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November 24, 2021 Mr. Chad Stewart:

I appreciate this opportunity to comment on the draft GMUG Land Management Plan. I live in Ridgway CO, which is in Ouray County and part of the Uncompahgre National Forest Ouray Ranger District. I love to hike, and seeing wildlife is always a treat [ndash] this is why I love Colorado. I am especially interested in the viability and sustainability of the Rocky Mountain Bighorn sheep in this part of the state. The 2 herds in and around Ouray County are the S-21 and 3-33 Tier 1 herds.

I believe that there are serious problems in the Uncompahgre NF with domestic sheep grazing and the disease risk to bighorn sheep. Allotment issues are not really discussed in the Draft plan; while specifics are beyond the scope of the plan the higher level process for renewing or assigning grazing allotments needs to tightenned up. Bighorn sheep should be declared a Species of Conservation Concern (SCC) in the GMUG [ndash] the current Draft Plan does not do that. The USFS is arguing that they don't need to list bighorns as SCC because they can provide for their persistence, but we don't want to just persist a few individuals or part of a herd [ndash] our local Tier 1 herds (S-21 and S-33) need to be monitored and maintained as viable and sustainable herds. The monitoring is necessary because of the high risk in this region that bighorns will contract respitory disease from local domestic sheep on grazing allotments; it is unfortunate but it almost seems inevitable that this will happen somewhere in or around Ouray County.

The USFS has already (proudly, in the webinars) stated that the GMUG has one of the largest grazing programs, but they have not recognized that this also leads to the GMUG being one of the areas with greatest future risk of bighorn die-off from respiratory disease. While the USFS may be proud of the grazing program (for its socioeconomic value) they also need to recognize that a proactive attitude is needed if the Tier 1 (genetically native) bighorn herds in this region survive in the long run.

1) Local allotments, local examples of "not effective separation".
In the Ouray District of the Uncompahgre National Forest there is a large overlap between the Ruffner and Bear Creek domestic grazing allotment boundaries and the CPW summer bighorn habitat. These are both active grazing allotments. Following are 2 images (from Mountain Studies Institute website

https://www.mountainstudies.org/bighorn) that show the overlap of the bighorn summer range 90% line (this is CPW data, can be seen in the CPW online date) with the USFS Ruffner and Bear Creek allotments. The USFS allotments are green, the BLM allotments are yellow, and the bighorm summer (90%) rage is pink. Where the bighorn range overlaps with the Ruffner and Bear Creek allotments it is a darker pink/gray color.N ote that most of these 2 allotments are included within the CPW bighorn summer range.

[EXCERPTED MAP: Ruffner allotment close-up:]

[EXCERPTED MAP: Bear Creek allotment close-up:]

There is a picture below [PHOTO] on iNaturalist from July 2020 of a bighorn next to a domestic sheep herd in the Ruffner allotment near Telluride [ndash] note that that bighorn is in both the domestic grazing allotment AND the CPW-mapped designated bighorn summer range (90% region, not even the 100% region!). CPW was called out the next day but of course the bighorn was gone. This is one picture [ndash] how many other instances have happenned where there was not a sympathetic individual around, and with a camera?

There is also documentation on iNaturalist of multiple bighorn observations up the Bear Creek drainage, within the actual boundaries of the Bear Creek domestic grazing allotment.

A bighorn herd can be decimated by respiratory disease and never recover. In George et al. 2009 (Colorado Bighorn Sheep Management Plan 2009-2019) the data show how quickly a herd can be reduced by respiratory disease; the S10 Trickle Mtn herd (SW of Salida) went from a population of 400 in 1992 to 150 in 1995 and 85 in 1996. After that it slowly decreased to 40 in 2007 (the last year in that paper). As of 2020 that herd is down to 35 (CPW online bighorn herd estimates). Prior to the die-off that herd was so productive that CPW removed over 350 sheep over the course of 28 years for translocations to other parts of the state.

2) Specific Draft Management Plan and DEIS comments:
There is no question scientifically of the risk with contact. The USFS acknowledges the risk to bighorns by having a standard that effective separation must be maintained:

FW-STND-SPEC-13: On active grazing allotments, maintain effective separation between domestic sheep and bighorn sheep herds. Effective separation is defined as spatial or temporal separation between bighorn sheep and domestic sheep.

