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Comments: Please note that the comment letter and attachments are jointly submitted by WildEarth Guardians and Western Watersheds Project.

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October 23, 2025

Re: Planning and Management of Domestic Sheep and Goat Grazing within the Range of Bighorn Sheep #53257

Tara Umphries, Forest Supervisor

Okanogan-Wenatchee National Forest

215 Melody Lane

Wenatchee, WA 98801

Dear Ms. Umphries,

This letter serves as WildEarth Guardians and Western Watershed Project's comments on the draft environmental impact statement ("EIS") analyzing the Forest Service proposal to 1) amend the Okanogan National Forest Land and Resource Management Plan ("LRMP") and the Wenatchee National Forest LRMP (also referred to as "Forest Plans") to include standards and guidelines that provide forest-wide management direction for identifying grazing suitability for allotments for domestic sheep and goat grazing within the range of native bighorn; and 2) develop site-specific allotment management plans for grazing of domestic livestock, including sheep, goats, and cattle.

WildEarth Guardians ("Guardians") is a non-profit, public interest, education, and conservation organization whose mission is to protect and restore the wildlife, wild places, wild rivers, and health of the American West. Guardians has more than 200,000 members and e-activists across the United States, including members that use and take benefit from public lands in Washington.

Western Watersheds Project ("WWP"), is a non-profit conservation organization based in the western United States. With more than 14,000 members and supporters, WWP works to protect and conserve the public lands, wildlife, and natural resources of the American West through education, public policy initiatives, and litigation. WWP staff and members use and enjoy the public lands in Washington state and derive many spiritual, aesthetic, cultural, and recreational values from the plants and wildlife that inhabit its unique landscapes.

Alternative 4 should be revised to suit the purpose and need for the proposed action.

Alternative 4 proposes amending the two Forest Plans to include forest-wide plan components for managing domestic sheep and goat grazing. These plan components would aid the Forest Service in meeting its obligation to maintain the viability of bighorn sheep on the Okanogan-Wenatchee National Forest ("OWNF"). The agency acknowledges that in order to meet this obligation it must mitigate the risk of domestic sheep and goats coming into contact with bighorn sheep and transmitting lethal disease. The two proposed components should be revised to take the form of standards, rather than the current form of guidelines.

As an initial matter, it is not clear whether the entirety of the text of the two proposed components is only the first paragraph for each, or should include the subsequent paragraphs as well. In other words, it is not clear from the font and typeface of the text whether the subsequent paragraphs are part of the components or a discussion of the purpose or meaning of the components.

If the intention was that the text of components include subsequent paragraphs, then the text should be revised to clarify that the components are standards rather than guidelines. For example, the second paragraph associated with proposed component BHS1 states that "The purpose of this guideline is to achieve an acceptable level of separation where bighorn sheep herds are anticipated to maintain their viability on the landscape." DEIS at 12 (emphasis added). The word "guideline" should be replaced with "standard" to reflect that the Forest Service is obligated to maintain sheep viability by spatial and temporal separation of domestic and native sheep. The third paragraph associated with component BHS2 states that "If there is a threshold change to the risk or the pattern of bighorn use has substantially changed, then management of domestic sheep can be adapted to this change." Id. at 13 (emphasis added). The word "can" should be changed to "shall" to make clear that the Forest Service is obligated to adapt management of domestic sheep to preserve bighorn viability.

The proposal should include amending the Forest Plans to include a component that seeks GPS tracking data captured in the implementation of virtual fencing.

The DEIS's description of virtual fencing technology notes that the cattle collars used for virtual fencing will allow permittees to track their livestock's location over time. The employment of virtual fencing on national forest cattle allotments will create a wealth of data showing where and when cattle move within an allotment. This data may be helpful in the development and revision of allotment management plans and annual operating instructions to reduce impacts to fish and wildlife habitat and reduce conflicts between cattle and carnivores. To increase the

quantity and quality of information available to range staff, the Forest Plans should include a standard that permittees be asked to voluntarily provide the Forest Service with data captured via virtual fencing.

The DEIS does not provide sufficient justification for permitting sheep grazing on the Limekiln-Sugarloaf allotment under Alternative 4.

Permitting sheep grazing on the Limekiln-Sugarloaf allotment under Alternative 4 would exceed the recommended risk of contact between bighorn and domestic sheep. DEIS at 73. The DEIS argues that this is acceptable because "[w]hile Limekiln-Sugarloaf under alternative 4 would exceed 0.08, it is a short-season allotment, much less than the 6 months assumed in the RoC Tool for exposure." The public and decision-maker must have more information to evaluate this claim. As it currently stands, there is no substantive justification given for this - scientific or otherwise. An unsupported assertion of lower risk from the Limekiln-Sugarloaf allotment cannot be made simply because the employed ROC model as currently constructed does not fit the particular season length parameters. This fact alone does not negate the risk posed by the continued grazing of domestic sheep on the Limekiln-Sugarloaf allotment and this risk must be accurately analyzed and clearly quantified.

