



November 10, 2011

Andrew C. Hammond, Director  
USDA, ARS Pacific West Area  
Via email to: [USSES@ars.usda.gov](mailto:USSES@ars.usda.gov)



RE: Comments on EA for USSES Sheep station in Dubois Idaho  
Grazing and associated activities project in 2009

Dr. Hammond:



On behalf of the National Wildlife Federation, the Idaho Wildlife Federation, and the Montana Wildlife Federation, we offer these comments on the US Sheep Experimental Station (USSES) Draft Environmental Assessment on Grazing and Associated Activities. Together, our organizations represent thousands of wildlife enthusiasts, hunters, anglers, and concerned conservationists. All of our organizations have long been involved in efforts to provide

secure habitat for wildlife on public and private lands throughout the northern Rockies. Within the conservation community, including NGO's, agency biologists, and individual leaders, there is near universal agreement that closing the USSES pastures in the Centennials to domestic sheep grazing is a critical next step in promoting wildlife connectivity between the Greater Yellowstone Area (GYA) and the Salmon-Selway Ecosystems. For this reason, we strongly urge ARS to adopt Alternative 3 as its management plan. We also urge adoption of Alternative 5 as well because of the risk of disease transmission from domestic sheep to bighorn sheep in the Bernice and Snakey-Kelly allotments.

### **Importance of the Centennials for grizzly bear habitat and linkage**

Biologists have long recognized the importance of creating larger blocks of habitat for wildlife in the northern Rockies and of connecting the refugia that surround Yellowstone National Park, Glacier National Park, and the great wilderness areas of central Idaho. This is especially important for species like grizzly bears, wolves, and other wide-ranging species that need extensive landscapes and diverse habitats if viable populations are to be maintained.

The importance of linking these areas will only become more important as many wildlife species are challenged by shifting habitats caused by climate change. Given the inevitability of warming of about two degrees centigrade at our latitude, the survival of many plants and animals will be challenged in ways that they haven't been for millennia. It is widely recognized that large and secure critical habitats and linkage zones between them is a key strategy that managers must adopt to cope with the challenges posed by climate change. We must make decisions now that recognize this reality. Continued sheep grazing in the Centennial Mountain linkage zone is inconsistent with an effective strategy for helping wildlife adapt to climate change.

For the last nine years, the National Wildlife Federation has been working to promote large carnivore conservation and connectivity by reducing conflicts between ranchers who graze

livestock on public lands and wildlife. Through this program, livestock permittees have voluntarily waived their permits in high conflict areas in exchange for incentive payments, and the USDA Forest Service has permanently closed allotments totaling more than 600,000 acres mostly on national forest lands surrounding Yellowstone National Park. Figure 1 is a map showing the allotments we've retired both within and outside of the Primary Conservation Area (PCA) for Yellowstone grizzly bears. As you can see from this map, we in cooperation with the Forest Service and other partners, have retired 8 sheep allotments that are adjacent to the "summer range" and Meyers Creek allotments where the USSES proposes to continue sheep grazing. The total cost of retiring these 8 sheep grazing allotment was \$116,000. These were retired voluntarily by the allotment owners who were willing to do so largely because of the increasing number of conflicts they were having between their flocks and bears and other large carnivores expanding westward out of the PCA.

Obviously, we would not be spending this money if we did not believe it was important for grizzly bear conservation. It is also obvious that if the ranchers who agreed to retire these allotments thought it was fiscally and managerially unsound to continue to use these allotments in the face of the expanding grizzly bear population; otherwise they would not have accepted our offers to retire them. Correspondingly, we find it incredible that the DEIS is so cavalier about dismissing the concerns offered by us and many others during the scoping period on the need to stop grazing these USSES and USFS allotments in the Centennials.