In the Draft Management Plan, below that spec it says: Management Approaches

[bull] To implement GDL-SPEC-13, Tier 1 bighorn sheep herds with the greatest potential to contribute to population viability in the plan area should be prioritized. Tier 2 herds, where they interact or have the potential to interact with Tier 1 herds, should also be prioritized. Use the most current version of the Western Association of Fish and Wildlife Agency[rsquo]s Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat to inform management.

Clearly there is a typo in the Management Approach section-it says [ldquo]To implement GDL- SPEC-13[rdquo] and it should say [ldquo]To implement FW-STND-SPEC-13[rdquo].

In the Draft EIS Part 1, on p203 there is the following text (DEIS in blue). My comments are in-line in red:

Disease Transmission and Effective Separation from Domestic Sheep and Goats

The current forest plan makes little to no recognition of the risk that disease transmission from domestic sheep poses to their wild cousins. However, the current plan does appear to allow a wide enough array of adaptive management flexibility for managers to have options to reduce risk somewhat. Trailing of domestic sheep through bighorn sheep habitat still occurs.(JC [ndash] there is significant overlap between bighorn sheep and domestic sheep in the specified allotment areas, not just [ldquo]trailing[rdquo]. See the maps included above of the Ruffner and Bear Creek allotments [ndash] most (not even part) of these allotments are within the bighorn summer range 90% line). All action alternatives contain two Forest-wide plan components that address the risk of disease transmission from domestic sheep to bighorn sheep:

[bull] FW-STND-SPEC-13, which addresses [ldquo]effective separation[rdquo] of bighorn and domestic sheep as a standard. The plan component does not define effective separation, but the emphasis of the planning rule on [ldquo]best available science[rdquo] means that the definition would be based on current science. As our scientific understanding of the species needs changes, so could the definition of [ldquo]effective separation[rdquo] as regards the risk of disease transmission from domestic animals to wild animals.

[bull] FW-GDL-SPEC-14 addresses the risk of disease transmission from goat to bighorn sheep, requiring the Forest Service to minimize the potential for interaction and to manage pack goats consistently with the way sheep are managed.

The impact of these two components on the disease transmission issue faced by bighorn sheep would be strong. SPEC-13 for [ldquo]effective separation[rdquo] would become a mandatory component of renewed allotment management plans. The guideline SPEC-14 does provide greater flexibility regarding separation between pack goats and bighorn sheep, but still requires justification for any occasion when the Forest Service allows the users or permittees to not comply.

Compared to the existing forest plan, these two components[mdash]over time, as incorporated into individual allotments as they are renewed[mdash]would likely greatly reduce the risk of disease transmission from domestic animals to bighorn sheep.(JC [ndash] these 2 components will not reduce risk unless something changes. A huge current risk is inside permitted areas) Any remaining risk would occur from domestic animals escaped from handlers or permitted areas, or from bighorn sheep wandering well outside known herd ranges[mdash]stochastic events that can be hard to predict or manage. (JC [ndash] stray or left-behind domestic sheep seems to be a more common problem than the USFS is aware of or acknowledges [ndash] see iNaturalist reports for the last

several years. I have seen strays or left-behind sheep myself. The USFS needs to step up and manage this issue [ndash] ideas include publicly-available (immediately) head-counts when moving to give the USFS and the public an indication of potential problems.)

3) Allotment renewal process needs to be standarized with rules:
In the webinars that the Plan management team conducted there was some discussion and questions regarding domestic sheep grazing, allotment renewals, and effective separation. In webinar #2 the planning lead stated: "GMUG grazing is one of the largest grazing programs in the agency. We do not change areas suitable, animal unit months, don't reduce head of cattle or sheep, wasn't one of the planning issues. Wasn't something evidently in need of change. We do address effective separation of bighorns and domestic sheep. As plans/allotment management plans come up in future for renewal will be required to set up plan to truly have effective separation. Also incorporate adaptive management and improve monitoring over time."

