



January 31, 2022

Dear CPW Commissioners,

I write on behalf of the Northern San Juan chapter of the national organization Great Old Broads for Wilderness. I met several of you in July of 2019 at your Mountain Village meeting where I presented our organization's concerns about habitat fragmentation due to increasing demands for recreation trails. Today, I write in response to the conversation regarding bighorn sheep and high-risk grazing allotments that transpired at your January 12<sup>th</sup> meeting.

Our member citizen scientists have been involved in the Bighorn Sheep Monitoring Project coordinated by Mountain Studies Institute since autumn of 2019. Our geographic surveying region encompasses the Uncompahgre Wilderness and surrounding USFS and BLM lands. Less frequently we visit some sites in the Sneffels Range.

The science is quite clear that the greatest risk to bighorn sheep populations is disease transmission from domestic sheep. CPW staff has repeatedly raised this concern. Comments from CPW to the BLM Gunnison Field Office (GFO) (regarding the domestic sheep grazing permit renewals) and to the GMUG National Forest (regarding the revised draft plan) reflect the high risk posed to bighorn herds by domestic sheep grazing. Moreover, CPW identifies bighorn as a Species of Greatest Conservation Need in its State Wildlife Action Plan.

Great Old Broads for Wilderness (Broads) agrees with the comments made on January 12 by Mr. Gary Skiba, retired Colorado Division of Wildlife biologist and current Wildlife Program Manager with San Juan Citizens Alliance. Commissioner Tuthton asked why this issue was being raised at this particular time. For Broads, the answer is our grave concern regarding the risk to the Tier 1 RBS-21 bighorn herd posed by the August 2021 draft decision by the BLM GFO to renew domestic sheep grazing permits for a 10-year period in three high-risk allotments that we survey: American Lake, American Flats and Henson Creek. The draft decision addresses other high-risk allotments in the Gunnison Basin with which we are less familiar, but are equally concerning. You may also be aware that the Town of Ridgway protested the BLM GFO draft decision and the County Commissions of San Juan and Ouray Counties submitted letters to the BLM requesting the closure of the three allotments within or adjacent to their jurisdictions. Our elected

officials value the RBS-21 herd for its intrinsic value as well as for the economic value that wildlife watching brings to our region.

CPW is in a position to significantly influence not just the GFO decision but also future permitting decisions. It is clear to us that CPW biologist and wildlife managers know, understand, contribute to, and apply in their management plans the science relevant to risks to bighorn sheep from domestic grazing. We also recognize that in the past CPW was party to a memorandum of understanding (MOU) that did not permit the agency to recommend closure of high-risk allotments. That MOU expired in April 2019, and yet it appears CPW leadership continues to operate as if the MOU were active.

Mr. Skiba was speaking to well-documented science and elevating the opportunity at hand (given the expiration of the MOU) for CPW to unequivocally recommend the retirement of high-risk allotments. Director Prenzlows reply, "We are not in the business of putting businesses (livestock producers) out of business," was notable in exposing the political pressures that influence CPW decisions. Director Prenzlows was, of course, correct in stating that CPW does not manage the federal lands. Nevertheless, CPW's recommendations can, and often do, influence USFS and BLM decision-makers.

CPW has a statutory responsibility to protect and manage Colorado's wildlife, and again I wish to emphasize CPW's identification of bighorn as a Species of Greatest Conservation Need. Furthermore, a recommendation by CPW to close high-risk allotments is not an action to put anyone out of business, but rather to adhere to the duties of the agency's mission and seize an opportunity to elevate science in the management of the state's bighorn herds. In areas across the west (as well as in SW Colorado) where high-risk allotments have been retired, livestock producers have found other private and/or public lands to graze their sheep or have converted part of their operation to cattle. To our knowledge, no producer has been put out of business due to closure of high-risk allotments. We urge CPW to separate politics from science, adhere to research and data, and recommend closure of high-risk allotments.

Broads would welcome further discussion on this topic as an agenda item at a future Commissioner meeting. We would also appreciate inclusion in any working group that might be convened. In addition, I am happy to correspond with Commissioners by email or phone at the contacts below. Thank you for your attention to this important matter.

Respectfully,  
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