Data Submitted (UTC 11): 11/4/2019 7:00:00 AM
First name: Carl
Last name: Larson
Organization:
Title:
Comments: From: clarson@bvea.net

Sent: Monday, November 4, 2019 10:54 PM
To: FS-Comments Intermtn Ashley ForestPlanRevision
Cc: Mike Fowlks; Amy Hendrickson; Larry Ogden; Rasure, Nora -FS; Shaun Sims; Vance Broadbent; Eric South; Craig Welling; Mark Anderson
Subject: Comments - Ashley Forest Plan Revision
Attachments: Ashley Forest Plan Revision.docx; UDWR - Mike Fowlks 4-27-18 P.1.jpg; UDWR - Mike Fowlks 4-27-18 P.2.jpg; Dr. Margaret A. Highland, DVM - 2-15-19.jpg

Attached is the letter with our comments regarding the Ashley Forest Plan Revision along with supporting information as attachments.

-Carl Larson

Ashley Forest Plan Revision.docx **TEXT FROM ATTACHMENT INCLUDED BELOW**
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

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:

[bull] Separation of domestic sheep or goats from bighorn sheep can be demonstrated, or
[bull] 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

Dr. Margaret A. Highland DVM - 2-15-19.jpg **TEXT FROM ATTACHMENT INCLUDED BELOW**

United States Department of Agriculture
February 15,2019
Dear Mr. Larson,

Research, Education and Economics
Agricultural Research Service

As per our phone discussion this morning, the Animal Disease Research Unit (ADRU) of ARS is providing the following information regarding recent scientific research findings on the bacterium Mycoplasma ovipneumoniae. Multiple peer-reviewed publications refer to this bacterium as being only carried by members of the subfamily Caprinae. This taxonomic subfamily includes only species of sheep and goats (wild and domestic) and muskox. ln sampling and testing> 1500 other wild (and captive wild) hoaved animals to date, including members of the Capreolinae subfamily (moose. caribou, white tailed deer, and mule deer), bison, and antelope for carriage of M ovipneumoniae, ADRU has identified this bacterium in multiple members of the Capreolinae subfamily (white tail and mule deer, caribou, and moose), and in a bison from MT and multiple from CO. ln working with a veterinarian in the Midwest, ADRU has received laboratory results and clinical data from another laboratory confirming white tailed deer can carrier M ovipneumoniae. Data from these findings has been published in the CDC's journal: Emerging Infectious Diseases, which is a high impact, open access journal. The publication can be found here: https://www.nc.cdc.gov.eid/article/24/12/2018-0632_article.

These newly identified species that can carry M ovipneumoniae are consistent with the following quote, taken from a textbook entitled Mycoplasmas: Molecular biology, Pathogenicity, and Strategies for Control:

"assumptions about restricted host range of mycoplasmas, based on the host from which they were first or frequently isolated, are usually made in the context of nearly complete absence of representative sampling of the vast majority of potential hosts". Also, worth referencing are other peer reviewed publications that have already described Mycoplasma ovipneumoniae carriage in two other non-Caprinae species, including domestic cattle in Colorado (Wolffe, et ai., 2010) and antelope at a wildlife conservation park in Qatar during a pnemnonia outbreak (Gull, et al., 2014). ln addition, there are reports of Mycoplasma ovipneumoniae in mountain goats in the United States. For example, here is just one news
article describing such, and the perceived risk to bighorn sheep:
http://www.nationalgeographic.com/animals/2018/10/news-diseased-mountain-goats-threaten-teton-bighorn-sheep/.
Respiratory disease outbreaks in bighorn sheep clearly remains a complex and multifactorial phenomenon, as infection with any of the historically and currently blamed infectious agents, including M ovipneumoniae, does not equate to disease occurrence in this species.
Detailed data supporting the information within this letter can be provided by ADRU upon request.
Sincerely,

yYl~~~
Margaret A. Highland, DVM, PhD, Dip\. ACVP
VMO Researcher
USDA, ARS, ADRU
509-335-6327 (office)
maggie.highland@ars.usda.gov
& Pacific West Area - Animal Disease Research Unit
P.O. Box 647030, 3003 ADBF, WSU [bull] Pullman, WA 99164-B630

UDWR - Mike Fowlks 4-27-18 P.2.jpg **TEXT FROM ATTACHMENT INCLUDED BELOW**

State of Utah
DEPARTMENT OF NATURAL RESOURCES

Division of Wildlife Resources

April 27. 2018
Jeff Schramm Forest Supervisor Ashley National Forest
U.S. Forest Service 355 North Vernal Avenue Vernal. UT 84078
David C. Whittckiend Forest Supervisor Uinta-Wasatch-Cache National Forest
U.S. Forest Service 857 West South Jordan Parkway South Jordan. UT 84095
Dear Mr. Schramm and Mr. Whittckicnd:

It is my understanding that the U.S. Forest Service ("'USFS"") is finalizing the High Uintas Wilderness Domestic Sheep Analysis Environmental Impact Statement. and that potential disease transmission between domestic sheep and wild bighorn sheep is one component USFS's analysis. At this time. the Utah Division of Wildlife Resources ("UDWR") supports authorization of the domestic sheep allotments under consideration. This population of bighorn sheep has co-existed with domestic sheep in proximity to their occupied habitat for nearly 30 years, and our agency has successfully managed a sustainable population of wild sheep during that time. Should unanticipated management concerns arise in the future, we will actively manage the bighorn population consistent with UDWR's approved bighorn sheep management plans to mitigate potential risks.
Collaboration with land management agencies and public stakeholders is critical in successful wildlife management. We wish to reiterate the positions made in the December 12. 2017 letter sent by Kathleen Clarke.

Director of Utah's Public Lands Policy Coordinating Office regarding proposed revisions to the Ashley National Forest Plan. wherein we identified potential habitat improvement solutions that would further minimize the risks of disease transmission to wildlife.

UDWR - Mike Fowlks 4-27-18 P.1.jpg**TEXT FROM ATTACHMENT INCLUDED BELOW**

We appreciate your consideration in this matter and are happy to answer any questions you may have.
Sincerely.

Michal Fowlks Director
(Signature)
cc: Eric South. Chaimlan, Uinta County Commission