

[EXTERNAL] Canyon Ferry WMA Lease Renewals

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To: Grove, Adam

Hi Adam,

In general, I'm opposed to agriculture in WMAs and NWRs, and I take issue with certain claims in the EA.

1) I question whether it is accurate to say the agricultural practices are sustainable. To be sustainable there must be complete recycling of nutrients back to the soil. Is that happening? Fertilizer could be used, but is it, and does it replace all the nutrients taken away? The fertilizer also has impacts on the ecosystem.

2) The negative impacts on wildlife, of cancelling or buying out the leases, should be analyzed from a perspective going back before agriculture started. The agricultural practices altered the existing ecosystem, and created a dependence on the crops, whether for food or cover. If people start feeding the wildlife, making them dependent on that food source, would you allow the feeding of wildlife to continue?

Stopping the feeding of wildlife from crops is not a negative impact, it is a return to the way it was, which is the way it should be. Natural processes should prevail. Was the WMA created because of the agricultural food source? I'm sure wildlife would be there without the crops. Waterfowl are omnivores. Grains are probably not their first choice of food, and leaving large amounts for them to feed on is probably an unnatural and maybe unhealthy influence on their diet and behavior.

3) There seem to be contradictory statements regarding the impacts on land resources. There is a claim that the soils would be less productive and the amount of cover would be reduced. Yet in the Vegetation section it states that an increase in plant diversity and species abundance would likely occur. Isn't that what should be there? It seems desirable in a WMA to me.

4) The statement about the new plant diversity not being beneficial to wildlife refers to wildlife that has become dependent on the crops. We need to consider what was there before the crops. The crops likely displaced other wildlife, which would likely return when the crops are gone. I don't consider that a negative impact, and see no point in FWP trying to maintain wildlife in an unnatural setting by planting vegetation that mimics the crops that were removed.

5) The statement about an increase in bare soil leading to more erosion seems to contradict a footnote that the topography is very flat and there is little to no runoff.

6) The weeds are an unfortunate problem which were probably introduced by farming. Perhaps the approach used by a ranch south of Livingston (can't remember their name but they gave a talk at MSU last year) could help.

7) The aesthetics of the area are not just about weeds. To me, seeing a farming operation in a WMA is objectionable. Seeing an entire WMA in its natural condition is what is aesthetically pleasing.

8) I also think FWP should not be promoting and supporting nonnative species. FWP should, across the board, be working to remove all nonnative species, especially if they were introduced on purpose. These other points of view should be represented in the EA.

I realize there is a concern about your relationship in the community. What I would propose is that all such incompatible uses gradually be phased out, for example when a property or lease, etc. might change hands or come up for sale. The long term goal should not be to try to prolong incompatible uses, but to gradually phase them out so the public land unit eventually achieves ecological integrity. Thank you for your consideration of these ideas.

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