



November 1, 2018

Chugach National Forest  
Supervisor's Office  
Attn: Draft Land Management Plan  
161 East 1<sup>st</sup> Street, Door 8  
Anchorage, AK 99501

Dear Forest Supervisor:

The Alaska Wild Sheep Foundation is a non-profit conservation organization with over 500 members throughout the state of Alaska. We appreciate this opportunity to offer comments on the Chugach National Forest Draft Land Management Plan. This National Forest represents 8,500 square miles of resource rich public land in Southcentral Alaska, a vast area relied on heavily by Alaska's outdoor community. Through our comments we hope to contribute to the USFS efforts to ensure the maintenance of a healthy environment and wildlife populations for years to come.

Pg 5 - Under **Introduction - Roles and Contributions of the Chugach National Forest - Other Social, Economic, and Ecological Contributions – Recreation** the word "hunting" should be added to the list of reasons people visit the National Forest. It is essential to recognize that hunting is an important activity within the National Forest, not only in respect to rural Alaskan residents as a subsistence activity, but also to other Alaskans and non residents as well for a variety of reasons that can largely be categorized as recreation. Hunting beyond subsistence was recognized in the 2002 plan, it should be reflected here as well. Public lands in the United States are increasingly important to hunters for providing wild game for personal consumption as well as a viable and sustainable commercial activity that often brings much needed income to rural communities. The absence of this recognition is concerning. The last line under the Recreation section notes there are 140 permitted commercial outfitters and guides. It is important to recognize that many of these permittees offer commercial services for hunters and anglers. The social and economic impact to Alaskans operating these commercial services within the National Forest is significant and should be recognized as a legitimate component of the National Forest.

Pg 11-12 - Under **Part 1 Vision - Forestwide Desired Conditions and Goals - Goal 1 Foster Collaborative Relationships** - there is initial recognition of collaboration with agencies and organizations including non-governmental organizations for the purposes of developing shared land stewardship options and strategies, yet under **Desired Conditions Associated With Goal 1** no relationship building opportunities with non-governmental organizations are noted under this section. Only the following statement could possibly address this opportunity "Relationships with new entities are established in a manner that attracts nontraditional visitors..." yet this does not

recognize any of the multitudes of conservation or education-oriented non-governmental organizations that have membership composed of Chugach National Forest users, many of which could offer significant value to the USFS through future partnerships. Under bullet #7, the second sentence should be re-worded “Relationships with new entities, including non-governmental organizations are established in a manner that benefits traditional and non-traditional Chugach National Forest users and resources. New relationships will strengthen connections between surrounding communities and the National Forest.”

Under bullet #9, “subsistence” should be replaced with the word “natural,” and the last sentence should be reworded “... with the goals of ANILCA Title VIII, the decisions of the Federal Subsistence Board and the Alaska Board of Game. It should be consistently recognized that wildlife and other natural resources in the Chugach National Forest are managed for all user groups, not just subsistence. There are a number of natural resources that the USFS manages for use by subsistence users as well as other forest users. For wildlife populations, it is important to recognize the State of Alaska maintains the authority to manage wildlife populations across federal lands for the benefit of all user groups. The USFS manages “subsistence opportunities.”

Pg 14 – Under **Goal 2 Contribute to Social and Economic Sustainability - Desired Conditions Associated with Goal 2 - *Lands and Access*** roads and trails are noted to be “efficiently managed” and “Unnecessary NFS roads and trails are decommissioned.” It would be helpful to define exactly how the USFS determines that a road or trail is unnecessary. It should be recognized that many old roads and trails provide valuable access routes to spread out hunters as well as other forest users, often helping minimize user conflict.

Pg 18 - Under **Goal 3 Provide for Ecological Sustainability - Desired Conditions Associated With Goal 3 - *Terrestrial Ecosystems*** we commend the recognition of the importance of minimizing disturbance “near important mountain goat and Dall sheep winter range, kidding, and lambing habitats” while ensuring “these activities do not alter long-term species distribution and habitat use patterns.” We fully support the following statement when it comes to ensuring ecological sustainability, “Mechanisms are in place to prevent contact and disease transmission between domestic livestock and vulnerable Dall sheep and mountain goat populations within the National Forest.”

