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November 7, 2005

Bison/Elk Management Plan
PO Box 510
Jackson, WY 83001

RE: Draft Bison and Elk Management Plan and Environmental Impact Statement for the National Elk Refuge, Grand Teton National Park and John D. Rockefeller, Jr., Memorial Parkway

Dear Sir or Madam:

The National Wildlife Refuge Association (NWRA) appreciates the opportunity to comment on the joint draft bison and elk management plan and environmental impact statement developed by the U.S. Fish and Wildlife Service (FWS) and National Park Service (NPS) for the National Elk Refuge (NER), Grand Teton National Park (GTNP) and John D. Rockefeller, Jr., Memorial Parkway.

The NWRA is a 501(c)(3) nonprofit, national membership organization, established in 1975. The NWRA's mission is to protect, enhance and expand the National Wildlife Refuge System (NWRS), lands and waters set aside by the American people to conserve our country's diverse wildlife heritage. Over the years we have worked on behalf of our membership, comprised of current and former refuge professionals and members of the more than 200 refuge "Friends" group organizations throughout the United States, to make the Refuge System stronger and better able to address the growing challenges of conserving wildlife in our country.

The NWRA endorses an improved Alternative 6 in the Draft Bison and Elk Management Plan and Environmental Impact Statement. Alternative 6 calls for restoring habitat, adaptively managing wildlife populations and completely phasing out the supplemental feeding program. The Association believes it is important to restore a natural balance to our wildlife populations. The supplemental feeding program creates unnaturally large populations of elk and bison in addition to artificially concentrating these animals on feed grounds within the National Elk Refuge. This program creates a high-risk environment for outbreaks of disease, including brucellosis, tuberculosis and chronic wasting disease (CWD). The supplemental feeding program must end if healthy wildlife populations are to be achieved.

Due in part to litigation in the late 1990s, the draft management plan and environmental impact statement addresses the future management of bison and elk by the FWS and NPS. Currently, the

Jackson elk and bison herds comprise one of the largest concentrations of elk and bison in North America, at 13,500 and over 800, respectively. The bison population is growing on average by about 13% each year. High animal concentrations have contributed to a number of problems, including an increased risk of potential disease outbreaks, damage to habitat, unusually low winter mortality of bison and elk, and a high level of brucellosis in the elk and bison herds.

U.S. Fish and wildlife policy directs that wildlife population levels on national wildlife refuges be maintained at levels consistent with sound wildlife management principles, that populations be managed for natural densities and levels of variation, and that population management activities contribute to the widest possible natural diversity of indigenous fish and wildlife, even when population management activities are implemented for a single species.

The winter feeding program, in existence since 1910, artificially concentrates wildlife on the National Elk Refuge, which leads to many problems, including a higher incidence of disease. Twenty-six percent of elk on the refuge test positive for brucellosis. In contrast, an average of one to three percent of free-ranging elk in western Wyoming test positive to the disease. Diseases such as chronic wasting disease, which is 100% fatal to elk, may soon show up in the Jackson herd. Major outbreaks of exotic diseases such as bovine tuberculosis and CWD, neither of which has yet been documented in the Jackson herds, could occur.

Chronic wasting disease exists approximately 100-miles from Jackson Hole, and it grows closer each year. The disease has the potential to decimate elk, mule deer and bison populations. If CWD enters the Jackson Hole region when wildlife is concentrated on feedgrounds, the results may be catastrophic. The disease is 100% fatal to those animals it infects.

According to the draft management plan, four goals were developed based on the purposes of the NER and GTNP, the missions of the National Wildlife Refuge System and the National Park System, and other legal and policy directives. Alternative 6, and its requirement to end the winter feeding program, would fulfill the four goals set out in the draft management plan as follows:

- **Habitat Conservation:** Eliminating the feeding program, and, consequently, the concentrated wildlife conditions, would undoubtedly result in the restoration of native flora, such as willow, cottonwood, and aspen stands. Naturally dispersed wildlife would reduce pressure on plant species in localized areas.
- **Sustainable Populations:** Eliminating the feeding program will disperse wildlife, which will directly reduce brucellosis infection rates and the risk of other exotic disease outbreaks, providing for healthier bison and elk herds. Dispersed wildlife populations relying on natural food sources will directly relate to more natural elk and bison populations.
- **Numbers of Elk and Bison:** Eliminating the feeding program will return wildlife densities to their natural levels and population fluctuations. The current system of wildlife feeding creates an artificially high density of elk and bison on the refuge. Wildlife populations should match the carrying capacity of available habitat.
- **Disease Management:** Eliminating the feeding program will disperse wildlife populations and reduce the risk of disease outbreaks and the spread of diseases such as brucellosis.

The NWRA recommends some additional improvements to Alternative 6.

Bison should be managed according to science-based principles of wildlife management and ecology. The bison herd of the NER and GTNP should not be reduced to the lowest genetically viable population. The number of bison should match the carrying capacity of the available habitat.

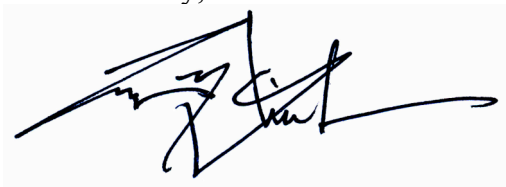
Migration routes and seasonal ranges for big game should be restored and protected to facilitate dispersion of wildlife throughout their native habitat. The wildlife and land management agencies in western Wyoming should work cooperatively to ensure wildlife movement between important habitats.

No vaccines should be administered to big game in the NER and GTNP. A moratorium should be placed on vaccinations for elk and bison until an effective vaccine for protection against brucellosis or CWD has been developed.

For the reasons stated above, the National Wildlife Refuge Association endorses an improved Alternative 6 in the Draft Bison and Elk Management Plan and Environmental Impact Statement. As the draft management plan states: "All of the biological issues identified stem from the winter feeding program." The winter feeding program is the primary reason for the concentrated conditions that are at the core of the major wildlife and habitat problems at the NER and GTNP. Therefore, the supplemental feeding program must be eliminated.

Thank you for the opportunity to comment on this draft management plan. If you have any questions regarding this letter or need additional information, please do not hesitate to contact me at (202) 333-9075.

Sincerely,

A handwritten signature in black ink, appearing to read 'Evan Hirsche', written over a light gray rectangular background.

Evan Hirsche
President
National Wildlife Refuge Association