



July 7, 2017

Monument Review, MS-1530
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240
Attn: Randal Bowman

Dear Secretary Zinke:

The Wild Sheep Foundation (WSF) submits these comments on behalf of our membership of wild sheep enthusiasts and conservationists. America's federal public lands are the mainstay of our conservation mission and are a defining aspect of American heritage. Federal public lands in the lower 48 United States provide irreplaceable habitat upon which more than 90% of wild sheep depend.

We strongly support the review of selected National Monuments. Large acreages of the Monuments in this review include many areas of the western states that support or could support wild sheep. These areas and other public lands are essential to our purpose of Putting and Keeping Wild Sheep on the Mountain®.

Conservation of wild sheep requires access for conducting scientific research and management, including hunting, which are all part of modern scientific wildlife management. Proper access enables managers and volunteers to promote healthy wild sheep populations and their habitats, and adequate, well-managed access also enables wildlife enthusiasts and other visitors to utilize federal lands, to stimulate growth in local economies while promoting sense of ownership and conservation ethic among users. Any rules for existing National Monuments that restrict such access must be revised. Other situations, where access is questionable, should be addressed case-by-case.

For example, Mr. Secretary, we applaud your support for the Upper Missouri Breaks National Monument, yet access to this superb hunting opportunity is less than ideal. The proclamation directs a clear prejudice against road access and motorized vehicles. As a result, as land ownerships and designations around the area have changed, options for access to the area have been curtailed. WSF has no opposite prejudice in favor of motorized access; instead, we want access policy to be permissive of any type of access that promotes the uses and needs for management of the area.

More recent proclamations put access and hunting at risk of exclusion from management plans for lack of clear direction in support. In these cases, we seek cooperation from the responsible agencies to ensure appropriate access to (and for) hunting opportunities. We are concerned that the boilerplate on state wildlife jurisdiction being neither enlarged nor diminished does nothing to resolve disputes between federal and state agencies on the extent of state jurisdiction in the first place.

The Río Grande Del Norte National Monument (RGDNNM) proclamation is an example of an excellent hunting opportunity left unprotected. There is no mention of hunting in the proclamation. Attacks against hunting are already mounting as the management plan for the RGDNNM develops. Scoping comments



already indicate that hunting and access are at risk. We ask that the management plan specifically assure state authority to continue conducting hunting seasons. We ask for assurance of state authority to effectively and proactively manage wildlife on federal lands, including by use of mechanized equipment and vehicles (including aircraft). Such management includes wildlife capture, removal of sick or infected animals, surveys, disease monitoring and intervention, removal of exotic species, installation and maintenance of wildlife water developments, translocations, predator management, enhancement of natural springs and seeps for wildlife, and cooperative habitat restoration.

Another example of these problems is the Sand-to-Snow National Monument in California, designated last year. In this proclamation there is, at least, acknowledgement that the area “provides ... hunting, fishing, hiking, camping, mountain biking, and horseback riding.” Yet, this preamble language is not reinforced in the order.

Lastly in regard to the review, although the Castle Mountains National Monument in eastern San Bernardino County, CA, falls under the 100,000-acre threshold for this review, it should be reviewed per the Executive Order clause concerning inadequate “public outreach and coordination with relevant stakeholders”.

Designation late in the Obama administration transferred an area previously managed by the BLM, (and previously open to public use) to the management authority of the NPS (Mojave National Preserve). This area had been an important area for multiple-use, including recreational hunting for deer, and potentially desert bighorn sheep; once transferred to NPS management, those recreational hunting opportunities vanished. WSF recommends the Castle Mountains National Monument be returned to BLM management, so multiple-use (including recreational hunting) can again occur.

WSF recommends that future monument proclamations focus on access for use and access for fish and wildlife management. An adequate public outreach effort is essential for existing and future monuments, including:

- 1) Providing access for people to enjoy designated National Monuments compatibly with the stated management purpose for the area. Access includes not just foot or horseback; access is also important to provide and properly manage motorized access (ground-, aerial-, and water-based) to and within these areas. Hunting and fishing are important components of that access.

- 2) Ensuring the completion of a Risk of Contact analysis for disease transmission from domestic sheep to wild sheep where grazing of domestic sheep continues. This analysis should be directed to proceed promptly with transparent involvement from the responsible Federal land management agencies, State and local governments, State wildlife agencies, and State and Federal animal health professionals, permittees, and stakeholders. Proclamations should direct action on the results of the analysis to swiftly identify and implement actions to eliminate high-risk allotments, including by relocating domestic sheep to low-risk allotments, with minimal disruption and displacement of permittees.



3) Providing access to State management authorities for hunting and fishing seasons, fish and wildlife management activities, and collaboration on habitat improvement projects, including:

- acceptance of State hunting, trapping and fishing regulations; more specifically, management of National Monuments should not challenge or infringe upon State authority via additional federal agency regulations;
- acceptance of State fish and wildlife surveys, including all forms of aerial (e.g., fixed-wing, helicopter, etc.) and ground-based (e.g., ATV, pickup, boat, snow-machine) survey methods;
- acceptance of State fish and wildlife capture and restoration efforts by methods deemed appropriate by the State, including any and all aerial methods (e.g., darting, drive-netting, net-gun, helicopter fish stocking, etc.); and
- supporting and collaborating with State initiatives for fish and wildlife habitat improvement methods including prescribed fire, installing/maintaining water guzzler systems (including helicopter support for slinging materials, tanks, personnel, etc.) for wildlife, improved grazing system management, noxious weed control programs, prescriptive silvicultural treatments, etc.

Thank you for making federal public land conservation a priority and offering this opportunity to comment.

Sincerely,

Wild Sheep Foundation

A handwritten signature in blue ink that reads "Brett H. Jefferson".

Brett Jefferson
Chairman of the Board

A handwritten signature in black ink that reads "Gray N. Thornton".

Gray N. Thornton
President & CEO