

Elizabeth Dawson Acting District Manager 2465 S. Townsend Ave Montrose, CO 81401

Re: Proposed Decision for Domestic Sheep Grazing Permit Renewals, 4160 (LLCOS06000)

The Town of Ridgway would like to echo the comments provided by Cory Chick, Colorado Parks & Wildlife Southwest Region Manger, with respect to the Domestic Sheep Grazing EIS. Protection of bighorn sheep is best achieved by avoiding *any* interaction between domestic sheep and bighorns. Keeping domestic sheep outside of the bighorn summer range, as planned in the proposed Alternative C, is not sufficient. The Western Association of Fish and Wildlife Agencies recommendations for domestic sheep and bighorn sheep herds is very clear: "The best protection for maintaining bighorn sheep herds is to maintain total spatial and temporal separation of domestic and bighorn sheep (WAFWA 2012)."

The Proposed Decision does consider Manual 1730 with respect to domestic sheep and bighorn sheep but stops before citing the portion of the manual that concludes "Domestic sheep and goat authorizations and other uses will be implemented to ensure that effective separation results in a high degree of confidence that there will be a low to no risk of contact with wild sheep." This seems to demand consideration of Alternative E. Alternative C does not result in the low or no contact risk demanded by the manual.

The science is clear that the commingling of domestic sheep with the largely undisturbed bighorn sheep populations of the San Juans puts the bighorn sheep populations at risk. Therefore, Alternative E should be the preferred option, in order to keep bighorn sheep isolated from domestic sheep populations, which would in turn benefit recreational economic drivers such as wildlife viewing and hunting. The Town of Ridgway believes that a proposed decision for Alternative C is scientifically unsound and inappropriate for the region.

Sincerely,

John I. Clark

Mayor

Town of Ridgway