



Western Watersheds Project

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Working to protect and restore Western Watersheds and Wildlife

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

Submitted electronically on 1/29/2017

RE: GMUG Potential Species of Conservation Concern

Dear Forest Officers,

Please consider the following comments on Grand Mesa, Uncompahgre, and Gunnison National Forests Potential Species of Conservation Concern list, submitted on behalf of Western Watersheds Project. Western Watersheds Project works to protect and conserve the public lands, wilderness, wildlife, and natural and cultural resources of the American West through education, scientific study, public policy initiatives, and litigation. Western Watersheds Project's staff and members use and enjoy the public lands, including those of the GMUG National Forests, and their wildlife, cultural and natural resources for health, recreational, scientific, spiritual, educational, aesthetic, and other purposes. Western Watersheds Project has about 1,500 members nationwide, including many in Colorado.

The best available science indicates substantial concern for the persistence of bighorn sheep on the Grand Mesa, Uncompahgre, and Gunnison National Forests, where every single bighorn population is within foray distance of public lands domestic sheep grazing allotments, private lands sheep operations, or nonnative mountain goat herds, and where genetic exchange is limited by management priorities and anthropogenic fragmentation of landscapes. SCC listing, fine filter analyses of threats to persistence, and specific plan elements developed for the protection of bighorn sheep are necessary to prevent further species losses and local extirpations of bighorns on the GMUG National Forest.

Bighorn sheep populations declined from an estimated historic population of 1.5-2 million to just 15,000-18,000 following the westward expansion of early American settlers, with this precipitous drop attributed to livestock competition, overhunting, and diseases associated with domestic sheep. After more than 4 decades of extensive species restoration efforts, including thousands of habitat improvement projects, disease sampling captures, herd health checks, and translocation efforts, bighorn sheep have recovered to approximately 73,000 individuals. This is less than 5% of historic numbers.

Wild sheep restoration efforts westwide have slowed in recent years as the causes of bighorn pneumonia have been elucidated, and as land managers and wildlife biologists have become increasingly reluctant to introduce bighorn sheep to historic habitat areas where they may be exposed to domestic sheep pathogens. Even healthy bighorn herds are limited from expansion, with ewe hunts and agency culls employed to prevent herd growth and reduce density in areas where bighorns may come in contact with domestic sheep. As a result, population growth seen in the previous four decades has not been sustained, and populations westwide have stagnated. Pneumonia outbreaks associated with domestic sheep and goats continue, with all-age die-offs and subsequent years to decades of limited recruitment occurring in every state where bighorn sheep are found.

Statewide, bighorn populations total approximately 7000, equal to the estimated population in 1915, over a century ago. This 1915 total represented remnant herds which survived several decades of interspecies contact resulting in pathogen transmission and pneumonia-related die-offs, as well as substantial overhunting, loss of habitat, and direct competition with livestock. The 1915 total also followed two significant population crashes which led the state to limit hunting in 1859 and 1885, an unprecedented measure for the time which illustrates the extent of observed bighorn losses. Populations prior to Euro American expansion into Colorado are unknown.

All bighorn herds on the Grand Mesa, Uncompahgre, and Gunnison National Forest are threatened by anthropogenic activities, including livestock grazing, motorized recreation, the spread of nonnative species, and climate change. Domestic sheep grazing occurs on Forest Service and BLM grazing allotments within 4.2 miles of the Colorado Parks and Wildlife mapped habitat for every bighorn sheep herd on the planning unit. Private lands domestic sheep grazing, recreational goat packing, and the use of goats for brush control also occur within the mapped habitat of bighorn sheep herds on the GMUG National Forests.

Mountain goats, which are known to host the same suite of bacteria carried by domestic sheep, occur in the same habitat as 7 mapped bighorn herds, putting these herds at risk of pneumonia and other livestock diseases. Mountain goats are aggressive and territorial, and may compete with or displace bighorn sheep on the landscape. Mountain goats are not native to the GMUG.

Displacement by cattle is also likely to impact bighorn herd health, as cattle consume forage that would otherwise be available for wildlife. Bighorn sheep demonstrate social avoidance of cattle, with the presence of cattle limiting wildlife access to water sources, preventing movement through occupied livestock pastures, and concentrating bighorn sheep on suboptimal landscape areas. Cattle may also transmit pathogens such as RSV, which has been implicated in some bighorn herd pneumonia events. Cattle allotments overlap nearly all mapped bighorn habitat on the GMUG.

Habitat fragmentation by roads, urban and industrial development, mineral extraction activities, and winter recreation limits genetic interchange between herds and reduces overall herd health. The GMUG is a popular destination for motorized and non-motorized recreation, and motorized recreation on National Forest lands is expected to increase.

Bighorn sheep have been listed as a USFS Region 2 Sensitive Species, a Colorado Species of Greatest Conservation Need, and a Colorado BLM Sensitive Species since at least 2007. Yet since 2007, bighorn populations have declined, and die-offs and limited recruitment have continued to impact herd numbers statewide. Little progress has been made in reducing the distribution of public lands domestic sheep allotments in bighorn occupied areas in the last decade, with this significant, known, and manageable threat to bighorn sheep persistence perpetuated through BLM and Forest Service permit renewals, often with no NEPA analysis. Despite the clear danger these allotments pose to bighorn sheep, the Forest Service has refused to appropriately address grazing allotments that imperil Sensitive Species in Colorado.

Bighorn sheep are warranted for inclusion on the Species of Conservation Concern list for the Grand Mesa, Uncompahgre, and Gunnison National Forests.

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