

January 5, 2016

Wyoming Game and Fish Department
3030 Energy Lane
Casper, WY 82604

Dear Director Talbott,

Subject: Comments on Wyoming Game and Fish Chronic Wasting Disease Management Plan

Thank you for the opportunity to review and comment on the Wyoming Game and Fish Department (WGFD) Chronic Wasting Disease (CWD) Management Plan. We appreciate the steps taken by WGFD to revise and update its CWD plan. CWD poses a clear threat to the health of wildlife populations in Wyoming and we are glad to see that the department is taking this issue seriously. We offer the comments below to improve the plan and provide for an adaptively managed framework that is proactive rather than reactive in addressing the risks of this disease. These comments are submitted on behalf of the Greater Yellowstone Coalition (GYC) and the Jackson Hole Conservation Alliance (Alliance) who both have offices in Jackson, Wyoming and have been working on conservation issues in Wyoming for over three decades.

The mission of GYC is protecting the lands, waters and wildlife of the Greater Yellowstone Ecosystem (GYE), now and for future generations. The GYC was founded in 1983 on a simple premise: An ecosystem will remain healthy and wild only if it is kept whole and we advocate for the idea that ecosystem level sustainability and science should guide the management of the region's public and private lands. This vast ecosystem includes 20 million acres of wild country that includes Yellowstone and Grand Teton National Parks, parts of six national forests, five national wildlife refuges, and state and private lands in Wyoming, Idaho, and Montana.

GYC works to ensure that a thoughtful and holistic approach is taken to managing the national and wildlife resources in harmony with people and modern development. We work to shape a future where wildlife populations maintain their full diversity and vitality, where ecological processes function on public lands with minimal intervention, where exceptional recreational opportunities abound for visitors and residents alike, and where communities can enjoy a healthy and diversified economy. GYC is based in Bozeman, MT with offices in Wyoming and over 40,000 members and supporters from within the Northern Rockies and across the country.

The Alliance represents over 2,000 constituents in Teton County, WY and works to protect the wildlife, wild lands and community character of Jackson Hole. Our work empowers the whole community to live in balance with nature. We strive to make sure

that our public lands are managed in ways that respect wildlife and wild places. We envision healthy and sustainable wildlife populations with protected wildlife habitat.

Overall, the plan proposes many positive and general steps to tackle the issue of CWD while maintaining an adaptable and flexible management response. Specifically, we commend your Department for maintaining the prohibition of cervid (elk & deer) ownership in Wyoming. We support efforts to acquire and protect critical winter range habitats and migration corridors. This work should be prioritized and adequately funded by the Department. Similarly, we support restrictions on the transportation and disposal of diseased, or potentially diseased, carcasses and would like to see improved information and education on these restrictions. We support the purchase and installation of an incinerator to deal with carcasses. We suggest coordinating with other federal agencies and Wyoming Department of Transportation (WYDOT) in funding and locating these facilities. It could also be a valuable cost-savings to the WGF to seek an agreement with WYDOT in collecting wildlife-vehicle collision carcasses of deer, elk and moose. Some research suggests that animals are predisposed to collisions by CWD infection and this could provide for early detection. Over and above these positive steps, we believe that more detailed actions can be crafted to better address the threat of CWD. Below, we suggest several improvements that would improve the CWD plan and better equip our wildlife managers to combat the threat of this disease.

The plan should identify clear objective(s)

The only objective addressed in the plan is providing flexible and adaptable direction for the management of the disease and that eradication is not a realistic objective. There are several other objectives that could be considered such as: 1) Minimize the prevalence of the disease in wild cervids; 2) Minimize the rate of the spread of the disease geographically in the state; 3) Reduce the impacts to populations of cervids through management actions; 4) Limit the distribution of CWD; 5) Prevent the establishment of the disease in feedground herd management units.

Further, each of these objectives has specific management actions that could be addressed preemptively to make this plan a proactive management document, versus a reactive document. We recognize that long-term and short-term impacts of CWD may be different, so this plan should incorporate an explicit time horizon and should clearly articulate what impacts the plan is working to minimize within that timeframe.

