



Mr. Martin Weimer
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Project Manager
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October 25, 2019

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

Thank you for accepting these supplemental comments regarding the BLM's Draft EIS for Domestic Sheep Grazing Permit Renewals. Please replace comments submitted August 11, 2019 (ID# SHEEP-1-500000505.) 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.

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in the winter of 2012–2013, and then lamb recruitment dropped to 13 per 100 ewes in the following season's survey (CPW, unpublished data).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/km² 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 RBS-21 given its indigenous status with little to no augmentation coupled with the history of low recruitment, Tier 1 status, and susceptibility to infection from *M. ovipneumoniae*.

Under the current livestock grazing practices and permits, domestic sheep allotments overlap with quality Bighorn Sheep habitat and the territory of RBS-21. While traveling in the backcountry, 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.

Furthermore, records reveals regular forays of Bighorn Sheep outside their home territory of 20 miles or more. Repeated reports of stray domestic sheep remaining in the high country for weeks or even months once the flock has been moved to the valley compounds the likelihood of contact between Bighorns and domestic sheep.

Best available science indicates that a spacial separation of 9–15 miles (depending upon the source) is recommended to protect Bighorn from disease transmission from domestic sheep.

Therefore, Great Old Broads for Wilderness supports Alternative E – No Grazing – in order to protect the unique RBS-21 herd. Alternative E is the only reasonable and responsible action under the circumstances outlined above. We urge BLM to adopt Alternative E as the Proposed Action.

Moreover, we urge BLM to cease permitted domestic sheep grazing not just in the current RBS-21 territory but also in the quality habitat into which this herd could expand. Please consider the research you have cited in the DEIS, and follow the recommendation of best available science. Adopt Alternative E.

Finally with the No Grazing alternative, vegetation can recover over time and provide improved forage for the RBS-21 herd. Science indicates, and we concur, that the resulting exclusion of domestic sheep from Bighorn territory 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 E.

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