

Data Submitted (UTC 11): 10/3/2025 7:00:00 AM

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Comments: Good morning, Blue Mountain Forest Plan Revision Team

I have already sent in this letter through email, but I did not receive any confirmation, so I thought I should try again to be sure it was received.

Thank you for the opportunity to comment.

LETTER TEXT:

Subject: Blue Mountains Forest Plan [ndash] Preliminary Draft Malheur, Umatilla, and Wallowa-Whitman National Forests Land Management Plans. The following comments on the Preliminary Draft Malheur, Umatilla, and Wallowa-Whitman National Forests Land Management Plan Revisions are from the Oregon (OR WSF), Washington (WA WSF) Chapters Wild Sheep Foundation, and the Wild Sheep Foundation (WSF). We have provided comments to you concerning bighorn sheep (BHS) management on several occasions since 2005 when the Blue Mountain Forests (BMNFs) began revising the Forest Plan. Including during the latest Assessment Phase via a letter sent May 21, 2024, and during the Draft Preliminary Need for Change via a letter sent November 7, 2024. Proactive BHS management, as outlined in that letter, is critical to disease-free wild sheep populations. Bighorn Sheep (*Ovis canadensis*) are among nature's most awe-inspiring animals. Native to western North America, wild sheep usually live in remote and rugged habitats. They have high ecological and economic values and are culturally and socially important. They are a vital component of the natural heritage of North America. The historic and recent distribution of wild sheep in western North America has changed with time; while once widespread, their ranges and populations are far smaller today. Bighorn sheep (BHS) populations declined significantly between the mid-1800s and the mid-1900s and have never fully recovered. BHS were extirpated in many states across the West during that time, due to many factors including disease, habitat disturbance/loss from human activities, effects of a changing climate, and predation. As the BMNFs Assessment Report indicates [ldquo]Hunting and fishing remain important to Tribes, national forest visitors, and people who live throughout the region. The activities contribute to and diversify local economies, and the national forests of the Blue Mountains maintain a reputation as one of the best places to hunt big game in the Pacific Northwest.[rdquo] The assessment report also states [ldquo]Hunting was the most popular activity[rdquo] amongst all the recreational uses. Maintaining and improving this popular recreational activity should be a priority throughout the planning process. The Species of Conservation Concern (SCC) analysis indicated that the most significant threat to BHS is respiratory disease (pneumonia) caused by bacteria transmitted from domestic sheep or goats or other infected wild sheep. Outbreaks of pneumonia have occurred in BHS herds for decades, throughout their range. These [ldquo]die-offs[rdquo] continue to cause catastrophic population declines and herd losses. Evidence that association or contact between domestic sheep and BHS leads to respiratory disease in BHS is overwhelming (Besser, et al. 2008, Clifford et al. 2009, Foreyt et al. 1994, Silflow et al. 1993). Although some adult bighorns appear to have or acquire immunity to pneumonia-causing pathogens, disease continues to impede lamb survival in the years to decades following disease-introduction events (Cassirer et al. 2013). Many organisms are associated with respiratory disease, including bacteria, lungworms, and viruses. One bacterium, *Mycoplasma ovipneumoniae* (referred to as Movi), has been frequently identified in the early stages of outbreaks, acting as a trigger. Movi infection in BHS reduces their immune defenses and allows other, often more

