

# DRAFT

## WEMINUICHE LANDSCAPE GRAZING ANALYSIS

### RESPONSE TO COMMENTS ON EA

JULY 2014

Addressed in this document are the comments received during two 30-day comment periods for the Weminuche Landscape Grazing Analysis EA. Previous input received during the scoping period was addressed during the development of the EA, and is summarized in the EA and detailed in the project record.

Comments during the two 30-day comment periods were received from 81 external sources: 60 from interested individuals, 9 from environmental or pro-wildlife organizations, 6 from livestock industry proponent organizations, 4 from other government agencies, and 2 from grazing permittees in this landscape or their families. A summary listing of all the comments follows in the table. Additionally, over 310 similar form letters were submitted in opposition to grazing in the wilderness. Full text of the comments can be found in the project record, available upon request.

#### SUMMARY OF COMMENTS RECEIVED DURING EA COMMENT PERIODS

Commenter #	Last	First	2 <sup>nd</sup> Name	Affiliation	Date Received	Topic, Issue or Quote	Forest Service Response
1	Ancel	Nadine			6/29/14	Grazing causes erosion	<i>Responses to comments on the EA have not been completed.</i>
						Grazing spreads invasive plants	
						Fees do not cover costs of damage	
						Adjacent private lands are affected	
						Livestock cause unsanitary conditions	
2	Anonymous				7/11/14	Please prohibit all grazing in the Weminuche Wilderness	
						Ranchers should be charged more	
3	Aspelund	Jason			6/12/14	Destruction of habitat	
						Degradation of wetlands and streams	
						Negative impacts to recreation	
						I do not support subsidizing ranching	
4	Bandy	Paul	Mary Friis	Grazing Permittee	6/13/14	Vacant allotments should be kept as back up [forage reserves]	
						Sheep control larkspur	
						Ranchers depend on permits for their livelihood	
						Don't put restrictions on who you can sell your permit to.	
5	Beaber	Paul	Mary		6/19/14	Sheep grazing hurts the local economy by discouraging recreation	
6	Berry	Nancy			6/15/14	Alt. 4 is being realistic on what could be managed and monitored in the future	

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						Sunset clause is "thinking into the future"	
						Grazing in Needles Mountain allotment is trespass and should be stopped and not reopened because of erosive soils and loss of vegetation	<i>Responses to comments on the EA have not been completed.</i>
						Cattle shouldn't be allowed in Cave Basin. The adjacent allotment has plenty of acres where cattle can be managed properly.	
						Decrease quality of hunting experience	
						Would further trample the only trail.	
						Herder camps should be 100' from water	
						At risk or unhealthy points will need additional monitoring	
						There needs to be fewer bands of sheep using Burnt Timber Trail	
7	Bickel	Bettina			7/19/14	Protection of native species such as bighorn is a higher priority than domestic sheep grazing.	
						The threat of disease transmission may increase as the bark beetle opens forest canopy.	
						Elk forage is decimated by sheep	
						Recreation experience is marred by a denuded landscape and unpleasant encounters.	
8	Bickel	Jean			7/19/14	Fragile vegetation obliterated and soil damaged	
						A sheepherder threatened my dog with a firearm.	
						Indiscriminately kill predators	
						Diseases are spread...bighorn at risk of decimation	
						Small financial payment in on way pays for vast damage to the environment	
9	Boehm	Kenneth		National Legal and Policy Center	7/21/14	Risk Assessment appears flawed, biased, and incomplete. No confirmed die-offs of bighorn. Any policy changed should rely on actual, confirmed facts over speculative notions. The point that die-offs have occurred without exposure to domestic sheep appears to have been downplayed.	
						FS has a statutory duty to promote multiple land uses. It appears the FS has had an agenda of closing off lands to sheep grazing.	
						Potentially putting permittees out of business would certainly be considered causing harm	
						The only responsible course of action is to conduct the research needed. Should include input from the ARS.	
						FS lacks the statutory authority to sunset active allotments.	
10	Boutilier	Elaine			7/20/14	I am not sure permittees have either the motivation or the ability to carefully monitor the interactions of domestic and bighorn sheep.	
						Moving the boundaries of Tank Creek and closing the vacant allots is not clear that this will provide sufficient protection because of close distance.	
						Hikers and hunters provide substantial economic benefit.	

