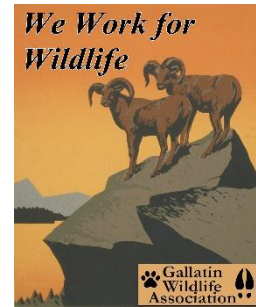


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September 6, 2025

Kelly Orr, Forest Supervisor
Uinta-Wasatch-Cache National Forest
857 West South Jordan Parkway
South Jordan, Utah 84095

Kristy Groves, Forest Supervisor
Ashley National Forest
355 North Vernal Avenue
Subject:
Vernal, Utah 84078

Bethany Nickison, Project Team Lead
Uinta-Wasatch-Cache National Forest
857 West South Jordan Parkway
South Jordan, Utah 84095

Objection Reviewing Officer,
High Uintas Wilderness Domestic Sheep Analysis (or HUWDSA),
USFS Intermountain Regional Office,
Room 4403
324 25th Street,
Ogden, UT 84401

Subject: High Uintas Wilderness Domestic Sheep Analysis Project (Ashley and UWC National Forests) #44503

Dear Objection Reviewing Officer:

On August 15, 2023, the Gallatin Wildlife Association submitted a letter to the above National Forests (dated August 15, 2023) providing comments on the release of the High Uintas Wilderness Domestic Sheep Analysis. The Draft Record of Decision (DROD) on said matter was released in July of 2025. The comments below represent those of the Gallatin Wildlife Association located in Bozeman, Montana concerning the DROD, a decision allowed under the previous National

Environmental Policy Act, otherwise known as NEPA. Again, a refresher as to the Gallatin Wildlife Association is below.

Gallatin Wildlife Association (GWA) is a local, all volunteer wildlife conservation organization dedicated to the preservation and restoration of wildlife, fisheries, habitat and migration corridors in Southwest Montana and the Greater Yellowstone Ecosystem, using science-based decision making. We are a nonprofit 501(c)(3) organization founded in 1976. GWA recognizes the intense pressures on our wildlife from habitat loss and climate change, and we advocate for science-based management of public lands for diverse public values, including but not limited to hunting and angling.

While GWA is primarily interested in wildlife and forest management issues of southwest Montana and the Greater Yellowstone Ecosystem (GYE). We do have interest in policies and actions outside of that geographical description if those policies may directly or indirectly impact wildlife or land-use surface decisions adjacent to or surrounding the GYE. They too could affect ecological harmony as well as set bad precedent for all western lands of the interior west.

In our comments of August 15, 2023, GWA supported and urged the U.S. Forest Service (USFS) to prefer the No Action Alternative, Alternative 1. We did so because of the poor lack of alternatives. Of the two alternatives offered, the No Action Alternative directly responds to the issue of pathogen transfer from domestic sheep to Rocky Mountain bighorn sheep. On page 25 of the Supplemental Draft Environmental Impact Statement (SDEIS), the document actually describes Alternative 1 as the Environmentally Preferred Alternative and so we chose Alternative 1. We did so because Alternative 2 exacerbated the current situation.

GWA does object to the poor application of NEPA by using the minimal application of number of alternatives.

But this brings us to an interesting question, what was the purpose of this SDEIS? The purpose was always the continuation of domestic sheep grazing in the high Uintas. So, we contend, the actual choice of alternatives did not meet the intent or the criteria of NEPA. Our choice was between an alternative that was never going to be chosen or one that exacerbated a problem situation. In the final decision, the USFS chose Alternative 2, the Preferred Alternative, which is no surprise.

With that said, we ask the following question. Has the USFS ever chosen an alternative different from the Preferred Alternative, especially after undergoing NEPA and receiving public comment? We're sure there is an exception here or there, but at what frequency? This makes us ask, why bother going through the motion of this process if the public and scientific comment are not being heeded?

Is it just a formality? Don't get us wrong, GWA appreciates the opportunity to respond and comment, but we want the agencies to seriously look at what is being said, not just something to be ignored, and the public deserves legitimate alternatives.

After reading the DROD, GWA must object to the decision utilizing Alternative 2.

