

File Code: 2670

Date: 21 May 2018

Carolyn Swed
Field Supervisor
U.S. Fish and Wildlife Service
Nevada Fish and Wildlife Office
1340 Financial Blvd., Suite 234
Reno, NV 89502

Dear Carolyn,

I am submitting amendment #1 to the previously submitted (November 13, 2017) biological assessment for the Revision of the Inyo National Forest Land Management Plan Final Environmental Impact Statement. In discussions pertaining to federally endangered Sierra Nevada Bighorn Sheep and plan components and direction regarding pack goat use. The Forest Service agreed to clarifications to be made in the Proposed Action and analysis of effects. The attached document explains these clarifications and edits made.

If you have any questions regarding amendment #1, please contact Don Yasuda at 707-562-8970 (Vallejo) or 530-409-5405 (cell) or by email @ dyasuda@fs.fed.us

Kindly,


Tammy Randall-Parker
Forest Supervisor



Items and paragraphs to be updated

During consultation on the Revision of the Inyo National Forest Land Management Plan, a review and discussion occurred about plan components and direction regarding pack goat use in areas of identified high risk of disease transmission to Sierra Nevada bighorn sheep. In discussions, the Forest Service agreed to clarifications to be made in the Proposed Action and analysis of effects. The following changes are submitted as Amendment #1 to the Biological Assessment dated November 12, 2017.

Prepared by: Donald Yasuda, May 21, 2018

Chapter IV, Relevant Plan Direction; Species-specific direction for Bighorn Sheep, pg 49 and Appendix B, pg 196.

Note: Additions are in **bold underline**. Deletions are in ~~**bold-strikeout**~~. These two edits were made after submission of the BA per discussion with the USFWS. Note these changes also occur in Appendix B on page 196. We have added a new Suitability plan component per discussion with the USFWS.

Desired Conditions (SPEC-SHP-DC)

Num	Plan language
02	The risk of disease transmission from domestic sheep and goats, <u>including pack goats</u> , to bighorn sheep (based upon the best available risk assessment model) is reduced to the maximum extent practicable.

Standards (SPEC-SHP-STD)

Num	Plan language
01	Do not allow domestic sheep or goat grazing or pack goat use adjacent to bighorn sheep populations where relevant bighorn sheep risk assessment models show there is a high risk of contact and spread of disease, unless risks can be adequately mitigated.

Suitability (SPEC-SHP-SUIT)

Num	Plan language
<u>01</u>	<u>Domestic sheep or goats, including pack goats, are not suitable within the high risk area for disease transmission to Sierra Nevada bighorn sheep identified in the most recent bighorn sheep risk assessment.</u>

Sierra Nevada bighorn sheep; Analysis of Effects, Range Management, page 83

Changes made to first full paragraph on page:

Although this minimization of contact within the areas identified as high risk is part of the environmental baseline, the Proposed Action includes plan direction to support continuing to manage to minimize the risk of contact if conditions change. A desired condition for bighorn sheep (SPEC-SHP-DC-02) directly addresses this by describing a desired condition that “[t]he risk of disease transmission from domestic sheep and goats, **including pack goats**, to bighorn sheep (based upon the best available risk assessment model) is reduced to the maximum extent practicable.” **Contact between domestic sheep or goats, including pack goats, and Sierra Nevada bighorn sheep could result in the transmission of disease**

that could result in reduced fitness or mortality of individuals, and it is possible that disease spread could become epizootic within a herd. The Proposed Action includes a suitability of lands plan component (SPEC-SHP-SUIT-01) that states that “Domestic sheep or goats, including pack goats, are not suitable within the high risk area for disease transmission to Sierra Nevada bighorn sheep identified in the most recent bighorn sheep risk assessment.” An associated standard (SPEC-SHP-STD-01) specifically directs “[d]o not allow domestic sheep or goat grazing or pack goat use ~~adjacent to bighorn sheep populations~~ where relevant bighorn sheep risk assessment models show there is a high risk of contact and spread of disease, unless risks can be adequately mitigated.”

Changes made to third full paragraph on page – edits and split into two paragraphs:

There is also a concern for disease spread from domestic goats. Although there are no livestock grazing allotments that permit domestic goats on the Inyo NF, there is ~~currently a limited amount of occasional~~ recreational pack goat use that occurs **within the high risk zone identified in the current risk assessment.** ~~Since r~~ Recreational pack goats are typically **of higher health than herd goats and they are** under close control of their handlers., ~~However, while~~ the risk of contact with bighorn sheep is ~~unknown but expected~~ **thought to currently be lower than for herd goats in grazing allotments, any contact could spread disease resulting in mortality of individual animals or lead to an epizootic event affecting the herd.**

To address the risk of pack goat use, the Proposed Action includes a goal (SPEC-SHP-GOAL-01) which expresses the intent to **continue to** “[c]oordinate with the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service to conduct a risk assessment of pack goat use on the Inyo National Forest and develop mitigations strategies to manage the risk of disease transmission, if needed.” ~~If upon completion~~ **This goal will facilitate the periodic review** of the **existing** risk assessment, **which will be updated as needed. If upon update of the risk assessment, additional or different** risk mitigation actions **for Sierra Nevada bighorn sheep** are ~~needed~~ **required**, the same standard as described above (SPEC-SHP-STD-01) would require that pack goat use would not be allowed or the risks would be mitigated in any areas having high risk of disease transmission. **Due to the risk of mortality, the Forest will achieve avoidance of pack goats and Sierra Nevada bighorn sheep contact by identifying the high risk areas determined by the most updated risk assessment as unsuitable for pack goat use (SPEC-SHP-SUIT-01). It is acknowledged that some risk of disease transmission will remain from uses that may occur in areas outside of the high risk area or from unauthorized animals that may trespass from areas outside of the national forest.** This ~~contributes~~ **would contribute** to Recovery Task 2.3.1 to prevent contact between bighorn sheep and domestic sheep or goats.

Other relevant paragraphs not needing edits:

Sierra Nevada bighorn sheep; Threats; Disease or Predation, pp. 79-80

Although there is no goat grazing within authorized allotments, recreational pack goat use is currently allowed on the Inyo NF but actual use is believed to be very low. Between 2000 and 2008 there were temporary or annual forest orders issued to restrict recreational pack goat use and free-running domestic dogs within identified areas within the bighorn sheep range. In coordination with the USFWS and the CDFW, these forest orders were allowed to expire in 2008 and analysis of management alternatives for recreational pack goat use is pending a new project analysis that has been contemplated but not initiated

to date. To better track goat packing, the Inyo NF added a new category in the wilderness permitting process used by visitors. Under the section titled “number of stock” a new category for pack goat use was added in 2012. Since 2014, one to two permits are issued annually for July and August. The trails used all differ as does the ratio of people to goats but the average is 2 people and 2 goats which suggests a low use and no pattern of concentration or regular annual use. Although there is potential for error in this electronic tracking process, the low number of reported use is consistent with the overall understanding of visitors with pack goats by forest staff. Furthermore, the Inyo NF has no records of pack goat contact with bighorn sheep. The forest is continuing to better understand the recreational demand for pack goat use and determine the area and amount of use by pack goat visitors by working closely with user groups and organizations such as the North American Packgoat Association.

Sierra Nevada bighorn sheep; Determination; Key conclusions, pg. 87

- The forest plan includes direction to avoid, mitigate or minimize the risk of disease spread from domestic sheep and recreational pack goats but cannot eliminate the risk entirely.