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11	Brass	Timothy		Backcountry Hunters and Anglers	7/21/14	While the majority of our comments are focused on impacts to native sheep, we believe it is important that the FS acknowledge and account for the broader impacts...polluted water...riparian margins...displacement of wildlife...aggressive guard dogs...illegal predator killing...etc	<i>Responses to comments on the EA have not been completed.</i>
						Contacts exceed the levels thought likely to maintain long-term bighorn persistence. Discussion of this expected loss must also be included within the EA.	
						Endlich Mesa allotment expansion must be eliminated...it is a violation of the standards outlined in the Forest Plan to prevent overlap with bighorn.	
						Significant overlap remains on the Tank and Canyon Creek allots.	
						It is unclear how separation will be administered and ensured by the FS	
						Forage reserve allots in areas of overlap should be eliminated.	
						Any expected decline of Tier 1 population based on grazing or land use decisions should be thoroughly discussed and mitigated in the EA.	
						Temporal and spatial separation is a "BMP" that should be implemented.	
						Adaptive management should not be used to make spatial or temporal grazing decisions- this reactive system cannot ensure that risk is minimized.	
						The agency should more clearly state that expansion of bighorn is a priority.	
						Figures of direct expenditures on harvestable bighorn should be incorporated	
						The claim that a disease event affecting 75% of the population would not impact the viability of the population on the forest is not scientifically defensible.	
						We question the validity of the statement that there is no known grazing overlap with bighorn year-round habitat. (RA p.13)	
12	Broscheid	Bob	John Salazar	State of Colorado: CPW/CDA	7/21/14	We urge a considered approach that strikes a balance between these two interests.	
						It is critical to demonstrate a strong and significant link between domestic and bighorn sheep interactions when disease outbreaks occur. Potential risk alone should not be the basis for taking actions. ...more clearly demonstrate the existence of a real and verifiable problem with the bighorn population that is clearly traceable to grazing.	
						The incorporation of local (CO) data provides sufficient flexibility to use the best available science (Risk of Contact Tool)	
						Closure of vacant allotments could negatively impact sheep grazing in the future...this impacts should be carefully considered and taken into account.	

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						It is not clear that there is high risk, nor that there is sufficient data to support closure of the vacant allots. . .does not provide clear evidence that grazing is contributing to a decline in bighorn,	<i>Responses to comments on the EA have not been completed.</i>
						Address management of stray domestic sheep, including immediate and comprehensive searches and notification.	
						Require marking of all domestic sheep	
						Require only experienced, informed, and responsible shearers	
						Require full counts of domestics at various times	
						Require herders to record GPS locations	
						Enhance bighorn habitat outside of domestic sheep allots.	
						Prohibit use of salt in proximity to bighorns.	
						Require survey for bighorn prior to domestic sheep turn-out, every two weeks, and following removal	
						Post advisory signs at trailheads to encourage prompt reporting of interactions	
						The vacant allots could be possibly converted to cattle	
13	Brown	Bonnie		Colorado Woolgrowers Association	6/13/14	Request extension of comment period because of addition of Alt. 4.	
						What courts or precedential authority determined that livestock grazing permits should not be re-issued without NEPA?	
						<b>I. The EA is inconsistent with existing collaborative agreements and mapping efforts.</b>	
						The EA and Risk Assess do not take into consideration the BMPs of the permittees	
						<b>II. The EA violates NEPA.</b> The proper standard us to analyze how an action affects the "human environment," not the "human and biological environment".	
						<b>A. Purpose and Need. B. Proposed Action.</b> We question whether scoping addresses statutory multiple use mandates (NFMA, MUSYA) and fails to mention compliance with authorizing statutes.	
						<b>C. Failure to consult USDA ARS.</b> During the EIS process, the Forest Service must obtain comments of any federal agency which has special expertise	
						<b>D. Other NEPA Issues.</b> Rather than provide clear, concise, and appropriately defined direction as to what adaptive management would mean, the Forest Service lists mechanisms by which it would restrict livestock grazing	
						There has been no full and fair discussion as to status as a sensitive species	
						<b>III. Flawed Science.</b> species viability rule is potentially outside the legal authority Congress has granted the multiple use mandates	

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						<b>A. Best Available Science. i. Limitations of Science Relied Upon.</b> Research from penned experiments, not in wild; no confirmed die-offs on SJNF; vaccine development should be considered; no data from SJNF to test model assumptions	<i>Responses to comments on the EA have not been completed.</i>
						<b>ii. Failure to Explore Relevant Scientific Questions.</b> Lack of in-depth consideration to other relevant threats; extent to which bighorn transplants themselves may spread disease	
						<b>B. Data Quality Act. C. Administration Memoranda and Orders</b> Does not rise to the standards of objectivity, utility, and integrity	
						<b>IV. Bias Against Agriculture</b> in favor of recreation	
						<b>V. The Preferred Alt. is Unlawful</b> The sunset clause is not supported by any existing statutory authority	
						<b>VI. Insufficient Economic Analysis</b>	
						<b>VII. Climate Change</b> Analysis of climate change should be outside the scope of the EA	
						<b>VIII. Implementation of the EA Would be Arbitrary and Capricious</b> Alternatives are unduly narrow and biased against grazing; some allotments bordering on occupied habitat are low risk, but others far from occupied habitat are high risk; FS gives little credence to occupied habitat as defined by CPW and WAFWA	
						<b>IX. Conclusion</b> Offer alternative allotments to displaced permittees; place alternative allotments on NEPA schedule OR; the agency should cease dislocations until NEPA is done	
					7/11/14	Request the Forest Service evaluate and incorporate ARS data in the final EA	
						Alt 4 closes vacant allotments that have previously been managed as forage reserves...and has not been willing to schedule these allotments for NEPA in order that interested permittees could have access to them.	
						Proposed Action...despite good conditions, no confirmed bighorn die-offs, and native herds not being affected	
						Not using best available science	
						During EIS process, Forest Service must consult with ARS.	
14	Brown	Jean		Permittee on Weminuche Landscape	6/16/14	Sheep keep fire hazard low, control undergrowth	
						Sunset clause of 5 years would be a hardship. Would they be paid for improvements?	
						Scientific studies prove that domestic sheep are not harmful to bighorn	
15	Brown	J.Paul		Permittee on Weminuche Landscape	6/16/14	Objects to timing of the comment period during lambing. Our comments will not be comprehensive because of that.	

