



Great Old Broads for Wilderness comments to SubRAC August 15, 2023 sixth meeting

Great Old Broads appreciates the time and commitment of agency staff and subRAC members for this process. We have been commenting in writing and orally at these meetings consistently as well as sending correspondence to BLM staff between meetings. I want to reiterate that Broads in no way desires or intends to harm livestock producers and we support producers pivoting their business plan and/or entertaining a voluntary allotment retirement sometimes referred to as “buyouts.”

We have maintained since the draft EIS that the three high risk allotments under consideration need to be closed to domestic sheep grazing due to the following facts:

There is no way to achieve spatial and temporal separation between domestic sheep and bighorn home range or summer range since the domestic sheep allotments are within bighorn home range.

Best Management Practices have not been proven effective or sufficient when domestic and bighorn sheep are in such close proximity as found with these allotments.

By allowing grazing on these three allotments - American Flats, American Lakes, and Henson Creek - bighorn sheep are at high risk of contact and the potential for disease transmission is high which science has demonstrated can result in all-age die offs and/or significantly reduced lamb recruitment - meaning death of lambs within the first year.

Therefore, we recommend (as we have consistently) that BLM move quickly to amend the RMP to allow for the selection of Alternative E as the proposed decision.

As a volunteer with the bighorn sheep monitoring project, I spend 20-25 days during domestic sheep grazing every year in and around these three allotments. This experience informs my following comments regarding the subRAC’s short and long-term recommendations.

Having read the terms and conditions for these three allotments, I don’t see anything in the short term mitigation recommendations that changes anything that is currently taking place prior to or during domestic sheep on the ground. You are basically recommending the status quo with perhaps more deliberate communication which keeps our bighorn at high risk of potential disease transmission.

As for long-term recommendations, though I do not know all the vacant BLM and USFS allotments on the Gunnison Field Office and GMUG Forest, the ones I do know pose the same high risk to bighorn as the allotments under consideration. In fact, one of those allotments in the Wildhorse Basin was vacated specifically to protect bighorn.

Re: 4 c. In my understanding these allotments are not appropriate for conversion to cattle grazing.

As for 4d, BLM analyzed risk of contact during their permit renewal process and found the risk to be high. CPW comments to the BLM during this NEPA process highlighted this science-based fact. So if the subRAC wants to recommend “foregoing” domestic sheep grazing in areas of high risk, then in essence you would be recommending vacating these three allotments. Similarly with 4e, as these allotments have been determined to qualify as high risk, if they were voluntarily relinquished, they should be vacated and preferably closed.

Again, Broads asks that this subcommittee seriously consider the necessary steps required to be able to close allotments named American Flats, American Lake and Henson Creek to protect the Tier 1 S-21 bighorn sheep herd.