June 7th, 2021

Forest Supervisor O’Conner
Bridger-Teton National Forest
P.O. Box 1888
Jackson, WY 83001

RE: Bridger-Teton National Forest; Bighorn Sheep Forest Plan Amendment

Dear Supervisor O’Conner,

The American Sheep Industry Association (ASI) appreciates the opportunity to comment on the above referenced proposed Bighorn Sheep Forest Plan Amendment. Since 1865, ASI has been the national trade organization representing the interests of more than 100,000 sheep producers located throughout the country who produce America’s lamb and wool.

ASI supports the Bridger-Teton National Forest in its efforts to provide Forest Plan direction in alignment with the Terms of Agreement outlined in the Final Report and Recommendations from the Wyoming Statewide Bighorn/Domestic Sheep Interaction Working Group. Specifically, we support the agreement and applicable Wyoming State Statutes focusing on prioritizing bighorn sheep herds that are of high biological importance, while de-emphasizing other herds to achieve the overall goal of maintaining the health of bighorn sheep populations, while sustaining an economically viable domestic sheep industry.

The domestic sheep industry in the state of Wyoming is tremendously important to the overall U.S. Sheep Industry. As of Jan. 1, 2021, Wyoming ranked fourth in total sheep numbers by state, with 340,000 head of domestic sheep. Wyoming’s sheep operations support a vibrant domestic lamb and wool industry, enhancing the rural economy. However, the greatest challenge to future growth in the sheep industry is the loss of grazing, specifically the closure of federal grazing allotments and loss AUMs across the west.

ASI urges the service to ensure Forest Plan amendment aligns with the current Wyoming State Statutes and the 2004 Wyoming Statewide Bighorn/Domestic Sheep Interaction Working Group Plan. Moreover, ASI expresses concern that the proposed Forest Plan standard uses the term “native bighorn sheep home ranges” without defining “home ranges”. We would ask the service use the terminology outlined in the 2004 Working Group Plan, specifically to replace “home ranges” with “core native herd management areas”.

Thank you for your consideration in this matter and we look forward to continuing to work with the service on this and other projects.

Sincerely,

Chase Adams, Senior Director
American Sheep Industry Association