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						Sunset clause to phase out sheep grazing will destroy the integrity of our business... will not be able to sell our business	<i>Responses to comments on the EA have not been completed.</i>
						Will force the development of the open space [private land].	
						There are no bighorns on any of our allotments and no evidence that there have ever been	
						Idaho decision is still under litigation and should not be used. Idaho is a different situation with direct contact.	
						No scientific evidence that disease can be transmitted on the open range. There are as many examples of bighorns dying when they haven't been in contact as when there is contact.	
						Voluntary tracking collars on domestic sheep prove they have not come close to bighorns	
						Proposed action will mean the end of grazing on these permits forever	
						Future may hold development of a vaccine	
						Threat of lawsuit by environmental groups is no reason to not renew our permits	
						Why is this proposed action different than the renewals that were granted in the Silverton area?	
						Our allotments are in compliance, 100 years with no adverse results, proposed action is political and not based on facts	
					7/21/14	Neither I nor the sheepherders have ever seen a bighorn on these allotments since 1971. I believe the risk of comingling is very low.	
16	Bruning	Donald			7/7/14	Will there be limits on the number of stock allowed? There should be set guidelines for numbers and the season.	
						Limits on time and location are needed to avoid conflict with other public use and negative interactions with guard dogs.	
						Do not allow goats at any time.	
						Why convert to cattle, with additional costs for fence and waters? Who pays?	
						What is timeframe for the sunset clause?	
						Have there been studies to determine long-term impact on native veg?	
						How are flocks monitored and how is poaching of wildlife prevented?	
17	Buickerood	Jimbo		San Juan Citizen's Alliance	7/21/14	Impacts of grazing on alpine ecosystems considering climate change should be reviewed prior to final decision. The EA provides insufficient information to give confidence that (alpine) species at risk will be given support through the management protocols.	
						We have not been able to discern the regulatory structure for the sunset clause.	

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						We recommend further investigation be undertaken relative to allot boundaries and how they potentially affect separation.	<i>Responses to comments on the EA have not been completed.</i>
						Some type of management actions are necessary to deal with the trail degradation reality.	
18	Colt	Lori	approx. 310 similar form emails	WildEarth Guardians	6/13/14-6/17/14	Wilderness provides ample opportunity for adventure and exploration...deserves protection	
						Proposed Action will improve resource conditions	
						...eventual removal without causing hardship to the permittee	
19	Davis	Paul			6/13/14	Wilderness Act says "untrammled by man..." grazing makes a mockery of this.	
						Grazing pollutes our streams and springs	
						...eroding our soils...	
						wasting our water, including growing hay	
						Loss of native vegetation	
						Contributing to global warming	
						Criss-crossing with barbed wire	
						Destruction of wildlife for predator control	
						Socio-economic analysis excludes virtually every American citizen except those few who benefit from taxpayer subsidies	
20	Davis	Paula		Hinsdale County		Availability of grazing on public lands is important to the economic health...we oppose the phasing out of sheep grazing and closing vacant allots.	
						Alt 4 does not consider the MOU or the work done by CPW or the BMPs of the lessee.	
						The information relied upon in Alt 4 is inadequate and fails to provide an objective evaluation of the risk of contact.	
						Hinsdale county supports a multiple use mandate and is not in favor of the sunset clause for the active allots.	
						Alt 4 does not provide sufficient economic analysis of the proposed action.	
21	Decker	Kennon		Grazing Permittee	5/21/14	I am writing in response to a recent decision...	
						That permits cannot be transferred is just wrong and goes against the whole free market system...destroys the value of the permits... we pay possessory taxes on these permits	
						If there is a problem with the bighorn, let the Game & Fish buy these permits	
22	Dvergsten	Cindy			6/16/14	No scientific or management basis or rationale for sunset clause or closing inactive allotments. Existing condition is healthy. Removing grazing as a tool of management will reduce the FS ability to be effective land managers.	
						It is unscientific for the FS to write off the economic importance of agriculture...open space and rural character provided...ag tourism...market is gradually improving	

