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November 12, 2021

**Re: Draft Revised Land Management Plan Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests and Draft Environmental Impact Statement (EIS) for the Land Management Plan Revision (August 2021)**

The Colorado Wool Growers Association appreciates the opportunity to provide the following comments on the draft revised Land Management Plan and draft EIS.  
**We support Alternative C.**

The excessive micro-management and regulatory overburden represented by the Draft Land Management Plan, and Draft EIS is nothing short of staggering. In excess of 1,300 pages and including years of USFS staff time, this document is too excessive and cumbersome for the average citizen, small business or organization to effectively comment on.

### **GMUG Draft Revised Land Management Plan** (requested additional language is in **bold type**)

- In addition to providing food and fiber, the ranches that are near the GMUG and rely upon the USFS grazing allotments provide vast amounts of wildlife habitat, help maintain the view shed, and assist in protecting the environment from further subdivision. It's crucial to keep these ranches on the landscape.
- Rangelands should be included in the GMUG plan as a carbon sink.
- Grazing should not be included in the same category as timber and other multiple use activities that impact scenic resources.

- Westwide only ~3 percent of federal sheep grazing allotments overlap with occupied bighorn habitat, yet there remains tremendous focus on using bighorn sheep to leverage domestic sheep off of their grazing allotments.
- The GMUG Forest plan continues to perpetuate the myth regarding “disease transmission” between domestic and bighorn sheep, and ignores the most recent information regarding *M ovi*. Disease is NOT transmitted! There is a possibility of pathogen transmission through DIRECT (nose-to-nose not indirect) contact. Even if pathogens are transmitted, that is not a foregone conclusion that the pathogens will cause respiratory disease to develop in bighorn sheep. Furthermore, The *Mycoplasmas: Molecular biology, Pathogenicity, and Strategies for Control* textbook states: “assumptions about restricted host range of mycoplasmas, based on the host from which they were first or frequently isolated, are usually made in the context of nearly complete absence of representative sampling of the vast majority of potential hosts.” Additionally, *M ovi* has now been detected in mule deer, whitetail deer, moose, bison, and caribou further demonstrating the lack of understanding of the host range and transmissibility of this bacteria. The USFS needs to stop relying upon forced enclosure (pen) studies to make decisions regarding open range grazing. Forced pen studies are not indicative of open range grazing, and greatly skew perspectives on this issue. Possible pathogen transmission may occur with direct contact, not just because the two species are in the same area.
- We truly don’t know the role of the various infectious agents in bighorn pneumonia, but dose and environmental stability of each organism is crucial knowledge to have. Specifically, what dose is required for transmission of pathogens to occur and how long can that dose survive in the environment? What duration (exposure time) is required for such a dose to be transmitted between animals? What are the different animal species that can transmit the pathogens of concern (currently identified hosts are mule deer, whitetail deer, bison, caribou, and moose)? Importantly, a dose for transmission of pathogens isn’t necessarily the same as a dose required to cause disease (disease threshold). Additionally, once a pathogen is transmitted, what parameters are required for disease to occur? Other factors that predispose bighorns to respiratory disease are the presence of co-infections (what is their role in disease severity?); recent management events (i.e. captures, handling, and observations); nutrition, weather (environment), herd genetics, and the impacts of hunting, and culling of outbreak survivors on genetics, and stress for predation.
- The degree of risk of potential pathogen transmission from domestic sheep to bighorns in open range conditions is unknown and it is not clearly understood even in experimental confinement settings. Forced enclosure experiments (“pen studies”) are not indicative of, and do not provide a direct correlation to, what happens in open range situations. Therefore, we strenuously object to the USFS continued reliance upon forced enclosure experiments to guide grazing policies on our national forests.
- Reducing permit numbers and/or timing should not be the direction provided as the tool when working to reduce the risk of potential direct contact between bighorn sheep and domestic sheep. If permittees are forced to reduce aums, an equitable alternative grazing allotment should be provided.