Pg 36-37 - **Part 2 Strategy - Suitability of Lands - Table 4. Suitability determinations for management areas, by use or activity** should include a key so that readers clearly understand the abbreviations pertaining to suitability determination without having to refer to previous text.

Pg 46 - **Forestwide Objectives and Management Approaches - Ecological Sustainability Strategy - Terrestrial Ecosystems - *Management Approaches* - Table 6. Sensitive wildlife species habitat, with sensitivity and seasonality**, we believe this table reasonably reflects the seasonally sensitive time periods for Alaskan wildlife, including Mountain goats and Dall sheep.

Pg 54 - **Part 3 Design Criteria - Forestwide Standards and Guidelines - Social and Economic Sustainability - Recreation and Recreation Special Uses “3. To maintain the federal rural priority of fish and game for qualified rural Alaska residents of State Game Management Unit 6C, outfitting and guiding special use permits for fishing and hunting in the western**

**portion of the Copper River Delta (Game Management Unit 6C) shall not be authorized.**

**[Standard]**” This section should be re-worded “To maintain the federal rural priority for the harvest of fish and game by qualified rural Alaska residents, outfitting and guiding special use permits for fishing and hunting may not be authorized in specified areas if necessary for conservation of healthy populations of fish and wildlife resources, or to continue subsistence uses of those populations.” As written, this section unnecessarily outlines a specific closure within a portion of the Chugach National Forest. There are numerous examples around the state, including the Upper Copper River region within the Wrangell St. Elias National Preserve in Game Management Unit 11 where commercial use of hunting and angling guides is permitted along-side federally designated local subsistence users. We urge the USFS to remove such a blanket closure in this plan in the absence of any permanent data indicating the closure is necessary for conservation or continuation of subsistence uses.

**Pg 62 - Part 3 Design Criteria - Forestwide Standards and Guidelines - Ecological Sustainability – Pathogens - 1. Incorporate specific prevention and control measures into management activities and authorized activities to prevent or minimize human-caused spread of environmental pathogens, such as white nose syndrome, *Mycoplasma ovipneumoniae*, and whirling disease, to NFS lands and waters. [Guideline]** We fully support this statement, with the specific addition of the words “wildlife and fish stocks” at the end. It appears this section may have been written with whirling disease and invasive aquatic vegetation in mind. It should be recognized that in some cases such as *Mycoplasma ovipneumoniae*, the pathogen cannot live long outside the host animal. In this case, eliminating pathogen transmission between carrier animals is the key to prevention.

**Pg 62 - Part 3 Design Criteria - Forestwide Standards and Guidelines - Ecological Sustainability – Wildlife Management - Mountain Goat and Dall Sheep Habitat Management**

**13. Management actions and authorized uses should minimize human disturbance to mountain goats and Dall sheep, especially near important wintering, kidding, and lambing habitats.** We agree minimizing human disturbance in these areas during critical periods including wintering and kidding/lambing. Regular/daily helicopter flights must be restricted in these areas particularly during the critical spring months of kidding/lambing to ensure ewes/nannies are not disturbed to ensure adequate survival of young. It is imperative that commercially permitted helicopters maintain a 1,500ft minimum vertical distance from all observed Mountain goats and Dall sheep.

**14. Domestic goats and sheep are prohibited on NFS lands within the Chugach National Forest. [Standard]** We fully support the intent behind this prohibition, to ensure Mountain goats and Dall sheep do not come in contact with domestic sheep or goats that carry devastating pathogens such as *Mycoplasma ovipneumoniae* (M.ovi). It is imperative that pathogens such as M.ovi not be transferred from domestic sheep or goats to wild sheep or goats in the Chugach National Forest. In the absence of any State Regulations requiring domestic sheep and goats to be tested and certified as M.ovi Free the only responsible approach is to prohibit domestic Caprinae (sheep, goats, muskoxen) from entering the Chugach National Forest. Should an M. ovi Free program be established this restriction might be relaxed under a special use permit system for pack goats and similar activities.

