October 28, 2014

Chris Iverson
Deputy Regional Forester
Forest Service-USDA
324 25th Street
Ogden, UT 84401

Dear Mr. Iverson,

Re: Region 4 Bighorn Sheep Risk Assessment

The Wyoming Department of Agriculture’s (WDA) Board of Agriculture and Wyoming Game and Fish Department (WGFD) Commission are writing you with shared concerns regarding the US Forest Service, Region 4 approach and implementation of the Risk Assessment Model for bighorn and domestic sheep.

Region 4 staff has provided various updates, including two at the Wyoming Statewide Bighorn Domestic Sheep Working Group meetings in Casper in April and August 2014. We are appreciative for the updates, but fail to see or hear how Region 4 is addressing our concerns before the Model is implemented, not just in Wyoming, but also in Idaho, Nevada, and Utah.

- **Implement State Working Group Plans:** Wyoming stakeholders, including forest service staff, have worked diligently to develop and implement our Plan. The Wyoming Plan has served not only our state, but also as a template for other states to use. We request Region 4 provide detailed information regarding how they will include and implement the State Working Group Plans into the proposed action.

- **Acknowledge State Jurisdiction of Bighorn Sheep:** National forest lands provide a significant portion of habitat for bighorn sheep. State wildlife agencies have jurisdiction for bighorn sheep, including assessing population, augmentations, and appropriate hunting opportunity. We caution Region 4 from deviating beyond proving viable habitat and considering populations or herd size.

- **Include State Agencies Prior to Implementation:** Recognizing the bighorn sheep is a state managed species, we urge Region 4 to transparently communicate with cooperating agencies such as the WGFD, WDA, and Wyoming Livestock Board. We would appreciate the opportunity to meet with Region 4 prior to implementation of any final decisions.
- **Develop Viable Management Actions Prior to Model Findings:** We appreciate the GIS map develop for open and vacant allotments. We ask Region 4 to take this map one step further by creating and sharing how the forest plans to prioritize and offer these allotments in a timely manner. We strongly oppose publicly making a management decision for risk prior to having alternative locations available. Grazing permittees should have the opportunity to discuss what allotments are possible alternatives and know what National Environmental Policy Act (NEPA) analysis is required.

We would appreciate Region 4 consider our concerns and comments prior to making any recommendations to forest supervisors. We believe our concerns apply not only to Wyoming, but also to neighboring states, of which may include grazing permittees who graze domestic sheep in states different than their base property in Wyoming. We look forward to receiving a written response from Region 4 prior to any final decisions or implementation.

Sincerely,

Richard Klouda, President
Wyoming Game and Fish Commission

Scott Talbott, Director
WY Game and Fish Department

Allison Lass, President
Wyoming Board of Agriculture

Jason Fearneyhough, Director
Wyoming Department of Agriculture

AL/jf/jw

CC: Governor’s Policy Office

Electronically Signed using eSignOnline™ [Session ID: cd169857-c2fb-42ea-b458-5812ee7d2f91]