LARSON LIVESTOCK, INC.

Box 395 Lyman, WY 82937

November 4, 2019

Jeff Schram

Forest Supervisor

Ashley National Forest

ATTN: Forest Plan Revision

355 North Vernal Avenue

Vernal, UT 84078-1703 via e-mail: [AshlelyForstPlan@usda.gov](mailto:AshlelyForstPlan@usda.gov)

Dear Sir:

We have reviewed the Ashley National Forest draft Plan Revision. Following are our comments that we request you consider for inclusion in the draft Plan:

In Guidelines (FW-GL-WL) item 09, it states, “When a domestic sheep or goat grazing permit for an allotment that is in proximity to bighorn sheep is voluntarily waived without preference, the allotment should be analyzed to provide separation of domestic sheep and bighorn sheep bgy either, 1) potential closure of all or a portion of the allotment to domestic sheep/goats, 2) potential conversion to a cattle allotment, or 3) utilization as a forage reserve.”

Then in guideline (FW-GL-WL) item 10, is stated, “New permitted grazing by domestic sheep or goats should not be authorized unless:

* Separation of domestic sheep or goats from bighorn sheep can be demonstrated, or
* Research demonstrates risk of respiratory pathogen transfer from domestic sheep or goats

To bighorn sheep can be avoided in another way, or research demonstrates respiratory pathogen transfer from domestics to bighorn sheep is no longer an issue.”

These guidelines run counter to the management of bighorn sheep in the State of Utah. We refer to three documents which are attached as follows:

1. The “Utah Bighorn Sheep Statewide Management Plan”,

2. The MOU signed by Nora Rasure, Regional Forester, on May 28, 2019 – (These two documents will be transmitted separately by forwarding a e-mail from Jace Taylor, UDWR dated 7-23-19.)

3. Letter dated 4-27-18 from Utah Division of Wildlife Resources, Director Mike Fowlks, to Forest Supervisors Jeff Schramm and David Whittekiend (Attached)

4. Letter dated 2-15-19 from Dr. Margaret A. Highland, DVM. Phd, Dipl. ACVP regarding all species which have been found to harbor the bacterium *Mycoplasma ovipneumoniae.)* (Attached)

We request that the Guidelines be rewritten to reflect that the State of Utah through the Utah Division of Wildlife Resources has the jurisdiction and responsibilities with respect to wildlife and fish on NFS lands. (See MOU signed May 2019, Page 3, Section V B).

We direct your attention to the letter dated 4-27-18 from Director Mike Fowlks and then to the letter from Dr. Margaret A. Highland in items 3 and 4 above. This information should provide you with current knowledge so as to make the proper adjustments to your Guidelines for bighorn sheep management in the Ashley National Forest, in collaboration with the Utah Division of Wildlife Resources.

Carl A. Larson

Carl A. Larson, President