



The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

August 10, 2017

Mr. Casey McQuiston, Resource Staff Officer
United States Forest Service
Shoshone National Forest
808 Meadow Lane Avenue
Cody, Wyoming 82414

Dear Mr. McQuiston,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the Shoshone National Forest's (SNS) Supplemental Draft Environmental Impact Statement (SDEIS) for pack goats, domestic sheep and bighorn sheep.

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

The Purpose and Need for this SDEIS states *"The purpose of the federal action being considered here is to determine what, if any, use by domestic sheep, domestic goats, or pack goats is appropriate within the Shoshone National Forest (SNF) and what direction, if any, should be included in the revised LMP."* It is clear, based on the alternatives and the analysis, that domestic sheep management on the SNF will remain unchanged. However, the FS should add more information to the document explaining this analysis is limited to pack goats and does not have any implications to domestic sheep grazing. We recommend clearly stating domestic sheep are not the concern or the main issue. Clarification may also be achieved through "Common to All" language regarding domestic sheep in the SDEIS. This would ensure domestic sheep are managed cooperatively under the Wyoming State-wide Bighorn/Domestic Sheep Interaction Working Group Plan (2004) (State Plan) and comports with the Stipulated Settlement Agreement (July, 2016). The State Plan does not specifically address pack goats and SNF should acknowledge this. Domestic sheep grazing and management is very different from pack goat use. We recommend the SNF review the document and ensure the analysis is solely focused on pack goat use.

The WDA supports the concept of mitigation measures to reduce risk(s). The goal of the State Plan and the Bighorn/Domestic Sheep Risk Analysis is to evaluate risk and provide potential management/mitigation measures to help reduce the potential impacts to bighorn sheep. Neither the State Plan nor the Risk Analysis tool insinuates Zero-Risk is the ultimate goal. We believe the SDEIS analysis includes a robust list of mitigation

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measures and could effectively employ adaptive management, providing the SNF enough flexibility to make management changes, while requiring a very restrictive permitting process for pack goats.

The North American Pack Goat Association (NAPGA) provided *“additional mitigation measures”* and yet these measures *“were not considered...because they were not feasible to implement”* (pg. 7). We assume if NAPGA volunteered these measures they consider them feasible. The FS must remember that the State Plan does not say *“make risk of contact zero”* – it intends to reduce the risk as much as possible through various mechanisms, including mitigation measures to reduce likelihood of contact.

The following are specific comments for the SNF to consider:

1. Pg. 6; *“Desired Condition – Low risk of disease transmission from domestic sheep and/or goats within the Shoshone National Forest. Use by domestic sheep, domestic goats, and pack goats will not be authorized in areas that overlap with bighorn sheep so as to reduce the risk of disease transmission.”*
 - Temporal and spatial overlap may become a concern if occurring in areas with Core Native herds. The Desired Condition, as written above, does not clearly articulate this distinction. Also of note, this Desired Condition does not match page 3 Desired Condition under the Proposed Action. SNF should use the language from the Desired Condition for the Proposed Action or insert *“Core Native”* before *“bighorn sheep”*.
2. Pg. 6; *“There is no proposed change to domestic sheep and domestic goat grazing allotments”*
 - We are not aware of any goat allotments. Either remove or provide more information. This information would could also be re-iterated in the Abstract (pg. i), Summary (pg. iii), or the Background section(s) (pg. 1).
3. Pg. 7, Table 1; *“Number of core native bighorn sheep herds potentially at risk of disease transmission”*
 - Add *“from pack goats”* to the end of this sentence to clarify.
4. Pg. 15, Under No Action, paragraph 4; *“Pack goat use is not currently known to have occurred...there would be a “high” risk of contact between pack goats and bighorn sheep, and increased disease transmission risk (USDA Forest Service 2017)”*
 - If pack goat use is not occurring, and is not known to have occurred, we fail to understand how there would be a high risk. This also assumes that no mitigation measures are applied to management. Contact does not necessarily mean transmission.
5. Pg. 20, Cumulative Effects
 - The Cumulative Effects section is weak and lacks multiple facets necessary for a robust analysis. Additionally, SNF has added portions to this section that are not within the scope of the document. For example, the third paragraph states *“The potential presence of domestic sheep on lands outside the jurisdiction of the Shoshone National Forest, yet still within the 35-*

km foray distance of bighorn sheep, adds to the risk of contact between bighorn sheep on the Forest and domestic sheep." This statement is not only unrelated to the analysis of pack goat use but represents a large and concerning overreach by the SNF. The entire paragraph needs to be reviewed and edited.

6. Pg. 23, Irreversible or Irrecoverable Commitments of Resources

- This section completely contradicts discussion on page 20 regarding Determination of Effects. We fail to understand how Alternative 1 and 3 *"...may adversely impact individuals (bighorn sheep)..."* yet then result in different commitments of resources on page 23. Please review these sections in conjunction and clarify.

We also have comments pertaining to the attached Risk Analysis of Disease Transmission. Specifically:

1. Pg. 1, Second Bullet – Final Report and Recommendations from Wyoming State-wide Bighorn/Domestic Sheep Interaction Working Group (2004), *"The group agreed that core native herds were the highest priority areas for bighorn sheep, where all efforts would be made to prevent contact between bighorn and domestic sheep within the Terms of Agreement put forth in the Wyoming Plan."*
 - This statement allows for active management and does not require zero-risk for core native herds.
2. Pg. 5, Causes of Disease Outbreaks in Bighorn Sheep; *"Domestic sheep and goats are the cause of many diseases in bighorn sheep."*
 - Speculative and does not match discussion on pages 8 and 9. Please remove this sentence.
3. Pg. 6, Experiments; *"...Mycoplasma ovipneumoniae are transmitted to wild sheep upon contact with, or proximity to..."*
 - Remove *"or proximity to"*
4. Pg. 8, Evidence for Disease Transmission from Domestic Goats; *"Although there have been all-age die-offs following observed contact between domestic goats and wild sheep, many of them occurred prior to the technology that allows for DNA strain typing to positively identify the source of the bacteria"*
 - Please provide a reference for these incidents. Also, the document states *"...there is no direct experimental evidence of domestic goats, and specifically pack goats, infecting wild sheep with life threatening diseases..."* (pg. 8)

In conclusion, we believe the SDEIS provides the ability to use a common-sense approach to managing pack goat use. It creates the potential for management flexibility, and certainty that no pack goats would occur in Core Native herd areas until certain criterion are met (which at this time is a high bar). The SNF should work with the pack goat industry and help determine the level of certainty needed to reduce the risk of disease transmission while meeting the multiple-use mission on the FS. Even the Threatened and Endangered Species

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Act, the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act allow for suitable mitigation measures and Best Management Practices to reduce the potential impacts to a given species. As bighorn sheep are not federally listed as threatened or endangered, we feel the proposed mitigation measures within the SDEIS are sufficient to reduce risks to wild sheep populations.

We believe NAPGA, bighorn sheep advocates, and state agencies can continue to develop additional mitigation measures, access and route designations, and best practices to continue to reduce risk to bighorn sheep. However, this can only be accomplished through adaptive management and sufficient flexibility of any decision to evaluate options on a case-by-case basis. We recommend SNF consider utilizing an adaptive approach to this issue and develop appropriate mitigation measures with the affected parties.

Please notify our office of any Objections (36 CFR 218/219) associated with this analysis. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Stacia Berry" with "for" written below it.

Doug Miyamoto

Director

DM/jb

**CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation
Wyoming County Commissioner's Association**

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