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Comments: Frankly, the FEIS and draft ROD confirm the concern I voiced earlier: the decision to only give serious consideration to these two alternatives was an illegitimate way of predetermining the outcome from the beginning.

The political climate, more than the actual environmental and economic impacts, determines that closing all of the grandfathered-in grazing permit offers would never have been deemed acceptable by the Ashley and UWC National Forests; it was never a live possible outcome of the decision making process at all. Its inclusion as one of only two options considered in any depth is therefore a farce rather than serious deliberation for prudent public decision making.

As a simple example, ceasing to offer grandfathered-in allotments which are not being currently used would have no economic cost, would protect wilderness qualities and plant and animal life in those basins in the future, and is better in keeping with the purpose of the original legislative actions in allowing grandfathered grazing permits than is continuing to offer these.

The FEIS contains a number of shallow and unscientific analyses. For instance, the FEIS dismisses the possibility that disease spread between bighorn and domestic sheep could be reduced by reducing the number of allotments, claiming that because there's some risk of contact on BLM land therefore there's nothing gained by reducing contact in the wilderness. This amounts to ignoring much of what we have learned in the last two centuries about epidemiology and disease transmission risk. Reduction in exposure and therefore in disease transmission rate is never an all-or-nothing proposition.

The USFS should go back to the drawing board and give real, rather than feigned, consideration to reducing the boundaries and number of allotments.