alternatives at that scale. The alternatives for these two individual feedgrounds did not drive large differences in CWD prevalence rates, deaths from CWD, or deaths over time across entire herd units.

GWA included the first 6 out of the 10 recognitions of impacts concerning the Supervisor. We have a problem with many if not all of these statements because it appears BTNF is willing to allow indigenous wildlife to suffer in favor of the cattle industry. Sacrificing the health of 12% to 20% of the elk herd unit for the benefit of cattle is not a shining light, nor purpose of the USFS. On this basis alone, we object.

We Object Based upon the Question of Morality and Ethics:

GWA has continuously brought this issue up in our many comments over the years, but it gets us nowhere. Perhaps it is because we have become numb to the aftereffects of artificial feeding. If that's true, then shame on us as a people and as a society. The Supervisor's recognition of impacts listed as 1, 2, and 6 7

hint at this question of morality and ethics. Minimizing the impacts on wildlife in order to justify actions protecting the cattle industry is beyond scope and purpose of this agency.

If one action can't be done without harming the other, then perhaps that action should not have taken place. This issue of morality and ethics, however, has always been the predicate that many of our comments have been based upon. We said as much on page 20 of our January 15, 2024 comments.

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"There needs to be a sense of morality in all agencies involved in the 21 century management of wildlife".

To knowingly allow disease and suffering to continue when it is in an agency's power to minimize that threat is just incomprehensible. We said as much above, and we shall say it again. The supervisor admits he is allowing the suffering of wildlife to continue because it "supports the economy in a number of ways". This is a horrible, horrible state to find oneself.

The feedlot issue is a composite of many diseases, not just one of CWD and Brucellosis. Even though, that is the key talking point throughout many discussions. In our earlier comments of January of 2024, we showed two or three pictures of elk feedgrounds. We will show them again, this time we want answers.

8

9
Pictures above were taken by Lloyd Dorsey at Camp Creek, Wyoming in 2014, deaths believed were a result of Fusobacterium necrophorum or hoofrot, Necrobacillosis, etc. We included this picture in our last set of comments at the time, but sadly, it seems our concern has gone unheeded. It is time for land management and wildlife management agencies to mitigate this ugly disease.

9

'A calf suspected to have succumbed to hoof rot lies dead on a ridgeline overlooking the Horse Creek Feedground in early 2023. (Ben Wise/Wyoming Game and Fish Department)"

"The above picture was taken from WyoFile magazine dated November 13, 2023 in an
10
article written by Mike Koshmrl . The article entitled "Historic die-off at Wyoming elk feedground prompts management changes" tells the story of an outbreak of hoofrot in the Horse Creek Feedground last year into year 2023. This storyline and picture are a sad testament to the management capability of state and federal entities. We would do better leaving the progression of nature alone and not interfering with such basic, yet natural instincts such as wildlife foraging for themselves. As GWA has said before, this is a societal problem, not an elk problem, but it is the elk who are suffering. For the DEIS not to address this issue is another example of malfeasance".

Those are the comments and pictures from our January 2024 comments. We would very much like to have an answer. How is WGFD going to address this situation? How is BTNF going to address this issue? BTNF has a responsibility here. They have given permission for this pain, suffering, and death to occur in justification for the cattle industry. Where is the morality that allows this to happen?

10

Before we move on from here, we would like to throw into the equation the ethical and morality question found in the premise of the North American Model of Wildlife Conservation. We mentioned this in our previous comments of January of 2024, but like many cases; it never was addressed. We don't want to minimize the predicate of which these principles were founded. Many in the environmental community downplay the role of these basic conservation principles. Perhaps because they are seldom applied, only ignored. GWA wants to instill these practices into common application, making them mean something again.

We Object Based upon Ecological Harm:

The Problem with Unchecked Prion Vectors: GWA just can't fathom the logic that agencies would allow dangerous prion vectors to go unchecked in a natural and public setting at the expense of private interests. The USFS has a responsibility to provide for the common good, does it not? These acts of permission given to WGFD are so foreign to that concept; there is no wonder why they are being challenged? Page 14 of the ROD states it clearly.

