



Post Office Box 1693
Helena, MT 59624
Phone (406) 442.1330
Fax (406) 449.8606
UPS Delivery: 7 Edwards St.



July, 13 2017

SECRETARY SONNY PURDUE
U.S. DEPARTMENT OF AGRICULTURE
1400 INDEPENDENCE AVE., S.W.
WASHINGTON, DC 20250

Dear Secretary Purdue:

As you will recall, we met during your visit to Montana for the Agriculture Summit hosted by Senator Steve Daines. During that summit, you and I personally discussed the problematic situation caused by Montana's ever expanding grizzly bear population and the inability of Montana's wildlife professionals to adequately manage the species due to its listing under the Endangered Species Act.

I write now as President of the Montana Wool Growers Association and on behalf of the membership of the Montana Wool Growers Association about another issue that is of critical importance to Montana's sheep producers.

Because of the significant research and work performed by the USDA-ARS U.S. Sheep Experiment Station, located approximately six miles north of Dubois, Idaho, the Association has a keen interest in ensuring that facility is adequately funded and properly managed by your Agency—both at the local and federal agency level. Due to the importance of the research performed by this facility, the MWGA was an active participant in the commenting process for the draft Environmental Impact Statement (EIS) "U.S. Sheep Experiment Station Grazing and Associated Activities Project 2016."

As you are likely aware, the Draft EIS for the Station and its grazing activities was released for public comment in March of 2016. The comment period on that EIS has long since closed.

Here we are in the middle of July of 2017. More than a year has passed since the comment period closed. Yet, the Final EIS and Associated Record of Decision have not been issued. Further, the fact that no final decision has been made does not comport with the representations made by the USDA that the final decision would be made by the close of the spring of 2017.

During our written comment, the MWGA advanced its support for adoption of Alternative 1. Alternative 1, if adopted, would authorize the Station to continue its ongoing grazing activities. Continued grazing of Station lands makes sense from both a public policy perspective and environmental perspective. Further, unlike US Forest Service or BLM grazing lands, the US Sheep Experiment Station lands were specifically set aside for and reserved for "agricultural experiment purposes". (Public Law 97-98, 1981).

We further emphasize the appropriateness of Alternative 1 in light of Department of Interior Secretary Zinke's announcement of the successful recovery and delisting of Yellowstone grizzly bear

population on June 22, 2017. Based on the current and historical land-use descriptions in the draft EIS, it is clearly evident that the US Sheep Station's research grazing activities on ARS lands have not interfered with the recovery of the Yellowstone grizzly bear. In fact, there has been no grizzly bear conflict on ARS lands resulting in any harm to grizzly bears in the known history of the US Sheep Experiment Station. Furthermore, the ARS lands that are described in the draft EIS are NOT in the Primary Conservation Area for the grizzly bear.

Based on Alternative 1 and the US Fish and Wildlife Service's (USFWS) Biological Opinion, the ARS operates under more comprehensive and stricter grizzly bear conservation measures than US Forest Service or BLM, and ARS's grizzly bear conservation measures align with USFWS's "2016 Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Ecosystem." Based on a recent conversation with the ARS, these strict measures will stay in place regardless of the fact that grizzly bears were delisted. Considering the factual evidence available, the ARS, as a research agency, has demonstrated that the rangelands of the western U.S. can simultaneously be used for generating food from agriculture for our national food security AND providing important habitat for our wildlife species.

The membership of the MWGA is quite concerned about the USDA's delay in finalizing the referenced EIS decision. This is particularly true in light of the fact that absolutely no public explanation or rationale has been provided for the delay in releasing the Final EIS. Such a delay is clearly inhibiting the ability of the Station to carry out its research mission fully.

We are even more concerned that USDA or ARS personnel in Washington D.C. may be entertaining comments and discussion from other groups, outside of the public comment period, that are advocating for alternatives other than Alternative 1 (the agency's preferred alternative) to be adopted. Such discussions by and between agency personnel and third-party groups would clearly be inappropriate in light of the fact that the comment period on the EIS has long-since closed.

In this vein, on behalf of MWGA's membership, I respectfully ask that the ARS issue its final decision forthwith and to further desist from holding non-public discussions about the content and/or direction of the draft EIS before the time it is finalized and released for public consumption.

Thank you for your time and attention to this matter. I once again extend an invitation to you and to Secretary Zinke to come to Montana in late August or in September to see the on-ground situation Montana's agriculture producers are facing when dealing with the management of, or lack thereof, of this State's grizzly bear population. As we discussed, I am happy to host such a meeting. I can be contacted through the Wool Growers Association.

Sincerely,

s/s

Dave McEwen, President
Montana Wool Growers Association

cc:

Dr. Ann Bartuska
USDA-REE Under Secretary
ann.bartuska@osec.usda.gov
1400 Independence Avenue, SW
214W, Whitten Building
Washington, D.C. 20250-0110

Dr. Chavonda Jacobs-Young
USDA-ARS Administrator
administrator@ars.usda.gov
1400 Independence Avenue, SW.
302A, Whitten Building
Washington, D.C. 20250-0110

Dr. Robert Matteri
USDA-ARS- PWA Director
robert.matteri@ars.usda.gov
800 Buchanan ST.
Albany, CA 94710