



DUCHESNE COUNTY COMMISSION

Greg Miles; Member, Irene Hansen; Member, Tracy Killian; Member

P.O. Box 270

Duchesne, Utah 84021-0270

Phone (435) 738-1100

Fax (435) 738-5522

August 21, 2023

David Whittekiend, Forest Supervisor
Uinta-Wasatch-Cache National Forest
857 W South Jordan Parkway
South Jordan, UT 84095

Susan Eickhoff, Forest Supervisor
Ashley National Forest
355 N Vernal Avenue
Vernal, UT 84078

RE: Supplemental Draft EIS - High Uintas Wilderness Domestic Sheep Analysis

Dear Supervisors Whittekiend and Eickhoff:

Duchesne County appreciates the opportunity to continue our Cooperating Agency relationship with the U.S. Forest Service on the subject project.

We submitted scoping comments by letter dated June 18, 2014 and again on February 29, 2016. Duchesne County entered into a cooperating agency relationship with the USFS in October 2014 and commented on the Draft Environmental Impact Statement (DEIS) by letter dated June 24, 2019 and again by letter dated November 14, 2022. These prior comments are incorporated as part of this letter by reference.

We encourage the U.S. Forest Service to select an alternative that will continue the traditional practice of domestic sheep grazing on the affected allotments, with the appropriate measures being taken to mitigate potential impacts on bighorn sheep that have been translocated into the area. Such a decision would be consistent with the Duchesne County Resource Management Plan (available on our website at: https://www.duchesne.utah.gov/wp-content/uploads/2022/09/Duchesne_CRMP_2022.pdf) which states:

Policy: *It is the policy of Duchesne County to support efforts by the Utah Division of Wildlife Resources and federal land management agencies to manage Bighorn sheep populations for recreational purposes such as hunting and viewing and to ensure their contribution to ecosystems, provided that such management can be accomplished in coordination with the domestic sheep industry in a manner that does not force domestic sheep operators from their ranges or force them out of business. The County supports efforts to manage and augment the bighorn sheep population as long as there is not competition or interference with domestic animals.*

The County received the latest information on this project recently from Project Manager, Paul Cowley, and our comments at this time are restricted to the supplements to the DEIS (highlighted in cyan color in the document).

Pages 10, 25-26: Duchesne County agrees with the conclusion and project-specific plan amendment recognizing that "Forest-wide sub-goal (3i) in the Wasatch-Cache Forest Plan cannot be met for bighorn sheep in the planning area alone. 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.” In other words, even if the two allotments with a risk of contact on the national forest were to be closed, Rocky Mountain bighorn sheep would likely come into contact with domestic sheep and mountain goats on lands administered by the BLM or under state and private management.

Page 21: Duchesne County agrees that the issue of “Climate Change” should be dismissed from detailed analysis. Climate has always changed during the history of the Earth and man has no control over such fluctuations. Although the Ashley National Forest has experienced several years of drought, the winter of 2022-2023 produced the most snow and snow-water equivalent since 1952 (<https://www.deseret.com/utah/2023/3/24/23655000/utah-friday-storm-snowpack-record>).

Pages 32-33: Duchesne County supports including, in the SDEIS, the August 2022 Memorandum of Understanding (MOU): “*Bighorn Sheep and Domestic Sheep Management – Nine Allotments in the Gilbert Peak Area of the Uinta Mountain Range*” established by the Utah Department of Natural Resources (Division of Wildlife Resources-“DWR”), the Utah Department of Agriculture and Food, two sheep grazing companies and the Forest Service. This MOU establishes management direction and mitigation measures and recognizes that the DWR has been able to sustain translocated Rocky Mountain bighorn sheep populations in the Uintas successfully over the past 35+ years in spite of occasional disease outbreaks. Under the State of Utah 2018 Statewide Plan, the DWR will continue to maintain Rocky Mountain bighorn sheep populations in spite of the proximity of domestic sheep allotments in the far westerly portion of bighorn sheep herd areas, where bighorn sheep numbers are low (see Pages 153 - 187 of the SDEIS).