"Based on modeling results for the PA, CWD prevalence in both elk herd units would provide a substantial source of infectious prions to soil and water resources at each feedground. Infectious prions would be introduced to surface runoff and receiving waterbodies as water comes in contact with saliva and feces shed by elk with CWD. Prions would bind immediately with particulate matter in solution and at soil surfaces. Particulates that are not filtered by surface vegetation would reach receiving waterbodies and be carried downstream. Currently, monitoring for prions in surface waterbodies is not conducted by the Water Quality Division of Wyoming Department of Environmental Quality. When a feasible and economical soil test for prions is developed, monitoring will commence".

To knowingly allow such contamination in disease and infectious prions to be shed onto the region's soil and waterways without any monitoring seems like a dereliction of duty. GWA does not know any other way to state the nature of what is happening on the BTNF. We have no choice but to object to what seems like madness. We say that knowing and understanding the history and rationale that has been conducted and developed over the years. But at what point do we say, enough is enough? GWA believes we passed that point years ago.

Our concern with prion contamination does not stop with accumulation of prions in soil and water, but all within the biological community itself. Elk and other ungulates, even other wildlife outside of that taxon brings up another question. Do scientists fully know and understand the life cycle and how the prions are spread throughout the ecosystem? Our understanding is that they do not, and we do not. With that being said, we can't fathom how the BTNF can allow this practice of artificial feeding of elk to continue. Yet there it is on Page 3 of the ROD.

11

"I clearly understand and acknowledge that the WGFC's action of feeding elk in

feedgrounds results in artificially high concentrations of elk during winter and early spring, which increases risk of disease transmission (see section 3.1.3.1.2.1.1 Chronic Wasting Disease, in the Final EIS). With CWD now established on the BTNF, there is a likelihood that the population-limiting effects of this disease to elk, mule deer, and moose will be hastened by supplemental feeding".

We guess at some point we could say we already know this, but then at what point do we say when does what we know make a difference? Again, there is this admission on Page 4 of the ROD.

As described in section 3.1.3.1.2.1.1 Chronic Wasting Disease, in the Final EIS, the use of feedgrounds is likely to increase the frequency and duration of contacts that may transmit CWD from elk to elk, from elk to the environment, and from the environment to other ungulate species. The projected rate at which CWD spreads is greater for the fed elk population under the PA than for the unfed-elk population, suggesting that CWD will spread faster among elk that utilize feedgrounds. While the influence of feedgrounds on the transmission of CWD is evident, the influence of a single feedground is more difficult to discern. The number of CWD deaths over time show relatively small differences under the PA and each of the alternatives for the Afton and Upper Green River herd units. Thus, there are not large differences in CWD prevalence rates, deaths from CWD, or deaths over time across entire herd units among the alternatives all considered in the Final EIS. However, if the alternatives were applied to all feedgrounds, or all Forest Service feedgrounds, there would be larger differences between the alternatives in CWD prevalence, CWD deaths, and elk population size within each herd unit over 20 years. If the PA feeding strategy is retained at all feedgrounds or all Forest Service feedgrounds, CWD prevalence rates and deaths from CWD would be higher than under the other alternatives, resulting in the lowest elk population size.

The rationalism of the unhighlighted portion of the paragraph above does not do justice to the problem as it exists upon the landscape and as far as we can tell, adds nothing to solving the problem at hand.

Altering Habitat from the Recurrence of Operational Feedgrounds: Truth be known, quotes and excerpts from the ROD are the best proof we have that the operation of feedgrounds is harmful to the wildlife, the soils and waters, and to the individual habitat in proximity to the feedgrounds themselves. This continued statement on page 4 again states the harm to wildlife. The Supervisor states the following.

I recognize that authorization of feedgrounds results in browsing and mechanical damage that over the course of time, has reduced historical distributions of aspen, sagebrush and willows, the effects of which are most apparent in the immediate vicinity of the feedgrounds which can be measured in some locations as far away as one mile. Although vegetation is impacted by elk at both feedgrounds, vegetation is functioning to trap pollution and filter runoff. Qualitative and quantitative monitoring data does suggest that past elk grazing has impacted growth and rejuvenation of

riparian woody species on and adjacent to feedgrounds. However, even after decades of use, soils on the two feedgrounds show the presence of fine and very-fine roots.

