



**SIERRA
CLUB**
FOUNDED 1892

Grand Canyon Chapter • 202 E. McDowell Rd, Ste 277 • Phoenix, AZ 85004
Phone: (602) 253-8633 Fax: (602) 258-6533 Email: grand.canyon.chapter@sierraclub.org

April 12, 2014

Arizona Game and Fish Commission and Department
5000 W. Carefree Highway
Phoenix, AZ 85086

RE: Santa Catalina Bighorn Sheep Restoration Project

Dear Arizona Game and Fish Commission and Staff:

Please accept these comments on behalf of the Sierra Club's Grand Canyon (Arizona) Chapter and our more than 35,000 members and supporters.

The Sierra Club is one of the oldest grassroots environmental organizations in the country. The Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." Many of our members use and enjoy the Pusch Ridge Wilderness and were significantly involved in its establishment. Sierra Club has also been involved in trying to keep development from creeping close to the Santa Catalinas and with trying to ensure that healthy populations of predators, including mountain lions, thrive along with other native wildlife species on our public lands.

We continue to have significant concerns about the Santa Catalina Bighorn Sheep Restoration Project. While we support restoration of native species to their natural habitat, we do question the efficacy of introducing animals to an area where they disappeared, where it is unclear why the population died out, and where a majority of the habitat is poor to fair. It is that last factor that is of particular concern. Encroaching development has impacted the lower elevation pastures where sheep historically grazed, while fire exclusion and climate change have rendered the Pusch Ridge habitat as poor to fair.

That is why the Sierra Club's Grand Canyon Chapter opposes further releases of bighorn sheep into the Santa Catalina Mountains until the Forest Service and Game and Fish have addressed the habitat issues. This includes restoring fire so that the majority of the habitat is in good rather than poor to fair conditions.

Considering that many of the sheep that have been killed have been in the poor habitat areas, it is not a stretch to think that habitat issues are a major factor in their demise. Rather than continuing to release sheep into habitat that is considered poor, something that is a detriment to the sheep and ultimately the mountain lions, we ask that you seek to improve the habitat conditions before proceeding further with this project.



Furthermore, we ask that Game and Fish provide additional information and evaluate the impacts of these translocations on the source populations of sheep. Please provide the information and protocol on how you make a decision about efficacy of removing sheep from a particular area. Is there follow-up monitoring? How many years does it take each source population to recover from the loss of 30 bighorn removed by translocation? Please include detailed recruitment rates, other population dynamics data, and any modeling you employ that allow managers to track or estimate natality/mortality changes and associated causative factors over time for both the source and translocated populations. We ask this because we have noted that the KOFA population of bighorn sheep declined significantly after repeated translocations.

Please keep us informed about any developments or actions related to this proposal.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Sandy Bahr". The signature is fluid and cursive, with the first name "Sandy" and last name "Bahr" clearly distinguishable.

Sandy Bahr
Chapter Director
Sierra Club – Grand Canyon Chapter