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Thomas Tidwell, Chief,  
USDA Forest Service,  
Attn: EMC - Administrative Reviews,  
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Responsible Official: Daniel J. Jirón, Regional Forester

March 25, 2014

Subject: **Objection to the Shoshone Land Management Plan Draft Decision**

Dear Chief Tidwell:

I wish to file an Objection to the Final Environmental Impact Statement (FEIS) and the Revised Shoshone Land Management Plan (EIS No. 20140007). The notice was published in the Federal Register / Vol. 79, No. 12 / Friday, January 17, 2014. The Responsible Official is Daniel J. Jirón, Regional Forester. I previously commented on the Draft EIS and Land Management Plan in a letter dated March 22, 2012; therefore I qualify to file an objection to the Final EIS and Land Management Plan, pursuant to 36 CFR 219 subpart B. A copy of my original comment letter should be available in the Public Record or Project file; I can also furnish you another copy upon request.

My previous comments dealt with the issue of the proposed Pack Goat Closure in the Preferred Alternative (G). My current Objection deals with the failure of the FEIS and Land Management Plan to adequately address my comments. Specifically, the Plan failed to include mitigation measures that prevent disease transmission between Pack Goats and bighorn sheep, and it failed to analyze the effectiveness of these mitigations. The Risk Analysis in the supporting documentation is flawed. Finally, the Plan failed to adequately analyze Cumulative Effects. I wish to note these and other specific shortcomings in the FEIS and Land Management Plan:

- In selecting the Preferred Alternative, G, you fail to adequately differentiate between PACK GOATS and other domestic goats and sheep, assuming Mitigation

Measures and Best Management Practices are used. Instead, when discussing the environmental consequences and MARGIN OF RISK of disease transmission between domestic livestock and wild sheep, the Plan continues to lump Pack Goats with domestic goats. With the assumption that previously-mentioned mitigation measures are required and followed, Pack Goats should be analyzed separately when discussing MARGIN of risk, and disease transmission probabilities.

- By continually citing the supporting document "Risk Analysis of Disease Transmission between Domestic Sheep and Goats and Rocky Mountain Bighorn Sheep, Shoshone National Forest 2012," the Plan fails to include PROBABILITY of disease transmission due to contact between Pack Goats and wild sheep in its risk analysis. Thus the risk analysis is flawed, and the Land Management Plan (and the study upon which it relies) sets an unrealistic goal with respect to reducing the risk of disease. In addition, the studies used in the supporting documentation were not site-specific, nor was the Risk Analysis peer-reviewed by experts on the subject or Risk, including methodology (e.g. including PROBABILITIES).
- The Shoshone ignored a request to collaborate with representatives from the Recreational Pack Goat Community, including the North American Pack Goat Association (NAPGA), in developing and incorporating mitigation measures and Best Management Practices (BMPs), and monitoring their effectiveness, and including these in the Preferred Alternative. I personally offered to collaborate; however, this offer was not mentioned in the comments section. In addition, no members or representatives from the Pack Goat community were listed in the collaborators/contributors section or included as "non-government work group members (Chapter 4)."
- The Shoshone performed an incorrect and incomplete Direct, Indirect and Cumulative Effects Analysis. Specifically, there was no analysis that separately analyzed the effects of the Pack Goat Closure on wild sheep. Instead, Pack Goats were lumped with other domestic goats and sheep in the Direct, Indirect, and Cumulative Effects Analysis. In addition, the Plan did not adequately examine the far-reaching indirect and cumulative effect ("ripple effect") of your Closure on the people that use Pack Goats (Pack Goat Community).

After reading the comment response section (Appendix A), I have the following suggestions about how the proposed plan and decision may be improved, with respect to my comments. I am also stating why I object to the manner and adequacy to which my comments were addressed in Appendix A.

The response to my comment (Public Concern #228) about analyzing Best Management Practices and Mitigation Measures states that "Although the risk of disease transmission is LOW TO VERY LOW, even ONE disease transmission event could be catastrophic to a core native bighorn sheep herd" (Appendix A pg. 767). You continually cite this response, as well as the document "Risk Analysis of Disease Transmission between Domestic Sheep and Goats and Rocky Mountain Bighorn Sheep, Shoshone National Forest 2012." I submit that if mitigation measures and BMPs are developed, implemented and most importantly, MONITORED, it is possible to lower the PROBABILITY of transmission, and achieve the Goal of "Maintaining LOW RISK of disease transmission from domestic sheep and domestic goats to wild bighorn sheep within core bighorn sheep ranges" (SENS-GOAL-03).

Given that "Currently, there are **no documented cases of disease transmittal from domestic sheep or goats to bighorns on the planning area** (EIS Page 226)" please explain the inconsistency that takes the current goal of "maintaining LOW risk" (SENS-GOAL-03) to saying that risk of "even one transmission" is too great. If there are currently NO documented cases of disease transmittal, then isn't that goal "maintaining low risk" being met, without having to impose a ban on Pack Goats altogether? Assuming Mitigation Measures are followed, what is the MARGINAL difference between the current condition of LOW/VERY LOW risk (Mlodik 2012), and "even one disease transmission?" Does eliminating even "one disease transmission" equate to ZERO risk? Is zero risk actually the goal?