Thus, soil is still functioning at each feedground for root penetration and water infiltration. Based on survey results, soil resources are meeting Forest standards. I also considered the potential effects of feeding elk during the winter on all wildlife, as described in Chapter 3 of the Final EIS, and find that with the exception of elk and other cervids susceptible to CWD, the impacts from allowing use and occupancy of the feedgrounds are minimal.

In our previous comments, GWA brought up the alteration of the landscapes adjacent and surrounding feedgrounds. Change of vegetation and in the associated biodiversity needs to be recognized. Changes are more than likely to affect more than one species. Our previous comments of January 2024 below.

"In some ways, the DEIS presents the agency's own best argument for why the feeding program should come to an end. We will show that here in these two pictures found in the DEIS on page 116 and 117. Photo 2 shows the Forest Park feedground in the year 1980 prior to use as a feedground. Photo 3 shows the same landscape after 25 years of supplemental feeding".

13

"Man has literally altered the native landscape to something that it was not. During this process, what is the loss of biodiversity on this landscape. How has it changed in terms of flora and fauna? How many species are lost? This is a good example of showcasing how man's decisions have consequences, perhaps unintended, but consequences are still the same. GWA cannot condone this type of alteration to the natural condition, for it is not a natural landscape anymore. It is a lost sagebrush-dominated shrub community".

GWA does not believe these concerns were addressed in the ROD satisfactorily. They deserve to have more detailed hearing. But this concern should remind us that when it comes to the natural world, when we change or alter course in one element in that world, it will have consequences. There will be repercussions. It is the arrogance of man that turns a blind eye to that possibility. We see that here in this case, which is why as a wildlife advocacy organization, we object to the manipulation and alteration of the natural landscape.

Predation: Predation is an issue we brought up in our original comments and it is one that is relatable directly to ecological harm and impacts. For a state known for its flat-out disgust for wolves, perhaps any and all predators, the state sure makes is easy for predators, wolves specifically, to have an impact upon the population and distribution of elk.

The manipulation and altering of the ecology as a result of supplemental feeding of elk seems to have no bounds when it comes to the impacts of the practice. At what point does the management of wolves in Wyoming play into the management of elk. Which practice begats the negative impact of the other. The

killing of wolves because they prey on elk which are managed to become easy prey for wolves seems like a vicious cycle, but one that needs to be broken. The management of elk and wolves have become distorted symbolizing that in nature, all things are connected.
14

GWA thinks we said it best in our comments of January of 2024.

"Here once again, we find where unintended consequences can arise from inappropriate wildlife management. In our earlier discussion about a biotic community, we found when we interfere with the complexity of that community, equal and opposite reactions can occur. But not only is the state of Wyoming interfering with the management of elk, but they are also interfering in the management of wolves".

Again, we will reiterate the science that we shared in previous comments.

15
In the Journal of Animal Ecology, Brandell, Ellen E ., et al., published an article on January 7, 2022, entitled "Examination of the interaction between age-specific predation and chronic disease in the Greater Yellowstone Ecosystem". In the Abstract, the following points are made from their research.

"Predators may create healthier prey populations by selectively removing diseased individuals. Predators typically prefer some ages of prey over others, which may, or may not, align with those prey ages that are most likely to be diseased.

Model results suggest that under moderate, yet realistic, predation pressure from cougars and wolves independently, predators may decrease CWD outbreak size substantially and delay the accumulation of symptomatic deer and elk. The magnitude of this effect is driven by the ability of predators to selectively remove late-stage CWD infections that are likely the most responsible for transmission, but this may not be the age class they typically select."

Further on in the report, in the Introduction, more information is provided that could prove beneficial to wildlife managers should they listen.

