

September 30, 2017

VIA ELECTRONIC SUBMITTAL, E-MAIL AND U.S. MAIL

Casey McQuiston, Resources Staff Officer
Shoshone National Forest
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RE: “Alternative 4” - Shoshone National Forest Supplemental Draft Environmental Impact Statement for Use of Domestic Sheep, Goats and Pack Goats

Dear Mr. McQuiston:

On May 12, 2017, the Shoshone National Forest published a Notice of Availability for, and requested comments on, the Shoshone National Forest Risk Analysis of Disease Transmission between Domestic Sheep and Goats and Rocky Mountain Bighorn Sheep (“RADT Report”) and Supplemental Draft Environmental Impact Statement for Use of Domestic Sheep, Goats and Packgoats (“SDEIS”). On June 6, 2017, the North American Packgoat Association (“NAPgA”) requested a meeting with the Shoshone National Forest and other interested parties to discuss issues raised in the RADT Report and SDEIS concerning the use of pack goats on the Forest. In response, the Shoshone National Forest hosted a public meeting concerning the RADT Report and SDEIS in Lander, Wyoming, on July 28, 2017, where representatives of NAPgA, the Wyoming Wild Sheep Foundation, the national Wild Sheep Foundation, the Bighorn Restoration Group, the Wyoming Wool Growers Association, the Wyoming Game and Fish Department, the Wyoming Department of Agriculture, and the public met and discussed issues concerning bighorn sheep management and the use of pack goats on the Forest. As a result of the meeting, these representatives, independent of the Shoshone National Forest, agreed to collaboratively develop an additional and potential reasonable alternative for the SDEIS concerning bighorn sheep management and the use of pack goats on the Forest.

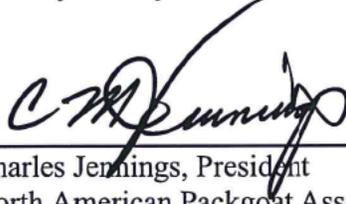
As part of this collaborative effort, representatives of NAPgA, the Wyoming Wild Sheep Foundation, the Bighorn Restoration Group, the Wyoming Game and Fish Department, the Wyoming Department of Agriculture, and the public met again in Lander, Wyoming, on August 29, 2017, and developed the framework for an alternative that would restrict the use of pack goats from certain areas of the Shoshone National Forest, but allow such use in other areas of the Forest under a permit system. Following this meeting, and throughout the month of September, these representatives worked together to prepare a written alternative based upon the agreed-upon framework and which would adequately address the concerns of each representative. The result of this collaboration is the enclosed “Alternative 4,” which presents an additional reasonable alternative for the SDEIS that would allow the use of pack goats outside currently occupied core native bighorn sheep habitat on the Shoshone National Forest under a permit system. The undersigned representatives submit this new alternative to the Shoshone National

Forest and request that it be considered in the Shoshone National Forest's Final Supplemental Environmental Impact Statement for Use of Domestic Sheep, Goats and Packgoats ("FSEIS").

While the undersigned representatives have reached agreement on a number of issues concerning bighorn sheep management and the use of pack goats on the Shoshone National Forest, and jointly submit and support the new Alternative 4, consensus has not been reached on the complicated and underlying issues concerning the risk of disease transmission between pack goats and bighorn sheep on the Forest. Thus, Alternative 4 does not necessarily address or reflect each representative's concerns about the science presented by the Shoshone National Forest in the RADT Report and SDEIS nor does it connote agreement with the Forest's analysis of that science and proposed choice of management direction. This joint submittal of Alternative 4 is not intended to negate or supersede any of the representative's comments on the RADT Report and SDEIS, and does not foreclose any representative's ability to provide further comments, object or seek other remedies during the National Environmental Policy Act ("NEPA") process or in response to the Shoshone National Forest's final RADT Report, FSEIS and/or final record of decision.

Please accept and consider the enclosed Alternative 4 in the FSEIS. If you have any questions or require additional information relating to Alternative 4 and/or this submittal, please contact Andrew A. Irvine at Andrew A. Irvine, P.C., P.O. Box 3221, Jackson, WY 83001, (307) 690-8383, andy@andrewirvinelaw.com, and he will coordinate with the undersigned representatives to answer such questions and/or provide additional information.

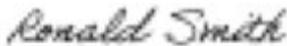
Thank you for your consideration,



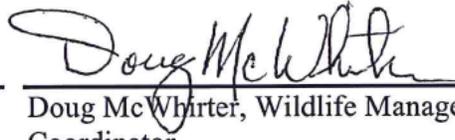
Charles Jennings, President
North American Packgoat Association



Steve Kilpatrick, Executive Director
Wyoming Wild Sheep Foundation



Ronald Smith, President
Bighorn Restoration Group



Doug McWhirter, Wildlife Management
Coordinator
Wyoming Game & Fish Department

Encl.