Through this program, we have managed to achieve retirement all of the sheep grazing allotments within the Primary Conservation Areas (PCA) identified in the Grizzly Bear Recovery Plan and in the Conservation Strategy for grizzlies in the GYA. These efforts are consistent with the USDA Forest Service's Plan amendments for the six national forests in the GYA that call for 1) retirement of sheep grazing allotments through voluntary actions by allotment leaseholders as the preferred method for dealing with conflicts between livestock and wildlife and for 2) the retirement of all sheep grazing within the PCA. Minimal sheep grazing in areas of critical habitat and connectivity for grizzly bears is also consistent with the grizzly management plans by Idaho, Wyoming, and Montana that are part of the Conservation Strategy for post-delisting management of grizzly bears. These state plans call for grizzly expansion into, and occupancy of, areas of habitat that are biologically and socially suitable; the Centennial Mountains qualify under both criteria. As can be seen in Figure 1, we in cooperation with the Forest Service have also retired many sheep grazing allotments outside of the PCA in areas where conflicts occur.

With respect to sheep grazing allotments on Forest Service lands, the package of Forest Plan Amendments adopted by the Forest service and incorporated into the Conservation Strategy for Yellowstone Grizzly Bears states that "*...no new active commercial livestock grazing allotments will be created and there will be no increases in permitted sheep Animal Months (AMs) from the identified 1998 baseline (Appendix F). Existing sheep allotments will be monitored, evaluated, and phased out as the opportunity arises with willing permittees.*" (Conservation Strategy page 43). Thus, the USSES'S preferred alternative #1 of continuing to graze these summer pastures is directly contrary to what the Forest Service is trying to accomplish and has accomplished with other sheep (and some cattle) grazing operations in areas with high actual or potential risk of depredation on livestock by large carnivores. The preferred alternative in the DEIS has 2 USDA agencies pulling in opposite directions with respect to sheep grazing in key wildlife areas.