aggressive bacteria entry into the lungs; the result is pneumonia and rapid death of the individual bighorn. The disease spreads to other individuals quickly and may kill the entire herd. After a die-off, survivors may carry and shed Movi and, if passed to lambs, it usually results in most lambs dying. This pattern may repeat year after year, with many infected herds never recovering or extirpating. Other afflictions of BHS such as scabies and lungworm have not been shown to drastically reduce populations. Additional potential threats include predation, poaching, genetic isolation, and habitat loss. There are organizations that suggest the possibility of other species transmitting Movi to BHS. While Movi has been reported in species other than sheep and goats (Caprinae), neither its ability to persist in these hosts for long periods of time, nor the ability of these non-Caprinae hosts to transmit the pathogen to BHS has been demonstrated, and the low carriage prevalence and the low genetic diversity of Movi in non-Caprinae hosts are not consistent with them representing a separate reservoir for BHS infection. Together, these data show that domestic sheep, if present on the landscape occupied by BHS, carry Movi that represents a large risk for BHS infection and resulting pneumonia outbreaks. Domestic goats also pose a definite risk to BHS due to their Movi reservoir status, although limited current data shows that goat sources tend to cause less severe and less persistent bighorn disease. In contrast, non-Caprinae species have not yet been shown to present any risk of transmitting Movi to BHS (Dr. Tom Besser, Declaration, Feb. 26, 2021). M. ovipneumoniae infections from different sources can be identified and distinguished based on variation within their DNA sequences. The DNA sequence-based molecular strain typing method (Multi-Locus Strain Typing, MLST) developed for Movi can be used to track spread of specific strains within and between BHS populations, and to identify potential sources of strains responsible for new bighorn pneumonia epizootics. Strains of Movi carried by domestic sheep were clearly distinguishable from strains carried by domestic goats, indicating that the strain type analysis could indicate the likely source host of this pathogen. Researchers have successfully identified the sources of Movi strains that were transmitted from domestic sheep and domestic goats, under range conditions, that resulted in BHS pneumonia outbreaks (Dr. Tom Besser, Declaration, Feb. 26, 2021). Multiple BHS populations in the Hells Canyon area, the Wallows and throughout the Blue Mountains have experienced high rates of mortality due to pneumonia outbreaks from the 1980s, through the present. We are actively monitoring another ongoing disease event as we write this letter. The origin of these outbreaks has been documented as domestic sheep and/or goat strains of *Mycoplasma ovipneumoniae* (Movi), which continues to have lingering effects. Many of these populations have not recovered, and are currently limited by low lamb survival, primarily due to persistent pneumonia-caused mortality. Pathogen transmission to BHS is controlled by maintaining effective spatial and temporal separation between BHS and domestic sheep and/or goats. BHS continue to exist and, in some places, thrive often due to intensive restoration and monitoring efforts, including funding from conservation partners. Active management includes moving animals to re-establish new populations, closing or moving domestic sheep and goat allotments, and actively managing and monitoring nearby domestic sheep and goats. The Hells Canyon BHS Initiative (HCI) includes much of the northern and eastern Blue Mountains, and has been an established partnership since the BHS die-off in the mid-1990s. Even with this active management, BHS populations are a fraction of their historic numbers and currently occupy a small proportion of their original range. Because of the economic, recreational, cultural and social value, we believe there should be additional emphasis on game species and hunting. You have identified hunting as the most popular activity on the three forests; the plan should reflect the importance of this activity and include desired conditions with identified objectives. Chapter 2 [ndash] Forest-Wide Plan Components - there should be desired conditions with identified objectives for hunting and the principal game species. This should include at least BHS, Rocky Mountain Goat, elk, and mule deer. [bull] The Draft includes a Desired Condition (FW-SPRSK-DC) (page 59 of plan doc) for BHS [ndash] Bighorn sheep herds are sustained at current or larger population size with minimal disease transfer from permitted domestic sheep and goats. Grasslands with nearby rocky escape areas provide native, high protein grass and forbs for bighorn sheep. There needs to be discussion in the section on Social and Economic Sustainability, in Chapter 2 on the importance of hunting in the BMNFs as a significant economic driver for our local economies. Especially for our smaller, more remote communities. This discussion should include cultural and social needs and desires. The draft plan as written states: Social and Economic Characteristics: (page 17 of plan doc). An abundance and variety of wildlife species may be seen, including bald eagles in the winter and bighorn sheep in the summer and fall. We do not believe this demonstrates the importance of hunting and wildlife viewing as two of the most popular activities in the BMNFs. It