Alternative 4 – SDEIS – Use of Domestic Sheep, Goats, and Pack Goats

Alternative 4: Pack Goat Use with Mitigations Outside Currently Occupied Core Native Bighorn Sheep Habitat

This alternative would prohibit the use of pack goats within occupied core native bighorn sheep habitat on the Shoshone National Forest (Figure 1, SDEIS (attached)) to minimize risk of disease transmission from pack goats to bighorn sheep. This alternative includes an adaptive management measure to authorize the use of pack goats under certain conditions outside occupied core native bighorn sheep habitat. Those conditions would include:

1. Implementing a permit system for pack goat use. Pack goat users would be informed on required and recommended actions for reducing risk of contact between pack goats and bighorn sheep when obtaining a permit.
2. Requiring any observed contact between pack goats and bighorn sheep, as well as any lost pack goats, to be reported to the Forest Service as soon as possible.
3. Limiting the number of pack goats per party.
4. Requiring pack goats to be leashed or in direct control by their owner.
5. Requiring pack goats to be high-lined or restrained in campsites.
6. Requiring pack goats to have bells attached to their collars.
7. Requiring pack goats to undergo disease testing and health inspection prior to use on the Shoshone National Forest.
8. Limiting pack goat use to May 31 through October 31 of each year.
9. Restricting pack goat use on the Washakie Ranger District to the area south of the Main Fork of Bull Lake Creek originating at the Alpine Lakes south of the Brown Cliffs (Figures 1.a.-b. (attached)).
10. Pack goat users would voluntarily avoid use outside occupied core native bighorn sheep habitat on the Clarks Fork, Wapiti, Greybull, and Wind River Districts to avoid potential grizzly bear conflicts.

The Forest Service and appropriate State agencies would annually review new science and technologies regarding pack goat use and bighorn sheep management, and consider adjustments to this management direction.

There is no proposed change to domestic sheep and domestic goat grazing allotments.

