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Comments:

The Montana Wild Sheep Foundation and the Wild Sheep Foundation comments are directed towards the bighorn sheep portions of the Plan and EIS, land use designations and wild horses. Our conservation organizations are dedicated to "Putting and Keeping Sheep on the Mountain".

1) Needs to be added to the Plan and Draft EIS:

An obvious omission of information throughout the Plan and Draft EIS regarding bighorn sheep is the importance of recreation generated by this species, both in viewing and hunting opportunities.

Bighorn sheep are an iconic species in Montana. Bighorn sheep on the Custer Gallatin National Forest generated 42% of Montana's total bighorn sheep hunter days and the unlimited bighorn sheep hunting districts alone in 2018 generated, 33% of the statewide total number of sheep hunting recreation days in Montana. The opportunities provided in Montana's unlimited bighorn sheep hunting districts on the Custer Gallatin National Forest are found nowhere else in Montana or in the lower 48 states. Unlike limited draw areas, these opportunities are unique, in that both resident and nonresident hunters can apply for and receive the permit annually until they are successful. Although hunters know their success rate will be low (6-10%) compared to near 100% for limited permit areas, unlimited areas are defined simply by the opportunity they provide to go sheep hunting.

2) Correction:

In the Draft Environmental Impact Statement in Chapter 3 page 430, it states, "In the late 1800s, bighorn sheep were likely present in the Crazy Mountains of the Bridger, Bangtail, and Crazy Mountains Geographic Area, but were historically absent from the Bridger and Bangtail Ranges." This sentence needs to be modified to read, "In the late 1800s, bighorn sheep were present in the Bridger, Bangtail, and Crazy Mountains Geographic Area" There is strong evidence to support this statement found in historical records and photos of Montana.

3) Alternatives Relative to Bighorn Sheep:

We recognize there are currently no sheep or goats grazing on the Custer Gallatin National Forest. We strongly support Alternatives B and C for the Pryor, Absaroka Beartooth, and Madison, Henrys Lake and Gallatin Mountains Geographic Areas. As stated in the plan, this is the "stronghold for bighorn sheep on the Custer Gallatin" and represents one of Montana's metapopulations of bighorn sheep. These alternatives emphasize the need for separation of domestic and bighorn sheep where wild sheep currently exist on the Custer Gallatin National Forests by: not allowing domestic sheep or grazing, designating these areas not suitable for recreational pack goats and requiring a risk assessment for use of domestic sheep and goats for weed management in these areas.

We strongly recommend the Bridger, Bangtail and Crazy Mountains Geographic Area be included with the same restrictions as those listed for the Pryor, Absaroka Beartooth and Madison, Henrys Lake and Gallatin Mountains Geographic Areas in Alternatives B and C for the following reasons. First, Montana Fish, Wildlife and Parks has written two EA for transplanting bighorn sheep to the Bridger Mountains, in 1993 and again in

2013. After each process Montana's Fish and Wildlife Commission has not denied the action, but has placed the onus on FWP to identify and implement domestic and wild sheep separation practices. Reintroduction is complicated due primarily to private land recreational domestic herds in close proximity and identifying strategies to keep them separate as bighorn sheep can wander. In addition, there are disease concerns with pathogen transfer between wild sheep, domestics and mountain goats. We view the Bridger Mountains as a viable transplant area with suitable habitat and a tremendous amount of public support. We are currently in the process of developing separation strategies that could be scientifically tested with a Bridger transplant in the future and are moving forward with Montana Woolgrowers to approach FWP to reconsider moving forward with an introduction. The other reason for inclusion is the significant mountain goat population in the Crazy Mountains. Mountain goats are also susceptible to the same respiratory diseases as wild sheep and caution at this time is warranted.

In the Ashland, and Sioux Geographic Areas not mentioned above, we recommend that part of the risk analysis for evaluating domestic sheep or goat grazing requires the Custer Gallatin National Forest to consult with Montana FWP and Tribal interests to identify suitable habitat not currently occupied by wild sheep that presents a wild sheep restoration opportunity. In the Draft Plan under Bighorn Sheep it states, "statewide restoration efforts led by Montana Fish Wildlife and Parks focused on habitat improvement projects and bighorn sheep transplants to recolonize areas of historic habitat. Disease transmission from domestic animals, particularly domestic sheep and goats, is considered a primary threat to bighorn sheep populations. At the time this plan was written, there were no permitted grazing allotments on the Custer Gallatin stocked with domestic sheep or goats." And under Desired Conditions (FW-DC-WLBHS) it states, "Habitat conditions support robust bighorn sheep populations that can if necessary, serve as source populations for translocation to facilitate recolonization of wild sheep in historic ranges or help augment existing populations where appropriate."

We fully agree with the Forest wide goal: "Goals (FW-GO-WLBHS) - Through Forest Service cooperation and collaboration with Tribal governments, State wildlife management and livestock health agencies, livestock permittees or producers, targeted weed sheep or goat operators, and pack goat users to develop livestock management protocols and habitat management strategies to minimize risk of disease transmission between domestic livestock and native bighorn sheep." Management practices are outlined in "Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat", prepared by the Western Association of Fish and Wildlife Agencies Wild Sheep Working Group. However, science-based separation strategies have not yet been developed and tested.

The Shoshone National Forest in Wyoming and the North American Pack Goat Association have developed permit conditions that would allow for careful mitigation of pack goat activity that could be applied in Montana. We recommend incorporating those conditions if permitting of this activity is contemplated.

We understand that, "Targeted grazing by domestic sheep or goats for weed control could be used anywhere on the Custer Gallatin, so long as mitigation measures could effectively minimize risk of disease transmission from domestic animals to wild sheep." We would like those measures and strategies outlined in the plan.

#### 4) Forest Plan Land Allocations:

In reviewing forest plan land allocations, we tend to favor Alternative C. We support the intent of managing for Backcountry Management Areas, i.e., "the current undeveloped or lightly developed characteristics of these areas. This land allocation generally supports the area specific existing uses, a mix of nonmotorized, motorized and mechanical uses. Habitat enhancement is an important component of wild sheep (and wildlife) conservation. "Allowing timber harvest for purposes such as fuels reduction, restoration, or wildlife habitat enhancement" is also a strong attribute for backcountry area designations, providing more flexibility in habitat management. In addition, these are the kinds of places favored by many hunters.

Providing people with access to their natural resources is important in fueling a conservation ethic in citizens. There is a balance from being overly restrictive to unrestrictive, the former tending to disconnect people from the landscape and the latter resulting in resource damage. The Backcountry Management Area and Alternative C strikes at that balance.

We also favor the Backcountry Management Area designation for the West Bridger's as presented in Alternative C. It compliments the Linkage Zone designation and compliments a future bighorn sheep transplant there.

5) Pryor Mountain Wild Horse Territory:

We are opposed to Alternative D. Based on wild sheep and natural resource impacts resulting from the reproductive ability of wild horse populations to quickly increase, it is critically important for the USFS and its federal agency partners to manage Pryor Mountain wild horses within the appropriate management level (APL) of 90-120 horses. Although the draft Custer Gallatin Draft Plan and EIS recognize the majority of bighorn sheep spend most of their time in the Bighorn Canyon National Recreation Area, a wilderness designation on the Custer Gallatin National Forest can inhibit the ability of federal agencies involved in managing this wild horse population within the APL. We agree with the analysis of Alternative D in the Draft Custer Gallatin National Forest Draft EIS.