



November 1, 2018

Chugach National Forest
Supervisor's Office
Attn: Draft Land Management Plan
161 East 1st Street, Door 8
Anchorage, AK 99501

Dear Forest Supervisor:

On behalf of the ~7,500 members of the Wild Sheep Foundation (WSF), please accept this comment letter in support of the U.S. Forest Service (USFS)/Chugach National Forest's (CNF) proposed action to prohibit grazing by domestic sheep and goats on CNF lands.

Published, peer-reviewed scientific literature to date clearly indicates adverse impacts to wild sheep from respiratory pathogens commonly carried and transmitted from domestic sheep and goats to wild sheep and mountain goats. WSF believes the significant body of peer-reviewed, published scientific literature, along with internal direction from the USFS Washington Office, provides sufficient basis and justification for the CNF to implement this strategy (as a Forest Plan Standard) in the CNF Plan Revision.

Mountain Goat and Dall Sheep Habitat Management

13. Management actions and authorized uses should minimize human disturbance to mountain goats and Dall sheep, especially near important wintering, kidding, and lambing habitats.
 - a. Special use permits authorizing fixed-wing aircraft and helicopter flights should include stipulations requiring:
 - i. Aircraft maintain a minimum landing distance of one-half mile from all observed mountain goats or Dall sheep.
 - ii. Aircraft maintain a 1,500-foot minimum vertical distance from all observed mountain goats or Dall sheep.
 - b. Seasonal restrictions should be considered when designing management actions or authorizing uses that would occur within or close to mountain goat or Dall sheep wintering (October 1 through May 30), kidding and lambing habitat (May 10 through June 15). [Guideline]
14. Domestic goats and sheep are prohibited on NFS lands within the Chugach National Forest. [Standard]

While the Alaska Department of Fish & Game (ADF&G) has management authority over resident wildlife, USFS has authority and responsibility to manage federal lands, including decisions concerning livestock grazing (i.e., domestic sheep and goats) on CNF-managed lands.

To our knowledge, domestic sheep and goats have not historically grazed on CNF lands. Further, WSF and other wild sheep conservationists are not aware of a demonstrated need for domestic sheep and goat grazing on CNF lands, for production of food or fiber, or any other reason. Finally, use of domestic sheep and goats for noxious weed control on CNF-managed lands is not realistic or needed, nor have they ever been used for weed control in Alaska on federal or state land.

Domestic sheep and goats are a known disease threat to wild sheep and mountain goats. In our view, it is critically important to pro-actively manage for and achieve effective spatial and/or temporal separation between domestic sheep and goats and wild sheep and mountain goats, to minimize risk of pathogen transfer and subsequent respiratory disease (e.g., pneumonia). Allowing domestic sheep and goats to graze on the CNF in the face of overwhelming data, published scientific literature, and numerous USFS NEPA analyses in western states for bighorn sheep, is irresponsible. Domestic sheep and goats are a disease threat to wild mountain ungulates, period.

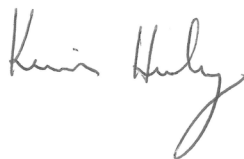
Alaska is home to over half the thinhorn sheep (Stone's sheep, Dall's sheep) in existence, and roughly one quarter of all the wild sheep in North America. This wild sheep resource is too important to risk contact with domestic sheep and goats.

WSF, our Alaska WSF Chapter, and other wild sheep conservationists appreciate CNF's recognition of the severity of contact between domestic sheep and goats and wild sheep, and mountain goats. We look forward to hearing from the CNF as your Forest Plan Revision continues.

Sincerely,



Gray N. Thornton
President & CEO



Kevin Hurley
VP for Conservation & Operations

cc: WSF Board of Directors
Kevin Kehoe, Alaska WSF Chapter President
Bruce Dale, Alaska Department of Fish & Game