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						No scientific justification for sunset clause. Only 986 acres of overlap. Bh populations are stable or increasing despite co-existence.	<i>Responses to comments on the EA have not been completed.</i>
						Increase hunting pressure to reduce the number of foraging rams.	
						Loss of Federal grazing lands will contribute to loss of private agriculture lands and further loss of winter grazing lands for big game species.	
23	Eaton	Wesley			6/22/14	Sheep and cattle have different grazing patterns and provide good stimulating growth to plants and soil biology. Without grazing, these lands will become degraded soils unhealthy overgrown plant matter.	
24	Egan	Veronica			7/10/14	Sheep herding culture is no longer an appropriate use of the public's watershed, especially considering climate change on higher elevation landscapes	
						A tiny handful of individuals benefit from grazing while the vast majority of users have little impact.	
						...vast majority ... are of vital importance to the economy of surrounding communities.	
25	Fetchenhier	Scott			6/18/14	Hiking ruined by the stink of sheep	
						Mowing down of wildflowers, destruction of tundra and erosion	
						Pristine pools polluted	
						Numerous trails cut into hillsides	
						Never seen test plots set aside from grazing	
						Aggressive sheep dogs	
						Sheep grazing benefits just a handful of ranchers who are not making much profit	
						Predominant use of wilderness is recreation. domestic sheep are not part of wilderness	
26	Hann	Michael			7/21/14	It would be better to entirely discontinued grazing at this time...hardship will be experienced by the permittee at any time ...get it over with now.	
						There is a choice to be made between the economic benefit from grazing and the economic benefit from hunting.	
						Mountain Pine Beetle will soon impact the area...may no longer be able to carry the load of sheep grazing in a sustainable manner, and the environment will have been weakened.	
27	Huggins	Ryan			6/10/14	Overall concern about the BMPs/measures/design criteria... assurance that these measures are in any way realistic	
						Concern with self-reporting about bighorn encounters	
						Is bighorn habitat updated? Expanding sightings and expanding range.	
						There do not appear to be any actual measures with teeth for enforcing compliance.	
						Range improvements are temporary fixes for livestock but can have long-term negative impacts for wildlife. Further details on removing these structures should be required.	

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28	Hurley	Kevin		Wild Sheep Foundation	7/21/14	WSF has grave concerns with continued sheep grazing on allots characterized as high risk, and views continued grazing of the active allots as too risky to be permitted.	<i>Responses to comments on the EA have not been completed.</i>
						The Design Criteria will help, but they will not prevent contact.	
						It is unfortunate that the current permittee was not willing to consider alternative allotments offered.	
29	Jefferies	Ned	Barbara		7/17/14	The animals on the forest not only supplement forage for sheep and cattle but help to prevent forest fires.	
						That domestic animas carry disease is a myth as ranchers follow a managed injection program to prevent disease.	
						A grazing permit is a large cash investment and would create a hardship should it be retired.	
						It is commendable to delay retirement of an allot, however, in the interest of forest health, it seems short-sighted.	
30	Jefferies	Wayne	Terry		7/21/14	We believe grazing has been a beneficial and appropriate use of public lands.	
						We do not believe the sunset clause can be accomplished without causing financial hardship.	
						The permanent closure of the vacant allots seems extreme...leave them vacant instead.	
						As conditions change (vaccine) consideration should be given to bringing these allots back.	
31	Jones	Kevin			7/17/14	Immediate closure of all allot would be preferable, but if the sunseting is all that is possible, that is what I support.	
						I have seen the damage that contact with domestic sheep can wreak on bighorn.	
						It would be tragic to lose bighorn, which benefit all of us, for supporting a small private grazing interest.	
32	Iverson	Paul			6/6/14	Destruction of the wilderness...owners of sheep should be required to pull every thistle ...and rebuild the trails that they have ruined	
33	Jarrell-King	Veronique			7/3/14	Livestock can be extremely destructive to our forests and meadows. Keep them out of the Weminuche to protect biodiversity.	
34	Jensen	Mike			7/15/14	It is crazy to allow grazing when 3 of the 5 are considered high risk, and another is moderate risk. Putting wild sheep into high risk is indefensible, arbitrary and capricious.	
						Ignoring the sensitive species analysis is poor science and poor decision making.	
						There is no good reason to subject a sensitive species like wild sheep to the high risks of disease transmission from domestic sheep.	
35	Johnson	Aran		Southern Ute Wildlife Resources	7/21/14	FS is mandated for multiple uses, the tribe feels that ...wild sheep should be a management priority.	
						If total prevention of contact is not possible in the allotment then we feel the allotment should be closed.	

