



IDAHO DEPARTMENT OF FISH AND GAME

600 S Walnut / P.O. Box 25
Boise, Idaho 83707

C.L. "Butch" Otter / Governor
Virgil Moore / Director

July 31, 2013

Dr. Scott Leibsle, Deputy Administrator
Division of Animal Industries
Idaho State Department of Agriculture
2270 Old Penitentiary Road
Boise, Idaho 83701

RE: Proposed Rule to Remove Barbary and Mouflon Sheep from the Deleterious Animal List

Dear Scott,

The Idaho Department of Fish and Game (IDFG) has reviewed the proposal to remove Barbary Sheep (*Ammotragus lervia*) and Mouflon Sheep (*Ovis musimon*) from the list of deleterious exotic animals (IDAPA 02.04.27.408) and offer comments below. The purpose of these comments is to assist the decision-making authority by providing technical information addressing potential effects on wildlife and wildlife habitat and how any adverse effects might be mitigated. It is not the purpose of the IDFG to support or oppose the proposed rule change. We provide comments from both a biological and regulatory perspective.

Our comments are restricted to Barbary and Mouflon sheep, which are considered wildlife by some jurisdictions, and do not reflect on Barbados Sheep (*Ovis aries*) which are widely considered domestic animals.

Biological Issues:

Barbary and Mouflon sheep were originally included in the list of deleterious exotic animals due to their potential risk to native bighorn sheep. Both Barbary and Mouflon sheep are capable of establishing feral free-ranging populations that are persistent and practically impossible to eradicate. Free-ranging Barbary and Mouflon sheep could come into contact with native bighorn sheep given their preference for similar habitats. Barbary and Mouflon sheep can carry diseases (e.g., *Mannheimia* spp., *Mycoplasma* spp., *Pasturella* spp.) that can be lethal to bighorn sheep. Additionally, bighorn sheep and Mouflon sheep can interbreed, raising concerns for genetic transgression in native populations. Finally, given experience in other areas of the U.S. where feral free-ranging populations of Barbary Sheep exist, there is concern that bighorn sheep are out-competed by the more aggressive exotic sheep.

Regulatory Issues:

I.C. §36-104 grants authority to the Idaho Fish and Game Commission to adopt rules pertaining to the importation, exportation, release, sale, possession or transportation into, within, or from

Keeping Idaho's Wildlife Heritage

Dr. Scott Leibsle
July 31, 2013
Page 2

the state of Idaho of any species of live, native, or exotic wildlife. IDAPA 13.01.10.100 restricts the importation, exportation, transport of any living wildlife without a permit issued by the Director of the IDFG.

IDFG has deferred to the Idaho State Department of Agriculture (ISDA) deleterious animal rules relative to regulatory authority for Barbary and Mouflon sheep. Our legal counsel has not had an opportunity to offer a determination on whether IDFG rules would be applicable should Barbary and Mouflon sheep not be listed under ISDA rules. On the surface, it would seem that IDFG rules would apply to importation, transportation, and possession of Barbary and Mouflon sheep given their native origin as wildlife. We recommend this issue be resolved before formal rule-making progresses so that all stakeholders are aware of the ramifications.

The conservation and management of bighorn sheep in Idaho is an important issue for IDFG, and we appreciate the opportunity to comment on the proposed rule change. Should you have follow-up questions or need clarification, please contact Brad Compton of my staff at 208-334-2920.

Sincerely,

A handwritten signature in black ink that reads "Virgil Moore". The signature is written in a cursive style with a large, looping initial "V".

Virgil Moore
Director

cc: Jim Unsworth, Jeff Gould, Jon Rachael, Mark Drew, Brad Compton

VM:BC:clc