Protecting the forests and wildlife of the Columbia Highlands since 1976

**Kettle Range**

CONSERVATION GROUP

August 22, 2023

Ashley National Forest

Uintah-Wasatch-Cache National Forest

Utah

RE: High Uintas Supplemental Draft Environmental Impact Statement re sheep grazing

To Whom it May Concern:

Thank you for the opportunity to comment on the Supplemental Draft Environmental Impact Statement ([SDEIS](https://default.salsalabs.org/T4cb1648e-a70d-4fb6-90df-296f8531d106/4832540b-0c7f-11e6-98b1-12c35146c141)) evaluating the future of 10 domestic sheep allotments in the High Uintas. Please accept these comments on behalf of the Board of Directors and members of the Kettle Range Conservation Group (KRCG). Since 1976, Kettle Rangers have been a voice of rural grassroots activism for wild fish, wildlife and wilderness in eastern Washington state. KRCG members recreate in the High Uintas, enjoying its serenity, beauty and wilderness characteristics.

The 455,000-acre High Uintas Wilderness forms the core of the Uinta Mountains in northeastern Utah and what should be a sanctuary for wild bighorn sheep – except for deleterious impacts of domestic livestock grazing there.

KRCG is very concerned about sheep and cattle grazing impacts to the environment: to clean water, native vegetation (especially flowering plants), fish and wildlife that we cherish a chance to see bear, cougar, coyote and other large carnivores that might someday inhabit this ecosystem. Grazing fouls the lakes and streams, and severely degrades the experience of visitors seeking a Wilderness experience.

KRCG members cover a gamut from vegans to hunters & fishers, mountaineers to bird watchers. We’re an eclectic bunch. Access to the High Uintas is a day drive from northeast Washington state where most of us live.

Questions & Concerns:

An environmental impact statement, in addition to providing a range of alternatives, must also assess the past, present and foreseeable future impacts of sheep grazing in the High Uintas. Yet the SDEIS considers just two alternatives: No Action and status quo maintaining existing practices. These are a few of Kettle Ranger’s questions and concerns:

1. What are the environmental impacts of sheep grazing to terrestrial and aquatic ecosystem function?
2. What are known or potential impacts t
3. Sheep grazing is fraught with predator problems especially in remote wilderness areas – what does your analysis show regarding annual sheep depredation associated with carnivore predation?
4. What special provisions are required of range permittees to protect sheep and predators?
5. What are the impacts to native ungulates caused by domestic sheep / livestock grazing?

Big Horn Sheep and Domestic Sheep

Domestic sheep grazing carries with it threats to native big horn sheep, spreading disease as well as consuming vegetation that wild sheep would otherwise use. Rather than remove these threats the Forest Service proposal essentially endorses the Utah Division of Wildlife Resources approach to sustain bighorn numbers by killing cougars. So whether directly or indirectly sheep grazing leads to slaughter of cougars that are a resource the public cares deeply about.

Sheep grazing is not a spectator sport. It is not a reason the public chooses to recreate in the High Uintas. Sheep grazing serves a very few ranchers at the expense of native ecosystems and the American public whose lands are leased specifically for financial gain. The state will spend taxpayer dollars to augment big horn via translocations and by constantly modifying the habitat.

To mitigate impacts, the Forest Service should retire grazing permits that are voluntarily waived back to the agency, giving the ranchers the opportunity to seek compensation from conservation interests before the allotments are permanently closed.

The High Uintas Wilderness should be dedicated to its native wildlife. To the extent livestock grazing is allowed, it should be limited so as to not compete with native wildlife for food or space or be permitted where it threaten disease transmission to bighorn sheep. Grazing should be curtailed to meet the public’s interest in protecting the High Uintas for wildlife and an authentic Wilderness experience for visitors.

It seems only fair that lethal removal of native predators to protect sheep or cows should be prohibited if domestic livestock grazing is allowed to continue.

Thanks for listening.

Sincerely,



Timothy Coleman

Executive Director