

Data Submitted (UTC 11): 8/2/2019 11:00:00 AM

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Organization: Sims Sheep Co LLC

Title:

Comments: Sims Sheep Co LLC appreciates the opportunity to comment on the above referenced Draft Environmental Impact Statement (DEIS)

Sims Sheep Company is a Permittee on two of the allotments in the project area and is directly impacted by this project and its outcome. Grazing has occurred on these allotments for over one hundred years starting in the 1800's and continuing until the present time with very little impact to the forest or the resources that we utilize in the project area. We have grazed two allotments in the project area since 1982 and take pride in our ability to graze the allotments and maintain the resource for future use. We practice "Transhumance Grazing" and are one of the last places in the United States to be able to do so. This is part of our culture and heritage.

Sims Sheep Co LLC strongly supports the Forest Services Proposed action in the DEIS to continue current grazing management and to permit livestock grazing at current levels and the continued use of the transportation route of the Sheep Driveway. We strongly oppose Alternative 1- the No Action alternative. Removal of sheep from these allotments will have a devastating effect on our ranch personally but also on a larger economic scale throughout the region where we purchase goods and employ workers.

Sims Sheep Co LLC would like to commend the Interdisciplinary team and the Cooperating Agencies for the effort that was put into gathering information and the development of this document.

Comments Specific to the DEIS:

Page 100: Methodology:

The use of Google Earth imagery to document measurements of trampled stream banks is not an accurate measuring tool and needs to be stated as such.

In this section the use of the word assumed in reference to areas where bacteria would enter streams is troubling in the fact that there are many different on the ground factors and variations that could prohibit or limit bacteria transport to the stream itself.

Page 155,156: Private lands

"One of the unknowns for assessing overall impacts to these bighorn sheep herds is a lack of information on private lands. There are approximately 33,911 acres of private lands that overlap the CHHR for which no data is available with regards to domestic sheep presence. Efforts made to collect this information through cooperative agencies were unsuccessful." The statement should reflect that without something barring the use of private lands from domestic sheep grazing that all of the private lands could be used for domestic sheep grazing.

Page 162:

At the end of the first paragraph it needs to be included that the permittees also use best management practices, guard dogs, and herding to discourage contact with bighorn sheep.

Page 210: Socio-economics

In the first paragraph Evanston should be listed also as being impacted by this decision. The two permittees live there and conduct business there.

The sheep driveway was developed over a century ago to be able to move sheep to the different allotments over rough terrain. The driveway evolved based on where sheep herds could traverse the steep mountain faces and river crossing.

After more than a century of use the impact is minimal to the trail and surrounding areas. The sheep driveway is a transportation corridor to move sheep to different allotments and has minimal impacts when compared to other forms of transportation corridors such as developed and undeveloped roads.

Utah Division of Wildlife resources has been monitoring pathogens in the Bighorn Sheep herds referenced in the DEIS and in their sampling results 58% of Bighorn Sheep sampled were positive for Mycoplasma ovipneumonia and 28% of those sampled were positive for Hymenitaca pathogens. It needs to be stated in the document that pathogens are endemic in these herds and pathogen transmission is occurring regardless of contact with domestic livestock.

Rocky Mountain Goats are prevalent in the project area and are a source of pathogen transmission to the bighorn sheep. Rocky mountain goats along with other species identified in Dr Highlands research should also be included in the DEIS.

The project area supports an abundance of uses and wildlife, and has done so in conjunction with livestock grazing for over a century. Sheep grazing allows the Forest Service to achieve the mandate for multiple use.

Sims Sheep CO LLC would also incorporate by reference the Wyoming Department of Agriculture's comments to these comments as submitted.

Respectfully,

Shaun Sims

Sims Sheep Co LLC