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36	Jones	Dale	Lois		6/11/14	Organic Act...to protect the watersheds. Close allotments that are free of grazing for water production. Climate change is happening and water will be far more important. Bighorn and domestic sheep are not compatible on the same range.	<i>Responses to comments on the EA have not been completed.</i>
37	Juracka	Kathleen			6/24/14	Erosion, pollution to our watersheds Native plants are decimated Wildlife pushed from their already shrunken habitat Predators killed Sight, sound, and smell is ugly and offensive	
38	Kappelman	John			7/14/14	Grazing produces major ecological disruptions, damage to riparian habitats, native populations of plants and animals Complaints about cattle grazing on another District Understands the language of wilderness legislation, but times have changed Fees charged for grazing do not approach the true cost... Financial costs to the surrounding community... Growing concern with sheep dogs. Why should the public have to be concerned for its safety? Negative costs to bighorn offer sufficient justification to end grazing. Competition for forage. Recreation al users like seeing native animals. We have only one chance at securing and defending our wilderness; once it is gone, it is gone, and there is no getting it back.	
39	Kenna	Matt			6/12/14	Negative impacts to land, water, wildlife, and wilderness experience Benefits only a very few ranchers Grazing should be disallowed above treeline in VA Gulch...no herder camps be allowed near or above treeline	
40	King	Janet			7/3/14	Phase out grazing in the Weminuche.	
41	Krebs	Clint	Mary Jensen	American Sheep Industry Association	6/6/14	Request for comment period extension	
42	Lanzen	Lee			7/21/14	The Wilderness Act states that man visits wilderness and does not remain...livestock shouldn't either. I have seen the degradation from grazing...it takes away from the experience.	
43	McClintock	Amy			6/16/14	I elect "No Action"	
44	McCord	Marilyn			7/21/14	Having seen the devastation that grazers can create, I am for the most restrictive strategy possible...sooner rather than later.	
45	McNeal	Dr. Lyle		Utah State University	6/16/14	It has not been proven that sheep are the vector for any disease that affects bighorns. Nasal bot fly (sinusitis) is of worldwide geographic distribution and is not from domestic sheep. Placing recreational usage more important than food and fiber production for a growing population is not ethical. Consumption of natural fed lamb is increasing.	

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						Multi-species grazing has been proven to be the best eco-friendly plant management tool. Removing grazing will increase wildfires.	<i>Responses to comments on the EA have not been completed.</i>
46	McQuarie	Donald			7/19/14	I have been particularly troubled by the damage caused in the area of small lakes around Mt. View Crest by grazing.	
47	Meyers	Terry		Rocky Mountain Bighorn Society	5/27/14	Request for comment period extension	
					7/21/14	The Forest Service is required by NFMA to manage for habitat to support a viable population of bighorn sheep. It should be acknowledged that multiple use cannot be to the detriment of viability if wildlife populations.	
						Object to continued grazing of domestic sheep on active allotments in the analysis area,	
						Object to the use of Design Criteria or Best Management Practices which are scientifically unproven to mitigate risk of contact between domestic sheep and bighorn sheep,	
						Object to the use of an Adaptive Management approach, which places bighorn sheep on the Forest at risk of a potentially devastating disease event,	
						Recent observations of documented foray behavior underscore the potential for interaction outside the bighorn core herd home range. (One at Lightner Creek and one on the VA Gulch Allot. )	
						Object to the Design Criteria stating that domestic sheep will not be grazed in "high risk" portions of the active allotments, without Risk of Contact analysis on individual pastures in each allotment, We request a new RA be conducted .	
						The boundary adjustments to Endlich Mesa Allot increase the risk...we do not agree that this is offset by closing the vacant allot.	
						Object to the contention that a disease event affecting 75% of the bighorn sheep on the Forest would not contribute to the loss of viability on the Planning Area, This is the most highly valued bighorn sheep herd on the Forest.	
						Object to the omission of consumptive and non-consumptive recreational values of bighorn sheep from the Socioeconomic analysis in the EA,	
						Object to the inclusion of a sunset clause on the active allotments in the analysis, which potentially keeps bighorn sheep at high risk for decades,	

