From: Gary Skiba mailto:gskiba6933@msn.com
To: Whitmer, Jared -FS
Cc: Hooley, Camela -FS; Chadwick, Kara -FS; dale jones; Suzanne O"Neill - CWF; Jimbo Buickerood; Dan Olson - SJCA addr; Chris Wilkins; John Mumma
Subject: RE: WEMINUCHE LANDSCAPE GRAZING ANALYSIS
Date: Monday, April 04, 2016 5:56:37 PM
Attachments: Weminuche Landscape Grazing Analysis GTS Letter FINAL.docx

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Dear Mr. Whitmer:

The attached file contains the comments I submitted for the Weminuche Landscape Grazing Analysis Environmental Assessment (EA) on July 2, 2014. I am re-submittting them in comment on the Draft Environmental Impact Statement (DEIS) as many of my concerns remain the same. . I was unfortunately not able to adequately review the DEIS, but I do want to comment on the decision made in that document; my newer comments are in the body of this email,

My primary concern revolves around the impacts of domestic sheep grazing on native wildlife. There is no question that such grazing negatively impacts a wide range of native wildlife, but the species of most concern is the bighorn sheep, *Ovis canadensis.*

There is no truthful way to sugar coat the situation. When domestic and bighorn sheep graze the same areas, bighorns die. Maybe not immediately, but eventually. Allowing and in fact promoting contact between the two species is tantamount to intentionally killing bighorns. It really is that clear and simple.

As a professional wildlife biologist, I'm disappointed that you have been put in the situation you're in due to economic and political pressure. I know it's not your choice, but I hope that you can find ways to ensure that the resources that you've been entrusted with are managed both as intended in law, and for the conservation and enhancement of those resources. I fear that the selection of Alternative 4 does not achieve those goals. Using "adaptive management" is unlikely to be effective, simply because the USFS does not have the resources to carefully monitor, analyze, re-plan and re-implement as required by a rigorous adaptive management approach. I'm fairly certain that your adaptive management will eventually devolve into a quick ride through the allotments, with a bit of squatting and drawing in the dirt. That's not adaptive management.

I'm saddened that Alternative 4 was chosen. This decision will likely lead to further declines in native bighorn sheep populations at worst, and inability of existing populations to expand at best.

That's the wrong choice. In every situation where bighorns can predictably come in contact with domestic sheep, the domestics should be removed. Please reconsider you decision.

Thank you for the opportunity to comment.

Sincerely,

Gary T. Skiba
56 Road 2634
Aztec, NM 87410

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Let no man pull you low enough to hate him.

-- Martin Luther King Jr**.**
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2 July 2014

TO: U.S. Forest Service

FROM: Gary T. Skiba

RE: Weminuche Landscape Grazing Analysis

Thank you for the additional comment period on the Weminuche Landscape Grazing Analysis Environmental Assessment (EA). By responding positively to the public's request for additional review time, the Forest Service has demonstrated the agency's responsiveness and desire to effectively gather input.

My primary concern is for the protection of our bighorn sheep herds. As recognized by the USFS, "…[p]hysical contact between domestic sheep or goats and bighorn sheep increases the risk of disease transmission from domestic animals to bighorn sheep, with potential for a subsequent bighorn sheep mortality event and/or extended period of reduced recruitment." Reducing the potential for physical contact is particularly important in the high value native bighorn herds that exist in the Weminuche Wilderness.

The closing of vacant allotments makes sense from both management and resource protection perspectives. If there is no demand for the use of those forage resources for livestock grazing, (as indicated by lack of use of those allotments for a range of 25 to 46 years, Table 1-1) maintaining these areas as allotments isn't justified. As noted in the EA, if conditions change in the future such that reopening closed areas is a reasonable proposal, a new analysis could be done.

Summary

In summary, I support the overall approach described in the USFS Proposed Action (Alternative 4) as described in the EA. I do, however, have some significant concerns as outlined below.