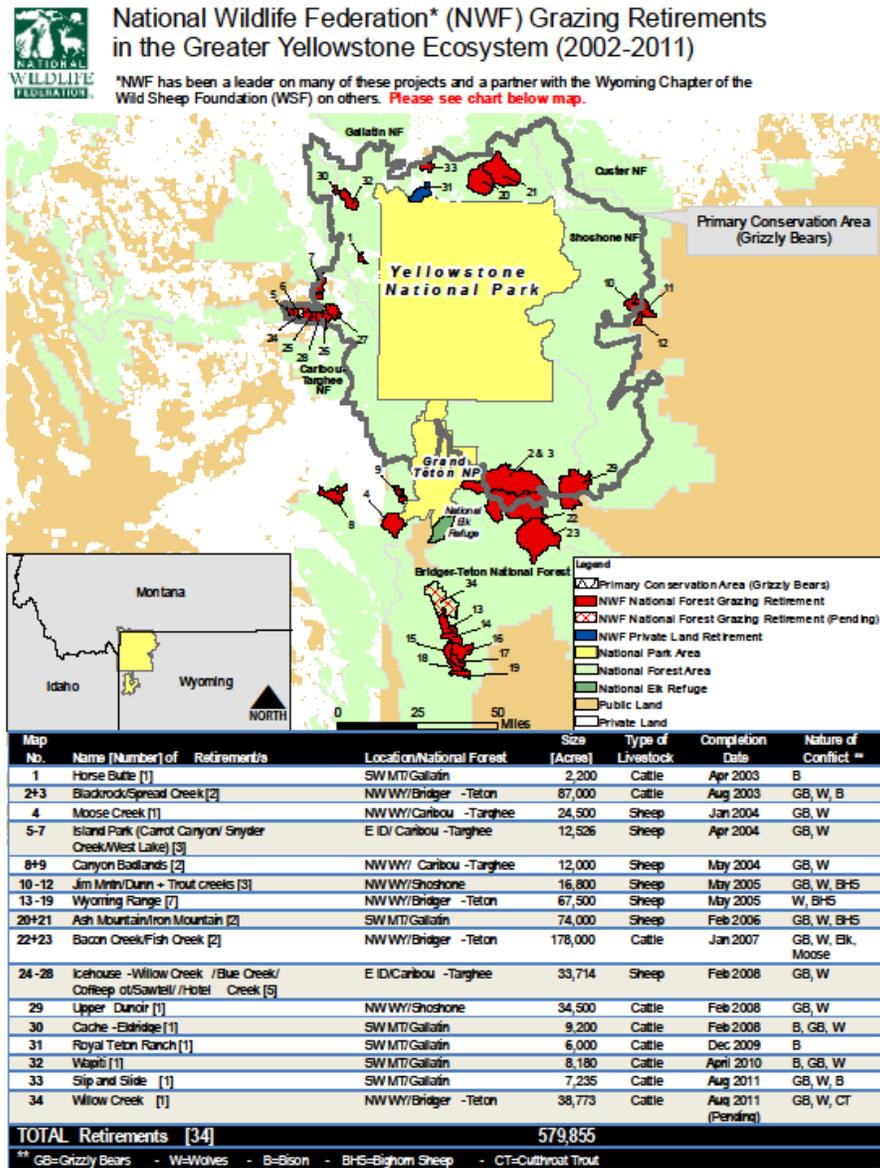


Figure 1. Map of grazing allotment retirements by the National Wildlife Federation, the USDA Forest Service and other cooperators in the Greater Yellowstone Area. Retired allotments numbered 5-7 and 24-28 were sheep grazing allotments in the Centennial Range adjacent to the USSES summer range and the USDA Meyers Creek allotment where the ARS/USSES proposes to continue sheep grazing activities.

The sheep station, which is a USDA facility, should maximize its consistency with the USDA Forest Service Plans for National Forests in the GYA. Continued grazing on Forest Service allotments adjacent to the PCA is not consistent with these plans that are part of the Conservation

Strategy for grizzly bears. The Meyers Creek allotment is within the PCA, while the Odell Creek, Big Mountain Allotments, and Tom Creek Allotment are adjacent to the PCA.

In addition, sheep grazing in the Humphrey Ranch, the East Beaver, and the Meyers allotments on USDA Forest Service lands should be discontinued because of the inevitability of increasing conflicts between sheep and large carnivores. It is consistent with the Conservation Strategy to make every effort to remove sheep grazing from these allotments and extremely important that the USDA facilities, like USSES, set an example in this regard. Failure to set such a good example provides implicit support to groups who claim that the Conservation Strategy is an inadequate regulatory mechanism and, therefore, grizzly bears and wolves should not be delisted.

As long as sheep are in the linkage zone between Yellowstone and these western habitats in the Bitterroots, and as long as grizzly and wolf populations continue to increase in the GYA, there can be no result but an ever-increasing level of conflict with these wildlife species and sheep. We acknowledge that there are not yet documented problems between grizzly bears and sheep in the East Beaver USFS grazing allotment or in the USSES Humphrey Ranch pastures. However, problems here are inevitable. Fifteen years ago there were also not grizzly bears on the summer pastures a mere 25 miles further east on the summer pastures but this situation has changed (Figure 2). A grizzly bear can easily move 25 miles in a single day and the Centennials are a natural path for dispersing individuals.

During the scoping period for the DEIS, the USSES received comments from the US Fish and Wildlife Service expressing concerns over continued grazing on these summer pastures (Letter from Damien Miller USFWS File #102.0100 TAILS # 14420-2010-TA-0122). In the letter the Service said it had “...*substantial concerns regarding the proposed action and its potential to adversely affect grizzly bears....[and] ...any grazing activity within or adjacent to the Recovery Zone or areas where conflicts between grizzly bears and sheep have occurred in the past may harm grizzly bears by significantly impairing normal feeding behavior*”. Comments in this FWS letter also make the highly pertinent observation: “*The [Biological Assessment] states you avoid areas where problems can be anticipated. All problems would be avoided if no grazing was allowed.*” (comment 7) and “*Thus, any grazing within the Primary Conservation area such as the Meyers Creek Allotment or in those allotments adjacent to the Recovery Zone (O’dell/Big Mountain and Tom’s Creek Allotments) can be reasonably expected to result in grizzly bear encounters with grazing sheep.*” (comment 9). The USFS requested additional clarifications on what actions the USSES would take and what would stimulate these actions and these clarifications were not provided in the DEIS.

