



NATIVE ECOSYSTEMS COUNCIL



February 18th, 2020

Lee Mabey, Project Lead
Caribou NF
1405 Hollipark Drive
Idaho Falls, ID 83401
lee.mabey@usda.gov

Re: North Fork Tincup Creek Process Based Stream Restoration Project

Comments sent via email to lee.mabey@usda.gov AND USPS CERTIFIED/RETURN RECEIPT.

Mr. Mabey:

We appreciate this effort to restore the North Fork of Tincup Creek in this 5.4-mile reach, but we have some concerns. Primarily the lack of proposed elimination of livestock grazing in the project area or the use of exclosures to eliminate livestock access to the stream is missing from the proposal. Both would increase the likelihood of the project's success regarding stream and riparian habitat health and ecological function.

Yellowstone to Uintas Connection, Alliance for the Wild Rockies and Native Ecosystems Council are submitting these scoping comments for the North Fork Tincup Creek Process Based Stream Rehabilitation Project.

Y2U is a 501c3 public interest organization whose staff and members have and will continue to work to protect the integrity of habitat for fish and wildlife as well as recreate in this region. We are concerned about the loss of integrity of the Regionally Significant Wildlife Corridor (Corridor) that connects the Greater Yellowstone Ecosystem and Northern Rockies to the Uinta Wilderness and Southern Rockies. The Yellowstone to Uintas Connection organization was given this name to bring attention to this Corridor and we use this name in reference to both the organization and Corridor as it provides context and public awareness to the location and its importance. Yellowstone to Uintas Connection is headquartered in Mendon, Utah with a satellite office near Paris, Idaho.

Alliance for the Wild Rockies is a 501c3 public interest organization whose mission is to secure the ecological integrity of the Wild Rockies Bioregion through citizen empowerment and the application of conservation biology, sustainable economic models and environmental law. Alliance for the Wild Rockies is headquartered in Helena, Montana.

Native Ecosystems Council is a 501c3 public interest organization whose staff reviews Forest Service National Environmental Policy Act (NEPA) assessments of logging impacts on wildlife in Montana and Idaho. NEC is headquartered in Willow Creek, Montana.

The February 12, 2020 scoping letter describes the project and provides an indication of some ongoing issues that this project proposal does not address. These include:

1. Over widened stream channel and vertical erosion of the streambank.
2. Severe lack of fish and wildlife habitat.
3. Willow in flood plain terraces shifting toward drier, upland species such as sagebrush.
4. Diamond Creek is 303d listed for sediment and E. coli.

We see no justification for this project until and unless livestock grazing is excluded from the project area. Continued Forest Service authorization of livestock access to the stream will continue to damage willows and stream cover, damage stream banks, and add sedimentation and E. coli contamination to the stream. Our work here in Paris Creek and other streams clearly demonstrates that when livestock, particularly cattle, have access to the stream, the problems outlined in the Purpose and Need section of the scoping letter for this project will continue. Idaho's own Agricultural Pollution Abatement Plan notes that livestock exclusion is the method that will relieve E. coli pollution. The best available science shows the livestock exclusion is the only way to restore and maintain a healthy stream ecosystem.

A comprehensive review of ecosystem effects of livestock grazing in western North America found that livestock grazing reduces levels of biodiversity, leads to decreased population densities for a wide variety of taxa, disrupts ecosystem functions, including nutrient cycling and succession, changes community organization, and changes the physical characteristics of both terrestrial and aquatic habitats (Fleischner, 1994). A similar review of livestock effects to streams and riparian ecosystems determined that livestock grazing negatively affects water quality and seasonal quantity, stream channel morphology, hydrology, riparian zone soils, instream and streambank vegetation, and aquatic and riparian wildlife. No positive environmental effects of grazing were found in this comprehensive survey of the literature (Belsky et al., 1999).

Fisheries are impacted by sediment from accelerated erosion which reduces the ability of native Yellowstone cutthroat trout to spawn successfully, placing them at further disadvantage from competition with brook trout. Loss of overhanging vegetation and undercut banks due to sheep trampling, grazing and bank scour reduces habitat for these fish. Native aquatic invertebrates that require clean, sediment free substrate are negatively impacted due to the increased sedimentation and habitat alteration from sheep grazing.

We also do not support the removal of any large trees of any species in the project area. The removal of any large trees of any species will result in increased temperatures in both the stream and surrounding forest and negatively impact many species of forest animals and birds.

This project should be considered as mitigation for some of the damage being done to streams in tributaries to the Blackfoot River, located in the phosphate mining region. The mining companies should be approached for funding to support this project, including the needed exclosure to eliminate livestock from accessing the stream.

Since beavers are an important attribute of the planned restoration, beaver trapping should be curtailed in Diamond Creek. 36CFR261 provides the Forest Service Prohibition Authority to ban activities that are detrimental to restoration efforts.

We believe however well-intentioned your effort, if livestock continue to have access to the stream, your efforts will have been in vain. We look forward to a modified proposal addressing these concerns.

Respectfully,



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And For

Michael Garrity – Executive Director
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And For

Sara Johnson – Executive Director
Native Ecosystems Council
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Willow Creek, MT 59760

References:

Belsky, A.J., Matzke, A., & Uselman, S. (1999). Survey of Livestock Influences on Stream and Riparian Ecosystems in the Western United States. *J. Soil and Water Conservation*, 54, 419-431.

Fleischner, T. (1994). Ecological Costs of Livestock Grazing in Western North America. *Conservation Biology*, 8, 629-644.