1. The boundary changes to the newly renamed Endlich Mesa allotment result in an increase in the likelihood of contact between domestic and bighorn sheep, in direct conflict with Standards in the Forest plan.
2. With limited resources, it's doubtful that the USFS will be able to effectively enforce the reporting requirements in the Design Criteria
3. The current economic analysis does not address economic values (both hunting and wildlife viewing values) of increases in bighorn herd sizes or the value of domestic sheep free recreation, including fishing, in wilderness.
4. Impacts of changes in grazing management should be analyzed for other wildlife species, particularly American pika (*Ochonota princeps*).

5. The sunset clause, which will eventually close existing active allotments, is vague and of questionable legality.
6. Potential replacement allotments (e.g., on other National Forest lands) which could reduce the risk of contact are not explored.
7. The Risk of Contact Tool, while a helpful way of organizing information, implies greater precision than available data can reasonably provide.

Specific Comments

1. **The boundary changes to the newly renamed Endlich Mesa allotment result in an increase in the likelihood of contact between domestic and bighorn sheep, in direct conflict with Standards in the Forest plan.**

As described in the EA and analyzed in the Risk of Contact model, the changes to the Endlich Mesa Allotment (renamed from East Silver Mesa Allotment) will increase the risk of contact between domestic and bighorn sheep. The allotment will be increased by more than 3,000 acres by moving the northern boundary to the north and east. The reasoning provided in the EA is that this will "correctly reflect land features within the allotment", which presumably means recognizing that current on the ground grazing areas are outside the existing allotment boundaries. This is unacceptable and a violation of the Standards in the Forest Plan. Specifically, four standards, as noted in the EA, (with my italics added for emphasis) are:

- During project-level planning on domestic sheep allotments, management options must be developed to *prevent physical contact between domestic sheep and bighorn sheep*. *Actions may include but are not limited to boundary modifications,* livestock type conversion, or allotment closures. 2.3.39

- Grazing permit administration in occupied bighorn sheep habitat *must utilize measures to prevent physical contact between domestic sheep and bighorn sheep*. Permit administration actions may include, but are not limited to use of guard dogs, grazing rotation adjustments, or relocation of salting and bed grounds. 2.3.40

- Grazing permit administration in occupied bighorn sheep habitat must utilize measures to prevent physical contact between domestic sheep and bighorn sheep. Permit administration actions may include but are not limited to use of guard dogs, grazing rotation adjustments, or relocation of salting and bed grounds. 2.7.11

- Management of domestic sheep must utilize measures to prevent physical contact with bighorn sheep. 2.7.12

I would further note that the Forest Plan Glossary defines Standards as "[a] particular action, level of performance, or threshold specified by the Forest Plan for resource

protection or accomplishment of management objectives. Unlike “guidelines” which are optional, standards specified in the Forest Plan are mandatory.”

The “Risk Rating” as displayed in Figures 5 and 7 in Appendix D (Assessment of Risk of Physical Contact between Rocky Mountain Bighorn Sheep and Domestic Sheep in the Weminuche Grazing Analysis Landscape) remain the same for the Endlich Mesa Allotment, under Alternatives 2 and 4, but these risk categories are arbitrary, based on questionable data, and so broad that they provide little information about the true risks. In spite of those limitations, the general qualitative direction of change produced by the Risk of Contact Tool is helpful, even if the implied precision is not supported. As an example, the Tool calculates an increase in annual herd contact rate of more than 82% for the revised Endlich Mesa Allotment with a predicted contact between the two species more than two times in 3 years. While the 82% increase is of dubious accuracy, the direction of change is logically correct. Any increase in the potential for contact is unacceptable, and the implicit acceptance that current grazing occurs outside the allotment boundaries brings into question the ability of the USFS to implement mitigating Design Criteria that might reduce the likelihood of contact between the species.