The only response to these FWS concerns, in the DEIS appears to be that problems will be avoided by removing the sheep when grizzly bears show up. Since the maps in Figure 2 illustrate that grizzly bears already have shown up in these summer pastures, if the Sheep Station is going to comply with the DEIS it is appropriate to do so now by adoption of Alternative 3. Further, we are aware that USFWS is currently preparing a consultation document on impacts to grizzly bears based on the recently reissued Biological Assessment. It is our view that it is inappropriate to issue a DEIS until this consultation is completed as the information provided is incomplete. We are aware of deadlines associated with ongoing litigation but believe that

extension of these deadlines could be obtained from the court if requested on the basis of a pending USFWS consultation.

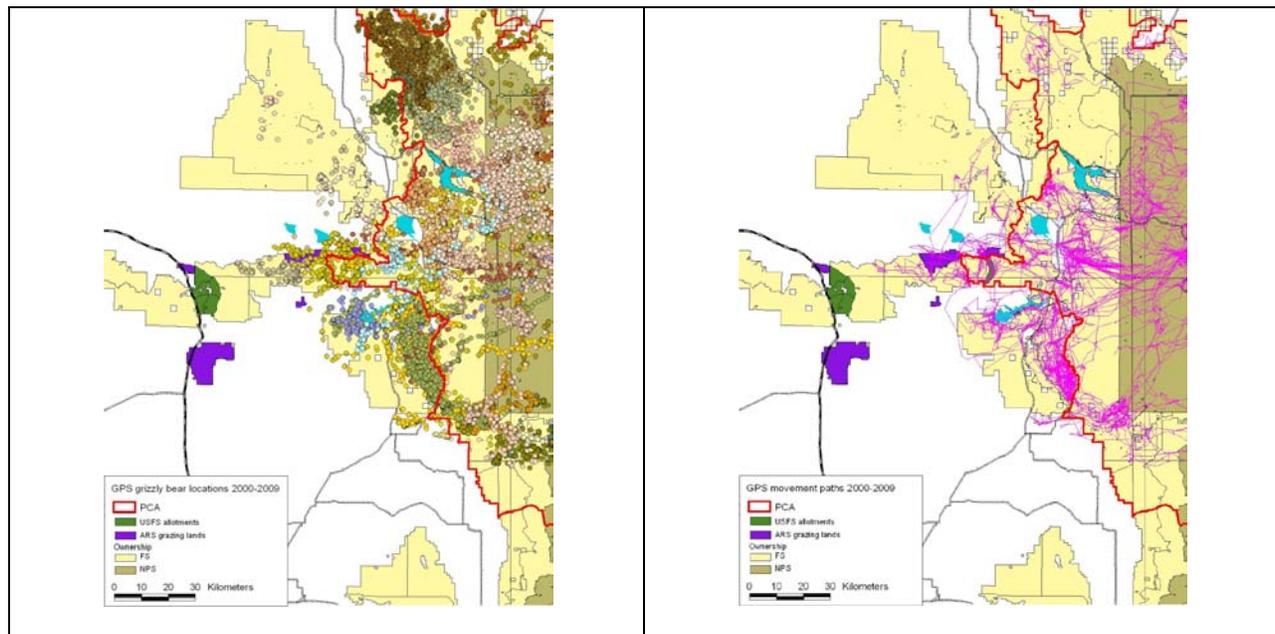


Figure 2. Location data for individual radio-marked grizzly bears marked in the Yellowstone Park area overlain on the map of USSES sheep station pastures. Map provided by the Interagency grizzly bear study team. The map on the left shows point locations and the map on the right shows movement tracks of radio-marked bears.