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						Object to the lack of detailed analysis of additional alternatives including conversion of active domestic sheep allotments to cattle and moving current permittee(s) to alternate allotments, either within the Columbine Ranger District or in neighboring Forest districts, and	<i>Responses to comments on the EA have not been completed.</i>
						Object to the completion of an Environmental Assessment and Finding of No Significant Impact, over the completion of a full Environmental Impact Statement.	
48	Mumma	John			6/12/14	This is the basic heart of current bighorn habitat on the forest. Many other areas are now devoid of bighorn...historic bighorn range is significantly reduced makes any decision of paramount importance.	
						Several of the bighorn herds are non-migratory...rely on windswept ridges for winter range (check with CPW for identifying winter range)...Please remove summer grazing by domestics there.	
						There are still 3 areas of High Risk	
						There is far too much reliance of herders and adaptive management	
						There is no mention of concern for lynx in regards to predator control	
						I urge not considering forage reserves and closing vacant allotments.	
						Option to work with conservation organizations to purchase the domestic herds	
						Work with permittees for conversion to cattle at lower elevations	
					7/2/14	The Social/Economic section should be rewritten to document some actual or projected value.	
						Congress is the guilty party to setting the ridiculously low grazing fee	
						Not included is the amount of Federal subsidies for sheep	
						Need to clearly portray the value of bighorns... auction prices...public interest draw...demand for hunting licenses...	
						There is a problem with the map showing suitable grazing lands	
						Domestic grazing is where the bighorn need to forage in the winter	
						The concept of Adaptive Management can't be trusted...questionable tactics...easier said than done	
						Search for lands to convert from sheep to cattle...or at lower elevations...or on private lands...or for conservation buyers that will purchase	
						It isn't accurate to say that ranchers will go out of business... there are alternatives to public land grazing	
						Have concerns with adding lands to the Endlich Mesa Allot – direct conflict with the Forest Plan.	
49	Musgrave	Chris			6/19/14	Damage to Burnt Timber Trail	

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						Countless erosion paths, remnants of vegetation, damage	<i>Responses to comments on the EA have not been completed.</i>
						Biased treatment of user groups: motorized use has been regulated with a heavy hand, but grazing has not been.	
						The landscape is being forever altered in a place whose sole designation stands for preservation of the natural environment	
50	Naegle	Robert		San Juan Woolgrowers Assoc.	6/16/14	The proposed action amounts to taking of valued property without compensation or justification.	
						This data certainly does not indicate that grazing should be curtailed.	
						Assumed conflict...yet actual increases in bighorn...no data to indicate incidences of contact...no record of die-offs...the current management is working and may indeed be a model for other areas to follow	
						The EA is biased and intends to remove sheep grazing	
						Grazing animals are actually the answer to water retention, plant restoration, carbon retention swell as many other restorative actions in the soil and will create a diversity of species.	
51	Nelson	MaryAnne			5/25/14	Irreplaceable damage done to high country tundra	
						Sheep ranching is a very small part of the mountain community and economics...it's the taxpayers' interests that need to be addressed...price they pay is not comparable	
52	Newman	Joseph		Wildearth Guardians	6/13/14	There are hazards of animal protein in the diet.	
						Some comments about the difficulty of raising cattle in the arid west.	
						Consider what is best for the greater good and not enable a destructive industry.	
53	O'Neill	Suzanne		Colorado Wildlife Federation	7/21/14	The claim that a disease event affecting 75% of the bighorn population on the forest would not result in a loss of viability is not well substantiated and likely would not hold up to scientific scrutiny.	
						The economic analysis should include economic values of hunting and wildlife viewing.	
						The approach in the EA does not appear to recognize the loss of a Tier 1 herd.	
						Does not consider or analyze the potential for moving current permittees to vacant allotments with lower risk...or convert to cattle on lower elevation	
54	Ong	Robert			7/5/14	The science is clear. Please remove all domestic sheep from the allotments designated as high/moderate risk for contact.	
55	Paden	Nathan			7/15/14	It is amazing to continue to permit grazing at a rate significantly below market value ...also subsidized for meat and wool production.	
						Is there any way to buy out these allotments? ..monetary settlement to offset the hardship t the permittee?	

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						How long is the sunset clause that is being proposed?	<i>Responses to comments on the EA have not been completed.</i>
						What is the risk that disease will be transmitted before the sunset clause is reached?	
56	Pansze	Trent			6/17/14	Destruction of habitat for bighorn, ptarmigan, and mountain goats.	
57	Parkinson	Dan			7/17/14	Biggest concern is the threat of disease. Expanding the Endlich mesa allot in in direct conflict with the approved forest plan.	
						The socio-economic segment of the EA is completely inadequate as it relates to the value of bighorn for hunting and wildlife viewing and the value of recreational uses.	
						Subsidizing sheep and cattle production makes about as much sense as subsidizing blacksmiths and wheelwrights.	
						Adaptive management does not seem practical...responsibility for monitoring will rest with the permittee. How will the agency actually monitor and manage the allotments?	
58	Parkinson	Laurie			7/17/14	Biggest concern is the threat of disease. Expanding the Endlich mesa allot in in direct conflict with the approved forest plan.	
						The socio-economic segment of the EA is completely inadequate as it relates to the value of bighorn for hunting and wildlife viewing and the value of recreational uses.	
						Adaptive management does not seem practical...responsibility for monitoring will rest with the permittee. How will the agency actually monitor and manage the allotments?	
59	Pavlick	Steve			7/21/14	The benefits f the natural environment and recreational users are superseded by the interests of a small group of livestock grazers.	
						Can the grazing rights be traded for grazing rights in national forest or BLM land?	
						I question the frequency/feasibility of the monitoring and enforcement program.	
60	Pearson	Mark			7/7/14	Support the proposed action. Pleased to see the SJNF working to implement improved management. Particularly support closing on long-vacant allotments.	
						The most significant measure to prevent physical contact is to permanently close the vacant allotments.	
						Closing vacant allots provides security for lynx. Permit renewals should have a built-in mechanism to penalize future illegal activity of poaching lynx.	
						Strongly support the intention to transition the remaining allotments into inactive status. This provides an incentive for third parties to negotiate financial compensation for a voluntary retirement.	
61	Petersen	Bonnie	Nicolle McCown	Club 20	6/16/14	Federal agencies have a multiple use mandate.	

