

Draft comments on USSES (sheep station, DuBois ID) EIS to continue sheep grazing in important wildlife areas

DATE

Andrew C. Hammond, Director
USDA, ARS, Pacific West Area
800 Buchanan Street, Albany CA 94710
Via email to: USSES@fs.fed.us

RE: USSES Grazing Project 2011, comments on Draft EIS for the USSES Sheep station in Dubois Idaho

Dear Dr. Hammond:

The Idaho Chapter of the Wildlife Society is the professional organization for wildlife biologists currently or formerly working in Idaho. Our members currently work or have worked for state, national, private, tribal or academic institutions. We are the Idaho State Chapter of the national professional society for wildlife biologists, The Wildlife Society.

Our Chapter recommends adoption of both Alternatives 3 and 5 in the DEIS. We have 3 primary areas of concern over the preferred alternative, which is to continue business as usual with respect to USSES (hereafter Sheep Station):

→ still using USSES throughout

- The proposed continuation of summer grazing of sheep in the USSES-owned summer pastures on the Idaho-Montana border adjacent to the Primary Conservation Area for Yellowstone area grizzly bears occurs in an area where conflicts with grizzly bears and other large carnivores expanding out from Yellowstone Park are inevitable. This is likely to become the case in the near future as well on the Humphey Ranch (USSES-owned) and East Beaver (USFS-owned) grazing areas.
- The Draft EIS is seriously deficient in making any case, especially for the summer range pastures, that continued grazing is necessary to accomplish any research or sheep husbandry objectives being conducted or anticipated by the Sheep Station.
- The proposed grazing on the Snakey Kelly (Forest Service) and Berenice (BLM) allotments poses an unacceptable risk of transmission of fatal pneumonia and, potentially, other diseases to bighorn sheep populations.

Comments on Grazing on the high elevation pastures in the Centennial Mountains.

The proposed "preferred option" is maintenance of the *status quo* level of USSES grazing on high elevation summer pastures in the Centennial Mountains, including on pastures owned by USSES and USFS allotments. However, the *status quo* has significantly changed since USSES grazing began on these pastures and no longer represents the most appropriate use of these pastures. ^{How so?} The Meyers Creek USFS allotment is within the Primary Conservation Area (PCA) for Yellowstone grizzly bears and the USSES-owned summer pastures including the Tom's Creek (or East Summer range) and Odell Creek and Big Mountain (West Summer range) are adjacent to the PCA and within area identified by the Interagency Grizzly Bear Study Team as being grizzly bear habitat.

The success of the grizzly bear recovery effort in the Yellowstone area has resulted in expanding ranges for grizzly bears as well as wolves and other species in all directions from Yellowstone Park. The main area of appropriate habitat for grizzly bears and many other species moving west from Yellowstone is in the Centennial Mountains. Areas, including the USSES summer pastures mentioned above, occur directly in the middle of this zone of expansion. Figure 1 shows location data for grizzly bears radio-marked in Yellowstone in this area. We are aware that these maps were provided to the USSES during the scoping period for comments on this DEIS and believe the DEIS is seriously deficient for not including these maps in the document as the information in these maps presented is directly pertinent to the main area of concern raised during the scoping period. We observe that there are a huge number of maps in Appendix A that are far less pertinent to comments received during scoping than these grizzly bear movement maps.

