

July 26, 2019

David Whittekiend
Uinta-Wasatch-Cache Forest Supervisor
857 West South Jordan Parkway
South Jordan, Utah 84095

JeffE. Schramm
Ashley Forest Supervisor
355 North Vernal Avenue
Vernal, Utah 84078

Subject: Comments Concerning the High Uintas Wilderness Domestic Sheep Analysis Project
(Ashley and Uinta-Wasatch-Cache National Forests) #44503

Dear Messers Whittekiend and Schramm,

As a Permittee on both the Ashley and the Uinta- Wasatch-Cache ("UWC") National Forests, we appreciate this opportunity to comment on the above mentioned Draft Environmental Impact Statement ("DEIS"). Some of our comments will be general in nature, and some will be more specific.

Initially we state that we support and are in favor of Alternative 2 - Proposed Action, Continued Management (Agency Preferred Alternative). Additionally, as stated in the DEIS, Alternative 2 is consistent with County and State Plans. Further, for reasons that we will discuss later, we oppose Alternative 1 - No Action, No Grazing (Environmentally Preferred Alternative).

The DEIS states on pages xxii and 18 that two primary issues were identified after the various comment periods, discussions with cooperating agencies, and presumably extensive internal discussions among the Forest Staff. These two primary issues were: 1. the continuation of sheep grazing would result in the likelihood of pneumonia pathogen transfer to Rocky Mountain bighorn sheep; and 2. discontinuing sheep grazing would have negative social and economic impacts to the permittees, and the local and surrounding communities.

Indeed the negative social and economic impacts to the permittees and the local and surrounding communities was reviewed and discussed in the Socio-Economic section of the DEIS. We find it interesting that with two primary issues identified, after extensive review, discussions and consultations of the Forest Service, that the second of two listed primary issues was not discussed more prominently in the various other sections and sub-sections of the DEIS. A substantial portion of the DEIS, Chapter 3 entitled Affected Environment and Environmental Consequences, addresses and discusses Vegetation, Soils, Water, Wildlife (Threatened, Endangered and Sensitive Species), Fisheries and Aquatic, Wilderness and Recreation, matters and concerns. When any or all of these sections are reviewed in conjunction with Alternative 1 (No Action, No Grazing), we found little or any reference or discussion regarding the attendant negative and social economic impacts to the permittees and the local and surrounding communities. Not even a simple or perfunctory statement that such action would (or could) result in negative socio-economic impacts. It would appear to us that several of the above listed categories in Chapter 3 would, in conjunction with Alternative 1, generate negative socio-economic impacts and should be so stated.

On pages xix and 22, and elsewhere in the DEIS, Alternative 1 is referred to as the "environmentally preferable alternative". We request that this designation of Alternative 1 be

removed. Our reading of the analysis in the DEIS indicates that the current ecological conditions of the area under review are satisfactory. In fact Alternative 2, the proposed action, is expected to result in limited impacts to the physical environment. Thus, the designating language in Alternative 1 should be removed because there are only marginal environmental benefits compared to Alternative 2.

Two comments at page 14. We believe the correct title for the referenced 2018 State of Utah Bighorn Sheep Management Plan is 2018 Utah Bighorn Sheep Statewide Management Plan. Additionally, the referenced 2019 State of Utah and Forest Service MOU for Bighorn Sheep Management is not a site specific MOU, but rather a Statewide MOU and probably should be clarified as such.

At pages 22-28, the Forest Service more than adequately discusses current grazing management and practices. They fail however to address certain relevant and key information regarding the project analysis. Specifically, the successful measures taken by the agencies of the State of Utah to manage a sustainable bighorn sheep population for decades while in proximity to domestic sheep. Further, current measures that are being taken to reduce the risk for pathogen transfer to occur. Additionally, the economic importance of grazing to the permittees and the local communities. We request the Forest Service revise this section to reflect these vital and principal issues. We understand that such issues are discussed in the middle and at the end of the DEIS.

Nevertheless, they should also be mentioned here for a more balanced read. Throughout the DEIS there are numerous references to the high risk of pathogen transfer and other complications due to domestic grazing. Substantial progress has been made by the cooperative efforts of the permittees with the Forest Service, and also with the Utah Division of Wildlife Resources. A reader has little or any awareness of such progress and improvements until said reader slogs his or her way through 160 to 170 pages of this report/analysis. Additionally, as we have commented above, the Forest Service has identified one of two major or primary issues to be the negative social and economic impacts to the permittees and the local and surrounding communities if domestic grazing is disallowed. This issue is actually 50 percent of the identified primary issues, yet this issue is rarely considered, discussed or even mentioned in the DEIS, until the reader reaches the Socio-Economics section at the end of the DEIS.

It seems appropriate and important to reference the history of the domestic sheep and the bighorn sheep in the two subject National Forests throughout the DEIS, and not merely at the end of the DEIS. Thus we would request that the Forest Service revise the language at page 29 to clearly reflect that domestic sheep have grazed these forests for more than a century; whereas the bighorn sheep were re-introduced into this area merely a few decades ago.

