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December 22, 2017

Montana Fish, Wildlife & Parks  
c/o Montana FWP Commission  
1420 East Sixth Avenue  
P.O. Box 200701  
Helena, MT 59620-0701

RE: Greenhorn Mountains bighorn sheep hunting comments

To Whom It May Concern:

These comments are submitted to the Commission on behalf of the membership of the Montana Wool Growers Association (MWGA). MWGA represents Montana's sheep industry.

As part of MWGA's mission, MWGA comments on proposals, such as this one, that could have an impact on agriculture production in Montana.

As the Department is well aware, because of recent federal court decisions related to the species and because of endless litigation being filed by self-styled environmental protection groups, the issue of bighorn sheep management is becoming of critical importance to the MWGA and its membership.

MWGA's membership supports Region 3 FWP's proposal to create a new bighorn sheep hunting district for the Greenhorn Mountain Bighorn Sheep Herd. MWGA also supports the Commission coming forth with a quota for the take of members of the Greenhorn herd.

Prior to the introduction of bighorn sheep into the greenhorns, Montana FWP conducted an environmental review and prepared management objectives for the herd. One of those management objections for the introduced herd was to provide hunting recreation opportunities.

Based on the monitoring analysis performed on the herd by MT FWP, the circumstances are such that the hunting opportunity management goal can be met. Allowing the take of bighorn sheep from the herd would be and is consistent with Montana FWP's Bighorn Sheep Conservation Strategy adopted in 2010. In that document, FWP denoted that it would develop opportunities for hunting when three of four stated criteria had been met for a minimum of three successive years. This standard has been met.

Further, in that Strategy, the Department noted that take of greenhorn mountain wild sheep would be authorized when removals of bighorn sheep due to potential interaction with domestic sheep was no longer a concern. As noted in FWP's quota change supporting information sheet, for the last decade, there has been sufficient spatial separation between domestic sheep and the greenhorn herd for over a decade. This is due in part to the fact that time has shown that the topography of the greenhorn mountains is a natural barrier by and between domestic herds grazing on the Beaverhead-Deer Lodge National Forest and the introduced greenhorn herd.

Because the environmental, management objective, social, and science factors are all present for establishing a new hunting district for hunting bighorn sheep in the greenhorns, the MWGA membership recommends the proposal be adopted.

What is more, MWGA supports placing a quoting on the number of take licenses issued for the new hunting district. While the proposal limits the quota to one license, MWGA's membership believes the greenhorn mountain population is large enough in numbers to authorize the issuance of up to 3 tags for male species harvest. This number can be adjusted downward over time if the Department determines that this level of harvest

With the above being stated, the Association noted with extreme interest the fact that four (ewes) from the greenhorn herd were lethally removed from the herd in 2008 as a result of comingling with bison. This removal was, apparently done at the request of a private landowner on the grounds that bighorn sheep pose a disease risk to their private bison herd. The Association has re-reviewed the 2010 and the Montana Sheep Conservation Strategy, as well as the EA performed on the 2003 greenhorn herd introduction. Neither of these documents analyze or even denote that bighorn sheep can pose a disease risk to bison. Further, unlike management protocols already established for domestic sheep, neither document sets forth management protocols for managing risk of contact by and between bison and the greenhorn mountain bighorn. As such, it is MWGA's position that FWP should perform a supplemental EA on the greenhorn bighorn herd that analyzes the risk of contact by and between members of that herd and domestic bison. Further, a supplemental EA should be prepared to analyze the risk of greenhorn bighorn sheep transmitting disease to privately owned animals, namely bison.

The need for a supplemental EA is also demonstrated by the fact that the Department recognizes that the Greenhorn Herd is expanding its habitat. The Department needs to be reminded that a range expansion to the south is outside the scope of the original EA. This expansion is causing livestock owners in the area concern as the Forest Service is asking for changes to our management in the trailing corridor through the Snowcrest Mountains due to this expansion of greenhorn mountain sheep habitat. Any establishment of greenhorn bighorn sheep outside the original core absolutely requires the Department to engage in supplemental environmental analysis.



MWGA is pleased to be a partner with the Department in the management of bighorn sheep. Our Association members look forward to working with FWP staff to ensure the health and viability of this wildlife species, as well as on maintaining the viability of public lands grazing.

In sum, it is MWGA's position that the proposed action holds the possibility of being a win-win for all interested parties, including those who advocate for domestic and wild sheep.

Sincerely,

S/S

James E. Brown  
Director of Public Affairs  
Montana Wool Growers Association

cc: MWGA Board

0002 – Bighorns