

January 25, 2010

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

Dear Dr. Hammond:

I am offering these comments regarding the Agricultural Research Service (ARS), United States Sheep Experiment Station (USSES), Dubois, Idaho/Grazing and Associated Activities Project 2009 Environmental Assessment (EA).

I offered scoping comments in August of 2008 and I appreciate that the alternatives in your EA appear responsive to the concerns I raised in that scoping letter. However, I would suggest you modify your preferred alternative to address our concerns.

Specifically, the USDA Forest Service and USDI Bureau of Land Management (BLM) made commitments in the final conservation strategy for grizzly bears in the Yellowstone Ecosystem to evaluate, monitor and phase out existing sheep grazing allotments on federal lands as opportunities arose with willing permittees in the primary conservation area (PCA). Montana FWP thinks these same commitments should apply to the ARS as another USDA agency. In order to fulfill that commitment you should no longer make use of the Meyers Creek allotment. In addition, you should further consider eliminating sheep grazing on allotments directly adjacent to the PCA. Those would include the USSES West and East Summer Ranges, the Humphrey Ranch, the East Beaver and the Henninger allotment. Our understanding is the forage opportunity lost by eliminating grazing on these allotments could be recovered with slight increases in grazing intensity on other allotments utilized by the USSES.

We appreciate the commitment you make in the EA to not take lethal control actions against grizzly bears that have depredated on sheep on USSES property or allotments. Although grizzly bears that have depredated can be relocated they may be repeat offenders in another location and may ultimately have to be dispatched. So grazing sheep in or very near the PCA remains a threat to grizzly bear survival.

We also appreciate your work with the Wildlife Conservation Society to identify important research questions related to grizzly bear management and domestic sheep husbandry. We encourage you to continue that effort and seek additional funding to support that research.

Furthermore, FWP appreciates the emphasis of USSES on hypothesis driven research. FWP suggests that the research agenda include studies on the efficacy and costs:benefits of non-lethal tools such as herders or guard dogs to prevent wolf-related sheep losses initially or to deter subsequent attacks. Research questions should be extended to include

economic assessments. FWP offers to work with USSES, the USDA Wildlife Services National Research Center, and Idaho Fish and Game to identify important research questions related to wolf-sheep conflicts and a variety of management prescriptions in the same spirit as USSES and the Wildlife Conservation Society.

FWP was not able to discern from USSES documents (e.g. Wildlife BA) whether the mitigation tools (stated elsewhere in USSES documents to be standard practice) were actually deployed at the time of the sheep losses in summer 2009. It is also not clear whether mitigation measures were employed after the first sheep incident. These issues should be addressed more clearly in the final document and USSES should reaffirm its commitment to implement mitigation tools anywhere domestic sheep occur on USSES lands or USSES-sheep are grazed on other federal or private lands. Additional mitigation tools USSES may consider are portable electric fencing, night penning, or electric fladry. Such tools have been used with success in occupied grizzly bear and wolf habitat.

While elimination of individual packs may not harm local state or regional wolf populations, the other recovery criteria of connectivity were clearly highlighted during litigation over the federal wolf delisting decision in 2008. The USSES lands (Summer East, Summer West, and Humphrey in particular) are physically situated in a landscape that has proven important to fulfilling the connectivity requirements of northern Rocky Mountain wolf recovery. Connectivity (and genetic diversity) needs for wolves are provided for by regulating human-caused mortality and facilitating wolf pack persistence where conflicts are low or otherwise manageable short of removing entire packs. If USSES continues to graze sheep in these important areas, FWP encourages USSES to do its part through research and increased mitigation to help promote the interchange of wolves among the three population areas and minimize the potential for lethal control.

FWP was not able to discern from the Wildlife BA or other documents what mitigation measures are employed on USSES to avoid non-target take of wolves by tools meant for coyote control, such as snares or M-44s. Typically, USDA Wildlife Services is required to adjust lethal control methods to avoid incidental take of wolves. This would be required either by federal regulations should the wolf be relisted in 2010 or by its own policy directives that require compliance with state laws and regulations when it comes to taking of wildlife species which are regulated by state fish and game agencies. This issue warrants further consideration by USSES and treatment in final documents.

Additionally, eliminating sheep grazing in the USSES West and East Summer Ranges, the Humphrey Ranch and the Henninger allotment could potentially provide habitat to establish bighorn sheep in the Centennial Mountains. The lack of domestic sheep in these areas would eliminate the potential for contact between domestic sheep and bighorns and the subsequent risk of disease transmission. The Red Rock Lakes-Cliff Lakes area in southern Madison and Beaverhead Counties at one time is reported to have had great bands of bighorns and was noted as a hunting area for these animals (Couey 1950). Any restoration effort would probably include portions of Idaho and would need to be coordinated with that state if it happened. One of the statewide objectives in the recently

completed Montana Bighorn Sheep Conservation Strategy is to establish 5 new populations of bighorns over the course of the next 10 years (Wildlife Bureau, FWP 2010). Eliminating sheep grazing in these areas would appear to not affect agricultural production and could potentially help Montana achieve that statewide objective.

Thank you for the opportunity to comment.

Sincerely,

Patrick J. Flowers
Region 3 Supervisor
Montana Fish, Wildlife and Parks

Couey, F. M. 1950. Rocky Mountain Bighorn Sheep of Montana. Montana Fish and Game Commission Bull. No. 2. 90pp.

Wildlife Bureau – FWP. 2010. Montana Bighorn Sheep Conservation Strategy. Montana Fish, Wildlife and Parks. 320 p.

CC: Dave Risley, Quentin Kujala, Carolyn Sime, Kurt Alt, Ken McDonald, Lauri Hanauska-Brown