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Comments: The following comments reference valuable observations of bighorn and domestic sheep recorded as part of the Colorado Bighorn Sheep Monitoring Program (CBSMP). This project is managed by Mountain Studies Institute (MSI), a non-advocacy, research and education non-profit.

The GMUG land management plan states that effective separation will be maintained between domestic and bighorn sheep (FW-STND-SPEC-13) and that sheep will be managed according to the Western Association of Fish and Wildlife Agency's Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat. These guidelines state that, "Land management agencies that regulate or are responsible for domestic sheep or goat grazing allotments, trailing routes, vegetation management, use as pack stock, or any other uses involving domestic sheep or goats should only authorize such use(s) outside of occupied wild sheep range." (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5385708.pdf, page 12). Data collected as part of the (CBSMP) can inform our understanding of both the current extent of wild sheep range and areas where effective separation has not been maintained in the past.

Beginning in 2018, volunteer citizen scientists have been trained to submit observations of bighorn and domestic sheep to iNaturalist.org. Photos are linked with a time stamp and coordinates of where the photo was taken. Observations, core bighorn ranges, grazing allotments, trail information, and public land types are available on an interactive map found at www.mountainstudies.org/bighorn. While this map is updated periodically, all observations, updated live, are publicly available at iNaturalist.org under the "Colorado Bighorn Sheep Monitoring" project page.

In Southwest Colorado (bounded to the north by Ridgeway and to the east by South Fork) there have been thirteen observations of bighorn sheep on or adjacent to an active domestic sheep allotment since 2012. Seven of these observations occur on Forest Service grazing allotments managed by the GMUG.

- Ouray Ranger District: 6 observations (5 on the Bear Creek allotment and 1 on the Big Blue/Fall Creek/Little Cim allotment).

- Norwood Ranger District: 1 observation on the Ruffner allotment.

The Bear Creek sheep allotment has the most observations of bighorn sheep on any single allotment in SW Colorado. Additionally, in 2021 potential contact between bighorns and domestic sheep was reported in the cow creek drainage (part of the Uncompahgre Wilderness) adjacent to the American Lake BLM sheep allotment and the Uncompahgre Peak/North Henson FS sheep allotment.

Collected opportunistically by volunteers, these results represent a limited picture of bighorn and domestic sheep distribution and interactions. Even so, the significant observations highlight the importance of considering bighorn and domestic sheep interactions in determining science-based land use policy and management. Of highest concern at this time is the presence of bighorn sheep on the Bear Creek domestic sheep allotment.

In conclusion, the results of the CBSMP show that domestic sheep grazing allotments in the GMUG overlap with occupied wild sheep range.