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First name: Thomas

Last name: Bills

Organization:

Title:

Comments: Dear Forest Supervisor Hudson:

As a former BTNF biologist and USFS representative on the Greater Yellowstone Interagency Brucellosis Committee, I am very familiar with the issues surrounding elk feedgrounds and wildlife diseases. I strongly recommend that you not renew the special use permits for the Dell Creek and Forest Park feedgrounds. The science is crystal clear, feedgrounds are not ecologically sustainable, feedgrounds result in elk populations far greater than the vegetation can support and facilitate disease transmission both intra and inter specifically. There is no controversy from a NEPA perspective. WGFD and the governor acknowledge these points.

The WGFD draft feedground management plan identifies the goals of reducing elk dependence on supplemental feeding and promoting elk wintering away from feedgrounds.

I do not understand how phasing out feedgrounds would reduce adverse impacts. The recent USGS Feedground Evaluation that BTNF commissioned concluded phased closing would likely increase CWD mortality. Other adverse impacts would likely continue until the feedgrounds are finally closed. Delaying feeding in early winter or ending feeding earlier in the spring, still attract and encourage elk to winter at or in close proximity to the feedgrounds.

Fortunately, both Dell Creek and Forest Park have less neighboring private lands than other feedgrounds. At Forest Park there is only the one private inholding. Elk at both feedgrounds have native WGFD designated crucial winter range on BTNF lands available to them.

Brucellosis is more hype than threat. Western Wyoming ranchers have been effectively managing the Brucellosis potential through vaccination, temporal avoidance of elk calving areas, and other methods for decades. Closing the feedgrounds would force the elk to spread out across the native winter range thereby reducing potential transmission to cattle and between the elk themselves; thereby over time decreasing Brucellosis prevalence.

Federal regulations require federal agencies to be as consistent as possible with local regulations while adhering to all federal regulations. Closing feedgrounds is consistent with the governor's direction of reducing elk dependence on supplemental feeding and promoting elk wintering away from feedgrounds. Closing feedgrounds is Caring for the Land and Serving the People.

Sincerely,

Thomas Bills