

Data Submitted (UTC 11): 10/27/2021 9:37:40 PM

First name: Jeremy

Last name: May

Organization:

Title:

Comments: Hello. In regards to "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."

effective separation needs to be more clearly defined. In order for this to carry true weight and result in decisions, it should be more specific. Furthermore, it should be based on best current science. I recommend that the plan state that effective separation will mean no risk of contact using the Risk of Contact Tool, which was developed jointly by the USFS and BLM and represents the best available science for evaluating the risk of grazing domestic sheep in close proximity to wild sheep. Alternatives would be to use a set distance from known bighorn core range, but as Matt V pointed out during the webinar, it is more complex than just distance. Another option would be to state that if any bighorn are known or proven to be within a domestic sheep allotment, that the allotment would be considered unsafe and therefore unsuitable.

Again, it seems like using the Risk of Contact tool makes the most sense, but if not some other concrete criteria should be used.

Finally, I would like to see some "teeth" to this. That is, what happens if there is NOT effective separation between bighorns and a domestic sheep allotment? The allotment permit should be revoked, or else it will just be a plan that is not adhered to.