"Predators will reduce CWD when they reduce the growth rate of the infection to a point where the prey population escapes disease limitation (i.e. reducing R). This occurs through
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at least three interacting mechanisms: (a) shortening the life span of infected individuals which reduces the duration of infectiousness, (b) selectively removing the most infectious prey, which reduces transmission rate and (c) decreasing the size of the susceptible prey population, which may reduce the number of potential infectious contacts."

In the conclusion of the article, the following is stated.

Our results suggest that CWD outbreaks are reduced as predators increase their selection for younger adults, which is the age class with the highest disease prevalence, but not necessarily the class that predators typically select. Additionally, predators that were highly selective for infected hosts promoted healthy prey populations while maintaining prey abundance under certain circumstances. Our results support the hypothesis that the

predator cleansing effect will be more efficient in systems where disease and predation target the same prey age groups, and this can be empirically evaluated in the coming years as CWD and predator distributions increasingly overlap.

Science is beginning to show, the advantages of returning the management of wildlife to its natural condition. GWA has shown on three separate instances
15

where the supplemental feeding of elk has and is affecting 3 natural systems in the ecological setting: affecting our soil and water, altering biodiversity, and affecting predator-prey relationships. This is unbecoming of a federal agency to intentionally allow such disturbances to happen when they are charged to do the opposite.

The Federal Mission:

Last January of 2024, GWA brought up this question. Is this practice falling outside the agency's federal mission? Even though we realize the agency itself is not performing these functions, the agency is obviously allowing and permitting these actions to happen. That makes the USFS complicit. Is the agency itself allowing or performing any oversight to occur? If not, why not?

As far as we know, Congress has never designated supplemental feeding as the agency's responsibility or mission. In fact, we're saying the conditions and changes which have already occurred on the BTNF landscape may have already violated the intent of Federal Law. We said this once and we will say it again. Congress has defined and redefined the agency's mission over the past century. Nowhere do we see the supplemental feeding of wildlife as part of that mission.

For this reason, we object to this decision and to the practice of supplemental feeding of elk on Forest Service lands.

Concluding Remarks:

GWA is not going to say much more than what we've already said. In fact, our concluding comments for January 2024 have already been depicted in these comments under the heading: The Premise of Our Objections. We feel confident in them in that they stand on their own and they are still applicable.

The science shared in these objections are not new and were part of our previous comments of January of 2024, hence references won't be repeated. GWA has reorganized our thoughts and placed them in several camps in this format because we firmly believe they did not get fair hearing or consideration.

In that frame of mind, we would like to close out these comments with excerpts from Judge Nancy Freudenthal's ruling of 2018. This was the first case in which GWA became involved in Wyoming feedgrounds. Here GWA, among other plaintiffs were challenging BTNF's approval of allowing WGFD to amend the special use permit of Alkali Creek Feedground. That decision was filed on Sept. 14, 2018.

Page 8, 9 of that document:

"CM/ECF Document ("Doc.") 43, p. 16; AR17781 (seasonal concentrations of elk create "an unnatural situation that has contributed to . . . an increased risk of potentially major
16

outbreaks of exotic diseases," and "damage to and loss of habitat"). Further, at least one expert with the USDA Animal and Plant Health Inspection Service ("APHIS") thinks "long-term feedgrounds are detrimental to the health of the wildlife." AR26800. The Service itself recognizes "that the WGFC action of feeding elk results in the artificial concentration of elk during winter and early spring that increases risk of disease transmission" (AR11108), and that prevalence of CWD is likely "functionally related to ungulate density" (AR28876). Indeed, in its brief the Service states, "the practice [of supplemental feeding] concentrates elk during the winter months and contributes to the spread of diseases such as brucellosis and CWD." Doc. 62, p.ll. Also, the Brief of Amici Curiae Scientists discusses the very high population density estimates of elk at Alkali Creek Feedground, the behavior changes that occur as elk population densities grow (higher frequency and duration of contact), and the corresponding significant risk of disease transmission, both directly between animals and indirectly through the environment."

For all of the above reasons mentioned in this document, we object to the ROD of July 2025.

Sincerely,

Clinton Nagel, President
Gallatin Wildlife Association
17