

March 30, 2016

TO: Matt Janowiak
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RE: Comments on Draft EIS Weminuche Grazing Analysis

I appreciate the opportunity to comment on the Draft EIS for the Weminuche Grazing Analysis. I am urging the Forest Service to adopt a limited application of Alternative 1, the vacating and closing of all sheep grazing allotments in the Weminuche landscape.

In my opinion, the most important factor to consider in analyzing sheep grazing in the Weminuche is the danger that domestic sheep pose to the viability and long term health of the Tier 1 herd of bighorns in the landscape. Contact between domestic sheep and bighorns is known to increase the risk of whole herd die-offs and/or long term lamb mortality from respiratory disease. Incidences of bighorn forays into these sheep allotments have been documented, and several of the allotments are rated as “high risk” for contact between domestic sheep and bighorns. There is no vaccine to protect the herd, and no treatment once the herd has been infected. The “adaptive management” being proposed will be too little, too late if the herd is infected.

The DEIS points out that “Herders are crucial to ensuring proper management and in maintaining compliance to an exacting standard. Ultimately the responsibility rests upon the permittees to ensure compliance is being achieved. (2.16)” DEIS p.63. Who will ensure that the herders are being properly trained to adhere to these “exacting standards”? And is it practical to expect herders to be anxious to report bighorn sightings, knowing that the presence of bighorns imperils their continued employment in the Weminuche landscape? How quickly will the FS and CPW be able to respond to possible bighorn sightings? Again, “adaptive management” changes could be too late after there has been a disease exposure, possibly resulting in the devastating loss of this Tier 1 herd.

The Social and Economic Study points out what a small impact grazing has on the economy of La Plata County; much less than other large economic drivers that are negatively affected by sheep grazing. The first of those economic drivers is tourism and recreation. Although the negative experiences of hikers encountering sheep, herding dogs or areas where wildflowers would be expected but have recently been decimated by grazing sheep is hard to quantify, it is a problem for many who recreate in the Weminuche landscape. In Wilderness, especially, is it fair to negatively affect so many people’s experiences for the sake of continuing grazing? I have personally hiked to a destination only to be turned away by the smell, the noise and the lack of wildflowers. I have never been threatened by a herding dog but have heard many stories from folks who have been.

Hunting and wildlife viewing are also negatively affected by sheep grazing in this landscape. Bighorn tags are in very high demand and bring significant funds to CPW, as well as to the surrounding community, as hunters spend significant amounts of money in La Plata County. Limiting sheep habitat by isolating the herds to prevent contact with domestic sheep imperils the herds and limits their ability to increase their population, thus limiting the number of sheep tags and practically guaranteeing that hikers and backpackers will NOT see bighorns.

“Management of NFS lands is expected to yield positive net benefits for the American public – including the consideration of all benefits and costs.” Social and Economist Specialist Report, p. 16. The cost (and potential cost) of grazing sheep on the Weminuche landscape far exceeds the benefits for the public. Alternatives 2, 3 and 4 are not financially efficient, and appear to require significant “man hours” from the Forest Service, and potentially CPW. Continuing to graze sheep in this landscape does not make financial sense for anyone but the permittee. The county-wide benefit from sheep grazing is minimal in terms of jobs and the economy. In this case it seems that the mandate for multiple use is forcing the hand of the Forest Service to continue grazing against all fiscal and common sense.

I do not understand why predator control is not part of the EIS. For the public, it is very difficult to determine how many predators and what type of predators have been killed by APS and by the permittee, and at what cost to the taxpayers. That should be public knowledge.

The effects of climate change should also be strongly considered in choosing an alternative. As noted on pg 193 of the DEIS “...there is little doubt that plants and animals found exclusively in the alpine zone may be the first to decline or face shrinking habitat areas as a result of changes in global climate.” Sheep grazing takes place mainly in the alpine zones, which, in combination with warming temperatures and less precipitation, may accelerate the degradation of native vegetation and hasten the spread of invasives. Sheep grazing simply adds another insult to the alpine zone, threatening the viability of native plants and wildlife.

“Major conclusions are that, while the landscape is generally in good condition, most natural resources including water quality, vegetation and soils, recreation, wildlife, and cultural resources, would benefit most from Alternative 1...” pg iv, DEIS. I believe that the only “argument” against this conclusion - that Alternative 1 would result in negative socio-economic impacts – is false. Agriculture IS important, and I recognize the multiple use mandate of the Forest Service, but grazing on this landscape at this point in time does not “..yield positive net benefits for the American public..”

Thank you,

Laurie Parkinson