- The specific language that refers to domestic sheep and goats being solely responsible for the long term viability of bighorn sheep is not accounting for all of the other factors that impact bighorn herd health.
- “Climate change” “extreme weather events” and references to “future climate conditions” should not be used as a decision-making factors in this document.
- “Citizen science” should not be used as a basis for decision making. There is a distinct difference from educated stakeholder involvement (e.g. permittee monitoring) vs. “citizen science”
- Recreation should not be a higher priority than other multiple use activities. Other multiple uses such as grazing are equally important and should not be negatively impacted by decisions for increased recreational opportunities.
- Livestock grazing should not be displaced by recreational activities or be negatively impacted or forced to change grazing practices due to impacts caused by recreationalists.
- Livestock should not be referenced in the context of invasive species.
- More emphasis should be placed on grazing to reduce fuel loads which consequently reduce the duration and intensity of wildland fires.
- Air Quality dust suppression: Is using water for dust suppression really reasonable during a drought?
- Page 15: Migration Corridors encompass thousands of acres and area specific adaptive management should be used to address issues such as intensive recreational pressure.
- Page 15: Snags and coarse wood. Serious micro-management, is this really necessary?
- Page 18 Restore/enhance 2,500 acres of riparian and meadow habitat: This should not negatively impact existing multiple use.
- P 20 FW-STND\_RMGD-08: *“In the riparian management zones, management activities ~~must~~ should strive to maintain or restore connectivity”*
- Page 20: *“for segments with paddling recreation, new water infrastructure should ensure stream connectivity and consider safe passage for paddling”* At what cost?
- Page 21 FW-OBJ-AQTC-03: *“Within 5 years of plan approval, the interdisciplinary team will identify areas critical to the conservation of native aquatic and semi-aquatic species (e.g., spawning areas and breeding habitat) and incorporate monitoring (e.g., streambank stabilization) and conservation measures (e.g., ~~modification of range annual operating instructions~~) to ensure the long-term persistence of native at-risk aquatic and semi-aquatic species.”* GMUG should only modify an AOI if the livestock operations are in question and can be shown to be the causal factor in departure from desired conditions.
- The GMUG should have no new special designation areas. Special designations should not negatively impact existing multiple uses.
- Page 23:FW-STND-IVSP-03: *“For all proposed projects or activities.....mitigation measures may include decontamination procedures of vehicles”* Grazing permittees vehicles should be excluded.
- Pg 23: FW-GDL-IVSP-08: *“aircraft dip sites”* Priority should be given to human safety and infrastructure protection including expanded risk of spreading wildfires instead of being concerned about “at-risk” species.

- Page 23 invasive species management approaches: Livestock grazing should be considered as a priority management tool to reduce invasive plants.
- Page 24: The reference to pack goats should be deleted under the invasive species section. Livestock should be referenced as non-native not invasive.
- Page 24 Fire and Fuels Management: Livestock grazing should be considered a priority land management tool to reduce fuel loads, which consequently reduces the duration and intensity of wildland fires.
- Page 25: Include livestock grazing in the list of management tools to reduce fuels loads
- Page 27 Native Species Diversity management approaches: ***FW-GDL-SPEC-07: “To minimize habitat impacts and direct disturbance of raptors and migratory birds during nesting and winter periods from new authorizations and management activities, utilize buffers and/or timing restrictions based upon Colorado Parks and Wildlife Recommended Buffer Zones and Seasonal Restrictions for Raptors (2020) or used to modify these buffers.”*** Historical multiple use activities should take precedence over raptors that have selectively chosen to change nesting sites.
- Page 27: Linkage/habitat connectivity should not negatively impact existing multiple use activities.
- Page 29:FW-STND-SPEC-13: guidelines should be to minimize direct contact between bighorns and domestic sheep, and should not result in a reduction of AUMs or displacement (removal) of grazing permittee. Effective separation ignores the fact The *Mycoplasmas: Molecular biology, Pathogenicity, and Strategies for Control* textbook states: “assumptions about restricted host range of mycoplasmas, based on the host from which they were first or frequently isolated, are usually made in the context of nearly complete absence of representative sampling of the vast majority of potential hosts.” Additionally, *M ovi* has now been detected in mule deer, whitetail deer, moose, bison and caribou further demonstrating the lack of understanding of the host range and transmissibility of this bacteria. At a minimum, it should be clarified that direct (nose-to-nose) contact must occur for possible pathogen transmission, and that pathogen transmission may or may not result in respiratory distress in bighorns.
- Page 29: FW-GDL-SPEC-14: delete *“to maintain long-term viability”*. This phrase implies that pack goats and domestic sheep are solely responsible for the long-term viability of bighorn sheep which in not true. At a minimum, it should be clarified that direct (nose-to-nose) contact must occur for possible pathogen transmission, and that pathogen transmission may or may not result in respiratory distress in bighorns.
- Page 31: Pack stock traffic should be removed from the limited use section regarding “at-risk” species. Pack goats have been proven to have a very low prevalence of *M ovi* bacteria, and the likelihood of direct contact between bighorn sheep and goats is extremely small.
- FW-GDL-SPEC-27 Page 32: *“management activities (livestock grazing) to a reasonable extent, should avoid occupied habitat”*
- Page 33 FW-OBJ-SPEC-30: *“Within 2 years of plan approval, install wildlife cameras near occurrences of *Sclerocactus glaucus* and *Phacelia submutica* to increase the understanding of potential big game impacts. If evidence indicates*