Contact Information:

Contact Person: Clinton Nagel,
President of the Gallatin Wildlife Association
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406-600-1792

We object based upon several rationale, but primarily upon the limited choice of alternatives, and upon the choosing of Alternative 2, an alternative which enhances the loss of biodiversity, viability, and integrity, as well as subjugates wild bighorn sheep (BHS) under the auspices of domestic sheep. GWA believes that the continuation of domestic sheep grazing in the high Uintas mountains of Utah propagates and transfers a host of diseases from domestic to native species and vice versa. In doing so, it undermines Federal Statutes and the intention and purpose of the authority of the USFS and the Federal Mission. For example, does this project undergo oversight as stated in Forest Service Manual 2600?

The Enabling of Disease on the Natural Landscape and its Impacts on BHS Population:

To begin with, GWA wants to ask this question. Does the USFS see themselves as enabling the spread and transmission of diseases on the natural landscape or ignoring it? This is the question which GWA is asking as we formulate our comments for objection. GWA believes that the USFS used every explanation in the book to justify the position they have taken. For example, the explanation given that it wouldn't make any difference to address risks on Forest Service lands when bighorn sheep can obtain diseases from domestic sheep and lands outside USFS lands is a weak argument to make.

Is that an explanation for not doing anything in order to prevent the transmission of disease? That is fatalistic viewpoint and is unacceptable. I'm shocked that the USFS would utilize such an unscientific decision. The following was stated in GWA's comments of 2023.

"As stated on page 142 of the SDEIS, there are 15 terrestrial wildlife species that are classified as sensitive species in the project area. Only three species have habitat in the project area, one of those being bighorn sheep. The Great Gray Owl and the Northern Goshawk are unaffected by this project for various reasons,

primarily due to lack of availability in the project area. But bighorn sheep on the other hand, a species well established in the project area, won't be affected because the viability of bighorn sheep can't be maintained with or without the project. The standard answer in the SDEIS is the following.

"The core herd home range for this metapopulation of bighorn sheep extends across two forests, two states, and includes multiple jurisdictions including Forest Service, state, private, and Bureau of Land Management managed lands. Based on its current distribution, the viability of the bighorn sheep metapopulation affected by the Project cannot be maintained on the Wasatch-Cache plan area independent of the other lands associated with the population."

GWA simply asks what kind of logic is this? Is this the kind of decision we get to expect from our Nation's land management agency? There still is a federal commitment to be upheld and a legal obligation to be fulfilled. Our organization cannot buy this as a legitimate response".

This fatalistic approach was even prevalent two years ago. This kind of logic and shortsightedness is not becoming of our Nation's land-management agency. We covered the issue in 2023 that disease should have been the driving force of this decision, but it wasn't. Domestic sheep were going to be on the public landscape no matter what, but that is the wrong approach to take in an agency whose original intention was to manage land for resource protection. We feel that the issues we brought up in our comments of 2023 did not get the attention or redress they deserve, and so we object to this decision. A few of those comments are below.

"As to the U.S. Forest Service responsibility to mitigate threats to the sensitive species of Bighorn Sheep, the SDEIS seems to once again be masterful in diverting attention from the key issue. That key issue is the ease of which disease is transmitted when bighorn sheep are exposed to domestic sheep. According to the U.S. Geological Survey, the lethality to bighorn sheep from pneumonia is estimated to range from 50-80%. By citing other sources of disease such as stated on page 150, it minimizes the overriding truth in the matter as shown here.

"There are counter-arguments from some scientists, who question the transfer of respiratory pathogens from domestic sheep to BHS and/or question the study design/methods of studies that conclude disease transmission or deleterious effects to BHS after contact with domestic sheep, and argue that other factors (environmental and anthropogenic) may have a larger factor in triggering respiratory disease in BHS than the presence of domestic sheep (Thurmond 2016, USDA Forest Service 2021)."

"Citing contrary opinions may be necessary in the overall presentation of all the facts, but they must be stated in a way that does not diminish the overall truth of the matter. That contrarian view was immediately contrasted by the following scientific fact".

*“However, there is increasing evidence that show pathogens (known to cause or that are associated with bacterial pneumonia in BHS) such as *Mycoplasma ovipneumonia* can be transmitted between domestic sheep and bighorn sheep and between individual BHS (Besser et al. 2014, Cassirer et al. 2018, USDA Forest Service 2021).”*

“Further down on that same page (page 150), there is a diversion once again proclaiming the fact that other species may be to blame. It is highly possible that other species would be carriers of disease or pathogens. But who is to say that those species didn’t also obtain the disease from domestic sheep”?

All the science we brought forth in 2023 seemed to be ignored. That is a mistake on the USFS. Their goal and intent of this policy was to continue bad practice, a practice of sheep grazing even at the expense and health of bighorn sheep. GWA will never agree to those terms.

