



April 3, 2023

Okanogan-Wenatchee National Forest
Supervisor's Office
215 Melody Lane
Wenatchee, Washington 98801

RE: Okanogan-Wenatchee National Forest; Washington; Forest Plan Amendment for Planning and Management of Domestic Sheep and Goat Grazing Within the Range of Bighorn Sheep; Correction

Dear Forest Supervisor Bail:

On behalf of the Wild Sheep Foundation (WSF), our ~10,500 members, our undersigned WSF Chapters & Affiliates and collaborating NGOs, please accept this scoping letter for the Corrected Notice of Intent (NOI) re the OWNF FPA for Planning and Management of Domestic Sheep and Goat Grazing Within the Range of Bighorn Sheep. Per clarification provided during your March 14, 2023 public information meeting, WSF is providing additional comments, to augment, reinforce, and highlight our detailed June 27, 2019 scoping letter.

We appreciate that the OWNF is acknowledging that since FY2016, Congress has annually directed the U.S. Forest Service (USFS) and Bureau of Land Management (BLM) to implement a variety of solutions to the risk of deadly pneumonia outbreaks where wild and domestic sheep encounter each other on public-land grazing allotments.

In our collective opinion, the most significant threat facing bighorn sheep on the OWNF, and throughout the West, is respiratory disease when there is contact with domestic sheep and goats. The effects on bighorn populations can take several forms, including acute all-age die-offs, persistently high mortality rates in lambs, and chronic, sporadic adult mortality. Pathogens associated with the respiratory disease complex are spread among inter-connected populations over a period of years, resulting in mortality in multiple populations (i.e., "meta-populations"), over time. Overall, this will chronically limit bighorn sheep numbers and distribution in areas where respiratory disease occurs. Consequently disease, especially recurring events, will depress bighorn populations and/or eventually lead to extirpation.

The Wild Sheep Foundation and our Chapters & Affiliates have been involved with Forest Plan Revisions across the West, commenting on wild sheep issues and concerns, when and where appropriate. We acknowledge and appreciate, that under the 1982 USFS Planning Rule, bighorn sheep have long been designated by the Region 6 Regional Forester as a Sensitive Species which calls for the agency to provide habitat to maintain viable populations distributed throughout their current range and to avoid or minimize impacts to the species (FSM 2620.1, 2622.01, 2670.22, 2670.32, 2672.1). Your March 14, 2023 public information meeting confirmed that this OWNF FPA will occur under the 2012 USFS Planning Rule; we ask that the Sensitive Species requirements continue and strongly urge designation and subsequent viability analysis of bighorn sheep as a "Species of Conservation Concern" (SCC), per the 2012 Planning Rule.

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Viability analysis requires actions to ensure that bighorn sheep habitat is well-distributed across the planning unit, and that that habitat is available to bighorn sheep. Bighorn sheep habitat should also be well-connected, to allow reproducing individuals to come in contact with each other. There likely is a need to address migration corridors and the potential for genetic exchange between bighorn herds. Connectivity and genetic interchange are important, and necessary to assure long-term viability in bighorn sheep populations.

Prior analysis (*February 2016, Application of the Bighorn Sheep Risk of Contact Model on the Okanogan-Wenatchee National Forest - Final Report*) demonstrated a high risk of bighorn sheep making contact with multiple domestic sheep grazing allotments on or near the OWNF. Tim Schommer's February 2022 declaration addendum includes a site-specific field-verified risk evaluation for all allotments based on eight different factors (instead of only one in the RoC model). This addendum, which we highly recommend you incorporate into your EIS, indicates five of the seven allotments evaluated have a High or Very High risk rating. We fully expect an updated, comprehensive Risk of Contact (RoC) modeling analysis will be completed as part of this FPA, reinforcing our (and others) long-held view that nearly all current domestic sheep allotments permitted on the OWNF are, and should be, clearly viewed as "high-risk" allotments, overlapping and compromising bighorn sheep distribution, herd health, demographic performance, and long-term sustainability.