Flexibility and adaptive management should not create agency paralysis for initiating specific, targeted actions. For example, if there are concerns about potentially increase elk-livestock conflict with reducing dependence on supplemental feed, what are the top conflict priority locations and what needs to be done to mitigate those concerns? Are there additional research needs that can address key stumbling blocks in decision-making?

The plan should explicitly identify triggers and actions

The CWD plan emphasizes maintaining adaptability and flexibility to manage the disease. However, more can be done to identify specific triggers for action. For example, the only trigger that is explicit in the current plan is if a single CWD positive is detected in an area adjacent to elk herd unit with feedgrounds, then WGFD will intensify surveillance and coordinate action. Importantly, this trigger has already been tripped in the case of the CWD positive moose in Star Valley and we know that migratory elk and deer are known to travel into CWD infected herd units, comingling with potentially positive animals near Cody, Green River and Dubois. This plan lacks specificity on actions that will lead to future uncertainty. For example, will actions be different if the case is a deer in a herd unit compared to an elk on a feedground? What if CWD is detected in another moose or a whitetail deer? It would be beneficial to engage in a scenario planning effort to proactively identify what feasible actions are available before CWD hits rather than wait for the disease to spread further. Also, there may be some management responses that are common to all different scenarios in which case we should start implementing those right away. We believe that such specific steps can be articulated and implemented without compromising the WGFD need to maintain adaptability and flexibility.

Role of Herd Objectives setting

We emphatically agree that WGFD should consider disease transmission/prevalence when developing herd objectives in general and specifically as it relates to elk feedgrounds. In relation to the section on feedgrounds (pg 5, Section I, point 9) the CWD plan specifies that feedground closure can occur if dispersal of elk will not cause damage or create a need to drastically reduce elk herd sizes. However, the next action says that disease transmission and prevalence will be considered in developing herd objectives. These two points appear to be at odds.

We argue that setting appropriate herd objectives should be used as a tool to provide management outcomes. We recognize that herd objectives are developed integrating both ecologically based upon estimates of carrying capacity and socially constructed factors based upon desired outcomes, such as reducing conflicts or providing hunting opportunity. We argue that ecological factors driving populations should take precedence over social considerations. Herd objectives are a tool that the Department has the authority to modify preemptively, in advance of CWD. We believe that more systematic modeling of population responses under different conditions will better inform choices about setting herd objectives. For example, hypothetically, would reducing a herd objective by 10% allow for an ecologically supported objective that minimizes the risks of CWD? We suggest modeling CWD impacts on herds, with and without feeding, with and without large carnivores and determining if there is some proactive modifications in setting herd objectives that gives WGFD greater management flexibility rather than limiting its tools to manage the disease.

The plan is designed to avoid “drastically” reducing overall elk herd sizes without defining drastically. Wyoming’s own research suggest that “drastic” reductions of elk could occur if CWD spreads to northwest Wyoming.

Coordination with federal agencies and neighboring states

The final plan should develop an explicit framework for coordinated action with federal land managers. We suggest this coordination should go beyond the existing Elk and Bison Management Plan and should include coordinated surveillance, response, research and management with all the relevant federal agencies: Bureau of Land Management, US Forest Service and APHIS, National Park Service, and US Fish and Wildlife Service. Specifically in northwest Wyoming we urge WGFD to coordinate with Bridger-Teton National Forest, Yellowstone National Park, Grand Teton National Park and National Elk Refuge. Working with these agencies, WGFD should identify specific actions and responses now and begin targeted implementation of some proactive measures (conflict reduction, habitat management, migration protection, etc.) rather than wait for the disease. We believe that there are significant actions that could be addressed by the state and federal agencies at this time that would make future management more feasible. For instance, steps to proactively address conflict, secure movement corridors and reduce supplemental feeding that can be taken at this time will put us on a path, in the long-term, toward ending our reliance on supplemental feeding to manage wildlife. We are not advocating culling proactively unless scientists/managers determine that is the best course of action.

