



*Problems with the Idaho Land Use Plans
 With the potential loss of more wilderness
 November 2017*

! Once again we stand to lose even more access to the wilderness in the new Idaho Land Use Plans being considered as we speak. There is much in the Draft version of these plans to be of concern, but the primary information that needs to be responded to is in the EA's for each of these plans. One is called the Hemingway-Boulders plan (HBWC), and the other the Jim McClure-Jerry Peaks plan (JMJP). BOTH must be responded to. The Deadline for Comment is **November 26, 2017**.

The information I have included on Page 3-5 outline the problems that I see in each of these plans. However there is one paragraph in each of the Environmental Assessments that is completely wrong in its entirety. It is found on Page 48 of the HBWC plan, and Page 46 of the JMJP plan. Our legal advisor, when presented with this paragraph noted, 'there isn't anything in this paragraph that is correct!'

This paragraph can be refuted in its entirety, and therefore needs to be the focus of your comments. (This paragraph is outlined later in this document, Page 4)

PLEASE, read over the attached documents, and/or download the actual plans, and send in your comments as soon as possible. Even if you never think you will access or want to access this section of the white cloud wilderness, we desperately need your comments to add weight to what I will be sending.

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Comments for the Hemingway-Boulders need to be sent to:

Written comments must be submitted to the responsible officer:

- Send an email to: comments-intermtn-sawtooth-nra@fs.fed.us. Please indicate "Wilderness Plan" in the subject line. Electronic comments must

be submitted as an e-mail message, plain text (.txt), rich text format (.rtf), or Word document (.docx).

- **Send a hardcopy letter to Sawtooth National Forest, 2647 Kimberly Road East, Twin Falls, Idaho 83301. For those submitting hand-delivered comments, business hours for the Sawtooth National Forest Supervisor’s Office are 8:00 a.m. to 4:30 p.m. Monday through Friday, excluding holidays.**
- **Comments may also be submitted by fax to (208) 737-3236. Include your mailing address and phone number.**

Comments for the Jim McClure-Jerry Peaks need to be sent to:

Written comments must be submitted to the responsible officer:

- **Send an email to: comments-intermtn-salmon-challis-middlefork@fs.fed.us. Please indicate “Wilderness Plan” in the subject line. Electronic comments must be submitted in a format such as an e-mail message, plain text (.txt), rich text format (.rtf), and Word (.docx).**
- **Send a hardcopy letter to: Salmon-Challis National Forest, Attn: Wilderness Plan; 1206 S. Challis Street, Salmon, ID 83467. The office business hours for those submitting hand- delivered comments are: 8:00 am to 4:30 pm Monday through Friday, excluding holidays.**

Comments may also be submitted by FAX to 208-879-4198. Include your

Potential Closure Area Map: Page 3
Background Information & Analysis of Plans: Page 4

The area enclosed by the red line will be closed to goats if we do not stop it in this misguided plan



Input Now Needed. There are still problems with Idaho's Land Use Plan

I talked with Emily Simpson, the Land Use Plan project coordinator to make sure we were doing the right thing here. If you are confused, as I was, the comments we asked for previously were for the **initial scoping phase** of the Land Use Plan generation. Now, the current comments we are asking for, are needed to address those things **in the DEIS that are items of concern**. It is only fair to note that they took much of what I included in the my scoping input, vis-à-vis NAPgA's desires/requirements comments for us to remain 'in the game' in reference to wilderness access, and incorporated in their plan. However, the **Big Boulder Basin** is within a zone that will still be off-limits to goats, due to our old threat, the perceived 'RISK' of pathogen transmission (often incorrectly phrased "disease transmission" or "pneumonia transmission") from pack goats to wild sheep.

Note that this plan is profoundly confusing, as it is one large area, but the wilderness Land Use Plan is split into two parts. The **Hemingway-Boulders** section, and the **Jim McClure-Jerry Peaks** section. And there has to be comments submitted for each plan separately. To further confuse the issue, there are two relevant documents for each plan that need to be examined. The land use plan itself, and the environmental analysis (EA)

If you want to read their documents that concern their draft version of this plan, they are here:

Hemingway-Boulders: (Relevant documents under 'Analysis')

<https://www.fs.usda.gov/project/?project=49647>

The Wilderness EA and Wilderness Plan are the relevant documents here.

Jim McClure-Jerry Peaks Wilderness (Relevant documents under 'Analysis')

<https://www.fs.usda.gov/project/?project=50223>

The [JMJP WMP_2017_10_23](#) (PDF 1655kb), and [JMJP EA 2017_10_23](#) (PDF 979kb) are the relevant documents in this one.

**** Areas of Concern in the Hemingway-Boulders "Wilderness Plan" ****

(the two Sections of the Plan must be considered separately:

Page numbers are the numbers in the actual document. Adobe Reader lists the page numbers different in their go-to section (just one more thing to add to the confusion).

Page 17, Para 1; "Risk of Disease Transmission" (Which we know, of course, is virtually nonexistent, having never been reported in association with a pack goat)(Reader Page #23)

Page 30, Para 2; Objective 2152, (Reader Page #36) "Minimizing contact with BHS" (What contact? Has there ever been any? It probably needs to be pointed out here that the feral Hells Canyon goat was NOT the animal that began the Hells Canyon die-off. It was carrying different pathogens. Nor is, or was, there any evidence to support that this goat was a lost or abandoned packgoat).