On page 31 of the DROD, the following is stated.

“We recognize that domestic sheep may continue to pose a risk to BHS; measures from the 2022 MOU (UDWR et al. 2022) that were added to the proposed action will provide some mitigation of this effect. We also recognize that recent science shows that some wildlife species may also have the potential to transfer pathogens that cause bacterial pneumonia to BHS, that transplants may have been infected with pneumonia before becoming a part of this BHS population, and that this BHS population spends time off National Forest System lands in areas where the BHS have a high likelihood of encountering domestic sheep. Therefore, regardless of which alternative we choose, pathogen transmission to BHS may continue to occur whether from other wildlife species or from domestic sheep contact off the Forests. In light of that, we deem Alternative 2 the better choice with respect to these two issues”.

The problem with this statement is that it sounds like the USFS is using every explanation in the book to justify the decision they want to make. The DROD has estimated the combined herd estimate of 160 individuals within the range of minimum viable population estimates of 125-250 (page 43 of DROD). GWA believes this should be the size of one herd, not the mega population. Diseases could easily wipe out or diminish the viability of this herd size.

GWA would like to introduce to the Uinta-Wasatch-Cache and the Ashley National Forest a premise that herd size of bighorn sheep needs to be much larger than what is currently existing. From GWA’s comments on the Custer Gallatin National Forest (CGNF) Draft Revised Forest Plan of 2019, we said the following.

GWA self-made Comments on CGNF Revise Forest Plan: In the Abstract, “Evidence for Strain-Specific Immunity to Pneumonia in Bighorn Sheep” published in *The Journal of Wildlife Management*; there is this statement (Cassirer, F.C., 2017)¹:

*“Transmission of pathogens commonly carried by domestic sheep and goats poses a serious threat to bighorn sheep (*Ovis canadensis*) populations. All-age pneumonia die-offs usually ensue, followed by asymptomatic carriage of *Mycoplasma ovipneumoniae* by some of the survivors. Lambs born into these chronically infected populations often succumb to pneumonia, but adults are usually healthy.”*

To combat the amount of distress in small herds who have succumbed to disease, GWA has long been advocating for larger herd sizes with FWP and anyone else who will listen. CGNF could be an advocate for this type of management. For in the Abstract of a paper entitled “Role of patch size, disease, and movement in rapid extinction of bighorn sheep” published by *Conservation Biology*, (Singer, F.J., L.C. Zeigenfuss, and L. Spicer, 2001)² they make these statements:

“Persistence in these sheep was strongly correlated with larger patch sizes, greater distance to domestic sheep, higher population growth rates, and migratory movements, as well as to larger population sizes.”

Larger populations (250+ animals) were more likely to recover rapidly to their pre-epizootic survey number following an epizootic ($p = 0.019$), although the proportion of the population dying in the epizootic also influenced the probability of recovery ($p = 0.001$).”

Data was provided by the Montana Dept. of Fish, Wildlife and Parks article entitled *Montana Bighorn Sheep Conservation Strategy*³ of 2010 on pages 82-83. As the CGNF can see, the threats are multifold, aligning with what was said within the DEIS.

Concerning the matter of population size, GWA would further like to include research by J. Berger, “Persistence of different-sized populations: An empirical assessment of rapid extinctions in bighorn sheep” (Berger, J., 1990)⁴:

“In general, large populations persist longer than small populations. Bighorn populations of 50 individuals or less, even in the short term are not a minimum viable population. This paper documents that 100% of bighorn sheep populations reviewed in this study with less than 50 individuals went extinct within 50 years. A “population” is defined as a bighorn herd confined naturally to a discrete mountainous area. Bighorn populations with >100 individuals persisted for up to 70 years.”

There is no mention of 125 animals being a MVP for bighorn sheep in this article. To the contrary, numerous papers mention thousands rather than hundreds of animals are necessary to ensure long term persistence for any given species (Traill et al. 2010, Reed et al. 2003, Snaith, T.V. and K.F. Beaszley. 2002, Dratch and Gogan 2010).”