says nothing of the economic, cultural and social importance of hunting and the associated wildlife species to Tribes, to our public and our communities.[bull] Bighorn sheep across the Nez Perce and Confederated Tribes of the Umatilla Indian Reservation Tribe's treaty territory, are a culturally significant treaty resource (Pinkham 2007). Based on archeological evidence and verbal histories of tribal elders, bighorn sheep were the primary game animal that sustained the Nez Perce way of life prior to European settlement (Randolph and Dahlstrom 1977, Pinkham 2007). Bighorn sheep were used for a large variety of purposes, including food, clothing, tools, utensils, and weapons (Pinkham 2007). The Tribe is in the process of designating bighorn sheep as a tribal critically imperiled species (Nez Perce Tribe 2016) and continues to work towards bighorn sheep restoration with state, federal, and other partners.[bull] There should be standards and guidelines on how you are going to balance the needs of the hunting community (your largest recreational user group) with the desires and needs of other interests.[bull] The plan should include standards and guidelines to maintain or improve these valuable economic, cultural and social resources. Examples of this should include; management for security, management of risk of contact from disease, managing impacts, and habitat. In your Draft proposed Management Approach (FW-SPRSK-MAPR): (Page 61 of plan doc). The Plan includes the following:[bull] The potential for spread of disease from domestic sheep and goats to bighorn sheep may be reduced by following a site-specific plan for sheep grazing allotments and special use permit areas for sheep and goats within 21.75 miles (35 km) of bighorn sheep herds. At minimum, plans would consider the following best management practices recommended by ODFW and WDFW: (need to include IDFG):

- o Maintain control of sheep or goats with use of herders and dogs.
- o Individually mark domestic sheep in a manner that allows field identification of ownership while on National Forest System lands.
- o Count domestic sheep as they go onto and off the permitted area to determine if any are missing. Report discrepancies to the District Ranger within 24 hours, and the permittee is to make a concerted effort to find missing sheep.
- o Remove sick or injured sheep or goats from the allotment as soon as discovered.
- o Manage recreational uses to consider health to bighorn sheep herds.
- o Report bighorn sheep observed near active sheep allotments to the state wildlife agency.

The BMNFs Plan Revision should also:[bull] Address the issue of disease transmission between BHS and domestic sheep and goats.

- o The Forest Service should minimize risk of contact between the species. A Standard should be developed to utilize a well-designed Risk Assessment (using the updated Risk-of-Contact Model that the FS, BLM, and Western Association of Fish and Wildlife Agencies (WAFWA) have invested in), coupled with wild and domestic sheep/goat monitoring are critical to evaluate effectiveness of management, especially when it comes to maintaining and restoring BHS populations.
- o If any new domestic sheep or goat allotments are initiated, or there is a proposal to utilize domestic sheep and/goats to treat vegetation for fire, invasives or energy management within the BMNFs under the plan, a standard should be adopted to disallow domestic sheep/goat grazing. Until either a ROC analysis is completed or within 21.75 miles of BHS herd home ranges, as proposed by the ODFW and WDFW. This is a similar distance to those identified in the 2010 Payette National Forest decision to maintain a low risk of contact (U.S. Department of Agriculture, 2010). These measures should reduce the chances that new disease transmission events.

[bull] We respect the access sought by those that use domestic goats as pack animals. However, allowing their use in bighorn habitat is simply not worth the risk to BHS populations. Best Management Practices are NOT foolproof, and the presence of domestic goats in proximity puts BHS populations at risk. The States of Washington and Oregon have already banned the use of pack goats in wildlife management areas that contain BHS, and Federal agencies should do the same. It only takes one incident to have catastrophic consequences that could take decades to overcome.[bull] With the existing emergency closure order in Hells Canyon NRA, the Forest Service recognized the potential for disease transmission between BHS and domestic sheep and goats. The plan should develop guidelines for the rest of the BMNFs, to ensure that effective separation exists to reduce the potential for pathogen transmission and subsequent disease outbreaks.

- o Standards and Guidelines should be developed for domestic goat use. New authorizations and Permit reauthorizations for domestic goat packing or for vegetation treatments should include provisions to prevent disease transmission between domestic goats and bighorn sheep.
- o We would like to see a Standard: To prevent disease transmission between BHS and domestic pack goats, domestic pack goats shall not be permitted within 16 miles of BHS occupied herd home ranges. This would ensure that separation exists between these species and should reduce the potential for disease transmission.

[bull] The plan should address impacts to BHS habitat from invasive plants, forest succession, increased recreational uses and climate change.

