



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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January 12, 2010

Dr. Andrew C. Hammond
Director
USDA
ARS Pacific West Area
USSES@ars.usda.gov

U.S. Sheep Experiment Station Grazing and Associated Activities Project 2009.

Dear Dr. Hammond:

I am commenting on the Information for Formal Public Comment regarding the Agricultural Research Service (ARS), United States Sheep Experiment Station (USSES), Dubois, Idaho/ Grazing and Associated Activities Project 2009 Environmental Assessment (EA).

On page 89 of the EA it is recognized that "Two U.S. Sheep Experiment Station parcels of land exist in Montana in high elevation portions of the centennial range. These parcels contain suitable habitat that is occupied by grizzly bear. They include the East Summer range (Tom's Creek) and West Summer Range (Odell Creek and Big Mountain). All are outside of the grizzly bear Primary Conservation Area."

While the USSES lands are not contained within the Primary Conservation Area (PCA) for the Yellowstone Distinct Population Segment of grizzly bear, a species on the Endangered Species Act Threatened Species List, the Odell Creek and Big Mountain Allotments (West Summer Range) and Tom Creek allotment (East Summer Range) are adjacent to and/or directly bordered by the PCA. The West and East Summer Ranges are both within occupied grizzly bear habitat. The Meyers Creek USFS allotment is also entirely within the PCA.

The USDA Forest Service and USDI Bureau of Land Management (BLM) made commitments in the Final Conservation Strategy for Grizzly Bears in the Greater Yellowstone Area to evaluate, monitor and phase out existing sheep grazing allotments on federal land as opportunities arose with willing permittees. As an agency of USDA, ARS should be consistent with the USDA Forest Service and other federal agencies in eliminating sheep grazing in occupied grizzly bear habitat. Since the federal government (ARS) is the operator on federal lands, in this case, the ARS, USSES has the ability to discontinue sheep grazing in these areas and eliminate a potential threat to grizzly bear survival in this critical habitat.

The Bureau of Land Management (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.

The BLM requests that you select a modified Alternative Three that would eliminate sheep grazing in the USSES West and East Summer Ranges, the Humphrey Ranch, the East Beaver and Meyers USFS

allotments and the Henniger allotment. This would impact 1,400 Animal Unit Months (AUMs) of forage utilized by the USSES sheep annually. These 1,400 AUMs can easily be replaced by the AUMs available but not utilized in the Headquarters, Mud Lake, Snakey-Kelly and Bernice allotments. On page two (2) of the EA it documents that the Headquarters, Mud Lake Snakey-Kelly and Bernice allotment utilization rates are 5.6%, 28.6%, 24 % and 23.2% respectively. By increasing the utilization rates in the Headquarters and Humphrey pastures you can replace these 1,400 AUMs while providing greatly increased protection to grizzly bears and an opportunity for BLM to reintroduce Bighorn Sheep on its lands north of the East and West Summer Ranges.

Statements in the EA that there have been no past control actions regarding grizzly bears that have resulted in lethal control actions on the USSES lands is debatable considering the Freedom of Information Act obtained report (enclosed) from 1988 where the USSES documents eleven (11) bears killed by the USSES in the summer of 1988 in the Odell Creek Allotment. This document reports "Bear Taken in Summer of 1988" and does not distinguish the type of bear taken. It is noted that the draft Wildlife Report and BA on page 48 states that 11 black bears were killed in 1988, but no documentation is provided to substantiate the claim that these were black bears and not grizzly bears.

While it is laudable that the USSES commits to not take lethal control actions against grizzly bears on USSES property, grizzly bears that kill sheep are very likely to continue to depredate livestock and thus will likely be removed from the population eventually. Therefore the existence of domestic sheep on lands north of the Headquarters Property greatly increases the risk to grizzly bears.

Grazing domestic sheep in the East and West Summer ranges may not conflict with existing Bighorn Sheep populations, however it does preclude reintroducing Bighorn Sheep on BLM lands adjacent to the USSES that are historic and suitable Bighorn Sheep habitat.

The federal government shouldn't use a low bar measure such a "Continuing grazing on the allotment may impact individual grizzly bears or their habitat, but would not likely contribute to trends towards federal listing or loss of viability to the population or species." to determine whether or not to continue grazing sheep in occupied grizzly bear habitat. Rather the federal Government should set an example in taking positive action to assist in the recovery of a threatened species.

The continued grazing of domestic sheep in the East and West Summer Ranges, the Humphrey Ranch, the East Beaver and Meyers USFS allotments and the Henniger allotment will only serve to demonstrate why the grizzly bear should remain on the threatened species list.

Sincerely,

/s/ T Bozorth

Tim Bozorth
Field Manager

Enclosure:

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