It is GWA’s contention, backed up by science, that small populations do not, have not, and will not work as far as providing a viable population. This statement is verified by the work found in the paper, “The role of disease, habitat,

individual condition, and herd attributes on bighorn sheep recruitment and population dynamics in Montana” (Garrott, R., K., et al.)⁵:

“In Montana, most populations are isolated and number less than 150 animals (Butler, Garrott and Rotella 2013) and this pattern has been described across their range (Berger 1990). This stands in contrast to the comparatively continuous distribution of other ungulates such as deer, elk and antelope. The most obvious factor hindering further bighorn sheep restoration is continued, widespread expression of respiratory disease. However, high predation rates, habitat loss and, poor genetic diversity and “unique factors” are also cited as factors limiting bighorn sheep populations (Festa-Bianchet et al. 2006, Hogg et al. 2006, Johnson et al 2010). Given multiple potential limiting factors, managers often face difficult decisions regarding bighorn sheep conservation with insufficient information on the drivers of demographic processes. The small size of many populations makes management decisions even more challenging by heightening the consequences of these decisions.”

GWA contends that as long as the USFS continues the domestic sheep grazing practice on the high Uintas Wilderness, bighorn sheep populations will never grow to the size or number needed to prevent extirpation or from the herd becoming a viable population. We predict that countless sessions of augmented intrusions of bighorn sheep will most likely have to continue over years, which state and/or federal authorities will most likely have to continuously monitor and instill a predator management program, a solution which GWA is generally opposed.

As GWA stated many times before, and as we should have learned by now, intrusions of man or societal influences onto the natural habitat does not bode well in the long run. Eventually, if manipulations or interferences continue, reactions and most likely opposite reactions will occur causing further action and more tax dollars spent on mitigating negative impacts.

GWA could also use the rationale in our objection from our comments on the ill-advised practice of artificial feeding of elk in the Bridger-Teton National Forest of Wyoming. In this case, that practice has increased the likelihood of disease transmission from cattle to elk and vice versa. Instead of putting an end to the practice, the USFS has decided to remain complicit in the practice sacrificing native wildlife for domestic grazing.

The Displacement Theory: Causing Ecological Harm to Wildlife Habitat

The colonization of the west during our country’s history was a forerunner of an ongoing and common occurrence we find in land-use management. But it is one that has and is causing immeasurable harm to wildlife for generations, and unless land-use management practices change, it will do so for decades to come.

The amount of past and present livestock grazing has pushed wildlife off their native lands, inhibiting their ability to roam freely upon their own landscape.

The DROD makes this statement on page 3 under the heading of Background and History.

Since around 1908, domestic sheep have been authorized to graze in the project area. Domestic sheep grazing has and continues to contribute to the social and economic fabric of the permittees and nearby communities.

It truly is time to bring this practice to an end.

GWA will present a piece of scientific fact concerning grazing and public land. We refer to the Abstract below found in an article entitled: “*Livestock Use on Public Lands in the Western USA Exacerbates Climate Change: Implications for Climate Change Mitigation and Adaptation*” by Kauffman, J Boone⁶, et al. In the Abstract, it says the following.

“Public lands of the USA can play an important role in addressing the climate crisis. About 85% of public lands in the western USA are grazed by domestic livestock, and they influence climate change in three profound ways: (1) they are significant sources of greenhouse gases through enteric fermentation and manure deposition; (2) they defoliate native plants, trample vegetation and soils, and accelerate the spread of exotic species resulting in a shift in landscape function from carbon sinks to sources of greenhouse gases; and (3) they exacerbate the effects of climate change on ecosystems by creating warmer and drier conditions”.

Further down in the Introduction, the following is said.

“Livestock grazing is the most widespread land use of federally-managed public lands in the western states of the coterminous USA. More than 98 percent of the public lands used for livestock grazing are managed by the Bureau of Land Management (BLM) and the United States Forest Service (USFS) in the western states of the coterminous USA, where a total of 56 million ha and 37 million ha, respectively, are authorized for grazing (GAO 2005; Glaser et al. 2015). This paper focuses on BLM and USFS lands in the western USA where a total of about 93.0 million ha were authorized for grazing (GAO 2005) mostly by beef cattle. However, less than 2.7% of all livestock operators in the USA enjoy the privilege of commercial access to those public lands (Glaser et al. 2015). Rimbey et al. (2015) estimated that only 3.8% of annual livestock forage comes from western US public lands, but this is an overestimate as they only included cows and no other animal type (e.g., bulls, steers)”.

GWA will use a term that has been used in political debate as of late, but not in the use we will find here. We will call it the **displacement theory**. This is obviously not a theory anymore, but a real annual occurrence happening across the west. The grazing of domestic livestock upon public lands is slowly replacing our native iconic wildlife.