In our collective opinion, and based on the overwhelming quantity of peer-reviewed, published scientific information, as cited in recent court proceedings and attendant expert declarations (e.g., Dr. T. Besser, Mr. T. Schommer), habitat for bighorn sheep is neither functional nor readily available to bighorns if domestic sheep permeate that habitat. Consistent with the National Forest Management Act (NFMA), as viability of bighorn sheep on the OWNF is analyzed, please recognize that areas occupied by domestic sheep are largely unavailable to bighorn sheep as habitat. Please address and clearly state how the OWNF will comply with pertinent regulations (e.g., 36 CFR 219.9).

The Forest allows one permittee to graze domestic sheep on nine allotments with seven of those allotments considered High Risk. Of the 17 bighorn sheep herds in Washington State, 10 of these herds have core herd home ranges that overlap or are within foray distances of the OWNF-managed public lands. We have significant concerns with the disease threat current domestic sheep grazing allotments pose to bighorn sheep herds on and adjacent to the OWNF, as well as to bighorn sheep populations ultimately shared across the international boundary with British Columbia.

It is well known that the Washington Department of Fish & Wildlife (WDFW) [a Cooperating Agency, for this FPA] was forced into depopulating the Tieton bighorn herd in 2013, in an effort to prevent pathogen transmission and likely bighorn die-off in the nearby Cleman Mountain herd. In the decade since that forced depopulation, WDFW has been unable to initiate restoration efforts for the Cleman Mountain herd, given the proximity of domestic sheep grazing and potential, further pathogen transmission. The OWNF FPA must acknowledge the forced loss of the Tieton herd, and take necessary steps to enable WDFW to pursue its planned restoration, and other bighorn sheep management goals. We are also aware of, and support, recent WDFW decisions to disallow domestic sheep or goat use (including pack goats) on a dozen state-managed Wildlife Management Areas, to reduce risk of contact and possible pathogen transfer.

Historically, bighorn sheep on OWNF occurred in sizeable numbers within multiple herds, in contiguous habitat. This “meta-population” function fostered constant interchange between populations that provided increased genetic diversity, greater adaptability in handling environmental changes and disease, and population persistence over time. However, because of high risk of disease, today’s wild sheep managers are forced to maintain small, isolated bighorn populations across the planning unit to provide for effective separation between bighorn sheep and domestic sheep. We urge OWNF to consider meta-population function when defining population viability and in your efforts to develop solutions for protecting and managing the habitat and health of bighorn sheep populations.

We encourage the OWNF to consider these significant threats when analyzing domestic sheep grazing while exploring and implementing solutions to address this significant risk, consistent with Congressional direction. We recommend seeking the input of experts (e.g., Dr. Tom Besser, recently retired from Washington State University), whose work and significant publication record would add vital information to this FPA analysis.

In our view, it is critically important for the USFS to pro-actively manage for and achieve effective spatial and/or temporal separation between domestic sheep and goats and wild sheep, to minimize the risk of pathogen transfer and subsequent respiratory disease (e.g., pneumonia). Simply stated, allowing domestic sheep to graze on high-risk allotments within the OWNF in the face of overwhelming data, published scientific literature, and numerous USFS NEPA analyses in western states is contrary to Forest Service law and policy. Potential solutions such as alternate, suitable allotments away from bighorn sheep range and/or changes in class of livestock (e.g., conversion to cattle, where suitable) should be explored.

In your FPA, please recognize and address the fact that contact and subsequent pathogen transmission may occur if domestic sheep stray or are left behind when allotments are trailed off of, in addition to contact with previously-infected bighorn sheep or seasonal/daily foray movements of bighorn sheep. When designing or adding plan criteria/components to mitigate risk of contact, please recognize that it only takes one contact event to initiate pathogen transfer. Please analyze and report how spatial and temporal separation will be achieved and maintained, for not only domestic sheep grazing allotments, but also recreational use of pack goats. Finally, please specify what specific mitigation measures will be implemented to reduce this risk, while this FPA process evolves.

