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September 13, 2021

On behalf of Great Old Broads for Wilderness, please accept the following protest of the BLM Gunnison Field Office proposed decisions to renew 10-year grazing permits for permittees Juan Inda and Poverty Mesa LLLP. As the local Northern San Juan chapter of a national organization, we will focus our comments on the allotments with which we are most familiar – namely American Flats, American Lake and Henson Creek. Several of our members are actively engaged in a community science project monitoring bighorn sheep in our region and therefore are well acquainted with the landscape in question. We unequivocally advocate for the permanent closure of all three grazing allotments due to the risk of transmission of respiratory disease to the Tier 1 RBS-21 bighorn herd. We vehemently oppose renewing leases in these allotments as proposed in your decision.

BLM admits in the EIS the vulnerability of the RBS-21 herd:

*“The San Juan’s West Rocky Mountain bighorn sheep population (RBS-21) is the greatest concern for interactions with domestic sheep in the planning area. RBS-21 herds have ranges that either overlap, are in close proximity, or are within foray distance of the domestic sheep allotments examined in this EIS. RBS-21 is indigenous to the area with very few augmentations occurring historically, so it is considered a primary core population (Tier 1) by CPW (Diamond and Banulis 2012). RBS-21 is managed as two herds: the Cow Creek/Wetterhorn Peak herd (S- 21) and the Lake Fork/Pole Mountain herd (S-33). The S-21 herd is one of the few remaining indigenous bighorn herds in Colorado (Diamond and Banulis 2012); S-33 bighorns are also indigenous but have received augmentation. Recent years have seen a decline from an estimated 400 bighorn in RBS-21 in 2013 to a 2015 estimate of 305 bighorn. There may have been an outbreak of disease in RBS-21, as blood samples from bighorn captured for a telemetry study showed high levels of *M. ovipneumoniae* in the winter of 2012–2013, and then lamb recruitment dropped to 13 per 100 ewes in the following season’s survey (CPW, unpublished data). The RBS-21 plan assumes an expected population of 400 to 500 animals and assumes densities that do not exceed 2.0 bighorn/km² of modeled winter range.”*

In addition the BLM Gunnison Field Office (GFO) Resource Management Plan (RMP) acknowledged in 1993 the risks of interaction between domestic sheep and bighorn sheep and set a goal of 500 bighorn sheep in the management area. The EIS does not indicate if this target has been met or sustained over time.

In the August 2019 Colorado Parks and Wildlife (CPW) DEIS comments, the agency charged

with managing the state's wildlife states: *"Bighorn sheep are the only ungulate listed as a species of greatest conservation need in CPW's State Wildlife Action Plan (SWAP)(CPW 2015). Specifically, the SWAP indicates that the highest priority threat is pathogen transmission by Livestock (Chapter 5 - Table 7). The best protection for maintaining bighorn sheep herds is to maintain total spatial and temporal separation of domestic and bighorn sheep."* CPW comments continue to emphasize the risk to RBS-21. *"The EIS analysis area is centered on RBS-21... The analysis area represents the highest degree of overlap between the number of bighorn herds and domestic sheep allotments in the state of Colorado (George et al. 2009: pg 64)."* CPW then reports the history of multiple events of co-mingling of domestic and bighorn sheep, bighorn forays and domestic strays along with suppressed bighorn lamb recruitment, bighorn mortality and all-age die-off events due to disease transmission. Acknowledging data which demonstrates that bighorn in this area foray great distances from their Core Herd Home Range, CPW supports analysis of bighorn foray probability out a distance of 35km from allotments to minimize risk of contact between domestic sheep and bighorn sheep and then concludes: *"Given the abundance of bighorn sheep habitat overlapping allotments, there are no localities within the allotments that are outside the range of high foray probability."*

Though BLM did consider this distance in the Risk of Contact analysis, the agency proceeded to remove overlap of bighorn sheep summer range and propose renewal of the two permits with no spatial separation between summer range and the allotments, citing that risks can be mitigated by Terms and Conditions and best management practices (BMP.) However, BLM acknowledges in the EIS that grazing BMP have not been scientifically proven to guarantee effective separation and CPW indicates, in their August 2019 comments, that BMP/Terms and Conditions are not effective in achieving total spatial and temporal separation.

Unreported foray events, domestic strays, and co-mingling of bighorn and domestic sheep, coupled with the inconsistent ability to address such events in remote, rugged terrain even when reported, puts the Tier 1 RSB-21 herd at considerable and unreasonable risk.

Given all the facts outlined above along with BLM's acknowledgement of the risks to bighorn sheep due to disease transmission, the only responsible action by the GFO is to permanently close the American Flats, American Lake and Henson Creek allotments in order to safeguard this bighorn herd.

Thank you for consideration of our protest as you prepare your final decision.

Respectfully,

Robyn Cascade, Member Leader
Northern San Juan Chapter