- o Habitat, wildlife, and recreational management are all

important elements that should be focal points. Healthy abundant BHS populations can only be achieved through good forest, range and recreation management practices. Invasive nonnative plants can replace native vegetation, rendering foraging areas unusable for BHS. Fire can rejuvenate native forage and reduce conifer encroachment, which increases connectivity between source habitats. Fires can increase security by reducing trees or shrubs cover increasing sight distances.[bull] To ensure long-term viability of BHS, the plan should include an analysis related to migration corridors and the potential for genetic exchange between BHS herds.Chapter 3 [ndash] Management Area Components [ndash]It is unfortunate that the Draft Plan discusses in detail the importance of some uses but does little to discuss interests and management for the largest user group in the Blue Mountains, the hunting community. This is a user group that is a huge economic driver, users that financially and actively reinvest in the BMNFs resources. We will share a couple of ongoing examples:[bull] The partners in the HCI are invested over \$900,000 dollars in 2025 and invested about \$775,000 in 2024 and plan on continued investment at this scale in 2026 to accomplish actions that will provide healthy BHS populations on these landscapes. You can imagine the long-term financial investment, since this work has been going on for 25 or more years. Unfortunately, BHS populations are still at risk.[bull] The Blue Mountain Elk Initiative (BMEI) is another example of the hunting/wildlife interests stepping up to actively provide funds and volunteers for the wildlife resource in the Blue Mountains. This investment has also been ongoing for more than 30 years.Chapter 4 [ndash] Monitoring Program [ndash] We are interested in the monitoring component of the planning rule for the Species of Conservation Concern (SCC) list.[bull] Wild sheep conservationists have consistently and strongly advocated for BHS to be designated as Species of Conservation Concern (SCC) list. We have had numerous discussions with USFS staff at the National, Regional and Forest Offices regarding their inclusion. We are pleased to see that BHS have been identified as a SCC on all three BMNFs (Umatilla, Wallowa-Whitman, and Malheur) in Appendix C [ndash] Preliminary Species of Conservation Concern (SCC) List. Thank you!Monitoring BHS population dynamics is important to ensure that adaptive and pro-active measures are taken immediately if species population viability is threatened.[bull] We do not expect the USFS to actively monitor BHS populations; however, we propose that the BMNFs specify the use of annually collected IDFG, ODFW, and WDFW data to fulfill the monitoring requirement of the 2012 Planning Rule.[bull] Monitoring and managing BHS disease issues are important and will continue to be a necessary component of BHS management. IDFG, ODFW, and WDFW are actively conducting research, implementing expensive management strategies, such as implementing Test & Remove, to better understand and actively manage threats to BHS herds on the BMNFs and surrounding areas. The BMNFs need to develop, with partner State and Tribal agencies, and develop a disease monitoring plan as part of this decision and plan.[bull] BMNFs need to monitor the movement of BHS. This will ensure that BHS does not stray onto existing domestic sheep/goat allotments or private & state lands that may have domestic sheep or goats.[bull] The BMNFs need to develop a site-specific monitoring plan that monitors domestic sheep straying off forest allotments and adjoining private lands. This was required in the monitoring plan on the Payette NF bighorn/domestic sheep FEIS Amendment, and it was found through radio telemetry that domestic sheep were frequently observed off the designated allotments. On the Okanogan-Wenatchee NF allotments, this straying is common enough that disease is spreading from domestic sheep to BHS continued to lead to disease (Schommer Declaration, 2/23/2021).[bull] Landscape vegetation treatments and large fires have the potential to create new BHS habitat or increase connectivity between existing habitats. This could allow BHS to utilize new or additional areas. These should be identified and adjustments made as needed.The experience today of seeing BHS along the rivers, roads and trails of the Blue Mountains was not always there. BHS were extirpated from the entire states of Oregon and Washington and much of Idaho. BHS are only present due to the massive efforts of agencies, tribes and conservation organizations that have been willing to invest time and money in the efforts to bring them back and then continue the massive efforts to keep them in these landscapes.We thank you for the opportunity to comment on the three Blue Mountain National Forest[squo]s Forest Plan Revision process and we look forward to continued participation.Respectfully, Kevin MartinOR WSF PresidentGarrett GrantWA WSFGrey N. Thornton President,President & CEO WSFCorey MasonChief Operating Officer &Executive VP of Conservation