



WAFWA's Wild Sheep Working Group

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Montana – Nebraska – Nevada – New Mexico – North Dakota
Northwest Territories -South Dakota - Oregon – Texas – Utah
Washington – Wyoming – Yukon -Wild Sheep Foundation - US Forest Service
Bureau of Land Management – National Park Service



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April 14, 2021

U.S. Forest Service
Director
Forest and Range Management and Vegetation Ecology
201 14th Street SW, Suite 3SE, Washington, DC 20250-1124

RE: Proposed Updates to US Forest Service Rangeland Management Directives

Thank you for the opportunity to comment on proposed updates to the USFS Rangeland Management Directives that guide public land grazing operations in support of healthy rangelands and forests and in concert with the multiple-use doctrine of our precious public lands. I am the current chair of the Wild Sheep Working Group (WSWG), an initiative sanctioned by the Western Association of Fish and Wildlife Agencies since 2007. Below is a brief background of the natural heritage of wild sheep in the west, and WSWG's thoughts on a few of the updates to RMDs and wild and domestic sheep sharing our USFS lands.

- The realistic numbers of bighorn sheep that inhabited the western states prior to European settlement is estimated to be over 500,000. By the 1950s, there was only an estimated 25,000 remaining due to disease transmission from domestic sheep, market hunting, and anthropomorphic disturbances. We have only restored a fraction of their historic numbers with the current population estimates of approximately 62,000 (excluding Canada).
- FSM 2252.21 needs to recognize *Mycoplasma ovipneumoniae (Movi)* as a contagious disease like sore mouth that impacts healthy wild sheep herds through pathogen spillovers/transmission from domestic sheep flocks or other adjacent and infected wild sheep herds.
- All the western states wildlife agencies continue to seek greater separation between wild and domestic sheep on public lands. Pathogen spillovers and deadly pneumonia events continue to occur with healthy bighorn herds having some level of contact with not only domestic sheep but also previously infected bighorn resulting in bighorn adult mortality but with the worst impacts from high lamb mortality that may persist for over a decade.
- We recognize the past and future benefits of Third Party Arrangements found in Chapter 10 section 13.7. We understand that the authority for permitting livestock grazing squarely rests within the USFS and is not delegable to third parties. But we also recognize the multiple-use doctrine on public land guided on USFS lands by The Multiple-Use Sustained-Yield Act (Public Law 86-517) that identifies recreation, range (grazing), timber, watershed, and wildlife values, with no use greater than any other. We realize that many historic bighorn habitats on USFS lands will likely never be suitable for future bighorn restoration due to many anthropomorphic and/or habitat limitations. But there

continue to be woolgrowers who are opting out of the sheep business without provocation. There are also significant habitat changes, like massive wildfires that can greatly alter the landscape making it more conducive for bighorn sheep where currently it would not be feasible or warranted for bighorn restoration. Over the last year in Nevada alone, 5 domestic sheep permittees committed to or are strongly considering relinquishing or converting their domestic sheep grazing permits on USFS and/or BLM lands. I have made a concerted effort to reach out and improve communication with Nevada woolgrowers in many venues, be it their annual conventions, on the mountain, or at their dining room table. I've told them that if they are in it for the long haul, we want to work with them to increase communication, vigilance and mutual respect for each other's industry to reduce potential for wild and domestic sheep conflicts, and quickly address stray domestics and foraging wild sheep. But I have also said if you no longer want to run sheep on public lands, to contact us or a third party. That is exactly what 2 of these woolgrowers did last year. It is these times that having the ability to engage with a third party who can greatly facilitate the process resulting in a win-win for the permittee and for wild sheep. What is so wrong with accommodating a willing seller, expanding the distribution of our natural heritage that is still a fraction of what it historically was, increasing low-impact recreational opportunities in wildlife viewing and limited hunting, and enhancing ecosystem health?

- To be clear and reflect both current science and reality, separation of domestic and wild sheep is currently the only reasonable management action to reduce pathogen transmission on our western landscapes. Vaccines are simply not an option in wild animals (though would make a great Gary Larsen Far Side cartoon of them waiting in line for vaccination). Domestic sheep *Movi* vaccines are highly unlikely due to insufficient funding and lacking need since pneumonia impacts to domestics are minimal, if not undetectable. But the Wild Sheep Working Group is still thinking out of the box for other solutions. Here in Nevada, research was initiated in 2021 in collaboration with 2 large public land domestic sheep operations to test a theory. Previous random sampling of domestic sheep flocks by USDA nationwide had found high *Movi* prevalence rates. But for several Nevada sheep operations, they have an extremely "closed" flock system with no purchase of domestic sheep from outside their "system". Several hundred domestic rams and ewes were recently tested to reveal initial prevalence rates. If the rates are reasonably low, both operations are willing to entertain limited culling of chronic *Movi* carriers, separating ewes from lambs during the summer, and possible antibiotic treatments to clear *Movi* from their flocks so maybe one day bighorn and domestic sheep could share our public lands with limited disease risk. It's no doubt a long shot but the collaboration, respect, and trust manifested from efforts like this, are what could open doors to more compatibility of domestic and wild sheep sharing USFS lands and future solutions.
- USFS needs to adopt similar language to BLM's Manual 1730 - "Management of Domestic Sheep and Goats to Sustain Wild Sheep" in concert with conducting the revised Risk of Contact Tool (initially developed through USFS support) to objectively evaluate if there is adequate separation between wild and domestic sheep on USFS sheep allotments.
- Lastly, the WSWG and WAFWA encourages the use of the 2018 Shared Stewardship Strategy in implementing Rangeland Management Directives with livestock permittees, domestic sheep industry representatives, state wildlife agencies, wild sheep NGOs, federal land management partners, and First Nations for workable solutions in managing

wild sheep and domestic sheep operations on public lands. Shared Stewardship is nothing new to the USFS and to the WSWG. From the WSWG inception, members of the group were not just state/provincial wildlife agencies, but with equal status and participation were all the major federal land management partners including USFS, BLM, NPS, and USFWS. We all value and realize the essential partnership of wildlife and habitat professionals working together for the benefit of wild sheep.

Sincerely,



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