



October 20, 2025

**Tara Umphries, Supervisor
Okanogan-Wenatchee National Forest
NEPA Responsible Official
215 Melody Lane
Wenatchee, WA 98801**

RE: Planning and Management of Domestic Sheep and Goat Grazing within the Range of Bighorn Sheep - Draft Environmental Impact Statement

Dear Supervisor Umphries,

On behalf of the Conservation Northwest and its 4,000 members, I am writing in response to the Notice of Availability for the Planning and Management of Domestic Sheep and Goat Grazing Within the Range of Bighorn Sheep Draft Environmental Impact Statement (DEIS) proposed by the Okanogan-Wenatchee National Forest (the Forest). Bighorn sheep are symbols of the North American West, culturally significant to indigenous people and multiple Tribes, and revered by hunters, sports teams, and wildlife enthusiasts. The following describes recommendations, concerns, and information our organization is interested in considering in the Final Environmental Impact Statement.

Conservation Northwest supports Alternative 4 (Proposed Action) to meet the purpose and need of the DEIS. We commend the Forest for finding solutions that meet the needs of local communities and wildlife. Alternative 4 provides a reasonable balance between protecting bighorn sheep from disease while maintaining some local domestic sheep grazing opportunities. We appreciate that Alternative 4 eliminates domestic sheep grazing where risk of contact is greatest or where domestic sheep grazing overlaps with bighorn sheep core herds. The proposed fish habitat protections and the inclusion of virtual fence technology in Alternative 4 stand out as beneficial project components compared to Alternative 1 or 2. Protecting water features and mineral sites utilized by bighorn sheep while simultaneously providing sources of water or minerals to draw domestic sheep away from bighorn sheep herds will give range managers the greatest control of domestic sheep movement away from bighorn sheep.

As we recommended in our scoping comments, the Forest should include a disease model in addition to the risk of contact model (RoC). The RoC identifies rates of contact between bighorn sheep and domestic sheep, but it does not estimate the persistence of bighorn sheep herds or disease transmission under different domestic sheep grazing scenarios (O'Brien et al., 2014). The Payette National Forest has constructed disease models, based on RoC models, to make decisions about domestic sheep grazing and project long-term consequences (Carpenter et al, 2014). The disease model factors episodic changes, events, and extirpation probabilities. The Final EIS should include a disease model that is based off the RoC models completed for the DEIS, and a schedule to re-analyze disease and RoC models that will consider changes to the landscape, domestic sheep grazing, and bighorn sheep populations.

In the scoping and the DEIS, only 17 core herds of bighorn sheep from Washington State are analyzed. These core herds are designated and managed by the Washington Department of Fish

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and Wildlife, but they do not represent all the bighorn sheep presence, or even core herds with proximity to the Forest. Tribal managed herds exist on the Confederated Tribes of the Colville Reservation but are not included in WDFW databases despite consistent genetic flow with herds existing off the Reservation. Small subherds and bands exist outside of the core herds and try to access new habitat each year, especially after wildfires. As fire regains its large role in the Eastside Cascades, public pressure to reduce dense vegetation increases, and climate change continues to drive temperatures warmer, bighorn sheep habitat will be greater across the forest. The Final EIS should analyze multiple scenarios to include core herds on Tribal land, potential subherds and small bands, and locations where bighorn sheep used to exist. This exercise may provide ideas for wildlife managers about where herds should be immediately managed for future population and habitat scenarios.

Thank you for your time and attention to this letter. We appreciate the opportunity to submit our comments and share our voice. If you or your staff have any questions, I would be happy to meet or join them in the field.

Sincerely,

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References

Carpenter, T.E., Coggins, V., McCarthy, C., O'Brien, C. and O'Brien, J. 2014. A spatial risk assessment of bighorn sheep extirpation caused by grazing domestic sheep on public lands. *Preventative Veterinary Medicine*, 3-10.

O'Brien, J. McCarthy, C., and O'Brien, C. 2014. Incorporating foray behavior into models estimating contact risk between bighorn sheep and areas occupied by domestic sheep. *The Wildlife Society*, 321-331.

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