



March 14, 2023

Good afternoon and thank you for the opportunity to address the SW RAC subcommittee, guest presenters and attendees. My name is Robyn Cascade and I am a volunteer leader for the local Northern San Juan chapter of Great Old Broads for Wilderness, a national organization, with 40 chapter across the country, dedicated to protecting and stewarding wild places. In keeping with our organization's commitment to equity and justice, at the outset, we ask that you honor the requests and priorities of our Indigenous representatives here today from the Nuche (Ute) Tribes.

Since the spring of 2020, our organization has been engaged in a collaborative citizen science project coordinated by Mountain Studies Institute to monitor the location of bighorn sheep. The Bighorn Sheep Monitoring Project began in 2017 as a result of concern for the health of bighorn herds who have limited to no immunity to respiratory pathogens carried by domestic sheep which, if contracted, could quickly kill an entire herd of bighorn.

It warrants mentioning that I have many acquaintances among livestock producers in Ouray County. I am trained as a biologist and am an avid solo backpacker who, since 2008, has spent dozens of days each year in and around the three high elevation/high risk domestic sheep allotments whose permits are addressed in the BLM proposed decision that spurred the formation of this subcommittee. I travel both on and off trail, speak in Spanish to the sheep herders whenever I encounter them, and have been fortunate to see bighorn in and adjacent to Henson Creek, American Lake and American Flats allotments on numerous occasions over the years (though I have only been reporting officially for the Project since 2020.)

Just last August, I stood on a ridge between Difficulty Creek and upper Bear Creek and witnessed a band of 1,100 domestic sheep grazing in the S Fork of Bear Creek just three miles from where the day prior I had seen 5 bighorn ewes. With the naked eye, I could see both locations from my position, and given my age, if I can travel the distance in less than 24 hours, so can bighorn. Although the Bear Creek allotment lies on USFS land, it is managed jointly with the BLM since the permittee also grazes the American Flats allotment and the domestic sheep move between USFS and BLM lands. I have also observed numerous bighorn in areas through which domestic sheep are trailed in order to reach the allotments under review. As for the recreation question posed earlier today, in the 10 days I traveled in the region, I saw only three other hikers. This solitude is typical. This remote country doesn't see the kind of recreation pressure we witness in the front country.

Best available science has proven that Best Management Practices are not sufficient to avoid risk to bighorn sheep in proximity to domestic sheep. We support the use of the Risk of Contact

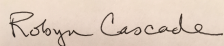
model and recognize like all models it's not perfect. Nevertheless, the BLM has at times relied on a spatial separation of 9 miles to minimize risk to bighorn even though bighorn have been documented to foray 20 miles in a day and domestic sheep can stray from the band. As with my observation last summer, bighorn are frequently observed in much closer proximity to domestic sheep grazing than this 9 mile limit. In essence, given the proximity and in fact overlap of allotments and bighorn range in the three high elevation allotments under review, effective separation – spatially or temporally – is impossible and cannot be achieved.

Thankfully I have never seen a bighorn/domestic sheep interaction where the two species are commingling, though other observers have witnessed such interaction on allotments within the meta population of bighorn in the SB-21 and SB-33 herds. However, I have seen bighorn on active allotments where no domestic sheep are grazing *at that moment* but the landscape is strewn with domestic sheep feces and tracks that indicate they were recently there. We know that a commingling occurrence, if detected, results in the bighorn individual or group being euthanized. This is not an emotional comment but a matter of fact.

In consideration of Adam Ortega's comments (Dept of Ag) regarding monitoring and working with permittees, I have observed practices which I believe are out of compliance with terms and conditions, such as salt licks and dog food left behind once a sheep herders camp has been dismantled. I have shared this information with agency personnel.

In addition to having boots on the ground to survey for bighorn sheep, Broads also is engaged in educating elected officials, recreation users, outfitters, jeep tour operators and the general public. In addition to verbally sharing information, we widely distribute rack cards detailing the purpose of our citizen science project and how to report sightings on iNaturalist. Our organization has also been instrumental in having permanent signage placed at trailheads in our region.

We are particularly concerned about and attentive to the SB-21 herd of bighorn in these three high risk BLM allotments as SB-21 is a Tier-1 herd meaning it has little to no augmentation from other herds and is one of the most genetically pure Colorado bighorn herds. Thank you for considering these comments.



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