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**JUL 10 2012**

Dr. Gregory Lewis  
U.S. Sheep Expt. Sta. USDA, ARS  
19 Office Loop  
Dubois, ID 83423

Dear Dr. Lewis:

The Yellowstone Ecosystem Subcommittee (YES) of the Interagency Grizzly Bear Committee supports the United States Fish and Wildlife Service's (USFWS) Biological Opinion Conservation Recommendations on the Environmental Impact Statement being prepared for the Sheep Station's activities. These conservation recommendations are as follows:

“The Service recommends the Sheep Station seek replacement lands outside of known grizzly bear use areas for the Sheep Station's Summer Range and the Forest's Meyer's Creek Allotment. This would reduce the likelihood of adverse affects to grizzly bears, at their current distribution, to a discountable level.”

Conservation recommendations are discretionary agency activities to minimize or avoid adverse effects of a proposed action on listed species or critical habitat, to help implement recovery programs, or to develop new information on listed species. While conservation recommendations by the USFWS are not required, implementing this recommendation would be consistent with Section 7(a)(1) of the Act that directs federal agencies to utilize their authorities to further the purposes of the Act by carrying out conservation programs for the benefit of endangered and threatened species.

In addition, this conservation recommendation would also be consistent with ecosystem-wide U.S. Forest Service Plan Amendments, the Grizzly Bear Management Plan for Southwestern Montana, the Final Conservation Strategy for Grizzly Bears in the Greater Yellowstone Area (2007) and the Ecosystem Linkage Goal contained in the five-year (2009-2013) work plan of action for the Yellowstone Ecosystem. To date the U.S. Forest Service has permanently closed allotments totaling more than 600,000 acres mostly on National Forest lands surrounding Yellowstone National Park, Grand Teton National Park, and the John D. Rockefeller, Jr. Memorial Parkway. The U.S. Forest Service has retired eight sheep allotments that are adjacent to the “summer range” and Meyer's Creek allotments.

The corridor through the Centennial Mountains is widely recognized by State and federal agencies as well as non-governmental organizations as being critical to wildlife movement between the Greater Yellowstone Ecosystem and the Selway-Bitterroot ecosystem particularly for large carnivores. Many have called it the High Divide Wildlife Corridor. For grizzly bears, this corridor is especially important, because the Bitterroot ecosystem contains suitable habitats leading to other occupied recovery areas all the way into Canada, and because grizzly bears are unlikely to reach the Bitterroot by any other path.

The YES is made up of Yellowstone and Grand Teton National Park, Bridger-Teton, Caribou-Targhee, Beaverhead-Deerlodge, Gallatin-Custer and Shoshone National Forests, Montana Department of Fish, Wildlife and Parks, Idaho Department of Fish and Game, Wyoming Game and Fish Department, Wyoming County Commissioners Association, Montana Association of Counties, Idaho Association of Counties, the Shoshone Bannock, Northern Arapaho and Eastern Shoshone Indian Tribes, United States Geological Survey Interagency Grizzly Bear Study Team and the Montana, Idaho and Wyoming Bureau of Land Management. It serves as an ecosystem subcommittee under the Interagency Grizzly Bear Committee, whose charge it is to oversee grizzly bear recovery and management in the contiguous 48 states and adjacent areas of Canada.

The YES would like to cooperate with the Agricultural Research Service United States Sheep Experiment Station (USSES) and help in any way possible to facilitate USSES's ability to implement the above Conservation Recommendations. We hope that this letter serves to initiate dialog on the subject. Specifically, it would be most helpful to develop a common understanding of alternate allotment requirements, so that appropriate federal agencies can evaluate the potential for identifying other viable locations that meet USFWS recommendations.

Sincerely,



Mary Gibson Scott  
Superintendent  
Grand Teton National Park and John D. Rockefeller, Jr. Memorial Parkway  
Chair, IGBC Yellowstone Ecosystem Subcommittee

cc: Mark Wilson, USFWS, Helena  
Harv Foresgren, IGBC Chair

Bcc: Tim Bozorth, BLM

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