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						It is troubling to learn that the USFS is engaging in questionable, aggressive, and non-transparent activities in what appears to be efforts to unilaterally reduce and/or eliminate historical grazing	<i>Responses to comments on the EA have not been completed.</i>
						The landscape is considered in generally good condition...does not support the closing or active or vacant allotments	
						There is no consideration for the MOU	
						Fails to provide an objective evaluation of the risk of contact	
						Does not provide sufficient economic analysis...ranching families, local communities, and myriad agricultural related operations would suffer. There is no valid economic analysis.	
						The FS fails to comply with NEPA has there has been no discussion regarding the bighorn sheep as a sensitive species.	
						We urge the FS to find science-based solutions to the issue of contact...	
						...as well as take into consideration of management practice that minimize any contact and overlap of grazing and habitat areas.	
62	Petersen	David			7/6/14	I know that at some point, public comments are all reduced to votes. My vote is to get all sheep off public lands.	
						Sheep grazing contributes only a tiny amount to the economy and supports only an insignificant fragment of rural residents.	
						...a visible reduction of all wildlife due to overgrazing along with killing and grassnebt	
						...stink, pollution to water, harassment by guard dogs	
						Loss of recreational income far exceeds the income from grazing. Net loss to the economy.	
						Once you do a thing for a while ... does not give license to continue forever.	
63	Pitts	James			6/20/14	Sheep cause severe grass damage by the method they use to cut the grasses very close to the soil.	
						Livestock increase flies	
						Ranchers used to getting low cost summer forage...benefits for a very small minority. I encourage the Forest Service to look...as part of a bigger issue of perennial historical practices versus new ideology...the time when grazing was valuable to the majority is long past.	
64	Rankin	Holly			7/21/14	I am concerned about the loss of valuable bighorn stock.	
						Wary of the fact that the adaptive management plan relies on the permittee to monitor.	
						No analysis of the value of bighorn has been done...for viewing, hunting, recreation.	
						I believe that grazing of sheep ion the national forest is a violation of the standard for a sustainable forest.	

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65	Ratner	Jonathan		Western Watersheds Project	6/14/14	DFC's set for the projects are not measurable and there are no timeframes.	<i>Responses to comments on the EA have not been completed.</i>
						The assessment failed to factor cattle as a disease transmission source	
						Current science, WAFWA Guidance, and Payette Principles require at least a 9-mile buffer for effective separation	
						Comparison of Alt 2 and Alt 4 is disingenuous...to show a difference which does not exist in reality because vacant allotments have not been stocked in decades.	
						No information was provided that would indicate the number of AUMs available for cattle or any suitability capability	
						PFC does not equate with "robust stream health" which is required under the WCPH	
						Livestock grazing as proposed does not meet Forest Plan guidance for wilderness	
						The monitoring provided is not required	
						List of adaptive options (Table 2-5) have not been analyzed in the EA	
						No monitoring for recreational impacts	
						EPA biennial monitoring is not required as stated. Most of the streams have probably never been monitored once.	
						The EA provides no site-specific analysis for water developments for cattle conversion	
						Please review the requirements for ESA determinations. Lynx and butterflies are negatively affected by proposed action. No discussion about predator control on lynx.	
						No evidence that the aquatic habitat was monitored and compared to habitat structure needed by boreal toad and northern leopard frog	
						BH section discussed a wide range of views outside CHHR, but provides no mapping of them nor does it appear they were integrated into the risk assess	
						Statements such as "Alt. 4 would have both positive and negative effects" are dishonest because all impacts of grazing are negative.	
						No information regarding the current conditions of cultural resources...or outcome of surveys or the area surveyed under Class III.	
66	Rowland	Peter			6/16/14	Shocked by the damage done by sheep. Everything from the noise to the manure detracts from the wilderness experience.	
67	Sampson	Jeri			7/21/14	The Weminuche bighorn population is one of the only in the west that has not already received transplanted bighorn and so are true natives	
						Your group should investigate other potential national forest lands where there would be less risk of contact.	
						Fs should charge ranchers a large enough fee that they will not abuse the privilege.	
68	Schwarz	Ann			6/16/14	Grazing harms wilderness. It trammels the untrammled land.	

