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January 29, 2018

Grand Mesa, Uncompahgre and Gunnison National Forests
Attn: Plan Revision Team
2250 South Main Street
Delta, CO 81416

Dear Forest Planners:

On behalf of Rocky Mountain Bighorn Society (RMBS), please accept this comment letter on the Draft Forest Assessments for the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) forest plan revision. The RMBS is a non-profit bighorn sheep conservation organization based in Colorado for the last 42 years, with a mission to promote the science-based management of bighorn sheep, educate the public about their life and habitat, and assure the sportsman's rights in proper opportunities.

The RMBS looks forward to reviewing species assessments for both Rocky Mountain and desert bighorn sheep (BHS) which were scheduled to be released in early January 2018, but have yet to be as of this comment deadline. We will provide comments on those assessments within 30 days following their release, per our correspondence with Clay Speas, GMUG Acting Renewable Resources & Planning Staff Officer. The RMBS appreciates that the GMUG has chosen to include both BHS species on the proposed Species of Conservation Concern (SCC) list submitted to the Regional Forester. We appreciate this proposed listing and provide support for bringing both species forward for inclusion on the final SCC list in the forest plan revision.

The purpose of the 2012 Planning Rule, in part, is "...to ensure that plans provide for the sustainability of ecosystems and resources; [and] meet the need for forest restoration and conservation, watershed protection, and species diversity and conservation..." According to the Forest Service Handbook 1909.12, ecological conditions include habitat and other influences on species and the environment such as human uses, for example, grazing. Stressors are factors that may directly or indirectly degrade or impair ecosystem composition, structure or ecological process in a manner that may impair its ecological integrity. It has been well established in the scientific literature that bacteria transmitted from domestic sheep results in pneumonia-related all age die-offs within bighorn populations, threatening the viability of those populations. Herds affected by these epizootics often remain suppressed for decades following a die-off due to low lamb recruitment. These events are not uncommon. The ongoing presence of domestic sheep on and adjacent to bighorn sheep habitat is a stressor that impairs National Forest System lands from providing the ecological conditions bighorn sheep require. Coarse filter habitat plan components will not provide sufficient conditions required by the Planning Rule for bighorn sheep persistence. Based on strong scientific evidence, the RMBS believes there is substantial concern for the persistence of bighorn sheep over the long term on the Forest.

Bighorn sheep were listed as a Sensitive Species in USFS R2 in 2007 following publication of a regional bighorn sheep species conservation assessment in support of the Forest Service Region 2 Species Conservation Project (Beecham et al. 2007). This assessment determined that several BHS herds on the GMUG and adjacent management units are at risk of extirpation from disease-related die-offs and/or chronically poor production, small population size, and total or near complete isolation from other bighorn populations. The most recent update to the R2 Sensitive Species list (July 13, 2017) maintains the BHS listing.

The Planning Rule directs the Responsible Official to identify potential SCC, identify and assess information relevant to species that occur in the plan area and when the best available scientific information raises a substantial concern about a species' capability to persist over the long term in the plan area, and engage the public and consider public input on the assessment including the identified potential species of conservation concern. The Forest Assessment 5 Identifying and Assessing At-risk Species outlined a step-by-step evaluation process used to select SCC to bring forward in the LMP. Notable criteria that should be considered per the 2012 Planning Rule include the R2 Sensitive Species list and State Wildlife Action Plans (SWAP). Colorado Parks and Wildlife lists BHS as a Species of Greatest Conservation Need in their SWAP completed in 2015.

Colorado Parks and Wildlife manages bighorn sheep based on Game Management Units (GMUs) and Data Analysis Units (DAUs). GMUs allow localized management prescriptions for relatively distinct subpopulations of a species, whereas DAUs group GMUs to represent frequently interacting subpopulations that comprise a relatively discrete population. In the context of bighorn social and spatial organization, GMUs represent relatively discrete herds and DAUs represent frequently interacting herd complexes. The GMUG includes portions of ten Rocky Mountain BHS DAUs and one desert BHS DAU. All of these populations are in close proximity to federal domestic sheep grazing allotments on the GMUG or adjacent management units, or they have documented interactions with BHS herds that are in close proximity to allotments.

While the 2012 Planning Rule does not require a range suitability analysis, 1909.12_10 13.32 requires the Interdisciplinary Team to evaluate the capability and productivity of the plan area to support grazing activity and the impacts of grazing on ecological integrity and species diversity. Other uses and values must be considered to identify areas not appropriate for grazing. We request that the GMUG complete a range suitability analysis in conjunction with the Forest Plan Revision. We expect that the GMUG will use the best available science to evaluate the risk of grazing domestic sheep in close proximity to BHS and will exclude lands that are high risk and jeopardize the long term persistence of BHS on the GMUG. The Risk of Contact (ROC) Tool developed by the USDA Forest Service Bighorn Sheep Working Group (2015) represents the best available science for grazing domestic sheep in proximity to occupied bighorn sheep habitat. We request that the GMUG incorporate results from the ROC Tool when making range suitability determinations for domestic sheep grazing.

In summary, the primary concern of RMBS is that the GMUG include Rocky Mountain and desert BHS on the final SCC list in the Forest Plan Revision. There is a preponderance of

evidence to support the need to manage these species with the fine filter provided by SCC listing. In addition, we request that the GMUG complete a range suitability analysis informed by results of ROC Tool analysis to ensure that domestic sheep grazing does not continue to jeopardize the persistence of BHS populations on the Forest and adjacent management units. We look forward to providing additional input on the specific species assessments when they are released. Please advise us on future opportunities to comment on all aspects of this Forest Plan Revision, as well as any proposed livestock grazing management actions that may adversely affect BHS.

Sincerely,

A handwritten signature in black ink that reads "Terry Meyers". The signature is written in a cursive style with a large initial "T" and a stylized "M".

Terry Meyers
Executive Director