Wyoming
Department of Agriculture

Dave Freudenthal, Governor

John Etchepare, Director

2219 Carey Ave., Cheyenne, WY 82002 ■ Phone: 307-777-7321 ■ Fax: 307-777-6593
E-mail: wda1.state.wy.us ■ Website: wyagric.state.wy.us

Board Members
District 1
Lee Otto
District 2
Meghan Lally
District 3
Reed Gardner
District 4
Helen Jones
District 5
Spencer Ellis
District 6
Alan Todd
District 7
Arlene Brown

February 23, 2005

Diane Chung
Deputy Forest Supervisor
Medicine Bow-Routt National Forest
2468 Jackson St.
Laramie, WY 82070-6535

Dear Ms. Chung:

I would like to thank the Bighorn/Domestic Sheep Snowy Range Working Group members for their efforts to assist the two domestic sheep grazing permittees in the Medicine Bow National Forest.

I am aware of the March 1, 2005 deadline proposed to inform the permittees of your recommendation. I also recognize the challenges confronting the group to successfully manage to maintain healthy bighorn sheep populations while sustaining an economically viable domestic sheep industry. I am concerned the working group has not had enough time to review all possible scenarios, and the March 1 deadline, simply, is not appropriate. If all entities of this group, including the Wyoming Department of Agriculture (WDA), are encouraged to develop their recommendations to successfully meet this challenge, I suggest an extension be granted.

I have also been briefed on the current status of the working group. I understand there are two permittees with a total of 10,000 head of sheep requesting to graze on the Snowy Range allotment. The 1998 Snowy Range Sheep Allotment Management Plan suggests a fully stocked allotment at 6,000 head. Therefore, a permittee's additional 4,000 head are still not being allowed to graze on this allotment. The recent recommendation, on which your group is working, reduces the 6,000 head to a suggested 1,000 – 3,000 sheep. This does not meet the needs of even one permittee. This loss of 3,000 – 5,000 head is simply unacceptable by the WDA, and all other agricultural supporting organizations.

History has shown a significant and continual decrease in the number of domestic sheep allowed to graze on these allotments. In 1970 bighorn sheep were allowed to be reintroduced while 11,000 domestic sheep were already present. The 11,000 head were reduced to 9,000 in 1978, to 8,000 in 1986, and then reduced again in 1992 to 6,000. Your current proposal of 1,000 – 3,000 domestic sheep is yet another decline, while the bighorn sheep numbers are allowed to grow at an unrestrained rate.

I am concerned that the current working recommendation eliminated pastures for domestic sheep grazing without any consideration of management actions that could provide separation from

bighorn sheep. The working group should be allowed to explore all possible actions to manage for both bighorn and domestic sheep on the Snowy Range. The Wyoming State-wide Bighorn/Domestic Sheep Interaction Working Group also had the goal of managing for both bighorn and domestic sheep. That group set two goals: maintain healthy bighorn sheep populations while sustaining an economically viable domestic sheep industry. It appears your discussions are focused on achieving the former objective while severely restricting opportunities to achieve the latter. Your group should be allowed the fullest opportunity to determine management actions to achieve both objectives on all pastures. They are not. Only one objective has been set as a given: maintaining healthy big horn sheep populations. However, the group is supposed to be achieving both objectives.

Both the charter of your working group and the revised forest plan support those joint objectives. The charter for your Bighorn/Domestic Sheep Working Group says the group has the goal of recommending options that will permit both wild and domestic sheep to graze concurrently on the Snowy Range in compliance with the 2003 Medicine Bow Revised Land and Resource Management Plan. The revised forest plan states on page D-124 that the Forest Service responsibility to maintain viable populations of bighorn sheep does not mean that populations must be maintained at 100 percent of potential; rather that there is a balance between this requirement and other multiple use objectives. On page D-120, that plan says there is no restriction on use by domestic sheep on the Medicine Bow Range, including the Douglas Creek Herd, which is the herd populating the Snowy Range and migrating across private land to the Sierra Madres range. For these reasons, I believe your working group must consider management actions that impact bighorn and domestic sheep, not just domestic sheep, as is currently the case.

I am also alarmed that not all of the environmental factors that affect the bighorn sheep on these Snowy Range pastures are being considered. The state-wide working group identified four areas of the state for bighorn sheep: areas of core, native herds; cooperative review areas; bighorn sheep non-emphasis areas; and bighorn sheep non-management areas. The Snowy Range pastures are a cooperative review area, which is to be "cooperatively evaluated". My comments on that are addressed above.

However, the bighorn sheep that frequent these Snowy Range pastures often migrate across bighorn sheep non-management areas off the forest on private lands. These bighorn sheep travel between the west slopes of the Snowy Range Mountains across private land non-management areas to the Sierra Madres range, a bighorn sheep non-emphasis area. When crossing private lands, these sheep are on bighorn sheep non-management areas. More importantly, these bighorn sheep historically and currently come in contact with domestic sheep. The state working group notes, "Bighorn sheep are permitted to occur in these areas, but are not actively encouraged." That group further state, "Wandering bighorn sheep with known, suspected or potential contact with domestic sheep, with likelihood of subsequent contact established bighorn sheep populations, should be captured/removed from the wild." Yet, this issue has not been addressed.

It appears unreasonable to demand draconian measures for total and absolute avoidance with domestic sheep on the Snowy Range pastures when these same bighorn sheep are contacting domestic sheep on non-management areas. I am further concerned that state wildlife and federal land managers refuse to take any action regarding these bighorn sheep and yet severely restrict domestic sheep producers on their request to graze these pastures.

Clearly there is a need to improve habitat. This should be one of your management strategies and be considered before grazing permitees are forced to reduce their flocks and make alternative management decisions.

There is a continual trend of domestic sheep taking the back seat to wildlife in the state of Wyoming. That trend appears to be continuing on this forest and on this range. I fully support a solution to manage the Snowy Range area for multi-use, but can not allow another reduction in domestic sheep numbers. I strongly encourage your group to reconsider the deadline and find alternative solutions that will meet the needs of all working group members.

Sincerely,

John Etchepare
Director

Cc: Governor's Planning Office
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Rocky Mountain Farmers Union
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation
Wyoming State Grazing Board
Mary Peterson, Medicine Bow-Route National Forest