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69	Semler	Wayne		La Plata-Archuleta Cattlemen's Assoc.	6/13/14	Growing populations will require raising food production. We disagree that these is a decline in demand for wool and lamb.	<i>Responses to comments on the EA have not been completed.</i>
						We request that high elevation lands suitable for grazing not be closed during a time low elevations have become less suitable fur to drought.	
						That 50 of 53 monitoring sites meet desired conditions is apparently not a factor	
						Public was allowed only 30 days to review the large documents	
						Future generations will have a vaccine	
						The Risk Assess is incomplete for how much mountain lion plays a role	
70	Skiba	Gary			7/2/14	Support for 2 <sup>nd</sup> comment period, reducing potential for contact, closing vacant allotments	
						Boundary changes to Endlich Mesa Allot increase likelihood of contact and violates FP standards to prevent physical contact. Claims of meeting standards are unfounded.	
						Doubtful that the FS wo;; be able to effectively enforce the reporting requirements	
						Economic analysis does not address economic values of bighorn or of recreation.	
						Impacts should be analyzed for other species like pika in light of climate change.	
						The sunset clause is vague and of questionable legality.	
						Potential replacement allotments (even off-forest) are not explored.	
						The Risk of Contact Tool implies greater precision than available data can reasonably provide.	
71	Sobal	Tom			6/16/14	Negative [resource] impacts: unnaturally made trails, damage to vegetation, mud, feces, soiled tainted water	
						[social impacts]: disruption to untrammled landscape, odor, compromised high scenic quality vistas, experience of solitude, livestock do not adhere to heartbeat limits	
						Economic benefits of wilderness visitors must be considered	
72	Stein	Ellen		Great Old Broads for Wilderness	7/21/14	Bighorn are highly valued and deserve maximum protection: Sensitive Species, Tier 1 herd, S28 is truly native,	
						The proposed boundary changes to Endlich mesa will increase the likelihood of contact and is in direct conflict with forest plan standards.	
						High alpine grazing of domestic sheep id unsustainable for the land and native wildlife.	
						Potential replacement allotments are not explored	
						The Risk of contact Tool implies greater precision than available data can reasonably provide.	
						The socioeconomic section of the EA in incomplete...should document actual costs and benefits of other uses	

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						There is no reference to climate change, which is resulting in reduced forage in many years and an inability to recover from grazing pressures.	<i>Responses to comments on the EA have not been completed.</i>
73	Sykes	Tom			6/13/14	Guardia in the water	
						It seems unreasonable to allow a very small minority of people to wreak such havoc on natural resources that so many people use.	
74	Taylor	Lorraine		SJ Woolgrowers	6/16/14	Sheep are source of locally grown food	
						Grazing keeps down undergrowth, saves firefighting costs, and controls weeds and brush	
						Recreation causes big impacts with noise, pollution, disturbing wildlife, wear on trails	
						Grazing is a source of income	
75	Tipton	Scott		Congressman	6/12/14	Request for extension of comment period	
						The Forest Service has expanded habitat designations well beyond occupied bighorn sheep habitat and WAFWA criteria while usurping state agency authority over bighorn sheep.	
76	Tobin	Dan			6/20/14	Livestock tear up the tundra, destroy wildflowers, defecate all over the place, attract flies, contaminate lakes and streams, Herd dogs are mean and scary	
						Grazing is not a compatible use with wilderness...against grazing even outside of wilderness	
77	Traina	Valerie		Wildearth Guardians	6/15/14	Also see Colt form letter comments	
						I am against corporate welfare for ranchers	
78	Wales	Charles			6/14/14	In oppose the proposed action. I have never observed any ill effects from grazing. Proper grazing is actually good for the forest and meadows. Keep the option for grazing on public lands	
79	Waslien	Randy	Kristen Nielsen		6/13/14	Eliminate grazing...have seen the impact that stock have on the high country.	
80	Young	James			7/15/14	It is amazing to continue to permit grazing at a rate significantly below market value ...also subsidized for meat and wool production. Is there any way to buy out these allotments? ..monetary settlement to offset the hardship t the permittee? How long is the sunset clause that is being proposed? What is the risk that disease will be transmitted before the sunset clause is reached?	
81	Young	Sandy			6/16/14	Why was there no public meeting? No normal person can digest...in 30 days. Comment period is in the middle of when people in agriculture are most busy. Where was Risk Assessment during scoping? Why did none of my scoping comments qualified for socio-economic consideration? To eventually eliminate sheep grazing without adequate public debate is unacceptable.	<i>Responses to comments on the EA have not been completed.</i>

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						Adaptive management provides the flexibility to do right...monitoring us a valuable tool...	

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