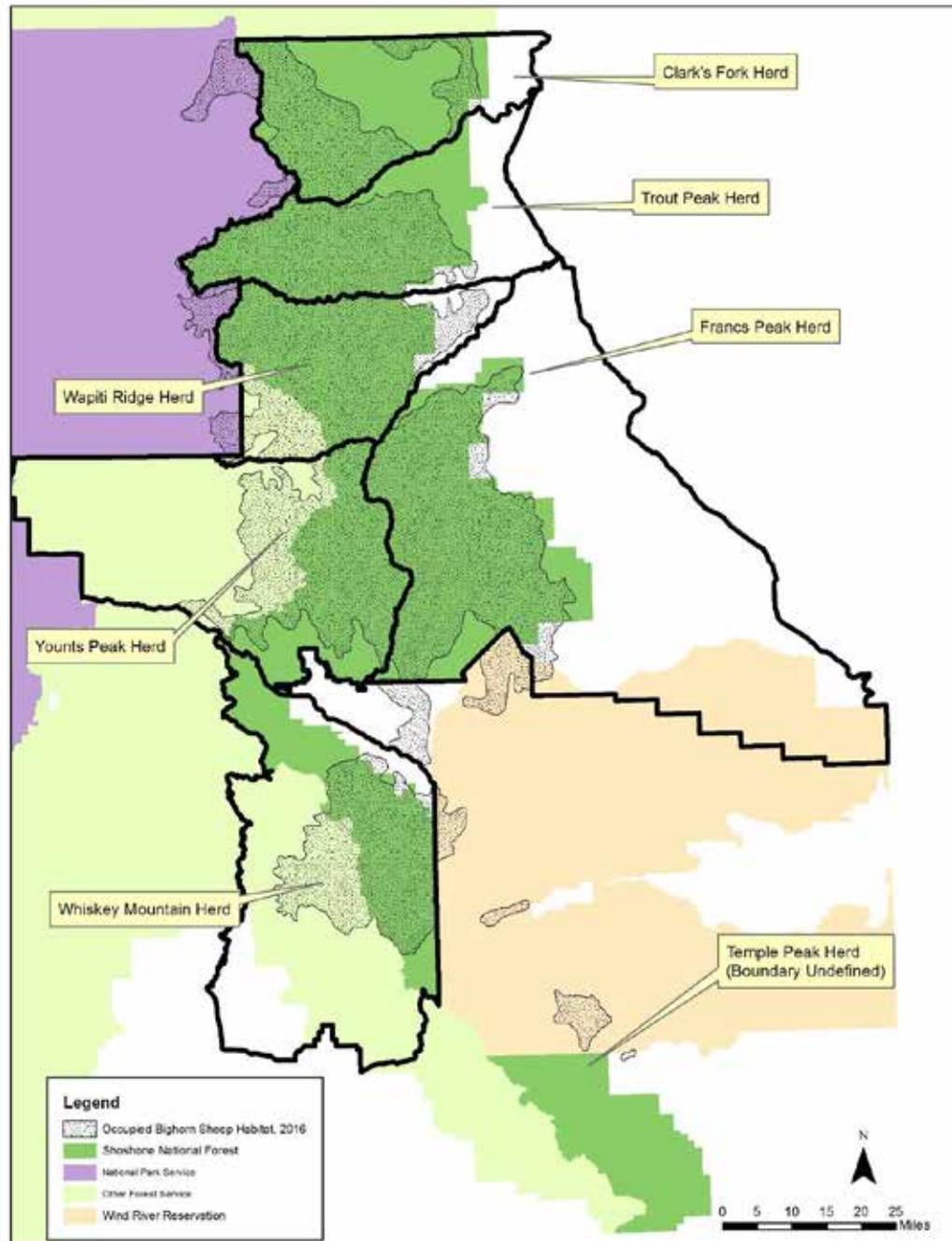


Figure 1. Bighorn sheep herds and occupied habitat on the Shoshone National Forest and adjacent lands.

Figure 1.a.

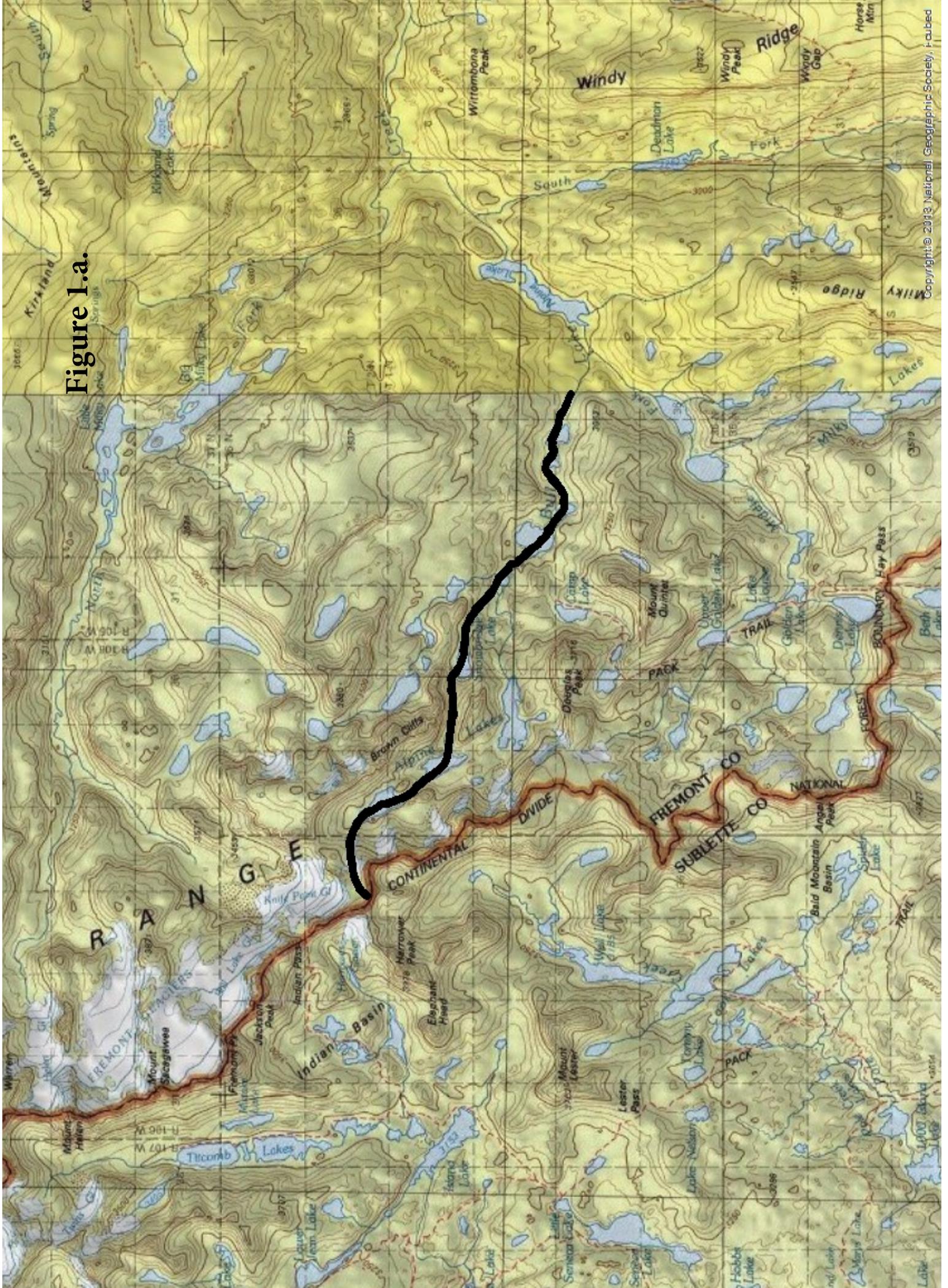


Figure 1.b.