The practice has imperiled our Nation's ecological integrity on public land in numerous ways. The more we learn, the more we realize how prevalent the problem has become. One impact is in the competition for food (forage), another is the spread of disease, communicative diseases from domestic to native or vice versa. That has already been discussed. Yet another is allowing the excuse to remove predators from the landscape. All three scenarios are real and are occurring.

They all are ecologically damaging to the public lands the USFS is charged to maintain. But there is still a more common and obvious impact, the actual damage to the land itself, to the soil, the water, and the vegetation that tries to eke out a living in times in the harshest of climates. The SDEIS has gone out of its way to minimize the impact of livestock grazing, whether it be by sheep or cattle, both have negative ecological impacts on a regional level.

GWA referenced this issue in our August 2023 comments, but the DROD appears to be downplaying or minimizing our concern. GWA must object to this practice of management. One question that we did raise in our comments of August of 2023; why in the world is the USFS allowing grazing to occur on perhaps the world's most fragile of all ecosystems? This was a lesson learned from Ecology 101. This should be a dereliction of duty, a violation of our Nation's common thread of land management, alpine tundra regions should be void of any grazing whatsoever.

According to Cynthia Louise Grier's⁷ article on Ecologic Life, she wrote an article entitled "*Why is The Tundra Ecosystem Considered Fragile and Unstable*"? She writes.

"The tundra is a fragile biome due to its vulnerability to climate warming and its unique characteristics, including its short growing season and extreme cold. These conditions make the ecosystems fragile, partly due to the low biodiversity, slow growth, and delicate ecosystem structures. The tundra is highly sensitive to changes in temperature and precipitation, making it one of the world's coldest, harshest biomes".

GWA must object to this practice because the USFS is taking one of the most fragile ecosystems on the planet and instilling the most harmful practice of livestock grazing. It harms the fragility of the ecosystem, the flora, the soil, the quality and quantity of water, and it allows competition for other wildlife species in the most fragile of ecosystems. It appears as if our arrogance is literally trying to harm the most sensitive landscapes on the planet. GWA cannot condone this action.

GWA brings into this discussion an article entitled: "*Spatial Analysis of Livestock Grazing and Forest Service Management in the High Uintas Wilderness, Utah*" by Carter⁸, et al. In the Abstract: it states the following.

“This case study addresses the Forest Service reauthorization for grazing of domestic sheep in Utah’s High Uintas Wilderness, USA. It provides an approach using spatial analysis and aerial imagery to evaluate the lands capable of being grazed based on Forest Service criteria and field surveys. The resulting model and analysis demonstrated that the Forest Service has not applied its own criteria. This has led to the Forest Service overestimating the amount of land and numbers of sheep that can be supported in the study area. Past field studies show this has resulted in environmental damage by grazing sheep. Our analysis concludes that the numbers of domestic sheep should be greatly reduced to protect these lands and wilderness values. Limitations of the study include the lack of a suitably detailed soil survey to determine erosion susceptibility, a lack of ground cover data, a lack of Forest Service data for the level of grazing use, or utilization, and the lack of a Forest Service quantitative measurement of vegetation production in each plant community and soil type. In the end, our use of aerial imagery, GIS determinations of areas of steep slopes and dense forests, and our measurement of vegetation production in the dominant soil types showed most of the land is not capable for grazing domestic sheep even in the absence of this other data”.

The question of soil and water ecology affects local vegetation in a very fragile environment. We said so in August of 2023. Again, we repeat ourselves below.

Utilizing another reference, that of a description of Alpine Soils found at this link below.

https://horizon.documentation.ird.fr/exl-doc/pleins_textes/divers15-08/010033761.pdf

Jerome Poulenard⁹ from the University of Savoie, Le Bourget du Lac, France and Pascal Podwojewski of the L’ Institut de Recherche pour le Developpement (IRD), Hanoi, Vietnam makes the following statements.

“The alpine soils are fragile and currently submitted to severe environmental threats, such as overgrazing, acid deposition, and climate change.

“High mountain ecosystems are generally considered to be particularly sensitive to climate warming. Therefore, they appear to be useful " ecological indicators" and extensive work has been done to study climate changes in alpine ecosystems. Overall warming and associated change in precipitation patterns and snow cover will drastically influence alpine vegetation with change in diversity and abundance of certain species. The possible impact of projected climate change on Alpine soils is then firstly linked with the alpine vegetation change.”