On page 33, relating to Risk of Contact (Bighorn Sheep only) the language in Alternative 2 should be expanded to include "High ROC also remains on Non-Forest Service lands (BLM, State, and private)."

At page 83, it seems appropriate for the Forest Service to include language regarding the negative socio-economic impacts of Alternative 1 and the discontinuance of livestock grazing. Pages 88 through 105 discuss stream bank trampling and water quality. Besides the impacts of livestock trampling, the Forest Service should include the impacts of trampling from wildlife on water and riparian resources. Wildlife can have significant impacts on riparian and wetland areas. Domestic livestock should not be considered the only source of impact to these areas. We request that the Forest Service differentiate between trampling by wildlife and trampling by domestic livestock. As to water quality, we are concerned that the common practices used by the Utah Division of Water Quality ("UDWQ") to assess, among other things, sedimentation are not being used by the Forest Service. We strongly request the Forest Service to revise this material after meeting and working with the UDWQ, the Utah Department of Agriculture and Food ("UDAF"), and the Utah Division of Wildlife Resources ("UDWR") to determine whether there are actual impacts to water quality in the project area from wildlife trampling, natural sources, or livestock trampling. Our experience indicates that livestock stream crossings and bank trampling alone are not adequate indicators of water quality. The Forest Service should also take actual water samples to clearly and accurately understand the impacts of such crossings and trampling by wildlife or livestock. We are concerned that the Forest Service is performing an extensive analysis regarding water quality without taking adequate water quality samples.

Our reading of the Soils section is that the continuation of the current levels of disturbance and erosion are at an acceptable rate and that the allotments are meeting desired conditions. We request the Forest Service revise the materials at pages 123 and 124 to also express that all allotments are meeting desired conditions.

There is a discussion of bighorn sheep at pages 139 to 168. Therein are several references to the 2013 Utah Bighorn Sheep Statewide Management Plan. As the Forest Service is aware this plan is no longer in effect and has been superseded by the 2018 Utah Bighorn Sheep Statewide Management Plan. We request that the Forest Service appropriately revise this material to reflect the policy and management strategies contained in the new 2018 Utah Bighorn Sheep Statewide Management Plan. Additionally, remove the material from and references to the 2013 Utah Bighorn Sheep Statewide Management Plan.

Wilderness and Recreation is discussed on pages 191 to 209 of the DEIS. As indicated therein, there is a sufficient amount of forage so that competition between wildlife and livestock is not an

issue. During the discussion regarding solitude, naturalness, unconfined recreation, and primitive state of the area,, probably between pages 202-208, we request a statement that "encounters with domestic sheep negatively impacting recreationalists is not an absolute conclusion, but rather a possibility."

On a personal note, our ranching operation now is managed by our family's fourth generation, with members of the 5th generation working on the ranch. We love ranch life. It's a hard life, but enjoyable and rewarding to our family. As you know, a substantial percentage (over 50%) of the land in the states of Utah and Wyoming is managed by federal agencies. Thus livestock producers, including ourselves, are forced to heavily rely on public land grazing permits.

Without such permits, it would be very difficult for most ranchers, ourselves included, to remain in business. We probably would be forced to sell our ranches, and the land that we have for generations acquired and managed. One of the many important responsibilities of the Forest Service is to oversee/manage habitat health. As a rancher we live and die by healthy habitat, adequate water, whatever the weather throws at us, and market conditions we have no control over. We try to be good stewards and carefully manage our grazing on federal, state or private lands. There is no benefit, profit or gain by abusing a grazing resource, thereby impairing the habitat. It would be the same as shooting ourselves in the foot or kneecap.

The DEIS clearly points out that the removal of domestic sheep grazing by the Forest Service would not solve or remove the risk of contact to bighorn sheep, due to the unique interspersed land pattern of federal (Forest Service or BLM), State, and private lands. With the foraging proclivities and habits of bighorn sheep, they would still have a high risk of contact with domestic sheep on BLM and private lands. Consequently there would still be a high risk for pathogen transfer to occur. We also feel it appropriate to note here the science in this area is currently evolving. As the Forest Service is surely aware there currently are studies and research indicating there are several other species other than domestic sheep, including various wildlife, that can transmit or transfer the pathogen to bighorn sheep. We encourage the Forest Service and relevant Utah state agencies to monitor, take a hard look, and give serious consideration to these recent and continuing studies and research.

Finally, the loss of domestic grazing on public lands would be devastating to us as a permittee.

Our ability to survive would be extremely questionable. This certainly would be a negative socio-economic impact to us as a permittee, to our local communities, and it would cause further harm to an already suffering sheep industry. Further, the loss of domestic grazing would have a negative impact on the forests under study. Livestock grazing is an extremely cost effective form of vegetative management. The cessation of grazing would increase fuel loads, which could create a risk of catastrophic wildfires.

We appreciate the opportunity to comment, and look forward to continually working with the Forest Service to ensure that responsible domestic livestock grazing continues on public lands.

Sincerely,

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By: Vance S. Broadbent, Manager 1

cc: L. F. Ogden
D.L. Darley

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