The claims pages 100-103 of Appendix D (Conformance with Land and Resource Management Plan (Forest Plan) that the Standards are met via allotment boundary adjustments (which clearly violate the Standards in the case of the Endlich Mesa Allotment) are unfounded. This section also claims that application of the Design Criteria result in compliance with the plan, yet these Criteria are admitted to be of untested effectiveness (Appendix D, p. 20: “However, the effectiveness of most individual measures remains untested and therefore the degree of risk reduction achieved from implementing project design criteria is also unknown.”)

2. **With limited resources, it’s doubtful that the USFS will be able to effectively enforce the reporting requirements in the Design Criteria.**

The modifications of the boundary of the Endlich Mesa allotment are an implicit recognition that current grazing occurs outside the allotment boundaries. This brings into question the ability of the USFS to implement mitigating Design Criteria that might reduce the likelihood of contact between the sheep species. If domestic sheep grazing cannot be confined to the defined allotment boundaries, there is little assurance that the Design Criteria will be adequately implemented and enforced. Further, the inability to effectively implement the criteria makes the increased Risk of Contact for the Endlich Mesa Allotment even more concerning.

3. **The current economic analysis does not address economic values (both hunting and wildlife viewing values) of increases in bighorn herd sizes or the value of domestic sheep free recreation, including fishing, in wilderness.**

The Socioeconomics section of the EA completely ignores the social and economic values of healthy bighorn herds and the recreational impacts of domestic sheep grazing

in the Weminuche Wilderness. Bighorn sheep are highly valued. From the perspective of hunting recreation, this value is reflected in the fact that from 2010 to 2014, there were 67,076 lottery applicants for 1,260 Rocky Mountain bighorn sheep licenses in Colorado, or 53 applicants per license. The economic impact of increased license availability through increased bighorn populations, or conversely the reduced economic activity that would result from reduced populations, should be analyzed.

Similarly, impacts to vegetation and watershed processes from domestic sheep grazing impact anglers visiting lakes and streams in the Weminuche Wilderness; these impacts should be analyzed.

Further, there is social and economic value to recreation in areas that are not impacted by domestic sheep.

Lastly, there is a value to hiking and backpacking in areas that are not impacted by domestic sheep that has not been analyzed.

4. **Impacts of changes in grazing management should be analyzed for other wildlife species, particularly American pika (*Ochonota princeps*).**

I recognize that the American pika is not considered a Sensitive Species by Region 2 of the USFS, but concern for the species in light of the impacts of climate change should be recognized and an analysis included in the EA.

5. **The sunset clause, which will eventually close existing active allotments, is vague and of questionable legality.**

It's unclear if the sunset clause as written allows for perpetual transfer of a permit within a family, or only allows for one transfer (e.g., from the current permittee to one of their offspring with no further transfers). This should be clarified.

I am also aware that the legality of the proposed sunset clause has been called into question by members of Congress as well as the general public; that concern should be addressed.

6. **Potential replacement allotments (e.g., on other National Forest lands) which could reduce the risk of contact are not explored.**

One potential method for reducing the risk of contact between bighorn and domestic sheep that was not analyzed is providing access to allotments on other public lands for domestic sheep grazing. There may be opportunities on adjacent USFS lands (Rio Grande, Uncompahgre National Forests), Bureau of Land Management Lands, or even other federal lands in New Mexico.

7. **The Risk of Contact Tool, while a helpful way of organizing information, implies greater precision than available data can reasonably provide.**

The Risk of Contact Tool is an excellent framework for addressing the potential for contact between domestic and bighorn sheep, but the implied precision of the output of the model is not supported by the data used to drive the model. It is highly doubtful that the Annual Contact Rates per Foray as displayed in Table 4 of Appendix D are significantly different given the sources of the data and the assumptions of the model. This is fine if the information produced is recognized as being speculative and qualitative, but using the information as quantitative support for decisions is inappropriate.

Thanks again for the opening of a second comment period.

Sincerely,

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