WILD SHEEP
Foundation

September 22, 2011

USDA Agricultural Research Service, U.S. Sheep Experiment Station draft EIS comment

On behalf of the Wild Sheep Foundation (WSF), please accept this comment letter, following our review of the 91-page USSES Wildlife Specialist Report. As you may know, WSF has been deeply involved with the issue of commingling between domestic sheep and goats and wild sheep for decades. For your files, we are attaching our current "Domestic Sheep & Goat" policy statement (+ supporting document), which clearly state the WSF view on this issue, recognizing the need to collaboratively manage domestic sheep and goat grazing to achieve effective temporal and spatial separation from wild sheep.

The Wild Sheep Foundation was integrally involved with the leadership of the American Sheep Industry (ASI) Association in organizing and conducting a mid-June 2011 Domestic Sheep/Wild Sheep workshop in Denver, CO. Four main points of agreement came out of that ASI workshop, including:

- The need for domestic and wild sheep interests to collaborate;
- The need to manage for effective separation between wild and domestic sheep and goats;
- The need to collaboratively fund vaccine research involving largely domestic sheep, but also investigating possible "one-time" vaccination of bighorn sheep, when in hand; and
- The need to collaboratively evaluate the efficacy and value of Best Management Practices (BMPs), which are frequently cited and recommended as means to facilitate effective separation between domestic sheep and goats and wild sheep.

In our opinion, the 5 Conservation Measures for Bighorn Sheep (page 12, Wildlife Specialist Report) identified as "...reasonable measures put in place to minimize potential interactions..." (page 49, Wildlife Specialist Report) only minimally address potential contact between bighorn and domestic sheep on the BLM Bernice allotment.

1. On-site supervision of DS bands, as well as accompaniment by guard dogs to prevent interaction.
2. Keeping DS below 5,600' contour and off of mountain foothills and canyons.
3. If $ is available, cooperation regarding data collection for BHS surveys.
4. Maintaining a 3-mile buffer of separation between DS and BHS.
5. Notifying a list of individuals if contact occurs or becomes imminent.

In addition to stray USSES domestic sheep observed, then subsequently removed, from near occupied bighorn sheep habitat in April 2011 (page 52, USSES Wildlife Specialist Report), we are also aware of another 45-50 stray domestics near the Bernice BLM allotment, that also had to be dealt with after lingering for an extended period of time near bighorn range; to us, these 5 Conservation Measures are not sufficient to minimize potential interactions.

On page 49 of the Wildlife Specialist Report, the statement is made that "Rocky Mountain bighorn sheep are not known or expected to be present on ARS lands....Bighorn sheep herds nearest to ARS lands are in Montana, approximately 20 miles removed from all Sheep Station activities such that **interactions are not a concern with these herds** (emphasis added)." WSF, and many others, disagree strongly with this statement; collectively, wild sheep interests are very concerned about potential interaction between domestic and wild sheep as a result of USSES domestic sheep grazing activities. The above statement flagrantly dismisses the collective concerns of our organization and other wild sheep conservationists.

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In the most recent Idaho Bighorn Sheep Management Plan (IDFG, 2010), risk of contact with domestic sheep on USFS and BLM lands (specifically mentioning the Snakey and Kelly USFS allotments [page 131, South Beaverhead PMU] and Bernice BLM allotment [page 138, South Lemhi PMU]) is identified as a management concern/issue by IDFG. Recent bighorn observations in the Beaverhead and Lemhi Mountains heighten the need to conduct a more quantitative risk assessment, and, as agreed to with BLM, ARS/USSES should contribute funding for collaborative bighorn sheep surveys. The Wild Sheep Foundation, along with our Idaho and Montana WSF chapters, is working with both IDFG and MTFWP to collect additional data on current bighorn sheep numbers and distribution in these areas of potential domestic/bighorn contact.

Over the past 30+ years, there has been a growing and compelling body of evidence and literature that clearly demonstrate repeated, significant, adverse consequences from field contact between domestic and wild sheep. In just the past 24 months, more than 14 bighorn herds in at least 5 western states have experienced dramatic pneumonia-related population-level dieoffs. In Montana alone, approximately 20% of that state's bighorn sheep population has died, involving at least 9 bighorn herds. In several instances, pre die-off contact between domestic and wild sheep was known or highly suspected to occur.

Wild sheep interests clearly recognize that bighorn die-offs may, and do, occur in the absence of contact with domestic sheep; however, we also clearly recognize that bighorn die-offs following contact with domestic sheep are much more pronounced and significant, often times resulting in a 75-100% loss of established bighorn sheep herds. We disagree strongly with ARS Researcher Dr. Don Knowles's "questioning" of whether these events would occur in a quantity high enough to lead to disease and/or a further transmission event. We concur w/ Dr. Knowles that this is a complex concept/issue, and we furthermore agree with the statement "...details of contact should be incorporated into management plans and risk models." In our view, the USSES DEIS does not provide any tangible risk assessment, and we feel this document falls short on providing sufficient details of potential contact and recommended domestic sheep grazing management.

The USSES Wildlife Specialist Report (page 52) acknowledges the Lemhi Mountain Range bighorn sheep survey as concluding that "domestic grazing allotments located on BLM land, adjacent to USDA Forest Service lands on the southern Lemhi Range, **are the primary points of domestic-wild sheep interaction and potential disease transfer** (emphasis added)." Stray domestic sheep remaining on/near bighorn habitat for months after scheduled "off-dates" remain a high-priority concern for wild sheep management agencies (i.e., IDFG, MTFWP) as well as for wild sheep conservation organizations, such as ours.

We are aware of, and engaged in, Washington, DC-level discussions about collaborative research between ARS and USDA-FS. We find the rationale questionable that the USSES needs to maintain its 3,300 mature ewes and lambs to allow for statistically valid research. In our view, if avoiding domestic sheep grazing in or near occupied bighorn sheep habitat necessitates a ~30% reduction in domestic sheep numbers from current USSES levels, there will still be ample domestic sheep (N=2,332 head) retained for ARS (or other) research purposes [page 16, USSES Wildlife Specialist Report]).

We strongly disagree with the conclusion drawn (page 55, USSES Wildlife Specialist Report) that "...bighorn populations are expected to continue in their current condition and trend, regardless of which alternative is selected." While we concur that selection of Alternative 2 (i.e., complete elimination of all USSES domestic sheep grazing) is the only option to completely remove all risk of contact, we support multiple use on public lands, including grazing. We think Alternative 5, avoidance of domestic sheep grazing on/near occupied bighorn sheep habitat, strikes the necessary compromise in sustaining USSES

operations, although at a reduced rate, while affording adequate protection for bighorn sheep populations in surrounding areas.

Based on what is known about the history and adverse consequences to wild sheep from contact with domestic sheep and goats, management recommendations from the Western Association of Fish and Wildlife Agencies (WAFWA) Wild Sheep Working Group (WAFWA 2010), recent peer-reviewed literature (Lawrence et al. 2010, Wehausen et al. 2011), and a working agreement to manage for effective separation reached with ASI at the June 2011 Denver workshop, it is WSF's recommendation that USDA/ARS/USSES select and implement Alternative 5 – No Grazing Near Bighorn Sheep Populations. While vaccine research continues, at present, the only recognized, clearly agreed-upon effective mitigation technique to achieve temporal and spatial separation between domestic and wild sheep is to not graze domestic sheep near bighorn sheep habitat.

We look forward to continued involvement with the analysis and anticipated decision on USSES domestic sheep grazing. Thanks for the opportunity to review and comment.

Sincerely,

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cc: Brad Morlock, ID-WSF President
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