*negative impacts from wildlife are occurring, work with Colorado Parks and Wildlife to mitigate these impacts.”* This government overreach and micro-management has got to stop. The USFS actually spent staff time to dream this up. This is government absurdity at its worst. It is untenable that U.S. (and potentially Colorado) tax dollars are being wasted on this.

- Page 41 Management Approaches: The CWGA opposes the USFS management strategy of the acquiring new water rights.
- Page 42 FW-OBJ-CHR-03: *“Within 5 years of plan approval, map populations of osha (ligusticum porteri) for tribes.”* This is a common plant, and mapping is another untenable waste of taxpayer dollars.
- Page 54 Land Conveyances: Land conveyances should not be made to non-governmental organizations if the NGO seeks to restrict multiple use.
- Page 54: The federal government should not acquire any more private land or waters rights.
- Page 57: Clarify that grazing is vegetation management.
- Page 57 FW-DC-RNG-01: add *“Well managed wildlife populations and their forage use will be considered, and populations levels managed to achieve desired ecological conditions, allowing for adequate forage for livestock use.”* Livestock permittees should not be negatively impacted because of over-utilization by wildlife.
- Page 57 FW-DC-RNG-03: Before implementing changes to allotment management, it should first be determined if livestock is the causal factor of changing conditions or resources.
- Page 57 FW-DC-RNG-04: Woven wire fence removal should only be done after consultation with the permittees. Removal cost to be covered by the USFS.
- Page 58 FW-STND-RNG-06: ~~No salting or mineral supplemental shall occur on or adjacent to know populations...~~ **When possible, salting or mineral supplementation should avoid known populations...** ~~Delete biological soil crusts.~~ Well salted livestock utilize forage/pasture more uniformly by not trailing in search of salt. Some sites may have limited options, and removing the ability to salt will end up with sheep straying in search of salt.
- Page 58 FW-STND-RNG-08: *“Livestock grazing ~~shall~~ **should not exceed**.. “desired conditions”* must be a logical and reasonably obtainable goal.
- Page 59 FW-DC-RNG-13: *“livestock/wildlife trampling”* Wildlife also utilize water sources and have the same ability to trample.
- Page 60 FW-DC-REC-01: delete *“(1) meet persisting and evolving needs of diverse user groups.(2) accommodate adjusted management as advancements in recreational equipment technologies make way for new and different uses.”* The national forest system is already under excessive pressure from heavy recreational impacts. Do not write a plan that further compounds existing problems.
- Page 60 FW-DC-REC-02: *“Recreation is managed to achieve a sustainable balance with other resources (e.g. recreation and wildlife habitat; **recreation and livestock grazing (vegetation management; recreation and timber.....)**”*
- Page 72: Recreational use of drones on the GMUG should be prohibited.