Page 30, Para 4; Standard 2154, "Packgoats will be prohibited in the East For Herd Home Range" [Figure 4, Page 32] (Ostensibly due, once again, to the 'RISK' of disease transmission. What disease transmission? If you can be tested for the current bugaboo, *Mycoplasma ovipneumoniae* (AKA "Movi"), and your boys don't have it, YOU CAN'T GIVE IT!!) This one must be addressed as it prohibits us from the entirety of the Big Boulder drainage, at total of at least 12 quality lakes & fishing. I have hiked this area at least 3 times, saw BHS once, above Slide Lake, at a distance of about 1/8th mile, and they clearly were: 1) very nervous due to our presence, 2) interested in moving up and away from where we were. Contact? Hardly. Where were my goats? Right by my side... watching...

Page 30, Para 5; Standard 2155, This is a listing of some of the standards adopted from my submission to them of our ‘Best Management Practices’. Their inclusion of these indicates to me that there is at least a limited willingness to consider alternatives.

Page 30, Para 5; Standard 2155, Item 4; “A limitation of 3 packgoats per person”. Where did this one come from?? If you have boys in training, they have to go along. I can’t imagine why a limit of 6 would not be more realistic, and intend to say so in my comments to them.

Page 30, Para 5; Standard 2155, Item 5; While these sort of scenarios sound great on paper, in many cases they are wildly impractical in practice due to the limitations of terrain, etc. Has anyone ever ‘met’ a BHS on the trail, with or without packgoats?

In the **Hemingway-Boulders** “Environmental Assessment”:

Page 48, (Adobe Reader Page #56) **Wildlife Resources:** Sadly this is the same old, same old. And the most egregious content in this plan. This statement is foundational. I believe that if we can completely refute the entirety of the statements in this one paragraph, and in doing so, we will have won the war: (Note here that Andy Irvine, our legal representative observed when I sent this paragraph to him, “There isn’t anything in this paragraph that is correct!”)

This first paragraph under ‘Wildlife Resources’ is wholly false and misleading...

Wildlife Resources (My comments are in Red)

The actual paragraph in question, followed by my dissection of it.

Wildlife Resources

Contact between pack goats and bighorn sheep can result in disease transmission. *Mycoplasma ovipneumoniae*, which is commonly carried by domestic goats, can be transmitted to bighorn sheep when the species interact. This pathogen can trigger pneumonia outbreaks in bighorn sheep, leading to high mortality in the bighorn sheep populations (Besser et al. 2017), affecting the natural quality of the wilderness.

Contact between pack goats and bighorn sheep can result in disease transmission [Possibly, but this is unproven and speculative. No record of that has ever occurred. If you comment on this, you have to note that the goat at the center of the well-known Hells Canyon feral goat incident, in the final analysis, was NOT found to be carrying the same pathogens as the BHS in the dieoff]. *Mycoplasma ovipneumoniae*, which is commonly carried by domestic goats (a patent falsehood as it is not ‘commonly’ carried at all), can be transmitted to bighorn sheep when the species interact [when has an interaction like this ever occurred? Meaning when has a packgoat left his/her handler and gone looking for BHS]. This pathogen can trigger pneumonia outbreaks in bighorn sheep, leading to high mortality in the bighorn sheep populations (Besser et al. 2017) [This is the most completely fraudulent statement in this paragraph. That was NOT the conclusion of Besser’s research], affecting the natural quality of the wilderness.

Dr. Besser’s actual conclusion as stated in his research (His statement in Red): ‘*M. ovipneumoniae* strains carried by domestic goats were transmitted to comingled bighorn sheep, triggering development of pneumonia. However, the severity of the disease was markedly milder than that seen in similar experiments with domestic sheep strains of the bacterium’. It is also very relevant that his study goats in one of the 2 described studies were ONLY *Movi* infected because he purposely gave it to them. They were unquestionably not infected until his intervention. Markedly milder AND there was no proof that the sheep even had pneumonia, as pneumonia was not found when the bighorn sheep were killed by the Dr. Besser so he could look at their lungs.

Dr. Besser also stated in his article to the Wyoming Wild Sheep Foundation: “If the low prevalence of ‘the carriage of *M. ovipneumoniae* by packgoats is confirmed by testing’ (and it was)... I believe that *M.*

ovipneumoniae test-negative packgoats represent a negligible risk for triggering pneumonia outbreaks in bighorn sheep and that it would be reasonable to take this into account when setting public lands policies.”

THE ALTERNATIVES:

Pages 18-22, Tables listing the three alternatives and proposed actions:

Alternative ‘A’ - Proposed Action

Page 8, Para 2; “... minimize risk of contact...”

Page 11, Para 6; NAPgA Best Mgt Practices

Page 11, Para 6, Item 4; Packgoats limited to 3 per person, same issues as within the Land Use Plan

Page 11, Para 6, Item 5; Same potentially unrealistic standards for meeting BHS. Has anyone ever ‘met’ a BHS on the trail, with or without packgoats?

Page 12, Para 4, Item 12; Same closure to Big Boulder Basin.

Alternative ‘B’ - Natural Focus

Page 12, Para 10; Packgoats are prohibited! Obviously unacceptable in its entirety.

Alternative ‘C’ - Minimal Management

Basically no further limitations. Basically for Packgoat owners, the most acceptable option, especially since there has never been any instances of **packgoats** infecting BHS with any pathogen/disease. Following the admonition, “If it ain’t broke, don’t fix it!”, It would be the most logical of all the options.

However;

That one is a wash. It will never be acceptable to the land managers, in a unreasonably fearful about losing their BHS cash income stream, so we will have no option except to attempt to make Alt. ‘A’ palatable... which it clearly is *NOT* right now.

Larry Robinson

NAPgA