



Stephanie Connolly, Manager
BLM CO Southwest District Office
2465 S. Townsend Ave.
Montrose, CO 81401

March 21, 2023

Dear Ms. Connolly,

I greatly appreciated the opportunity to participate virtually in the first BLM SW RAC subcommittee (subRAC) regarding the domestic sheep grazing risks to bighorn sheep relevant to the Gunnison Field Office (GFO) proposed decision. It was an informative meeting that caused me to think deeply about process.

It is my understanding that the BLM is required to analyze a “no grazing” alternative (Alt E,) however due to the current GFO RMP, the agency cannot legally select Alt E as the decision. It is quite clear to me based upon best available science that effective separation – whether spatially or temporally – is impossible in the three high elevation/high risk allotments – namely Henson Creek, American Lake & American Flats. It also seems highly likely that in an attempt to avoid litigation, the BLM is stalling on making a final decision given the current flawed analysis. Though I recognize that education and awareness of the science, economics and complex circumstances related to this decision could be beneficial, I view the approach of waiting six additional months to be a critical delay during which the 2023 grazing season will occur and potentially jeopardize the health of the SB-21 Tier 1 herd.

Based upon best available science, the only decision to guarantee the sustainability of the SB-21 and SB-33 meta population is to close the three high elevation allotments to domestic sheep grazing that overlap with bighorn home range. I ask myself whether by participating in these subRAC meetings, I am complicit in the delusion that a viable compromise is possible – viable for livestock producers and viable for a healthy bighorn population. Such a compromise is simply not a reality.

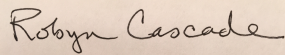
Therefore, I am reaching out to ask that, given your authority, you direct the GFO to begin work on a new EIS and an RMP amendment WHILE holding these subRAC meetings. Time is of the essence, and it has become increasingly apparent that a reworking of the EIS and an RMP amendment will be required regardless of the subRAC’s recommendation.

Though the supposed transparency of this process is laudable, BLM’s hesitancy to move forward in a meaningful way is cause for grave concern. I appreciate the difficult decision BLM

faces – to employ scientific data to protect our bighorn herds while negatively impacting livestock producers or to jeopardize the bighorn population to benefit agricultural economies. However, there are other alternatives. Voluntary buyouts have been successful in sustaining producers while protecting bighorn, and examples of sheep producers pivoting their business model exist – converting to cattle in some instances or securing locations other than bighorn habitat to graze their domestic sheep.

In the end, the GFO could be proactive in advancing this decision by beginning immediately to work on a revised EIS and RMP amendment. I welcome your response and appreciate your consideration of these comments. I will be away from devices and internet most of April to prioritize some family events, so I appreciate hearing from you at your earliest convenience. Sadly, I am unable to attend the April subRAC meeting and am arranging for another member to represent our organization next month.

Respectfully,

A handwritten signature in cursive script that reads "Robyn Cascade". The signature is written in black ink on a light-colored, rectangular background that appears to be a scan of a piece of paper or a digital signature pad.

Robyn Cascade, volunteer
Northern San Juan chapter
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