



January 25, 2010

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



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



Dear Dr. Hammond:



On behalf of the National Wildlife Federation, the Idaho Wildlife Federation, the Montana Wildlife Federation, and the Theodore Roosevelt Conservation Partnership, we offer these comments on the US Sheep Experimental Station 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.

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 large predators 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 this strategy for coping with climate change.

For the last eight 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 Forest Service has permanently closed allotments totaling more than 550,000 acres on national forest lands surrounding Yellowstone National Park.

Through this program, we have managed to achieve retirement of nearly 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.

Given our heavy involvement in efforts to reduce conflicts between sheep and large carnivores in the Yellowstone Ecosystem, we are distressed by the preferred alternative's insistence on continuing to graze sheep in the Centennial Mountains. We urge, instead, adoption of a modified version of Alternative 3.

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 USSSES, 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 numerous organizations and individuals commented during the scoping process, it is our view that the sheep station activities should not occur in areas where conflicts with large carnivores in the GYA are occurring or where they are likely to occur in key linkage zones between the GYA and other important habitats. The activities of the sheep station in the Centennial Mountains are right in the middle of the important linkage zone for wolves and grizzlies moving between Yellowstone and key habitats to the west in Idaho. 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.

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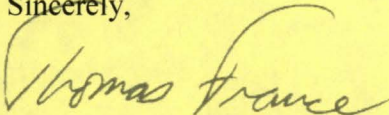
Some of the activities conducted at the USSES have value to sheep ranchers, but none of these benefits require that the sheep station be situated in the middle of this important linkage zone.

Alternative 5 of the EA is designed to minimize grazing near bighorn sheep populations. The discussion of Alternative 5 indicates that domestic sheep grazing can be eliminated in the Bernice and Snakey-Kelley allotments and we support elimination of sheep grazing in these areas. It is very unclear how diseases are transmitted into wild sheep populations, but in almost all cases transmission via domestic sheep is considered the most likely route.

With respect to sage grouse, the EA states that 11,803 acres have been identified for prescribed burning at a rate of 400 acres/year. At this rate it would take 30-40 years for the sagebrush habitat to return to pre-burn condition. This far exceeds the appropriate rate of burning recommended by regional grouse experts, who state that in mountain big sagebrush communities treatments should be limited to <20% of breeding habitat within a 20-year period (Connelly et al. 2000). The EA also states that sheep water troughs are moved specifically to sage-grouse leks immediately after the courting season and suggests that this maintains lek sites by preventing sagebrush encroachment. What the EA fails to acknowledge is that the highest densities of sage grouse nesting is always closest to lek locations. This locates intensive sheep grazing atop the most important grouse nesting and brood rearing areas. The height and density of residual grasses have been shown to be one of the most important factors influencing nesting success, and high intensity grazing should be avoided in nesting areas, not emphasized.

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

Craig Sharpe, Executive Director
Montana Wildlife Federation

William H. Geer, Director, Center for Public Lands
Theodore Roosevelt Conservation Partnership

Connelly, J.W., M.A. Schroeder, A.R. Sands, and C.E. Braun. 2000. Guidelines to manage sage grouse populations and their habitats. Wildlife Soc. Bulletin 28:967-985.