The recommendations by the USFWS were reinforced by comments from the Bureau of Land Management during the scoping period (letter dated Jan. 12, 2010 signed by Tim Bozorth). The key recommendation in this letter is that the BLM "...*thinks that the ARS, USSES should be consistent with USDA Forest Service policy and requests that the ARS/USSES permanently cease grazing sheep in the East and West Summer Ranges, the Humphrey Ranch, the East Beaver and Meyers USFS allotments and the Henniger allotment.*"

**There is no documentation in the DEIS of the necessity to continue to use the high elevation pastures in the Centennials.**

If sheep grazing in high elevation pastures such as those in the Centennials was an important component of the sheep industry, there should have been documentation to this effect provided in the DEIS. Similarly, if research important to the sheep industry was being conducted in these high elevation summer pastures by the USSES, documentation of this should have been provided in the DEIS. There is nothing in the DEIS that documents either although there are assertions that this is the case. Assertions on an issue as important as this are insufficient to justify a policy. A science-based organization like the USSES should do more than make assertions about its activities, it should document the need for them. The absence of documentation of the importance of continued use of these summer pastures leads to the conclusion that the only reason the USSES insists on continuing to use these pastures is

bureaucratic inertia based on past practices rather than an ongoing need. It is our belief that absent a compelling justification for continued USSES ownership of the summer pastures, that these summer pastures should be transferred to the Forest Service and managed in a way consistent with adjacent Forest Service lands. We would also support an initiative by the USFS to unilaterally retire the Meyers Creek and East Beaver allotments.

The mission statement of the USSES is “...to develop integrated methods for increasing production efficiency of sheep and to simultaneously improve the sustainability of rangeland ecosystems.” The explanation further states that USSES “...programs will lead to an understanding of the interactions between sheep and the environments in which they are produced that can be used to improve sheep production systems and ensure the sustainability of grazing land ecosystems” (page 15 of the DEIS). If sheep grazing on high elevation pastures such as those in the Centennials were an important (or anything but declining) husbandry practice for the sheep industry this should have been documented in the DEIS and should be reflected in research programs being conducted to sustain it. The fact that there was no such documentation and no such research suggests that this kind of land use isn’t an important husbandry practice for the sheep industry. This coincides with our impression of the declining economic viability of sheep grazing in such high elevation pastures that leads to the willingness of rancher with such grazing allotments to retire them when provided incentives to do so (Figure 1).

In response to several public concerns about the need for USSES to continue to use the high elevation pastures (e.g. public concern #17 on page 19 AND Public Concern 27 on page 24 in “response to scoping comments”) the DEIS cites pages 1-3 of the DEIS (History of the Sheep Station at Dubois) and Appendix E, page A-83 of the DEIS (“Collaborative Research at the ARS USSES”). Nowhere in these referenced portions of the DEIS is there any justification for continued use of these high elevation pastures for past, ongoing, or future research conducted by the USSES. Appendix E includes a list of 17 papers all of which deal with disease or genetic issues that could be done anywhere. Similarly, during an August 16 2011 “field tour” of sheep station research station research studies USSES staff handed out a list of 21 research reports (“representative Peer-Reviewed Scientific Publications August 16, 2011”). These manuscripts dealt with various aspects of plant physiology, plant ecology, fire ecology, exotic weeds, climate change impacts on sagebrush-steppe. None of these manuscripts involved any management or research activities that was based in or required use of the summer pastures in the Centennials. Indeed, of all of these papers in Appendix E and in the hand out, only perhaps 2-4 appeared to deal directly with range management issues associated with sheep husbandry and these were based on low-elevation sagebrush-steppe grazing issues, not the summer pastures in the Centennials.

Additionally, the description of “Current USSES research..” on page 3 of the DEIS includes no reference to any research that uses or would require use of the high elevation pastures in the Centennials. This description of current research does make general mention of research on various aspects of “rangelands” management but the absence, mentioned above, of reports of research on these Centennial pastures suggests that these are not the rangelands where research is being conducted.

We do not question the utility of much of the ecological research in the reports listed in Appendix E of the DEIS or in the handout. However, the DEIS is incorrect to indicate that these reports in any way are responsive to the concerns expressed during scoping about whether it is necessary to continue grazing on the high elevation pastures in the Centennials.

