



# COLORADO

## Parks and Wildlife

Department of Natural Resources

SOUTHWEST REGION  
415 Turner Drive  
Durango, CO 81303  
P 970.375.6702 | F 970.375.6705

Mr. Matt Janowiak  
District Ranger, Columbine Ranger District  
P.O. Box 439  
Bayfield, CO 81122

4 April 2016

Dear Mr. Janowiak:

Colorado Parks and Wildlife (CPW) appreciates the opportunity to review the DRAFT ENVIRONMENTAL IMPACT STATEMENT-WEMINUCHE LANDSCAPE GRAZING ANALYSIS. CPW provided comments on the Weminuche Grazing Analysis Environmental Assessment in July 2014. In those comments we outlined concerns about the potential for disease transmission to Rocky Mountain bighorn sheep (RBS), gave the background on the population status of this Tier 1 herd and referenced the WAFWA guidelines for managing domestic sheep in close proximity to wild sheep.

We offer the following comments to outline key issues and provide clarification on topics that we have identified within the EIS. We have also attached specific management suggestions for your consideration (Appendix A).

### Bighorn Sheep

San Juan National Forest Resource Management Plan (2013) recognizes that the potential for disease transmission is a primary factor limiting Rocky Mountain bighorn sheep populations in Colorado. CPW appreciates the outlined Desired Conditions (EIS pg 11) for grazing management within the Weminuche Landscape and the USFS's efforts to manage for effective separation between wild and domestic livestock. Modifying the allotment boundaries to avoid overlap with wild sheep, implementing Design Criteria for Alternatives 3 and 4 (if selected), and implementing a monitoring program to assess progress, effectiveness, and compliance with the Desired Conditions are all positive steps to reduce the risk of interactions between bighorn and domestic sheep.

We understand that the potential for contact remains high in several allotments due to the edge to edge contact between the allotment boundary and the Core Herd Home Range boundary, the gregarious behavior of wild and domestic sheep, and due to bighorn dispersal, migratory, and exploratory behaviors (Memorandum of Understanding for Management of Domestic Sheep and Bighorn Sheep. 2014.). It will be critical for the Forest Service to have sufficient resources for compliance monitoring and to respond and implement adaptive management strategies in a timely manner.

The 'Restocking Requirements for Vacant Allotments' as outlined in the EIS (pg 47) are important for making informed decisions based on the best available science when considering restocking. We suggest clarifying the roles, responsibilities, and flight protocol between the permittee and USFS to achieve these requirements.

### White-tailed Ptarmigan

White-tailed ptarmigan are being closely monitored, in part, due to potential climate change impacts the ptarmigan's life history in the alpine environments. White-tailed ptarmigan were petitioned in 2010 to be listed as 'Threatened' under the Endangered Species Act. The U.S. Fish



and Wildlife Service determined in June 2012 that two of the five recognized subspecies warranted a 12-month status review. (This includes the white-tailed ptarmigan subspecies found in Colorado and within the EIS analysis area.)

The EIS states that the white-tailed ptarmigan population within the analysis area is not self-sustaining (pg 136). Recent occupancy, demography and genetic studies conducted by CPW, though preliminary, indicates the contrary:

- Ptarmigan populations in the San Juan Mountains are occupying the same areas they did in the late 1960s and early 1970s.
- Breeding abundance estimates are similar to historic estimates and to other sites in Colorado.
- Nest and brood success are also similar to historic estimates and to other sites in the state (unpublished data, CPW).

There are a number of potential threats to white-tailed ptarmigan including domestic and wild ungulate grazing, human recreation; dogs off leash and not under voice control of owners; incised recreation trails and 4-wheel drive roads that divert water resources from willow carrs; increased predator populations above treeline that are attracted to anthropogenic food sources. Managing potential threats as they collectively impact white-tailed ptarmigan and its habitat through proactive management is important.

#### **Socio-economic Value of Bighorn Sheep**

CPW offers a clarification related to this section of the EIS. Bighorn sheep hunting licenses for the units in this area (S71, S28, and S16) are administered by CPW through a drawing system. Interested hunters apply for the license they wish to receive and are awarded the license if they are successful in the drawing process. It often takes 10-15 years for a hunter to be successful in drawing a bighorn ram license. A resident sheep license costs \$250, while a non-resident pays \$2,084 for a bighorn license if they are successful in the draw.

On page 168 of the EIS it states “The opportunity to hunt a bighorn sheep is made available through drawing or raffle sold through the Rocky Mountain Bighorn Society for \$25 per ticket.” The Rocky Mountain Bighorn Society, through an agreement with CPW, offers one sheep license by raffle and one by auction each year. These additional auction/raffle opportunities to hunt bighorn sheep raise approximately \$190,000 each year for projects that benefit bighorn sheep and their habitats. Funds generated from these licenses go to support big game management projects throughout the State. (In 2014 the hunter, who successfully won the Auction license, chose to hunt within GMU S-33 which is part of the Weminuche Bighorn herd.)

#### **Conclusion**

CPW appreciates the continued efforts of the San Juan National Forest and the Columbine Ranger District to thoughtfully address natural resource management issues on the Forest. If you any questions or concerns regarding our recommendations to improve the EIS, please contact Area Wildlife Manager, Matt Thorpe at 970-247-0855.

Sincerely,



Patricia D. Dorsey  
SW Region Manager, CPW

xc: CPW Director Bob Broscheid, SW Senior Terrestrial Biologist, Scott Wait, Durango Area Wildlife Manager, Matt Thorpe, SW Region Land Use Coordinator, Brian Magee, Area 15 File, SWRO File

## Appendix A - CPW Management Suggestions for DEIS- Weminuche Landscape Grazing Analysis

### **BIGHORN SHEEP**

Suggestions for the design criteria include:

- Reducing the “Spot” reporting requirement time. Currently the Design criteria suggest with 24 hours the herder should use the Spot to notify USFS personnel of contact or impending contact. We would recommend that the herder immediately use the SPOT as response times for implementing other reporting requirement and management protocols will require some coordination time.
- In addition, herders should undergo proper training on the use of the Spot and reporting protocols. If language barriers exist we suggest the USFS solicit the expertise of an experienced interpreter to conduct the training.

### **WHITE-TAILED PTARMIGAN**

Suggestions related to ptarmigan include:

- Identifying key ptarmigan habitat within the active allotments and resting, or excluding, these areas from domestic sheep grazing ,
- Reducing the density and duration of domestic sheep grazing in ptarmigan habitat,
- Actively herding sheep away from and out of important ptarmigan habitat,
- Allow grazing to begin no sooner than July 15 and end no later than September 1,
- Defer grazing in drought years,
- Avoid grazing on slopes over 40%,
- Avoid grazing in riparian and wet areas,
- Conduct annual ptarmigan population surveys within and adjacent to actively grazed allotments to evaluate the effectiveness of adaptive grazing management (alternative 3 and 4 of EIS),
- Repair and maintain trails and 4-wheel drive roads,
- Manage and restore riparian/wetland habitats,
- Management of recreation in the alpine environment to reduce impacts to ptarmigan and their habitats,
- Look to build resiliency into the ecosystem to address climate change, and
- Conduct willow browse survey to identify the amount of grazing by elk and by domestic sheep, and to evaluate the effectiveness of adaptive grazing management (alternatives 3 and 4 of EIS).