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Attn: Forest Plan Revision

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The Oregon Chapter, Foundation for North American Wild Sheep (OR-FNAWS), the Idaho Chapter (IDWSF), the Washington Chapter (WAWSF), and the Wild Sheep Foundation (WSF) have been closely following the Forest Plan Revisions for Oregon, Washington and Idaho since 2005, commenting on bighorn sheep issues where appropriate. In 2010 we were involved in the round table process for the 2012 planning rule with interests that centered around species viability and more specific, an interest in Diversity of Plants, Animals and Wildlife Habitat.

Bighorn sheep herds in the Lower Salmon River Canyon are some of the few remaining herds that were not extirpated in Idaho. Because bighorn sheep were not extirpated from this area, they represent the last remaining native populations in Idaho. Unfortunately, current population levels remain low. Bighorn sheep within the Salmon River area represent the core of Idaho's bighorn sheep populations. This unique native genetic stock represents a heightened conservation need across federal, state, and tribal jurisdictions, as this population is one of the largest native populations of Rocky Mountain bighorn sheep remaining in the western states.

The Nez Perce - Clearwater National Forest is one of the early Forests in OR, WA & ID to revise its Management Plan under the 2012 planning rule. We are pleased with how you are handling the challenges of identifying Species of Conservation Concern (SCC) within the Region and on the Forest. We are glad to see that you have classified Rocky Mountain Bighorn Sheep as a SCC, and wholeheartedly support your decision!

As your analysis indicates, the most significant threat facing bighorn sheep on the Nez Perce - Clearwater NF in Idaho, and throughout the West is the respiratory disease threat when there is contact with domestic sheep and goats. The effects on bighorn populations can take several forms, including acute all-age die off events, high mortality rates in lambs for years and chronic, sporadic adult mortality. Pathogens associated with the respiratory disease complex are spread among interconnected populations over a period of years, resulting in mortality in multiple populations over time. Overall, this will chronically limit numbers and distribution in areas where respiratory disease occurs. Consequently disease, especially recurring events, will depress bighorn populations and/or eventually extinction.

The plan adequately documents, and accounts for invasive weeds, forest succession, fire management and climate change in bighorn sheep habitats.

Bighorn sheep in the Salmon River and Hells Canyon population management areas have experienced high rates of mortality due to pneumonia outbreaks in the 1980's and 1990's. The origin of those outbreaks was

documented as domestic sheep and/or goat strains of Movi; which have lingering effects today. These populations have not recovered, and are currently limited by low lamb survival, primarily due to persistent pneumonia-caused mortality (Idaho Department of Fish and Game, 2010). Pathogen transmission to bighorn sheep is controlled by maintaining separation between bighorn sheep and domestic sheep and goats.

Within the Draft Revised Nez Perce-Clearwater Forest Plan, two actions were proposed to address threats to the lower Salmon River bighorn sheep populations. First, the Nez Perce-Clearwater only has one remaining sheep allotment across the whole planning area (the Allison-Berg Allotment) which is located within the heart of the Lower Salmon River bighorn sheep home range area. This allotment is currently vacant, declared as unsuitable for domestic grazing and recommended for closure in the plan. Second, in the event any new sheep allotments are proposed for the Nez Perce-Clearwater Forest, a standard was adopted to prevent domestic sheep grazing within 16 miles of core bighorn herd home ranges. This is consistent the standards identified in the 2010 Payette National Forest decision to maintain a low risk of contact (U.S. Department of Agriculture, 2010). These measures will reduce the chances that new pathogen transmission events will occur from Forest Service allotments.

All proposed alternatives, other than the No Action Alternative, recommend eliminating the only remaining sheep allotment (the Allison-Berg Allotment) on the Forest, plus they also provide for active management to restore habitat for bighorn sheep lost through forest succession. We support and are very pleased with this decision. This decision is also consistent with the US Dept of Int. BLM Record of Decision and Approved Amendment for the Cottonwood RMP for Forest Service was a cooperating agency on that decision.

The Draft Revised Forest Plan mandates any new sheep allotments initiated within the Nez Perce-Clearwater NF, conform to standards adopted to reduce pathogen transmission. Specifically, Standard FW-STD-WL-02 is included to implement this decision: In order to prevent disease transmission between wild and domestic sheep, domestic sheep or goat grazing shall not be authorized in or within 16 miles of bighorn sheep occupied core herd home ranges.

We support the decision to include this standard but would like to include that if a new domestic sheep or goat allotment is proposed the Forest will complete an additional risk assessment for pathogen transmission. Collectively, these standards will reduce the chance new pathogen transmission events will occur from Forest Service allotments.

As documented in your analysis, the primary limiting factor for bighorn sheep in the plan area is disease. Domestic sheep, goats, and other exotic relatives of bighorn sheep carry pathogens that are lethal to bighorns, plus they have lingering effects on population performance.

Also recognized is the potential for pathogen transmission from domestic pack goats to bighorn sheep, plus guidelines to prevent pathogen transmission; specifically:

Guideline: FW-GDL-WL-05 related to domestic goat packing. New authorizations and permit reauthorizations for domestic goat packing should include provisions to prevent disease transmission between domestic goats and bighorn sheep.

We recommend a Standard: FW-STD-WL-## addressing domestic goat packing rather than a guideline. In order to prevent pathogen transmission between bighorns and domestic pack goats, domestic pack goats shall not be permitted and/or authorized where effective separation (physical and/or temporal) cannot be maintained. Strict adherence by pack goat users to the 5 Best Management Practices (BMPs) identified by the North American Pack Goat Association <https://www.napga.org/resources/best-management-practices-psr/> and featured in their NAPgA educational/training video <https://www.napga.org/bmp-video/> should be required by the USFS, as a condition of use for pack goats. Included among those BMPs is the requirement that the owner/handler of pack goats on Forest land is to (at a minimum) notify Forest officials immediately if any goats under their jurisdiction

are unaccounted for, when use on the Forest is terminated. This will assure that separation exists between these species and will reduce the potential for pathogen transmission. Furthermore, as the Shoshone National Forest in Wyoming (USFS R2) is developing, there could be a permitting system implemented for the Nez Perce-Clearwater NF, to provide the USFS with information on the number, frequency, duration, destination, health status (i.e., NAPgA Health Passport), and other indicators of desired pack goat use. In addition, domestic goats will not be authorized for vegetation control within occupied bighorn sheep habitat.

The document is deficient in addressing migration corridors and the potential for genetic exchange between herds. Connectivity and genetic interchange are important, and necessary to assure long-term viability in bighorn sheep populations in the Salmon River corridor.

Thank you for the opportunity to comment on the Nez Perce - Clearwater National Forests Forest Plan Revision process and we look forward to continued participation.

Respectfully,

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