

Greater Yellowstone Coalition
Jackson Hole Conservation Alliance
Defenders of Wildlife

March 25, 2009

Steve Kallin, Manager
National Elk Refuge
Attn: Irrigation
POB 510
Jackson, WY 83001

Dear Manager Kallin:

Please accept these scoping comments from our organizations regarding the proposed irrigation expansion on the National Elk Refuge.

This proposal increases the amount of irrigated acres on the refuge above the amount allowed in the April 2007 Record of Decision (ROD) on the Bison and Elk Management Plan and EIS. These comments are being submitted by organizations that have challenged that ROD in court. We have concerns as to the purpose and need for this new proposed irrigation expansion on the Elk Refuge so soon after the ROD and during a period where the outcome of the litigation is yet to be determined.

Our questions and comments listed below are not in an order that reflects the relative importance of the question. We hope that in the brief time allowed before the Environmental Assessment is written the USFWS will take the time to adequately consider our questions and comments, and that it thoroughly considers the cumulative effects of this and associated federal actions.

Here are some of our questions and concerns:

1. Please explain the purpose and need for this proposal. What prompted this proposal? Are there new objectives or goals that the USFWS wishes to achieve? Are there new funding sources for projects to achieve their goals? What are the anticipated costs? When would this proposal take place?
2. What are the differences in this proposal from what is already in the April 2007 Bison and Elk EIS ROD? Has the USFWS found the April 2007 ROD to be deficient in achieving its goals, or has the 2007 ROD been found to be in error?
3. The March 4 news release states that the proposed additional sideroll irrigation infrastructure is to be temporary, yet the news release further discusses a "comprehensive plan to annually produce more high-quality standing forage". Is

the comprehensive plan involving temporary sideroll irrigation infrastructure time limited? How temporary are the siderolls? How many years is the annual production via this proposal scheduled to last?

4. The news release states as an objective, “reduc(ing) concentrations of elk and bison”. The USFWS needs to offer the public information about what the densities are under current management and then show the amount of the reduction. Without such a clear comparison the public cannot know how much the alleged change is supposed to be. Will this anticipated change in densities affect habitat or wildlife? In what ways? The USFWS must also analyze densities of elk and bison for 24-hour periods, and how much of the winter time (e.g., how many days during what months?) will bison and elk spend time on irrigated acres and how long bison and elk will spend on feedlines?
5. The USFWS must describe and compare the densities of native range bison and elk compared to those densities of bison and elk wintering on irrigated lands, and compared to those wintering on feedlines. In addition, the USFWS must estimate the reductions in risk of disease transmission between these scenarios.
6. The USFWS must describe the soils and plants affected by this proposal. It must also accurately describe whether the plants are native or non-native.
7. What will be the effects of shed Chronic Wasting Disease (CWD) prion retention, persistence, and possible subsequent infection of vulnerable elk from the soil types involved in the proposed irrigation expansion? How would the irrigation project help or hinder the persistence and transmission of infectious prions?
8. The USFWS must offer a comparison between this proposal and restoring the acreage to natural condition as Grand Teton Park is doing with some 3,000 acres of former cultivated lands.
9. The USFWS must divulge what part(s) of the 2007 ROD, if any, it is not able to fulfill due to budgetary shortfalls, and what, if any, projects would be lost or deferred due to competition for the funds targeted for this proposal. In other words, if this proposal falls *outside* what was approved in the 2007 ROD, what has happened to everything that fell *within* the 2007 ROD? Is the USFWS on track with all the components of the ROD? Will there be components of the 2007 ROD that will not be implemented, and are those discarded projects affected by this proposal?
10. The USFWS must describe whether the proposed acreage is likely to be unavailable to elk and bison because of snowpack.
11. What will be the visual impacts from this proposal?
12. How will plant communities within and surrounding the proposal be affected by it? And, how will those wildlife species that use those plant communities be affected?

13. What will be the estimated difference between this proposal and not doing it in terms of forage produced, and the differences in impacts to habitat(s) and wildlife? And, what will be the financial and ecological costs and benefits? Calculated over what period of time?

While there may be some localized and short term benefits to irrigating some acreage, the overall goal of the USFWS should be to transition the elk to native ranges in appropriate densities as soon as possible. The best model for compliance with Refuge legal directives and for sustaining healthy, free-ranging bison and elk is reliance on the native range as is done in most jurisdictions in North America. Modern wildlife management science tells us to manage wildlife slightly below the carrying capacity of the natural habitat. We feel that community efforts and finances are best spent on protecting natural habitat and offering landowners assistance to fence in their livestock to prevent wintertime commingling with free-ranging elk. We feel that the mission and purpose of the Elk Refuge is best served by -- and that solutions to disease and habitat problems are best achieved through -- a reliance on native range rather than an emphasis on expensive and intensive artificial forage production.

Thank you for considering our comments. We remain ready to discuss this issue with you at any time. Please keep us apprised of any developments in this or any related issues.

Sincerely,

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Cc:

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