- Page 81 Designated Wilderness: Wilderness Area regulations should be suspended if needed to assist in wildfire containment and suppression to prevent wildfires from reaching an uncontrollable size or excessively damaging the landscape outside the wilderness area.
- Page 81 Designated Wilderness: Existing permitted livestock grazing should continue to be a valid use of wilderness areas.
- Page 90 Recommended Wilderness: This section should be deleted. The CWGA does not support further land grabs for wilderness areas. If the plan is requiring “removal of all nonessential improvements and nonconforming structures” then it does not meet the qualifications for wilderness designation.

## Draft EIS for the Management Plan Revision Grand Mesa, Uncompahgre, and Gunnison National Forests

- EIS preferred alternative C
- The degree of risk of potential pathogen transmission from domestic sheep to bighorns in open range conditions is unknown and it is not clearly understood even in experimental confinement settings. Forced enclosure experiments (“pen studies”) are not indicative of, and do not provide a direct correlation to, what happens in open range situations. Therefore, we strenuously object to the USFS continued reliance upon forced enclosure experiments to guide grazing policies on our national forests.
- Livestock should not be referenced in the context of invasive species.
- Recreation should not be a higher priority than other multiple-use activities
- “Climate change” “extreme weather events” and references to “future climate conditions” should not be used as a decision making factors in this document.
- Page 14: The CWGA opposes any new special designation areas that restrict multiple use.
- Page 15: The CWGA opposes any new special interest area designations that restrict multiple use.
- Page 5: ~~disease transmission~~ **potential pathogen transmission**
- Page 84: Sheep grazing should be incorporated in landscape management to control invasive species.
- Page 131 Species of Interest - General Wildlife: The CWGA supports the GMUG analysis (Appendix 3, page 85) that excludes Rocky Mountain and Desert bighorn sheep from the list of Proposed Species of Conservation Concern for the GMUG.
- Page 188: Overgrazing does not continue to be a concern for sage grouse habitat. Managed grazing in the norm. This is an inaccurate statement that should be removed from the GMUG plan.
- Page 200: *“Disease epizootic events are likely the most influential factor affecting population trends.”* CPW staff reported to the CPW Bighorn/Domestic Sheep working group during a breakout session that included CDA staff, that all bighorn herds in Colorado have tested positive for the presence of *M ovi* bacteria (2018 or 2019 meeting in Glenwood Springs). Therefore *M ovi* is endemic in Colorado bighorn herds.

- Page 200 Disease Epizootics: The *Mycoplasmas: Molecular biology, Pathogenicity, and Strategies for Control* textbook states: “assumptions about restricted host range of mycoplasmas, based on the host from which they were first or frequently isolated, are usually made in the context of nearly complete absence of representative sampling of the vast majority of potential hosts.” Additionally, *M ovi* has now been detected in mule deer, whitetail deer, moose, bison, and caribou further demonstrating the lack of understanding of the host range and transmissibility of this bacteria. This section clearly points a finger at domestic sheep while failing to recognize the shortcoming of the assumptions upon which the disease epizootics is based upon.
- Page 200 Herd Size and Loss of Genetic Diversity: It should be noted that *M ovi* is endemic in bighorn herds, and bighorns can transfer pathogens including *M ovi* to other bighorns, thus compromising the health of individual herds. Inbreeding can also be a significant factor that drags down herd health. It’s lazy science to continue to use domestic sheep as a scapegoat for all of the factors that negatively impact respiratory disease in bighorn sheep. Continually blaming domestic sheep for low lamb recruitment does not address the problem of finding out why bighorns are less resilient, and how environmental, nutritional, and genetic factors impact bighorns’ immune systems.
- Page 201 Competition: Has anyone ever considered the potentially negative impact of bighorn licking up mag chloride off of the roads in the winter? The *Affected Environment* section indicates a minimal overlap of bighorn range into the GMUG. It does not provide a quantitative analysis of how much that minimal overlap occurs on grazing permits. Consequently, it’s reasonable to assume that observations included in the competition section are negligible. Westwide only ~3 percent of domestic sheep grazing allotments overlap with occupied bighorn habitat.
- Page 201 Harvest: It is important for the public to know that the bighorn sheep population in Colorado is robust enough that the Colorado Parks & Wildlife allow hunting.
- Page 202 Predation: It should be noted that wolves may impact bighorn herd health as a result of stress if the two species are within proximity of each other, and as a result of depredation.
- Page 202 Disease/Effective separation from domestic sheep and goats: The CWGA supports reasonable measures to minimize the potential for direct contact between bighorns and domestic sheep. The USFS is not mandated to manage for zero risk. In a decision released on July 31, 2017 the U.S. District Court for the District of Wyoming upheld the Medicine Bow National Forest Plan that gave preference to domestic sheep grazing allotments within the Encampment River herd of bighorn sheep. Judge Alan B. Johnson ruled that the “viability mandate” in the National Forest Management Act does not require the forest to be managed in order to maintain the maximum number of each species in every part of the forest, but rather gives the U.S. Forest Service flexibility to provide species viability through the entire forest. This ruling is an important shift in favor of multiple-use and balanced, objective management.