There are additional benefits of coordinating with federal agencies. Coordinating research on migration and movement of ungulates with federal land management agencies will provide for better protection and ensure that these corridors remain intact to provide flexibility for future disease management scenarios. We also encourage the state to seek additional federal funding through these partnerships for research and monitoring of the disease. For instance, as we stated earlier one research need is what population of elk would remain if feeding were phased out? This question permeates the discussion of CWD and elk feedgrounds, and could be an inter-agency research priority.

Because our wildlife often cross state lines, we similarly encourage greater coordination with Montana and Idaho. Our ungulate herds are known on summer range before moving to winter areas cross state boundaries. We request that Wyoming solicit and incorporate comments from Montana Fish Wildlife and Parks and Idaho Department of Fish and Game in considering these interstate transmissions and what could be a likely route for CWD entering those states via Wyoming transmission routes.

Proactive management of elk feedgrounds to reduce CWD transmission risk

The science is clear that artificially concentrating elk on feedgrounds will result in rapid spread of CWD. Not only would the disease spread quickly among wild cervids, but the

infectious prions would also accumulate on the soils, potentially deeming these lands inhospitable to elk and deer for generations to come. Yet WGFD continues to question the models as “worst-case” scenarios or in comparison to other non-fed herds in CWD endemic areas of Wyoming. The plan states that it is “still unknown what the ultimate impact CWD could have on feedground elk populations,” even though WGFD’s own research suggests long-term declines in population ranging from worst case to only slightly better scenarios. WGFD is also involved in ongoing research modeling feedground CWD scenarios to address this uncertainty.

In support of all of this available research, a prudent solution would be to begin reducing reliance on supplemental feed through a rigorous program before it becomes a management crisis. Time is on our side to take important steps that will matter in the future when we don’t have the luxury of “what-if” scenarios. This plan should prioritize those actions that implement proactive steps to mitigate conflicts and improve protections for winter range and migration corridors while also considering the phase-out of supplemental feeding at the same time. Unfortunately, the plan limits the ability of the Department to be successful in managing CWD by allowing conflict and status quo herd objectives to drive decisions instead of taking concrete steps to improve these conditions.

Clear assessment of the role of large carnivores

Research suggests carnivores tend to select for sick or weakened animals and potentially reduce the time a CWD infected animal can shed infectious prions into the environment. The draft plan mentions the possibility of this benefit, but quickly focuses on the potential for negative impacts caused by carnivores, in particular, wolves. We would like to see this section of the plan developed as a disease management objective. Maintaining healthy, robust, populations of native carnivores should be a best management practice, in particular at elk feedgrounds.

Hay from “certified” CWD-free areas

The Department addresses issues related to the risk of CWD prions being transported throughout the state in hay and alfalfa that is fed at elk feedgrounds. We urge you to explicitly prohibit the transfer of hay and alfalfa from CWD endemic areas to elk feeding areas currently free of the disease.

Additional Considerations/Suggestions

Samples for surveillance

In review of the plan and after attending the public meetings we have some novel ideas that could improve the final plan. We believe that Wyoming hunters and outfitters should be encouraged with training and supplies in obtaining samples to have their harvested animals tested and in the possible health risk associated with this disease.

Would it be possible to educate hunters and outfitters to take samples and use the outreach to explain the disease and its implications?

Improved mapping of CWD endemic areas

Currently, the plan and associated CWD distribution maps rely upon deer, elk and moose hunt areas to represent disease distribution. Would it benefit the Department and its management response to improve spatial resolution of mapping CWD endemic areas? Could a more fine-grained spatial modeling approach be applied to sampling efforts and positive cases, rather than simply presence/absence of CWD in hunt area?

Environmental Contamination

Research on water, soil and vegetation contamination raises new concerns for this disease and our response. Are we downplaying the potential risks of CWD transmission across species barriers? Are we providing the public a clear understanding of these issues?

Conclusions

In closing, we appreciate the opportunity to provide comments on the Draft CWD Management Plan. Wyoming should take a proactive leadership role to best manage CWD, rather than a wait and see approach that does not reduce the risks of this disease. We offer the above improvements on the plan and urge you to incorporate these suggestions in the final draft. We are also available to follow-up on these comments and suggestions beyond this public comment opportunity. Thank you for your consideration of these comments.

Respectfully,



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