We also believe that it very unclear that the research being conducted overall by the sheep station is consistent with the station's mission of doing research of value to the sheep husbandry industry. The genetics and disease research that is likely of significance to the sheep husbandry industry could be done anywhere and need not be done in areas where there are conflicts with wildlife. Our examination of the research presented in the DEIS and during the USSES tour last August suggests that the sheep station is reinventing its mission as a one of field station for basic and long-term ecological research on sagebrush dominated ecosystems. This impression is reinforced by statements made during the tour that grazing on sheep station lands is held to less than 15% of available forage. However admirable this low level of utilization is, it is unlikely to represent the standard for the sheep grazing industry on public or private lands.

Additionally, the summer domestic sheep ranges in the Centennial Mountains are within the historic range of bighorn sheep and only approximately 20 miles from known populations in Montana. Recolonization of the Centennials by bighorn sheep through natural dispersal or reintroduction is, correspondingly something that USDA agencies like the USSES should be encouraging rather than making impossible through unnecessary grazing activities by domestic sheep on USDA lands.

### **Risks of disease transmission to bighorn sheep**

We are concerned about the impacts of the preferred alternative on bighorn sheep and therefore urge adoption of Alternative 5 as well as Alternative 3. The 2010 Payette National Forest Record of Decision "Identifying Suitable Rangeland for Domestic Sheep and Goat Grazing to Maintain Habitat for Viable Bighorn Sheep Populations" observed "*Although limited knowledge of transmission dynamics exists, extensive scientific literature supports a relationship between disease in bighorn sheep populations and contact with domestic sheep... evidence linking bighorn die-offs in the wild to contact with domestic animals and controlled experiments where healthy bighorn sheep exposed to domestic sheep displayed subsequently high mortality rates.*" This Record of decision concluded that bighorn sheep and domestic sheep must be separated. The DEIS prepared by Payette National Forest concluded based on the literature that "the risk of contact must be absent or extremely low to ensure bighorn sheep viability across the Payette National forest...the potential risk of contact must be approaching a zero percent probability" (pages 3-28 to 3-29). Based on an analysis of telemetry data for bighorn sheep in the Payette National forest, "...one bighorn ram has traveled up to 35 kilometers; however the vast majority of forays end at 26 kilometers" (page 12 of ROD). A key paper on disease transmission between domestic sheep and bighorns concluded "Buffers between domestic and bighorn sheep that appear to be effective at preventing disease outbreaks, presumably caused by transmission of pathogenic organisms between species, have been identified as 20 km (Singer et al 200), 23 km (Zeigenfus et al. 200), and 40 km (Monello et al. 2001)" (Cassirer and Sinclair 2007:1086, Journal of Wildlife Management 71(4)).

The Bernice BLM grazing allotment is within the modeled summer range of the (reintroduced) population of bighorn sheep in the Southern Lemhi Herd (Fig. 10 of the DEIS, Chapter 7). This same figure shows that the USFS Snakey-Kelly allotment overlaps the management unit for the Southern Beaverhead bighorn Herd and is approximately 5 miles (8 km) from modeled summer habitat for that herd.

Bighorn sheep are designated a “sensitive species” by the Forest Service primarily because of dangers of disease transmission. Correspondingly, the only alternative in the DEIS that is consistent with USFS policy on domestic sheep grazing in proximity to bighorn sheep is Alternative 5.

Our concluding comment is that it is regrettable that USSES has chosen to be confrontational and dismissive about the expressions of concerns over Alternative 1 that were raised by other federal agencies and conservation organizations during the scoping period. This approach encourages conflict rather than resolve it and puts at risk what may be valuable research programs conducted by the Sheep Station on pastures where conflicts with wildlife either do not occur or are minimal.

Thank you for your consideration of these comments.

Sincerely,



Thomas France, Regional Executive Director  
National Wildlife Federation

And For:

Rob Fraser, President  
Idaho Wildlife Federation

Tim Aldrich, President,  
Montana Wildlife Federation

Cc: Sen. Max Baucus  
Sen. Jon Tester  
USDA Secretary Tom Vilsack  
USDA Forest Service Chief Tom Tidwell