- Page 202 Disease: ~~Disease Possible pathogen~~ transmission (domestic and bighorn sheep)” Disease is NOT transmitted! There is a possibility of pathogen transmission through DIRECT (nose-to-nose not indirect) contact. Even if pathogens are transmitted, that is not a foregone conclusion that the pathogens will cause respiratory disease to develop.  
Page 203: ~~Disease Possible Pathogen~~ Transmission  
Page 203 FW-STND-SPEC-13/FW-GDL-SPEC-14: This section fails to recognize that bighorns can be a pathogen reservoir to other bighorns, and other wildlife species may also serve as a pathogen reservoir that may negatively impact bighorns and places the blames solely on domestic sheep and goats. The CWGA supports reasonable steps to minimize separation, and the USFS is not mandated to manage for zero risk of contact.
- Page 203: *“Compared to the existing forest plan.....Any remaining risk would occur from domestic animals escaped from handlers or permitted areas, ....stochastic events that can be hard to predict or manage.”* Again, this paragraph completely ignores the best available science from *The Mycoplasmas: Molecular biology, Pathogenicity, and Strategies for Control* textbook states: “assumptions about restricted host range of mycoplasmas, based on the host from which they were first or frequently isolated, are usually made in the context of nearly complete absence of representative sampling of the vast majority of potential hosts.” Additionally, *M ovi* has now been detected in mule deer, whitetail deer, moose, bison, and caribou further demonstrating the lack of understanding of the host range and transmissibility of this bacteria. This section clearly points a finger at domestic sheep and goats while failing to recognize the shortcoming of the assumptions upon which the disease epizootics is based upon.
- Page 204 Habitat Connectivity: Bighorn herds and individuals can exchange harmful pathogens without any contact from domestic livestock. *M ovi* is endemic is all Colorado bighorn herds. If bighorns develop respiratory disease as a result of comingling with other bighorns, domestic sheep grazers and pack goat users should not be negatively impacted (e.g. grazing permits should not be modified by reducing/eliminating aums or changing grazing patterns or timing).
- Page 208: ~~transmitted diseases possible pathogen~~ transmission
- Page 208 Habitat Fragmentation and Recreation: Livestock permittees should not be held responsible (forced to change allotment management plans) due to impacts cause by recreation and habitat fragmentation.
- Page 209: Livestock should not be referred to as “invasive species”
- Page 209: risk of ~~disease transmission possible pathogen~~ transmission
- Page 212 Harassment: Although this section references the impact of recreation on wildlife, heavy recreation can also impact grazing allotments. Recreation should be managed to minimize the impact on grazing allotments. It’s also important to note that the impacts of harassment of wildlife by human activity is parallel to the impacts of wolves harassing livestock. Permittees should not be negatively impacts because of changed grazing behavior due to the presence of wolves.
- Page 215 Pristine Designations: This designation is impractical, and it limits the USFS’ to effectively manage the impacts of recreational, invasive weeds, and wildfire mitigation.



