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Comments: I am writing as a

- Utah Republican precinct chair (SLC074),
- biologist (1977 BS Biology, magna cum laude, Phi Beta Kappa, Utah Secondary Teaching Certificate 1977-1992),
- lawyer (1979 JD),
- member of the Union of Concerned Scientists, and
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The 455,000-acre High Uintas Wilderness forms the core of the Uinta Mountains in northeastern Utah.

This massive mountain range-the highest in Utah-was named for the Uintah Indians, early relatives of the modern Ute Tribe.

The High Uintas contain the largest contiguous alpine tundra in the central Rockies, with lower slopes blanketed by forests of lodgepole pine, spruce, and subalpine fir.

The High Uintas, with its massive alpine terrain separated by 13,000-foot peaks, should be a haven for native Rocky Mountain bighorn sheep except for one simple reason -- the High Uintas has more livestock grazing than any other Wilderness in the country.

Years of extensive grazing by domestic sheep has

- displaced native wildlife,
- led to persecution of predators like bears, coyotes, and mountain lions,
- marred the landscape,
- compromised water quality, and
- negatively impacted visitors seeking solitude and an authentic Wilderness experience.

Over the past couple of decades, bighorns from a nearby reintroduction effort have found their way into the High Uintas Wilderness.

A nascent herd is becoming reestablished on its eastern end where domestic sheep grazing ended years ago.

But the future of the bighorn herd and its ability to recolonize its native range across the High Uintas is in doubt.

Much of the rest of the bighorn range is filled with domestic sheep that carry disease fatal to the bighorns.

The U.S. Forest Service has released a Supplemental Draft Environmental Impact Statement (SDEIS) evaluating the future of 10 domestic sheep allotments-including one which has not been grazed in more than 40 years-covering about 144,000 acres in the High Uintas Wilderness

Unfortunately, the agency's proposed action is to continue the status quo.

USFS intends to fill the High Uintas with more than 10,000 domestic sheep and their lambs for two months every summer to the exclusion of native wildlife.

The SDEIS fails to disclose

- how many native predators-such as black bears, mountain lions, or coyotes-are killed in the High Uintas Wilderness to protect domestic sheep, and
- the effects continued sheep grazing has on the potential for recovering native wildlife such as wolves and grizzly bears.

Rather than

- removing the threat of domestic sheep, and
- allowing the bighorn population and other wildlife populations to expand,

the Forest Service proposal essentially endorses the Utah Division of Wildlife Resources' (UDWR) approach:

- maintain bighorn numbers by killing native predators, especially mountain lions, and
- augment the bighorn population with translocations and by constantly modifying the habitat.

The SDEIS considers two alternatives: maintain the status quo and no grazing.

The choice is simple: the decision should

- end grazing in the High Uintas Wilderness in order to protect native wildlife,
- restore the degraded watershed, and
- enhance opportunities for an increasingly rare Wilderness experience.

To mitigate impacts to the few affected ranchers, the Forest Service should decide to retire grazing permits that are voluntarily waived back to the agency.

Ranchers should be given the opportunity to seek compensation from conservation interests before the allotments are permanently closed.??

To summarize,

1. 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 wildlife for food or space or to spread disease to native species.
2. Grazing by domestic sheep and cows compromises the High Uintas watersheds, fouls the lakes and streams, and severely degrades the experience of visitors seeking a Wilderness experience. Grazing should be curtailed to meet the public's interest in protecting the High Uintas for wildlife and an authentic Wilderness experience for visitors.
3. Domestic sheep grazing is incompatible with recovering native bighorn sheep population. If domestic sheep grazing remains in the High Uintas, the native bighorn sheep are likely doomed.

Killing native predators to protect sheep or cows should be prohibited if domestic livestock grazing is allowed to continue.

The SDEIS fails to disclose how many native predators-such as black bears, mountain lions, or coyotes-are killed in the High Uintas Wilderness to protect domestic sheep.

The SDEIS also fails to disclose the effects continued sheep grazing has on the potential for recovering native wildlife such as wolves and grizzly bears.

USFS should support the no grazing option as it is best for the

- wildlife,
- watersheds,
- recreation, and
- the Wilderness.

At the very least, the Forest Service should close any sheep grazing allotment if the permit is waived back to the Forest Service.?