



RE: DOI-BLM-CO-S060-2014-0001-EIS

Thank you for accepting these comments regarding the BLM's Draft EIS for Domestic Sheep Grazing Permit Renewals. I write as the leader of the local Northern San Juan chapter of Great Old Broads for Wilderness on behalf of over 400 supporters, members and donors from Delta, Montrose, Ouray and San Miguel Counties including dozens of business owners.

Our members are active outdoorsmen and women and travel extensively in the GMUG Forest and across BLM lands. We solitude monitor in the Uncompahgre Wilderness for the USFS and have assisted the Uncompahgre Field Office with monitoring WSAs. We know in detail much of the landscape involved in your DEIS especially the Uncompahgre Wilderness and the landscapes in Ouray County. Many of us have been trained in grazing monitoring protocols.

Our organization would like to direct our comments specifically to concerns related to RBS-21 (and perhaps RBS-33 as the boundaries on your map show these two groups as adjacent.)

Page 33 of the DEIS states: *The San Juan's West Rocky Mountain bighorn sheep population (RBS-21) is the greatest concern for interactions with domestic sheep in the planning area. RBS-21 herds have ranges that either overlap, are in close proximity, or are within foray distance of the domestic sheep allotments examined in this EIS. RBS-21 is indigenous to the area with very few augmentations occurring historically, so it is considered a primary core population (Tier 1) by CPW (Diamond and Banulis 2012). RBS-21 is managed as two herds: the Cow Creek/Wetterhorn Peak herd (S-21) and the Lake Fork/Pole Mountain herd (S-33). The S-21 herd is one of the few remaining indigenous bighorn herds in Colorado (Diamond and Banulis 2012); S-33 bighorns are also indigenous but have received augmentation. Recent years have seen a decline from an estimated 400 bighorn in RBS-21 in 2013 to a 2015 estimate of 305 bighorn. There may have been an outbreak of disease in RBS-21, as blood samples from bighorn captured for a telemetry study showed high levels of *M. ovipneumoniae* in the winter of 2012–2013, and then lamb recruitment dropped to 13 per 100 ewes in the following season's survey (CPW, unpublished data). The RBS-21 plan assumes an expected population of 400 to 500 animals and assumes densities that do not exceed 2.0 bighorn/km<sup>2</sup> of modeled winter range.*

No doubt from this description, the BLM must do everything within its authority to ensure the health, viability and resiliency of these two herds and especially RBS-21 given its indigenous status with little to no augmentation coupled with the history of low recruitment, potential infection from *M. ovipneumoniae* and Tier 1 status.

Under the current livestock grazing practices and permits, our members have encountered large domestic flocks (~1000 sheep) in American Flats, Fall Creek, Big Blue Creek, East & Middle Forks of the Cimarron and in S. Fork Bear Creek. All these areas are Bighorn Sheep habitat. The proximity in both time and space of Bighorn and domestic sheep in these areas is unacceptable and compromises the health and sustainable population of RBS-21.

In our opinion, short of ceasing domestic grazing all together, Alternative D is the only responsible action in order to protect RBS-21. We urge BLM to adopt Alternative D as the Proposed Action. Any other alternative (with the exception of Alternative E) is irresponsible of land managers to protect RBS-21. Please consider the research you have cited in the DEIS, and only permit domestic sheep grazing outside the Overall Range of Bighorn sheep.

With the adoption of Alternative D, a decrease in authorized allotments and pastures as well as a reduction in AUMs, will result in far better forage for the RBS-21 herd. Science indicates and we concur that the resulting separation of domestic and Bighorn sheep (and thereby less risk for infection) coupled with improved forage and habitat, will benefit the RBS-21 herd with regard to recruitment, resiliency, integrity and population health.

We appreciate your consideration of these comments and urge you again to adopt Alternative D.

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Northern San Juan Chapter  
Great Old Broads for Wilderness