The reports by the USFS and others are basically trying to justify an already ongoing practice that special interest groups don’t want to see come to an end. Science and observations contradict what is being said in documents being released by the USFS.

The ecological harm done to ground cover, soils, and flora of the High Uintas Wilderness is simply staggering. Pictures portray a better reason for concern. We refer to pictures as they appear in the reference listed above by John Carter.



Figure 1. Lake EJOD, High Uintas Wilderness, deposits of sediment entering the lake from its grazed watershed.



Figure 2. Stream bank scouring, High Uintas Wilderness



Figure 3. High Uintas Wilderness steep slopes grazed by domestic sheep.

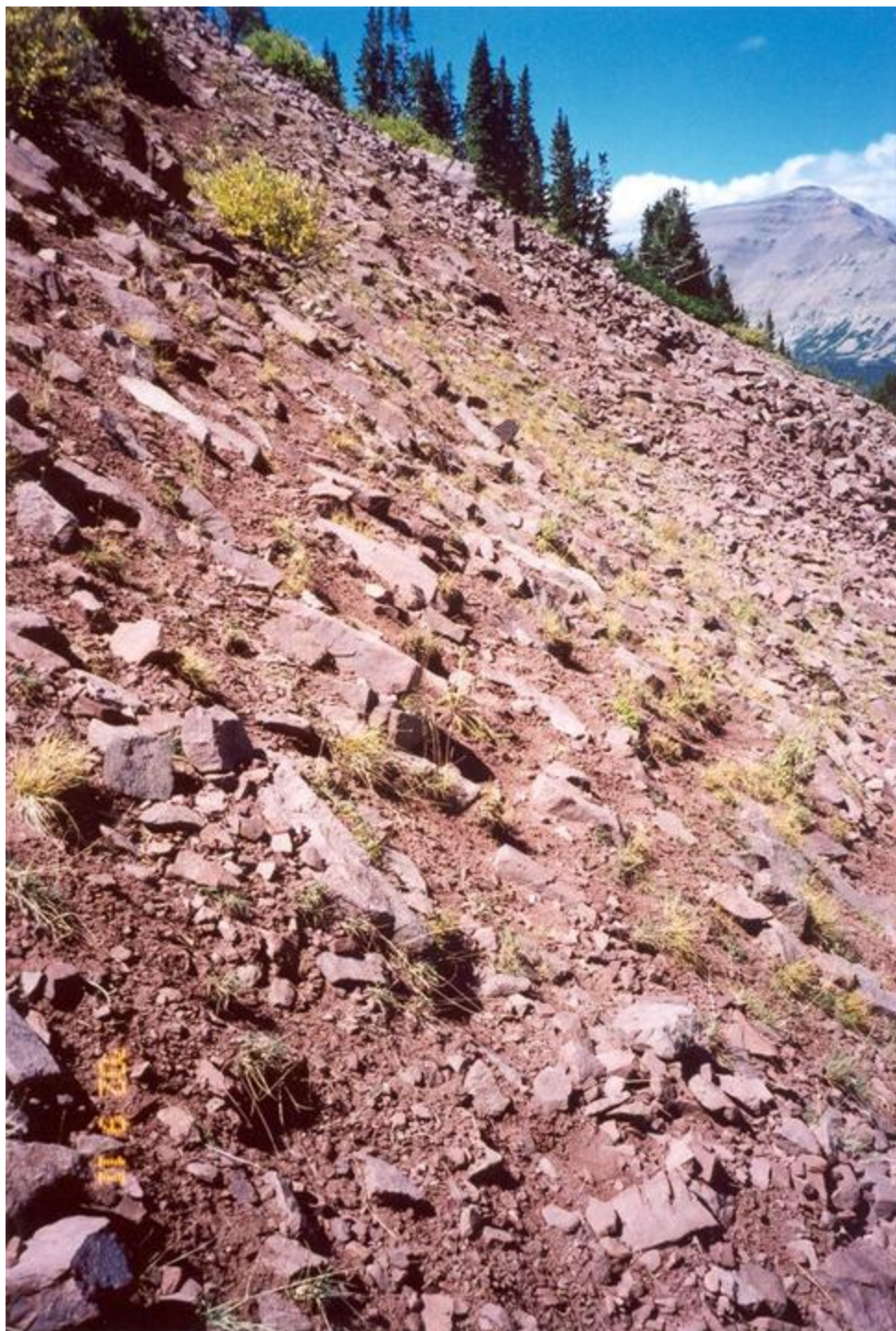


Figure 17. Result of sheep grazing on steep slopes leaving loose, erodible soil and sparse plant cover.

