

February 8, 2011

To: Toni Griffin, Planning Team Leader
Division of Refuge Planning, USFWS
134 Union Blvd., Ste. 300
Lakewood, CO 80228

Re: National Elk Refuge CCP Scoping comments

Dear Ms. Griffin:

The Jackson Hole Conservation Alliance appreciates this opportunity to respond to your request for comments for the scoping of the Comprehensive Conservation Plan for the National Elk Refuge. The National Elk Refuge comprises a significant part of the valley in which most of our 2,000 members live and recreate. The Conservation Alliance strives to provide the Elk Refuge with citizen input and concerns and submits the following comments toward that purpose.

The Federal Register notice for scoping indicated that the CCP will not incorporate comments concerning elk and bison on the refuge. It further implies that the Bison and Elk Management EIS and Plan adequately covers the issues associated with those species. We would like to encourage that the findings from that EIS and from the supplemental irrigation EIS be included in the CCP, and that continued monitoring and implementation of the decisions associated with those studies be assured.

In addition, we stress the need to evaluate the status of the following, to identify the need for improvements or changes, and to implement long-range programs for monitoring and addressing these needs:

- There have been, and will be more, major changes to the hydrology of the refuge since the expanded irrigation project began. These changes will be compounded by climate change in the near and distant future. This hydrological component – existing marshes, wetlands, streams, and the removal of some of them by the irrigation project – should be carefully considered in the CCP in order to maintain those species directly impacted by the presence or loss of these water bodies.
- Climate change will also impact other species besides elk and bison, both flora and fauna. Resident and transitory wildlife species, native vegetation and invasive weeds should be included in the CCP and determinations made on how to best manage for these fluctuating and changing species.
- Visitor use, directly or indirectly on NER lands, should be addressed. The adjacent pathway, for example, threatens to have a greater negative impact than originally perceived because of public perception that pathway users will not contribute to wildlife behavior. What other land uses might compromise the purpose of the NER?

- As there is a range of habitats that require separate and distinct management programs on the refuge, there are other land and wildlife agencies that should be recognized as collaborators on the lands that comprise the Greater Yellowstone Ecosystem. The National Elk Refuge is an integral part of a much larger picture and the resources it provides for wildlife should be considered a critical piece in this process. The ability of the NER to work with other agencies to manage wildlife and the varied components of the lands under its mandate will help ensure the health of the National Elk Refuge and the Greater Yellowstone Ecosystem.

Thank you.

Sincerely,

Louise Lasley, Public Lands Director
Jackson Hole Conservation Alliance