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Comments: Risk of Contact Model Flaws: Disease risks to bighorn sheep from the Okanagan-Wenatchee allotments have been overestimated. The Risk of Contact model is overly conservative and does not take into account risks not associated with domestic sheep grazing, as well as other factors such as landscape features, grazing restrictions or design features that may otherwise reduce potential risks.

Contact potential can be and has previously been effectively mitigated through temporal and spatial separation, as well as other herd management techniques. These should continue to be options rather than removing areas from grazing based solely on one estimate of proximity.

Risks of disease spread to bighorn sheep populations from wildlife are already present and may likely explain many or most instances of significant outbreaks.

As has been noted previously, removing sheep grazing from certain areas of the Okanagan-Wenatchee does not necessarily reduce the possibility for contacts, given that sheep grazing on federal lands is typically supplemented with use of nearby or adjacent private lands and other lands that present similar contact potential as those on federal lands.

Flexible Approach: USFS should retain flexibility in approach that would allow grazing to be reincorporated if risks of significant die-offs can be effectively mitigated or are lessened through changes to habitat use.

Right of First Refusal: In the event grazing is going to be reincorporated into any areas removed from grazing pursuant to the forest plan amendment, as existing and long-time permittees Martinez Livestock should retain a right of first refusal.