Data Submitted (UTC 11): 12/16/2021 11:00:00 AM
First name: Hannah
Last name: Hollenbach
Organization: Ouray CO
Title: Deputy Clerk
Comments: Good Afternoon:

Please find attached a letter from the Ouray County Board of County Commissioners providing additional information on the importance of the Rocky Mountain Bighorn Sheep and Ouray County's opposition to the Bureau of Land Management - Gunnison Field Office Proposed Decision for Domestic Sheep Grazing Permit Renewals and the Final Environmental Impact Statement.

Please include this letter and attachments with Ouray County's comments on the GMUG Draft Revised Land Management Plan and Draft Environmental Impact Statement (letter dated November 26, 2021)

Thank you,

Hannah Hollenbeck

[ATTACHMENT COPIED BELOW - COMMENTS TO GMUG. NOTE PDF CONVERSION MAY RESULT IN ERRORS.]

BEN TISDEL

LYNN PADGETT JAKE NIECE

BOARD OF COUNTY COMMISSIONERS

541 4th Street [bull] P.O. Box C [bull] Ouray, Colorado 81427 [bull] 970-325-7320 [bull] FAX: 970-325-0452

December 16, 2021

Grand Mesa, Uncompahgre, and Gunnison National Forests 2250 South Main St

Delta, Colorado 81416

Attn: Responsible Official Frank Beum, Regional Forester, USDA Forest Service Rocky Mountain Region (Region 2); Responsible Official Chad Stewart, GMUG Forest Supervisor; and GMUG Plan Revision Team

Via email to: frank.beum@usda.gov; chad.stewart@usda.gov; tamera.randall-parker@usda.gov; samantha.j.staley@usda.gov; jonathan.tucker@usda.gov and gmugforestplan@fs.fed.us

RE: Ouray County Cooperating Agency Comments on the August 2021 DRLMP and DEIS Public Documents [ndash] Grand Mesa, Uncompahgre, and Gunnison Forest Plan Revision #51806 [ndash] Rocky Mountain Bighorn Sheep within CPW Data Analysis Unit RBS-21, which contains the Game Management Units (GMU) S21 and S33.

Dear Responsible Official(s) and Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests Planning Team,

On behalf of the Board of County Commissioners and citizens of Ouray County, thank you for the opportunity to provide Cooperating Agency comments regarding the GMUG Forest Plan Revision. Ouray County is one of the cooperating agencies for this GMUG Forest Plan Revision Process. We provided substantial comments on the GMUG Draft Revised Land Management Plan (DRLMP) and the Draft Environmental Impact Statement (DEIS) on November 26, 2021. We are providing additional information on the importance of Rocky Mountain Bighorn Sheep (RMBS) to Ouray County and our opposition to the Gunnison Field Office (GFO) of the Bureau of Land Management (BLM) regarding the GFO[rsquo]s Proposed Decision for Domestic Sheep Grazing Permit Renewals, 4160 (LLCOS06000): Domestic Sheep Grazing Permit Renewals, and the Final Environmental Impact Statement, #DOI-BLM-CO-S060-2014-0001-EIS (Attachment A).

The GMUG domestic sheep grazing allotments are adjacent to the BLM GFO domestic sheep grazing allotments within CPW Data Analysis Unit RBS-21. Please review our comments to the GFO BLM. GFO[rsquo]s American Flats #06509 06507 and American Lake #06509 Allotments intersect Ouray County. The GFO BLM Henson Creek Allotment #60504 is adjacent to the east Ouray County boundary. Similarly, the Ouray Ranger District of the GMUG manages the Bear Creek Allotment #00651 which intersects Ouray County. Ouray Ranger District[rsquo]s Uncompahgre Peak/North Henson Allotment #00662 is adjacent to the east Ouray County boundary. The Board of County Commissioners recognizes that these allotments may not be within Ouray County, but are included as they abut Ouray County, and bighorn sheep do not recognize political boundaries.

The overlap of the RMBS Overall Range and the BLM and GMUG domestic sheep allotments demonstrate the importance of both agencies ensuring that there is total separation between domestic sheep allotments and RMBS.

[EXCERPTED: Map 1: Showing adjacency of GMUG and BLM domestic sheep allotments and RMBS overall range overlap. Source: Western Watersheds Project1 interactive ArcGIS Online Map.]

Please review our communication to the GFO and the attached Colorado Parks and Wildlife letter (Attachment A-1) to the Gunnison Field Office dated August 8, 2019. This information should provide further evidence to compel GMUG to designate RMBS as a Species of Conservation Concern, as requested by Ouray County and several others during the DRLMP/DEIS public comment period. The potential risk of contact with domestic livestock is the most significant concern for RBS-21 because it is the primary factor limiting bighorn sheep populations in Colorado and RBS-21 specifically. According to CPW, RBS-21 has the highest degree of overlap between the number of bighorn herds and domestic sheep allotments found in the state of Colorado. CPW (and citizen science data compiled in iNaturalist by Mountain Studies Institute) provide information about documented contacts between RMBS and domestic sheep. CPW states that documented contacts required euthanasia of the RMBS to protect the remainder of their herd from a major disease die-off. CPW refers to the Wild Sheep Working Group Western Association of Fish and Wildlife Agencies (WAFWA 2012) report: "RECOMMENDATIONS FOR Domestic Sheep and Goat Management in Wild Sheep Habitat." This report clearly states, "The best protection for maintaining bighorn sheep herds is to maintain total spatial and temporal separation of domestic and bighorn sheep." The position of Ouray County is that both GMUG and BLM should ensure that domestic sheep and goat authorizations and other uses result in in a high degree of confidence that there will be total separation between RMBS and domestic livestock.

Respectfully submitted,

BEN TISDEL

LYNN PADGETT

JAKE NIECE

Cc. John Whitney, Western Slope Regional Director, U.S. Senator Michael F. Bennet; Helen Kalich, Southwest Regional Representative,

U.S. Senator John Hickenlooper; Sarah McCarthy, Western Colorado Regional Director, U.S. Senator John Hickenlooper

Attachments:

1. Attachment A: Ouray County Opposition to Proposed Decision for Domestic Sheep Grazing Permit Renewals, 4160 (LLCOS06000): Domestic Sheep Grazing Permit Renewals, and the Final Environmental Impact Statement, #DOI-BLM-CO-S060-2014-0001-EIS