The long term sustainability of these populations of wild Caprinae throughout the Chugach National Forest and beyond relies on staying M.ovi Free. Much like Chronic Wasting Disease (CWD), pneumonia precipitated by the respiratory pathogen M.ovi has no cure. We recognize there are many strains of M.ovi, though most prove fatal to wild sheep and goats when paired with other endemic respiratory flora or natural stressors. There is no treatment and there is no recourse for wildlife managers if a wild Mountain goat or Dall sheep population were to contract a pathogenic strain of M.ovi. Many western bighorn sheep and Mountain goat populations have experienced all-age pneumonia related die-offs where M.ovi was the catalyst pathogen. In most cases, wildlife managers have indicated the original pathogen transmission was most likely from a domestic sheep or goat. It is imperative that our wild sheep and goat populations are kept free of M.ovi. While a few small bighorn populations are living with a single strain of M.ovi, lamb mortality is generally excessive year after year after initial exposure. Some of these populations have experienced secondary die-off events following exposure to a second strain of M.ovi. This is a devastating pathogen to wild sheep and goats.

M.ovi is the most important currently known disease causing agent (pathogen, virus or parasite) that can cause population level impacts to wild sheep and goats. Unlike their wild cousins, domestic sheep and goats often carry M.ovi asymptotically. This pathogen in an otherwise healthy domestic sheep or goat may go undetected for years. According to the USDA in 2011, 89% of all U.S. sheep operations sampled in western states had sheep that carried M.ovi (401/453). Further, it has also been shown that some sheep operations can contain numerous strains of M.ovi. Most recently, voluntary testing in Alaska's domestic sheep and goat populations have confirmed that the pathogen is also present here. While M.ovi is not the only respiratory disease-related pathogen, it is the only one that has consistently been described as a viral precipitous pneumonia-causing pathogen in wild sheep and goat populations.

Should individual domestic sheep flocks or goat herds be certified M.ovi Free and consistently test negative on standard tests for CAE/OPP, CL, and Johne's, it would be provisionally acceptable to allow their use within the Chugach National Forest under a special permit system. It is important to recognize that not all domestic sheep and goats carry M.ovi or other significant disease causing agents. In fact, there are likely some domestic sheep and goats that pose no immediate threat to our wild sheep and goat populations. With ongoing M.ovi testing for Alaska's domestic sheep and goats, we are hopeful that an official state disease-free certification program will be forthcoming. To be M.ovi Free, we would expect that every animal in a sheep flock or goat herd would test clean for M.ovi through multiple PCR nasal swab tests as well as an anti-body detecting ELISA test.

**Pg 73 - Management Area Standards and Guidelines - Management Area 1 Wilderness Study Area - Non-Forest Service Facilities and Authorized Activities - 11. Helicopter landings in the wilderness study area will not be authorized except for emergencies, activities allowed by ANILCA (section 1010(a), 1310, 1314(a), 1315(b)) or Forest Service policy, for access to the Wolverine Glacier Research Natural Area, or for use in mineral operations where helicopter use is determined the minimum necessary tool and essential to the mining operations.**

**[Standard]** Helicopter landings are an essential component of big game wildlife capture operations in Alaska, and this essential activity should be allowed within Wilderness areas. This could involve a streamlined application and approval process to allow monitoring. If helicopter landings are prohibited in this area for wildlife capture work, wildlife professionals will have no opportunity to

quickly assess population die-offs or troubling declines. Only by capturing, handling, sampling and sometimes collaring big game animals with the use of helicopters can wildlife professionals quickly address population health issues.

Again, we would sincerely like to thank you for the opportunity to offer comments on the Chugach National Forest Draft Land Management Plan. We hope these comments contribute to the quality of the Plan. With continued diligence, we believe the future of wildlife populations, viewing and harvest opportunities are secure within the National Forest. Thanks for your hard work.

Sincerely,

A handwritten signature in blue ink that reads "Kevin J Kehoe". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kevin J Kehoe  
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