



Uinta County Conservation District

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Aug ____, 2019

David Whittekiend

Uinta-Wasatch-Cache Forest Supervisor

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Jeff E. Schramm

Ashley Forest Supervisor

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Vernal, UT 84078

Submitted via Email

Re: Notice of Availability for the Draft Environmental Impact Statement; High Uintas Wilderness Domestic Sheep Analysis; Evanston-Mountain View Ranger District, Uinta-Wasatch-Cache National Forest and Roosevelt-Duchesne Ranger District, Ashley National Forest (FS Project ID 44503)

The Uinta County Conservation District (UCCD) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) referenced above and commends the Forest Service for their work on this document thus far. UCCD, established to support and promote the natural resources and agriculture in Uinta county, has been involved as a Cooperating Agency throughout the drafting of this document. As the North slope of the Uinta Mountains is the principle watershed for Uinta County, and as many of the allotments mentioned in the DEIS are leased by Uinta County producers, UCCD is directly involved in the outcomes of the DEIS. We strongly agree with the Forest Service's preferred Alternative 2 to continue grazing and use of the sheep driveway. We also strongly disagree with both Alternatives 1 and 3; no grazing and the reduction of the number and/or size of the allotments.

On page 142, the DEIS acknowledges the presence of peer reviewed research by Highland et.al.2018, stating that *Mycoplasma ovipneumonia* has been found in other species

such as moose, mule deer, caribou, white-tailed deer, Rocky Mountain Goats and cattle. We appreciate the inclusion of this important research in this document. However, we found that the research is not referenced in other key areas of the document where Risk of Contact between Big Horn Sheep and animals carrying *Mycoplasma ovipneumonia* is addressed. The DEIS considers only the risk of contact between Domestic Sheep and Big Horn Sheep, much of which is an estimate based on a Risk of Contact (ROC) model.

Utah Division of Wildlife Resources has been monitoring for disease in these herds of bighorn sheep and in their sampling results 58% of bighorn sheep sampled were positive for Movi and 28% were found positive for Hymalitica pathogens. It needs to be stated that the pathogens are endemic in these herds and pathogen transmission is happening regardless of contact with domestic livestock.

In regards to private ground and BLM allotments, the DEIS acknowledges that the possibility of domestic sheep grazing on these lands maintains the ROC for Big Horn Sheep and thus concludes that, in Alternative 1- No Grazing, removing domestic sheep grazing from the Forest Service would not eliminate ROC for Big Horn Sheep. The DEIS should also acknowledge that Alternative 1 would not remove Big Horn Sheep exposure to *Mycoplasma ovipneumonia* due to the presence of mule deer, moose, Rocky Mountain goats, and cattle. White-tailed deer, too, have been found within Uinta County. Given the presence of wildlife, not only in private lands close to the High Uintas, but in the High Uintas themselves, the DEIS needs to acknowledge that the risk of Big Horn Sheep coming into contact with *Mycoplasma ovipneumonia* exists due to wildlife, whether or not domestic sheep are present at all.

The DEIS also holds that information on the private lands bordering the Forest Service is not included due to difficulty in obtaining this material. UCCD affirms that information on private land bordering Forest Service as it regards sheep grazing is always available if properly sought after.

The DEIS also addresses the sheep Driveway. We feel it is important to understand that the driveway has been used for over one hundred years with minimal effect on the environment and has a very low percentage of impact on the project area. It should also be realized that this is a transportation route that has been used for over one hundred years and has much less of an impact when compared to other transportation routes such as developed and undeveloped roads.

We again appreciate the opportunity to comment on the DEIS and express our gratitude to the Forest Service for their work in compiling this DEIS for public review.

Sincerely,

A handwritten signature in cursive script that reads "Kerri Sabey".

Kerri Sabey
District Manager