



State of Utah Department of Natural Resources
Division of Wildlife Resources
Michael Fowlks, Director
1470 N Airport Road
Cedar City, UT 84721

May 30, 2018

Re: April 12, 2018 Memorandum Mineral Mountains Bighorn Sheep Unit Plan

Director Fowlks,

We are writing on behalf of the American Sheep Industry Association and the Public Lands Council concerning the above referenced plan by your department to transplant desert bighorn sheep into the defined Mineral Mountain Range. We would strongly urge the Utah Department of Natural Resources not proceed with the outlined plan and review more viable alternatives to achieve its management goals while supporting grazing and Utah's rural economic stability.

Interactions and potential pathogen transmission between domestic livestock and wildlife have been a concern for many years. Unfortunately, the domestic sheep industry has been the proverbial scapegoat of this complex and multi-factorial issue for so much of that time that the stated intent not to force domestic sheep off the range in these situations is not enough to risk such an important part of Utah's livestock economy. We have seen a multitude of instances where assurances were made (verbal and written) that transplanting bighorn sheep will not affect traditional domestic sheep grazing, only to have those agreements later rescinded due to litigation, federal agency rulemaking, or both.

New research from the USDA Agricultural Research Service Animal Disease Research Unit has confirmed that the pathogen most commonly cited for wild sheep die offs, *Mycoplasma ovipneumoniae*, is not only carried by members of the subfamily Caprinae (sheep and goats), but other species. In sampling and testing >1200 other wild hooved animals to date, including members of the *Capreolinae* subfamily (moose, caribou, white tailed deer, and mule deer), bison, and antelope for carriage of *Mycoplasma ovipneumoniae*, ADRU has identified this bacterium in multiple members of the *Capreolinae* subfamily and in a bison. In working with a veterinarian in the Midwest, ADRU has received laboratory results and clinical data from another laboratory confirming white tailed deer can carrier *Mycoplasma ovipneumoniae*. Data from these findings has been submitted for publication; the manuscript is currently under peer-review for publication.

These newly identified host species are consistent with the following quote, taken from a textbook entitled *Mycoplasmas: Molecular biology, Pathogenicity, and Strategies for Control*: "assumptions about restricted host range of mycoplasmas, based on the host from which they were first or frequently isolated, are usually made in the context of nearly complete absence of representative sampling of the vast majority of potential hosts". Also, worth referencing are other peer reviewed publications that

have already described *Mycoplasma ovipneumoniae* carriage in two other non-*Caprinae* species, including domestic cattle in Colorado (Wolffe, *et al.*, 2010) and antelope at a wildlife conservation park in Qatar during a pneumonia outbreak (Gull, *et al.*, 2014). Detailed data can be provided by ADRU upon request.

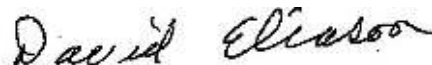
Moreover, research being done by Montana State University is finding significant exposure of bighorn herds in the state of Montana to *Mycoplasma ovipneumoniae*, calling into question the pathogen status of any bighorn sheep targeted for transplant. We also understand from centuries of animal care and husbandry that stress, nutrition, and environmental factors have significant impact on the connection between the presence of a pathogen and a corresponding disease event. This necessitates the need for a full understanding of the complexities of pathogen transmission before future transplants are prudent.

These findings raise significant questions for the grazing community that is reliant on the Mineral Mountains range. We cannot condone a process that is set up to fail, especially when that failure is so often inappropriately blamed on the domestic livestock grazing industry. Therefore, on behalf of the American Sheep Industry Association, the Public Lands Council and our affiliates, we again urge your department not to proceed with the referenced translocation plan.

Sincerely,



Mike Corn, President
American Sheep Industry Association



Dave Eliason, President
Public Lands Council