



August 9, 2019

Gunnison Field Office
210 West Spencer
Gunnison, CO 81230

Submitted via ePlanning Portal Only

Re: Notice of Availability for the Draft Environmental Impact Statement Domestic Sheep Grazing Permit Renewals, Gunnison Field Office, Colorado

The American Sheep Industry Association (ASI) and the Public Lands Council (PLC) appreciate the opportunity to comment in the matter of the above referenced Draft Environmental Impact Statement (DEIS). Since 1865, ASI has been the national trade organization representing the interests of the over 90,000 sheep ranchers located throughout the country who produce America's lamb and wool. ASI is a federation of forty-five state sheep associations representing a diverse industry. PLC is the only national organization dedicated solely to representing the roughly 22,000 ranchers who hold federal grazing permits and operate on federal lands. ASI, PLC and their affiliate the Colorado Wool Growers Association represent the interests of not only the greater grazing livestock industry, but also individual sheep producers directly impacted by the Agency's decision in this matter.

ASI and PLC join with the Colorado Wool Growers Association in supporting the Bureau of Land Management's Alternative B – No Action Alternative. Under the No Action alternative, livestock grazing allotments would continue to be permitted and successfully managed as they have over recent years. Conversely, we strongly oppose Alternatives C, D, and E.

The DEIS contemplates direction consistent with the BLM released manual MS-1730 Management of Domestic Sheep and Goats to Sustain Wild Sheep. ASI and PLC object to the consideration of this guidance, as it is beyond the Agency's scope as designated by Congress. The authority to manage for spatial or temporal separation between domestic sheep and wild sheep is not contained in the document's referenced statutory authorities. The Agency's prescribed management practices cannot exceed the scope authorized by Congress under relevant statute. Therefore, it is improper for the Agency to cite, reference or apply MS-1730.

In the alternative, should the Agency find there is relevant statutory authority to consider separation based on concerns over pathogen transmission as part of its habitat management duty then it must also consider separation among bighorn populations. The DEIS incorporates Secretarial Order 3362, Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors as supporting the "long-term sustainability of Rocky Mountain bighorn sheep populations in Colorado." Specifically, "maintaining connectivity between populations (or between herds)." Research in Wyoming and Montana has shown that in 77% of bighorn herds

tested, *Mycoplasma ovipneumonia* (*M ovi*) was detected (Butler, et. Al. 2018). While the objective in that study was to determine how commonly the pathogens associated with respiratory disease are hosted by bighorn sheep populations, the study noted that minimizing the introduction of novel pathogens from domestic sheep and goats remains imperative and that ecological factors often determine population-level effects. Therefore, it follows that if minimizing the introduction of novel pathogens from domestic sheep is imperative, it must also be imperative between and among bighorn sheep. While this action broadly by the agency “would not create or influence this issue,” the inclusion and implementation of Secretarial Order 3362 would, therefore it’s reference should be removed.

As the DEIS also notes, bighorn sheep that survive an all-age epizootic become immune, but some continue to carry the pathogen. There is increasing evidence that show pathogens such as *M ovi* can be transmitted between individual bighorn sheep, and between bighorn and domestic sheep (Besser et al. 2014, Cassirer et al. 2018, USDA Forest Service 2019). Likewise, *M ovi* has also been found in other species such as moose, caribou, mule deer, white-tailed deer, and cattle (Highland et.al. 2018). Additionally, there are arguments from scientists, who question the transfer of respiratory pathogens from domestic sheep to bighorn sheep and/or question the study design/methods of studies that conclude disease transmission or deleterious effects to bighorn sheep after contact with domestic sheep (Thurmond 2016, USDA Forest Service 2019). While pathogen transmission among and between wildlife was an issue eliminated from detailed analysis by the agency (as previously recognized that this action “would not create or influence this issue”) it and other factors do play a significant role in weighing the “risk of contact” and therefore should be considered.

In contrast to the 77% of bighorn herds in which *M ovi* was found present (Butler), the DEIS cites a 2006 survey of 453 flocks of domestic sheep across the United States where 88% were found to be carriers of *M ovi*. When considering that there are more than 100,000 flocks of domestic sheep in the United States (2017 Census of Agriculture), and the prevalence within each flock was not identified, the inclusion of this statistic becomes questionable. As noted, domestic sheep and bighorn sheep have coexisted on these allotments in excess of a century, with increases in bighorn populations in the past 25 years. With the addition of the facts that *M ovi* is endemic in bighorn herds and other species carry the pathogens; the scientific ground upon which “effective separation” is based quickly erodes.

The risk-of-contact model (ROC) only attempts to predict estimated contact; it does not predict viability and it is only one factor among several the Agency should consider. ASI and PLC strongly disagree that the ROC can be further extrapolated to predict the number of potential disease outbreaks in a given time frame, especially given the aforementioned variables the DEIS failed to consider. Further, we find the values from 1:20 to 1:1 contacts “would result in a disease outbreak” are arbitrary and at best misleading. Therefore, we request the consideration of additional factors be considered in the final ROC analysis to better reflect current science and that the prediction of future disease outbreaks be eliminated from the final EIS as unsubstantiated by science.

Additionally, risk under Alternatives C, D, and E should also reflect that diminishing or removing sheep grazing entirely does not eliminate the risk of a potential disease outbreak, even at the low end. Ignoring the endemic nature of these pathogens in bighorn sheep herds is

misleading and places the potential continuance of grazing at a disadvantage in the eyes of the public. Granted that the Agency's action in these alternatives may not increase the risk, but to imply that in the absence of domestic sheep no risk exists ignores current science and field observations of bighorn sheep die-offs without any corresponding connection to domestic sheep. Moreover, the effects of Alternatives C, D, and E fail to account for the absence of the benefits of grazing. Grazing reduces fuel load thereby reducing catastrophic wildfire, controls noxious and invasive species, and enhances forage mosaic. Wildfire specifically is the largest threat to the habitat of endangered and threatened species listed. These outcomes benefit the Agency in achieving its management goals and should be acknowledged.

America's sheep and cattle producers pride themselves on their stewardship of the range, both private and federal, and rely on those resources for their long-term livelihood. The American Sheep Industry Association and the Public Lands Council again appreciate the opportunity to comment on this DEIS and looks forward to working with BLM to meet its management goals. We look forward to working with you and your staff on this project. If you have any questions, please contact Chase Adams, ASI Senior Policy Director at chase@sheepusa.org or (202) 815-1411, or Ethan Lane, PLC Executive Director at elane@beef.org or (202) 347-0228.

Sincerely,



Benny Cox, President
American Sheep Industry Association



Bob Skinner, President
Public Lands Council