



November 26th, 2021

Chad Stewart, Forest Supervisor
USDA Forest Service
2250 South Main Street
Delta, CO 81416
Submitted Electronically

Re: ASI Comments on the Draft Revised Land Management Plan Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests and Draft Environmental Impact Statement (EIS) for the Land Management Plan Revision

The American Sheep Industry Association (ASI) appreciates the opportunity to comment on the above referenced Draft Revised Land Management Plan and EIS. Since 1865, ASI has been the national trade organization representing the interests of the over 100,000 sheep ranchers located throughout the country who produce America's lamb and wool. ASI is a federation of forty-five state sheep associations representing a diverse industry. ASI and its affiliate the Colorado Wool Growers Association (CWGA) represent the interests of not only the greater sheep industry, but also individual sheep producers directly impacted by the Agency's decision(s) in this matter.

ASI fully supports and concurs with the comments submitted on November 11, 2021 by our affiliate, CWGA, which should be taken as incorporated herein by reference especially as it relates to our support for Alternative C under the Draft Plan and EIS. Additionally, ASI would like to take this opportunity to highlight and expand upon a few specific points.

Report language in the 2016 Consolidated Appropriations Act, the 2019 Department of Interior appropriations bill and reaffirmed in subsequent federal spending bills specifically directs the Forest Service and other land management agencies to use the best scientific understanding of pathogen transmission in cooperation with the USDA Agricultural Research Service to guide decisions to ensure both the health of the domestic sheep industry and state bighorn sheep herds. ASI believes that bighorn sheep conservation and the legacy of domestic sheep operations are mutually compatible and that land management planning should recognize the role of each in underpinning our rural economies.

Pathogen transmission and the potential resultant disease is a complex issue. While draft plan and EIS cite a relationship between disease in bighorn sheep and contact with domestic sheep or goats when in close proximity (FW-STND-SPEC-13-14 et al), that does not represent the entirety of scientific understanding on the topic. On review of modeling the risk of pneumonia epizootics in bighorn sheep, it was concluded that factors associated with risk of pneumonia epizootics are complex and may not always be from the most obvious sources (Sells et al. 2015). Similarly, looking at *mycoplasma ovipneumoniae* in wildlife species beyond subfamily caprinae, these pathogens were documented in species that also frequently occupy overlapping habitat as bighorn sheep including; moose, caribou, mule deer, white-tailed deer, bison, cattle and antelope

(Highland et al. 2018). ASI greatly appreciates the Agency's efforts in engaging research and researchers, such as its sister agency ARS, which have special expertise in animal diseases.

ASI appreciates that the GMUG recognizes the role the grazing program plays in contributing to the economic feasibility of ranching and the socioeconomic sustainability of local communities, as well our members' role in maintaining open space for recreation and wildlife. Any Land Management Plan must continue to reflect the principal of multiple-use on our federal lands. As such, we also appreciate the fire and fuel management considerations included in the Draft Plan and exemptions for livestock grazing for fuels reduction in FW-STND-RNG-08.

Additionally, as it relates to Management Approaches, sage grouse and cheat grass (FW-DC-SPEC-36), and Nokomis Fritillary Butterfly (FW-GDL-SPEC-27); short and long-term management guidelines should include those outlined in "Targeted Grazing: A Natural Approach to Vegetation Management and Landscape Enhancement" American Sheep Industry Association 2006. Targeted Grazing and prescriptive management techniques for the control of invasive species and fuel loads are critical tools in meeting the Agency's range management goals and should be fully considered as outlined with collaboration between rangeland management personnel and grazing permittees.

America's sheep producers pride themselves on their stewardship of the range, both private and federal, and rely on those resources for their long-term livelihood. As such, we share in the conservation success and the responsible stewardship of our nation's federal lands. ASI again appreciates the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Adams", written in a cursive style.

Chase Adams
American Sheep Industry Association