Pictures are worth a thousand words as they say, and these pictures tell a story that needs to be told. The harm that is happening to these landscapes is

overwhelming and sad. The harm we're allowing to happen in the name of the America people is just unfathomable, but sadly we surmise is mainly unknown.

GWA does not have the time to spend on pages and pages of comments with so many other issues we face, but please be assured, this issue of ecological harm to further the cause of livestock grazing is one in which we object in the strongest of terms. And we do so for the following reasons.

- Harm to the native vegetation, from either depleting natural forage and/or causing competition with wildlife.
- Harm to quality and quantity of delicate water systems in tundra regions by the addition of urine and feces from domestic sheep.
- Harm to soils causing erosion, compaction, and loss of nutrients.
- Harm to BHS populations from diseases.
- Harm to predators from predator control programs.
- Harm to the Wilderness Values which the U.S. Forest Service is structured to maintain. All of which incorporate the above stated impacts.

Even though GWA could not bring all of these issues to a deep discussion at this place and time, they are all rational reasons to object to this proposed action in and of themselves.

Cumulative Impacts of Climate Change:

GWA will make this short because we understand the hesitation of the USFS to use climate change in objections because it falls outside the scope of their project. This has been the excuse in the past. However, even though climate change is beyond their control, it is here, and it will have an impact on this and nearly all projects given time. The agency can be a positive force in this regard, but it must acknowledge that fact. The USFS can take actions that can alter projects to minimize those impacts of climate change impacts.

That is where the USFS can take steps to minimize the impact of climate change so we don't buy into the theory that you can't control it therefore the agency doesn't have to alter course. The cumulative impacts of climate change, especially in a high-altitude wilderness, is exactly where the USFS can be a positive force for change instead of ignoring the problem and pretending there is nothing the agency can do.

As snow becomes less, and snow melts sooner in the year, and perhaps summer rain becomes less frequent overtime, the forage and soils in the high-altitude wilderness will change. The amount and quality of water will deteriorate over time. But the occurrence of grazing will exacerbate those conditions. We saw very little mention of climate change in the DROD and that is unacceptable. The USFS is continuing as if it is business as usual.

Conclusion:

The DROD states the obvious on page 8, where it says the following.

“Livestock grazing is a discretionary action by the Forest Service and there is an overall need to analyze the possible effects to determine whether to continue or modify the grazing authorizations. To accomplish the above purposes, there is a need to objectively evaluate the existing conditions and the effects of domestic sheep grazing on these 10 allotments, especially regarding rangeland condition, impacts on wilderness and recreation, natural resources, and socioeconomic impacts”.

Truly it is time to bring this harmful saga of the American West to a close. The perpetuation of tolerance of something so destructive to the natural state is not logical for a caring Nation, so why are we perpetuating the intolerable.

GWA's concern is based upon our advocacy towards wildlife and on the obedience of law. Both need application here by the USFS. GWA found fault with this project from the outset since there were only two Alternatives to be considered, the No Action Alternative and the Preferred Alternative. There were no choices or options to consider leaving GWA to naturally choose the No Action Alternative. Even the SDEIS referred to this option as the environmentally preferred option. But this is not the intent of NEPA, at least the NEPA we used to know.

Instead of earnestly trying to lay out the preferred alternative to a long-time problem, the USFS laid out a preferred alternative for those benefiting from that very same preferred option. That is not a choice. GWA objects to the poor choice of alternatives and to the poor application of NEPA. The Nation deserves better than what we see here.

GWA's other objections are dependent upon the impacts of the project itself; the mechanism that man impacts his natural environment. The allowance and enabling of disease transmission to occur among species is beyond troublesome, it is cruel and inhumane. Granted in many cases across this Nation, events happen, they occur. We should know that based upon our latest pandemic, Covid. Some events are outside of our control. But that should not stop us from doing what we can to scientifically and technologically minimize or mitigate the circumstances, to minimize the harm, to do no harm. That is not being done here.

The logic provided by the USFS falls on deaf ears in our camp. We have experienced similar problems in Montana concerning disease transmissions with BHS and domestic sheep. But this problem is a logical occurrence when man interjects himself trying to either exploit or extract something for financial gain. We surely have seen this picture play out time and time again. This is nothing new under the sun.