Page 149: Duchesne County applauds the Forest Service for conducting a “*Revised Assessment of the North Slope Uintas Bighorn Sheep Herds*” for the five bighorn sheep herds that occur in the Uintas, and on the Ashley NF and Wasatch-Cache NF (USDA Forest Service 2021). This Assessment “reviews the history of these herds and associated threats, the 2018 Utah State-wide Bighorn Sheep Management Plan (UDWR 2018), an abundance of bighorn sheep literature regarding bighorn sheep biology, habitat, threats, and risks (including disease)” and its incorporation by reference is appropriate for the SDEIS.

Page 150: Duchesne County agrees with the SDEIS amendment which recognizes that other species, including mountain goats, moose, mule deer and white-tailed deer can be responsible for transmission of respiratory pathogens to the translocated Rocky Mountain bighorn sheep in the study area.

Pages 153-169: Duchesne County appreciates the efforts of the Forest Service and the Utah DWR to utilize location data from collars affixed to Rocky Mountain bighorn sheep to track their movements to prepare an updated, accurate and scientifically defensible risk of contact model. This updated model clearly shows how only the two easterly domestic sheep allotments raise potential concerns; but even if those two allotments were closed to domestic sheep, the risk of contact would remain given the existence of BLM, state and private grazing lands in the area and possible contacts with mountain goats, moose, mule deer and white-tailed deer.

Pages 174-175: The Forest Service makes a good case here for not adopting Alternative #1; the “no grazing alternative.” Closing of the USFS allotments to domestic sheep does not reduce the risk of contact from mountain goats, moose, mule deer and white-tailed deer and does not reduce the risk of contact with domestic sheep grazing on BLM and private lands near the bighorn sheep range. There are 102 square-mile sections of private land that overlap the core herd home range (see Page 182).

Pages 175-181: The Forest Service makes a good case for Alternative #2; which continues the historic management, including eleven Range Annual Operating Instructions (AOI)/Permit Requirements, the six strategies within the 2018 Utah DWR Statewide Bighorn Sheep Management Plan, four coordination measures between the USFS, State and permittees, and 27 strategies within the August 2022 Memorandum of Understanding (MOU): “*Bighorn Sheep and Domestic Sheep Management – Nine Allotments in the Gilbert Peak Area of the Uinta Mountain Range*” established by the Utah Department of Natural Resources (Division of Wildlife Resources-“DWR”), the Utah Department of Agriculture and Food, two sheep grazing companies and the Forest Service. All of these strategies and coordination efforts will contribute to the continued persistence of the translocated Rocky Mountain bighorn sheep herds in the High Uintas.

Pages 183-188: Duchesne County supports the Forest Service conclusion that domestic sheep grazing in the Uinta Mountains on these allotments occurred for many decades prior to the introduction of bighorn sheep into the Uintas. The bighorn sheep have persisted since their introduction concurrent with these active domestic sheep allotments. Thus, domestic sheep grazing the 10 allotments and the associated sheep driveway system described in the proposed action may impact individual bighorn sheep, but would not cause a trend toward their federal listing or reduce the current viability of the bighorn sheep population on the Ashley National Forest or Wasatch Cache National Forest. The Utah Division of Wildlife Resources is doing a great job managing the bighorn sheep herds and acting to control predators and augment the population when needed.

Page 201: Duchesne County agrees with the Forest Service conclusion that cumulative effects combined with domestic sheep grazing on the allotments, would not adversely affect wildlife; including migratory birds, management indicator species and focal species.

In conclusion, Duchesne County commends the Forest Service for finding a way to move forward in a manner that preserves the cultural and historic use of the lands in the High Uintas for domestic sheep grazing while seeking to protect translocated Rocky Mountain bighorn sheep from potential disease transmission. This is a good compromise based on several years of effort to find common ground and allow continued multiple use of these public lands.

Thank you for the opportunity to comment.

Sincerely,

David Whittekiend & Susan Eickhoff
Forest Supervisors
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August 21, 2023
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DUCHESNE COUNTY COMMISSIONERS

Inene Hansen
Tracy Killian
Amy Wilson


Mike Hyde, AICP
Community Development Director