In webinar #3 the planning lead stated "Only way to implement effective separation is through allotment renewals", and "Allotment renewals is project level, not this plan"

I don't want to take issue with what 1 person said specificly; the issue here is that the FS has been saying that the way to address effective separation is through the allotment renewal process, and yet they don't want to address allotment renewals specifically in this plan because the renewals should be project-level. The problem is that the FS currently does not have any obligation to process allotment renewals - they can just not process them and the result is that they stay hte same (they are effectively renewed). The FS can also process a renewal without any public notification or comment; the FS renewed the Ruffner allotment for 10 years relatively recently without any notice. The Ruffner allotment (discussed above) is mostly within bighorn sheep summer range of a Tier 1 herd, and there is documentation (picture above) of a curious bighorn (in, not out of it's official CPW range) next to the domestic herd in July 2020. I understand that it doesn't make sense to address specific allotment renewals in this management plan but the process does need to be addressed. The FS seems to be repeatedly saying that "adaptive management" will allow them to deal withe specific management issues, but there are higher level guidelines that need to be codified and put in the management plan. Items that need to be included in the plan are:

a) The FS should be required to give public notice and invite comments when renewals come up.

b) The default for no-decision should be no grazing allowed until there is a decision, not continuing the status quo.

c) The grazing allotment renewal process needs to be more transparent to the public; these are public lands.

d) Current information on what allotments are active, owners, and grazing dates should be readily available to the public via website. There is some information out there but what I have found is always out-of-date, there may be info on some allotments but not others, some ranger districts have no available information.

c) There should be a specific process for addressing grazing allotment location, size, and practices in-between the 10 year renewals. It would seem to make sense to have a 5 year review, again with public comment.

4) Argument for SCC
The problem is that it is next to impossible to maintain effective separation; there will be incidents, observed and not observed. In order to manage this risk the FS needs to carefully monitor and manage the herds, and to do that the bighorns need to be declared a SCC. Without the SCC designation the FS can just manage for persistance rather than monitor the herds and make sure the herds are viable and sustainable.

The process that the FS used to decide that the bighorns were not a SCC was incorrect [ndash] they did not follow their own rules in the Land Management Handbook FSH_1909.12_10, section 12.52d. These rules include:

Item 3d) adjacent forests declaring the species as SCC:

The Rio Grande National Forest to our south has recognized bighorns as SCC; there is no reason that they should not also be recognized as SCC in the GMUG. The RGNF shares some boundaries with the GMUG, but it should also be noted that these National Forests share boundaries with BLM land where there is also significant grazing. The bighorn sheep herds move across all these boundaries, of course.

Item 3c) Other agencies declaring the species in need of help:

CPW has declared bighorns as a Species of Greatest Conservation Need (SGCN) in their latest State Wildlife Action Plan (SWAP).

Item 3f) Assess 4 items under 3f as 'or' not 'and'

f. Species for which the best available scientific information indicates there is local conservation concern about the species capability to persist over the long-term in the plan area due to:

(1) Significant threats, caused by stressors on and off the plan area, to populations or the ecological conditions they depend upon (habitat). These threats include climate

change.

(2) Declining trends in populations or habitat in the plan area.

(3) Restricted ranges (with corresponding narrow endemics, disjunct populations, or species at the edge of their range).

(4) Low population numbers or restricted ecological conditions (habitat) within the plan area.

I would argue that all 4 of these conditions are met for bighorns:

1) threat from disease from deomestic sheep grazing

2) Habitat is declining because of the increased human use (people hiking, jeep/ohv usage) all over the GMUG, even up high. Have you driven across Engineer Pass lately [ndash] an amazing amount of traffic in the summer,

3) Range is restricted, again because of increased human use/pressure. On a map the range is there, but effectively there are increasing peopled/vehicled areas that bighorns will avoid.

4) Restricted habitat [ndash] again increased human use/pressure

The USFS has been arguing (in GMUG plan webinar for example) that the GMUG herds do not have restricted

ranges (item f3) because the GMUG 'is in the middle' of their range.

In the GMUG Draft Plan there is an argument that bighorns cannot be declared SCC because they do not meet all 4 of the required items in the Land Management Planning Handbook. In Appendix 9 of the Draft Plan it says that a species needs to meet all 4 items, but in the actual FSH handbook it does not say that; it is clearly an 'or' choice from the way it is written. That statement in Appendix 9 is wrong, and the USFS needs to re-assess those 4 items correctly.

However there are increasing habitat/range pressures from increased people and vehicle/jeep usage all over within the GMUG - this is unfortunate but it is why we need to pay close attention to the bighorn herd health and maintain these herd's viability, not just persistance of some decreasing subset of the original herds. If we wait until a big die-off is evident it is then too late [ndash] that is why the bighorns in the GMUG need to be declared a Species of Conservation Concern in this plan.

Thank-you for providing the opportunity for the public to comment on the GMUG Draft Management Plan.

Jennifer Cram