GWA also objects based upon the ecological impacts this proposed action will have upon the landscape and region. The idea of allowing livestock to graze on high tundra wilderness is unexplainable. We can say that because our advocacy is on wildlife and the ecological integrity of the landscape. That should be the purpose of the USFS even in the advent of the Multiple Use Concept and the National Forest Management Act (NFMA).

We understand the predicament the USFS finds itself in, but it is also time to get back to the original intent of the USFS even before all the 20th century implications of trying to be all things to all people. That time must come to an end, especially as that paradigm threatens the health of the landscape the agency is committed to protect.

In the case of ecological integrity, the damage could be severe and irreplaceable, especially in our lifetime. The ecological damage done to soil, the water, the vegetation, and the indirect cause of predator control could be insurmountable. This could be even more true when you consider the cumulative effects of questionable action over 100 years. One pervasive effect that GWA has not even mentioned yet is the impact of noxious weeds brought onto the landscape by domestic livestock. The intricate balance that is disturbed in an alpine tundra setting is inexplicable.

GWA wants to show a picture, and we shall give full credit to John Carter for sharing this and other knowledge with this discussion.



This picture from a Soil Specialist Report showing a portion of the sheep driveway in a forested location. Loss of soil cover and severe erosion are represented here with tree roots exposed.

GWA wanted to share this picture because it is a classic example of damage done from excessive grazing. This does not represent good management. It represents a mistake that has gone bad. In closing, GWA wanted to bring up one more element in all these land-use projects, one that will be with us now forever in our lifetime and that is climate change.

The USFS must, must adopt a policy to manage the land, the water, and the wildlife in a context where climate change is a key driver of change. A warming world will have impacts in ways that we cannot foretell. The USFS should look upon this stressor as a new paradigm to manage our landscape. Apply new sciences that can help us understand how to mitigate a threat beyond our control. Climate change will emphatically play a devastating role unless management practices are changed to mitigate impacts. This will be especially true in high alpine tundra regions. A warmer and drier climate will alter that world as we know it. The management of practices that only use and negatively impact those dry, open regions will not be sustainable or viable.

Sincerely,

A handwritten signature in cursive script that reads "Clinton Nagel".

Clinton Nagel, President
Gallatin Wildlife Association

Cited References:

1. Cassirer, F.C., K.R. Manlove, R.K. Plowright and T.E. Besser. "Evidence for Strain-Specific Immunity to Pneumonia in Bighorn Sheep". *The Journal of Wildlife Management*. 2017. 81(1):133-143.
2. Singer, F.J., L.C. Zeigenfuss, and L. Spicer, "Role of patch size, disease, and movement in rapid extinction of bighorn sheep", *Conservation Biology*, 2001 15(5):1347-1354.
3. Montana Dept. of Fish, Wildlife and Parks, *Montana Bighorn Sheep Conservation Strategy*. 2010.
4. Berger, J. 1990. Persistence of different-sized populations: An empirical assessment of rapid extinctions in bighorn sheep. *Conservation Biology* 4:91-98. It should be mentioned that this reference cited (*Traill et al. 2010, Reed et al. 2003, Snaith, T.V. and K.F. Beasley. 2002, Dratch and Gogan 2010*)."
5. Garrott, R., K. Proffitt, J. Rotella and C. Butler. 2016, "The role of disease, habitat, individual condition, and herd attributes on bighorn sheep recruitment and population dynamics in Montana".
6. Kauffman, J Boone, et al., *Livestock Use on Public Lands in the Western USA Exacerbates Climate Change: Implications for Climate Change Mitigation and Adaptation*, National Library of Medicine, April 2022.
<https://pmc.ncbi.nlm.nih.gov/articles/PMC9079022/>
7. Grier, Cynthia Louise, *Why is The Tundra Ecosystem Considered Fragile and Unstable*, Ecologic Life, July 23, 2025.
<https://ecologiclife.com/why-is-the-tundra-ecosystem-considered-fragile-and.html>
8. Carter, John, et al., *Spatial Analysis of Livestock Grazing and Forest Service Management in the High Uintas Wilderness, Utah*, Scientific Research, April 2020.
<https://www.scirp.org/journal/paperinformation?paperid=99003>
9. Poulenard, Jerome, Podwojewski, Pascal, *Alpine Soils*,
https://horizon.documentation.ird.fr/exl-doc/pleins_textes/divers15-08/010033761.pdf