Specific recommendations we collectively make include:

- With new concerns related to existing Allotment Management Plans (AMPs), we reiterate the importance of FPA components, including development/inclusion of Standards & Guidelines that will contribute to recovery of bighorn sheep and help maintain viable populations within the planning area;
- Include the Declaration of Mr. Tim Schommer in Support of Plaintiffs’ Motion for Preliminary Injunction - Case file No. 2:20-cv-00440-RMP ECF No. 20 filed 2/26/21 pageID.968 U.S. District Court, Eastern District of Washington; [attached here as Appendix A]

- Include the Declaration of Dr. Tom Besser in Support of Plaintiffs’ Motion for Preliminary Injunction - Case file No. 2:20-cv-00440-RMP ECF No. 20 filed 2/26/21 pageID.1039 U.S. District Court, Eastern District of Washington. [attached here as Appendix B]
- Conduct a direct, indirect, and a cumulative effects analysis for each alternative that may be developed;
- Analyze the cumulative effects of domestic sheep and goat allotments and hobby farms within 20 air miles of the forest boundary;
- Determine if high-risk allotments might be suitable for conversion to cattle grazing;
- Identify any alternate allotments away from bighorn sheep habitat that might be utilized instead of the current high-risk allotments;
- Address cultural and historic resources by working closely with Tribal Governments/Staff to assure those resources/interests are protected;
- To prevent pathogen transmission between bighorns and domestic pack goats, domestic pack goats shall not be permitted and/or authorized where effective separation (spatial and/or temporal) cannot be maintained;
- Include monitoring components for the planning area. (36CFR219.12);
- Include WDFW (and other) recent data on:
 - BHS herd population status/trajectory;
 - Recent pneumonia/die-offs of BHS;
 - Current/lower BHS numbers;
 - Movi strain information;
 - Recent site-specific and field verified risk analyses; and
 - Cumulative effects of all allotments federal and state.

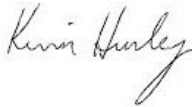
WSF, our Chapters and Affiliates, and other wild sheep conservationists, appreciate the OWNF’s recognition of the severity of contact between domestic sheep and goats and wild sheep, and commend you for seeking direction and improvement in managing domestic sheep and goat grazing, to better provide for bighorn sheep viability on the OWNF.

Based on issues and concerns identified during 2019 scoping and your Corrected NOI, and, as alternatives are developed in this Forest Plan Amendment, we encourage the OWNF and higher USFS authorities to fully acknowledge the science, Congressional Direction, and the identified risk of contact that status quo represents. We look forward to being involved in the OWNF Plan Amendment, associated site-specific allotment management plans, and subsequent OWNF Forest Plan revision. Thank you for your consideration of wild sheep needs.

Sincerely,



Gray N. Thornton
President & CEO



Kevin Hurley
VP for Conservation



Garrett Grant
WA-WSF President

Alaska Wild Sheep Foundation
Arizona Desert Bighorn Sheep Society
Bear Trust International
California Wild Sheep Foundation
Eastern Chapter Wild Sheep Foundation
Fraternity of the Desert Bighorn
Idaho Wild Sheep Foundation
Iowa Foundation for North American Wild Sheep
Montana Wild Sheep Foundation
National Bighorn Sheep Center
Nevada Bighorns Unlimited - Reno
New Mexico Wild Sheep Foundation
Northern Nevada Safari Club International
Oregon Wild Sheep Foundation
Rocky Mountain Bighorn Society
Rocky Mountain Goat Alliance
Texas Bighorn Society
Washington Wild Sheep Foundation
Wild Sheep Foundation Alberta
Wild Sheep Foundation Midwest Chapter
Wild Sheep Society of British Columbia
Wyoming Wild Sheep Foundation
Yukon Wild Sheep Foundation

cc: Glen Landrus, WSF Chairman
WSF Board of Directors
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