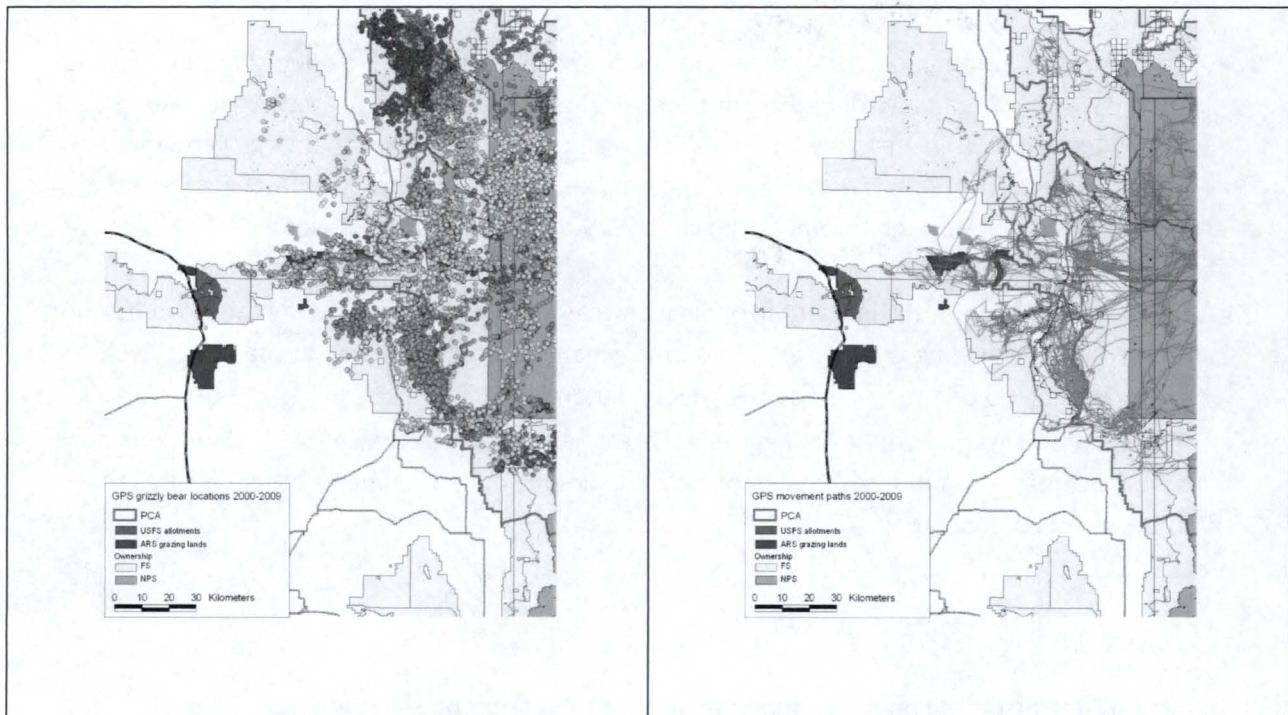


Figure 1. Location data for individual radio-marked grizzly bears marked in the Yellowstone Park area overlain on the map of USSES sheep station pastures. Map provided by the Interagency grizzly bear study team. The map on the left shows point locations and the map on the right shows movement tracks of radio-marked bears.

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 (concerns shared by this Chapter), in the DEIS appears to be that problems will be avoided by removing the sheep when grizzly bears show up. Since the above maps 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.

These 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."*

Alternative 3 is further inconsistent with the USFS policy on sheep grazing on Forest Service Allotments incorporated into the package of Forest Plan Amendments adopted by the Forest Service and incorporated into the Conservation Strategy for Yellowstone Grizzly Bears. The Conservation Strategy

for allotments within the PCA is 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). We observe that all commercial sheep grazing allotments within the PCA have now been retired as well as many other allotments outside the PCA. These were retired based on voluntary agreements reached with willing permittees. The preferred alternative of continuing to graze these summer pastures by the USDA's USSES 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.

Fact? 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.

*Relax on
act
action
discuss
USDA plan*

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, selection of a modified version of Alternative 3 as the preferred alternative.

*Our grizzly
says 3/2/2?*

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.

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.

Although not in the linkage zone, we believe that it is appropriate to eliminate domestic sheep grazing in the Bernice and Snakey-Kelley allotments to avoid potential conflicts with bighorn sheep 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.

Finally, we are also concerned that the proposed scope of the DEIS is inadequate with respect to sage-grouse habitat management or population conservation. The greater sage-grouse (GSG) population found on the Sheep Station is likely comprised of both breeding birds resident to Idaho and seasonal migrants from core habitats in Montana. The GSG breeding population densities found near Dubois are some of the highest known (Rangewide Conservation Assessment 2004). The USFWS found in March 2010 that GSG are warranted for addition to the federal Endangered Species list but precluded by higher priorities. As such, the appropriate management of these breeding and seasonal habitats and populations are highly significant to conservation of the species.

The 2008 EA stated that 11,803 acres of sagebrush have been identified for prescribed burning at a rate of 400 acres/year. If this rate of prescribed burning is contemplated under the DEIS, it 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). At ~~this~~ ^{proposed} rate of prescribed burning, sage grouse habitat would never return to desired levels.

Livestock grazing can be both compatible or incompatible with sage-grouse habitat, depending on the sagebrush steppe community types and trend, the season of use by sage-grouse of the habitat, and the livestock class, stocking rates and duration, range treatments, and grazing infrastructure employed (Beck and Mitchell 2000). Much work is being done by both state and federal agencies, including your sister agency the NRCS, to compatibly manage GSG habitat with livestock grazing.

Because of the potential inconsistencies between the Sheep Station's proposed actions and current accepted practices for sage-grouse habitat conservation, any DEIS alternative contemplating continued sheep grazing should consider employing accepted conservation practices. The guidelines of Connelly et al. (2000) that relate to livestock and habitat management specifically compatible with sage-grouse, and/or the accepted livestock grazing and range management practices of the NRCS' Sage-grouse Initiative in Idaho (http://www.id.nrcs.usda.gov/programs/sage_grouse/index.html) should be required for all the grazing alternatives considered in the EIS.

No documentation in the DEIS of the necessity to continue to use the high elevation pastures in the Centennials.

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 papers dealt with various aspects of plant physiology, plant ecology, fire ecology, exotic weeds, climate change impacts on sagebrush-steppe; none of these papers 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 handout, 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.

We do not question the utility of much of the 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 the need to continue grazing on the high elevation pastures.

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 pastures.

Additionally, the description of "Current USSES research.." on page 3 of the DEIS includes no reference to any research that 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.¹

Risks of disease transmission to bighorn sheep

We are concerned about the impacts of the preferred alternative on bighorn sheep.

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 (page 7) "While much of the evidence for disease transmission from domestic sheep to free-ranging bighorn sheep is circumstantial, a large literature base has emerged that documents bighorn sheep die-offs near domestic sheep." 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

¹ During the Sheep station tour in August 2011, a passing reference was made of a research study involving simulated rainfall on sheep bedding grounds in these high elevation pastures to determine if there were elevated levels of nutrient runoff on these bedding grounds compared to non-bedding grounds.

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 Berenice BLM grazing allotment is within the modeled summer range of the (reintroduced) population of big horn 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.

Additionally, the summer domestic sheep ranges in the Centennial Mountains are within the historic range of bighorn sheep and only 20 xxx 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. ↗