The "qualitative risk analysis" cited in the Plan (Mlodik 2012) is incomplete because it lacks a discussion of "PROBABILITY of disease transmission by contact between Pack Goats and wild sheep, assuming Mitigation Measures are followed." "Probability" is an essential and necessary component of any sound Risk Analysis. Nor did the Risk Analysis explain and support its ASSUMPTIONS concerning Pack Goats. In addition, as I stated in my previous comment, the "qualitative" risk analysis cited in the Plan was not reviewed by representatives from the Recreational Pack Goat community, NAPGA, or people with a fundamental knowledge of Pack Goats, their behavior, and their relationship to their human owners. These flaws in the Risk Analysis were never addressed in the the comments section (Appendix A).

Please do a correct risk analysis that includes probability of disease transmission from Pack Goats, assuming mitigation measures are followed. Please include members of NAPGA or other experienced representatives from the Recreation Pack Goat Community in the State-wide Bighorn Sheep/Domestic Sheep Interaction Working group. The analysis must take into account the unique differences between Pack Goats and other domestic livestock and it must explain the assumptions concerning

Pack Goats. It must include the PROBABILITIES (not just the RISK) of transmission and the marginal difference between these probabilities. If LOW risk is your goal, you should state it. If VERY LOW risk is your goal, you should state it. If ZERO risk is your goal, you should state it. Conduct a peer review of this analysis by experts in the field of Risk Assessment (not just Wildlife Biologists), with the disclosure that there has **never been a single case of disease transmittal from domestic sheep or goats to bighorns on the planning area.**" Please include and reference documentation of your consultation and concurrence with the U.S. Fish & Wildlife Service. Once this analysis is complete, collaborate with members of NAPGA or other experienced representatives from the Recreational Pack Goat Community in implementing effective mitigation measures, BMPs, and monitoring of Recreational Pack Goat Use. .

Cumulative effects are a combination of direct and indirect effects of an Alternative combined with the effects of past, present, and reasonably foreseeable future activities undertaken by either the Forest Service or other parties. My comment with respect to Cumulative Effects was NOT addressed in the Final EIS. The comment had to do with the precedent ("*ripple effect*") of this Decision. Numerous Federal Land Managers intend to use the Shoshone's Land Management Plan as their own guidance for wild sheep management. Your decision will affect Recreational Pack Goat Users not just on your Forest, but on ALL other Federal Lands that have wild sheep habitat. Although you mentioned my comment in Public Concern #514 ("*...an outright ban can cause a ripple effect amongst other forests...*"), I can find no analysis of this in the Cumulative Effects Section. The following is NOT a complete or adequate discussion this "*ripple effect*" in the Cumulative Effects section (Final EIS pg 226):

*"Currently, the Shoshone is working with other State, Federal, and local partners (State-wide Bighorn Sheep/Domestic Sheep Interaction Working group) to better identify where bighorns occur, where they wander, and how they might interact with other herds and domestics. In managing both domestic sheep and goats and bighorns, the Shoshone is using a nationally recognized collaborative process for resolving bighorn/domestic sheep management conflicts. The approach outlined in the process has been incorporated into the management of domestics and bighorn sheep through the Plan design criteria and Plan components. It is anticipated that this approach will help Forest Service range and wildlife specialists work with interested individuals and organizations to develop site-specific solutions to potential conflicts amongst the species. This effort is expected to help reduce potential cumulative effects to bighorn sheep on Shoshone."*

I repeat: your decision will affect the Pack Goat Community not just on the Shoshone, but on all Federal Lands that have wild sheep habitat. Please analyze the far-reaching indirect and cumulative effects of this decision, and include its effects on Recreational Pack Goat Users, both on the Shoshone and on other Federal Lands that will be affected by your precedent-setting Decision.

With respect to your Public Concern #842, "regarding the effects on elderly or disabled individuals who rely on pack goats to carry their gear..." you suggest that this group of individuals simply rely on another type of pack animal or go someplace else that isn't closed to Pack Goats. Although the elderly or disabled are not considered "populations" under the definition of Environmental Justice, your response is still disingenuous in that you fail to display any understanding whatsoever of the passion and fondness that Goat Packers have for their animals and for the ability to recreate in these specific areas with their beloved livestock. It is not just the elderly and disabled that are affected by your decision. It is a group of enthusiastic outdoor people (and potential outfitter guides) that enjoy packing with goats are affected. To suggest that we purchase a different type of livestock if we want to visit areas that are now closed off to Pack Goats smacks of elitism. To suggest that we simply take our goats and "go someplace else" smacks of ignorance of what recreating in our Federal Wildlands is all about.

In my previous comment letter, I have:

- Suggested mitigation measures.
- Volunteered to monitor the effectiveness of these measures.
- Offered to meet with Forest Officials and work collaboratively to discuss alternatives and solutions to closing large portions of the Forest to Pack Goats.

My comments were either ignored or inadequately addressed. Instead, you have chosen to single out pack goats over other pack stock as a potential threat and with poor or insufficient analysis. Please work with the Pack Goat Community to employ sound science to this issue. Please perform a correct Risk Analysis that includes effective mitigation measures. Please acknowledge that Pack Goats are an insignificant factor in contributing to "even one transmission." Please look at the far reaching "cumulative effects" of your decision on the Pack Goat Community, not just on the Shoshone, but on Federal Lands throughout the West.

Best Regards,

Irene Saphra, Retired BLM Fuels Specialist and Land Use Planner

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