- Page 242: Livestock does not emit a significant amount of carbon dioxide and should not be singled out versus other breathing animals and uses on the GMUG.
- Page 248: Quantify the contributions of rangelands as a carbon sink on the GMUG.
- Page 289: Livestock grazing is not a primary influencer of forest or watershed condition.
- Page 293: ~~“Excessive or unrestricted grazing by permitted livestock and big game may result in widespread impacts on watershed function and water resources.”~~ This statement is false and needs to be deleted. Livestock grazing is not a primary influencer of forest or watershed condition.
- Page 299: Table 135 should be updated, 2020 census data is available.
- Page 335 Effects of Rangeland Program Direction: ~~“This direction will integrate the rangeland management program into other program areas across the GMUG and prioritize domestic sheep allotments with high risk of contact with bighorn sheep allotments with multiple resource values (e.g. dispersed/developed recreation, wildlife concerns, forest health) for sufficiency reviews.”~~
- Page 365 Range Management: ~~“the difference between grazed and ungrazed vegetation at allotment boundaries and fences, cattle waste dominating grasslands and meadows, and trailing around water developments”~~

### APPENDIX 3

- Page 85: The CWGA supports the GMUG analysis that excludes Rocky Mountain and Desert bighorn sheep from the list of Proposed Species of Conservation Concern for the GMUG. *M ovi bacteria* is endemic in Colorado bighorn herds. The CWGA supports reasonable efforts to minimize potential contact between bighorn and domestic sheep.
- Page 90 Sufficiency: Livestock use should be removed as a risk factor to the ecosystem, or clarification language should be added, such as “in limited circumstances, livestock can impact localized areas of an ecosystem.” To portray that livestock grazing impacts the montane-subalpine grasslands as a whole is incorrect.
- Page 91: “Roads and livestock have contributed to erosion, soil compaction, soil loss, and a loss in proper hydrologic function in the sagebrush ecosystem.” A reasonable estimate of the percentage of loss attributed to livestock needs to be presented, instead of a sweeping generalization.
- Page 111: ~~“Disease Possible pathogen~~ transmission (domestic and bighorn sheep)” Disease is NOT transmitted! There is a possibility of pathogen transmission through DIRECT (nose-to-nose not indirect) contact. Even if pathogens are transmitted, that is not a foregone conclusion that the pathogens will cause respiratory disease to develop. Furthermore, The *Mycoplasmas: Molecular biology, Pathogenicity, and Strategies for Control* textbook states: “assumptions about restricted host range of mycoplasmas, based on the host from which they were first or frequently isolated, are usually made in the context of nearly complete absence of representative sampling of the vast majority of potential hosts.” Additionally, *M ovi* has now been detected in mule deer, whitetail deer, moose, bison and caribou further demonstrating the lack of understanding of the host range and transmissibility of this bacteria.

#### APPENDIX 4

Page 30: We agree that Rocky Mountain bighorn sheep and desert bighorn sheep should not be a proposed Species of Conservation Concern for the GMUG.

Page 34: *“evidence from heavy sheep grazing from late 1800s to mid 1900s) is a purely speculative comment.*

Page 34 Sufficiency: *“improved regulation of sheep grazing”* Changes to sheep grazing should not occur unless there is direct evidence that sheep grazing is causing a long-term, negative impact to the allotment.

Page 35: *“loss of viability”* Federal court has previously ruled that the USFS is not responsible for maintaining species viability across the entire landscape. In a decision released on July 31, 2017 the U.S. District Court for the District of Wyoming upheld the Medicine Bow National Forest Plan that gave preference to domestic sheep grazing allotments within the Encampment River herd of bighorn sheep. Judge Alan B. Johnson ruled that the “viability mandate” in the National Forest Management Act does not require the forest to be managed in order to maintain the maximum number of each species in every part of the forest, but rather gives the U.S. Forest Service flexibility to provide species viability through the entire forest.

Page 36: *“livestock have contributed to erosion, soil compaction, soil loss, and a loss of proper hydrologic function in the sage brush ecosystem.”* In what percentage of the ecosystem?

The size and scope of the draft revised Land Management Plan and the EIS warrants more scrutiny but there is a limit to the amount of time individuals, and small businesses and associations can dedicate to addressing this voluminous and overly prescriptive document. As such, we’re forced to conclude our comments at this time.

Respectfully,

*Terri Lamers*

President