The DEIS must follow Risk of Contact (ROC) model User Guide recommendations and incorporate a cumulative, landscape scale analysis that goes beyond the allotment level

While allotment-level ROC analysis may serve as a useful starting point for planning, this alone is not sufficient when quantifying the overall risk posed by domestic sheep grazing. The User Guide that accompanies the ROC model is clear that allotment-level analysis alone is not adequate for this task: "While carrying out allotment-level analyses, it is important to keep in mind that what matters, biologically-speaking, to a bighorn sheep herd, is its overall, landscape-level, rate of contact with domestic sheep. That landscape-wide rate, not its rate of contact with a single allotment, is what will determine the frequency of interspecies pathogen transmission and the herd's long-term prospects for viability". ROC User Guide Appendices at H-3. Given this explicit guidance that accompanies the very same model used by the OWNF, it is crucial that the FEIS incorporate a ROC analysis at a broader scale so that both the agency and the public have the information needed to make an informed decision. Without expanding the analysis beyond the allotment level, the agency fails to take a hard look at impacts and ignores what the best available science explicitly recommends.

There are at least two specific features of this project that demand analysis beyond the allotment level:

* Many of the allotments under analysis are adjacent to each other and have shared borders (i.e. the Manastash/Naches/Nile/Rattlesnake group and the Limekiln/Mosquito Ridge/Eagle-Blagg/Switchback group)

* There are allotments either nearby or adjacent to active state DNR lands leased for domestic sheep grazing (ex. the Swauk allotment is less than 6km from the active Naneum Ridge DNR domestic sheep grazing lease)

Failing to implement the above guidance as stipulated in the ROC User Guide would thus be a failure to meet the stated Purpose & Need for the DEIS which includes the following:

"This action is needed because scientific research shows a relationship between disease in bighorn sheep and contact with domestic sheep or goats when these species are in proximity to each other (Lawrence et al., 2010; Besser et al., 2014), the FS is obligated to maintain viability of bighorn sheep on the landscapes, and there is a need for the Forests to allow for grazing domestic livestock to help the local economy." DEIS at 5 (emphasis added).

Given that the ROC User Guide Appendices explicitly cite "prospects for viability" when recommending the need for an analysis that goes beyond the allotment level, the DEIS must incorporate and implement this guidance in order to meet its obligation to maintain the viability of bighorn sheep on the landscape, as stated in the Purpose & Need section of the DEIS.

The FEIS must consider and analyze the impacts of the recent Lower Sugarloaf fire.

The Lower Sugarloaf Fire, discovered on September 1, 2025, has burned almost 43,000 acres to date. The fire's boundary significantly overlaps the Limekiln-Sugarloaf allotment. The DEIS acknowledges that earlier wildfires have affected aquatic habitat conditions in allotment watersheds to varying degrees. DEIS at 92. In fact, the Nile and Rattlesnake allotments have not been grazed since the 2021 Schneider Springs fire. DEIS at 132.

The Forest Service has a continuing duty to gather new information and evaluate its significance, as it "would be incongruous with . . . the [National Environmental Policy] Act's manifest concern with preventing uninformed action, for the blinders to adverse environmental effects, once unequivocally removed, to be restored prior to the completion of agency action simply because the relevant proposal has received initial approval." *Marsh v. Oregon Natural Resources Council*, 490 U.S. 360, 371 (1989). A supplemental EIS is required if the new information or circumstances are "significant".

The DEIS, published while the Lower Sugarloaf Fire was still burning, could not consider the adverse effects of the fire. The Forest Service must therefore re-analyze the affected environment and existing conditions of the Watershed Baseline for the Fisheries subsection of DEIS Chapter 3 to address potentially significant effects of the fire on the Limekiln-Sugarloaf allotment area. After re-analysis the agency should consider whether it needs to close the allotment to grazing until the area recovers.

Alternative 2 (not Alternative 1) is the de facto "No Action" alternative and should be labeled as such

Alternative 2 is presented in the DEIS as the "Interim Management Strategies" alternative, despite it already being the de facto management regime currently in place for all of the allotments involved. Alternative 1 (the "No Action" alternative), if implemented, would actually be a reversion back to the previous management regime that was responsible for severe impacts to bighorn sheep viability. Similarly, if Alternative 2 is adopted and the current grazing regime is formalized, the risk to bighorn sheep would be unacceptably high, as the DEIS itself acknowledges. See DEIS at 72. Adopting Alternative 2 does not represent a change to the current management regime despite its rather confusing presentation as a novel option.

Thank you for the opportunity to comment on this proposal to better manage domestic sheep and goat grazing on the OWNF.

Sincerely,

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Attachments:

[Appendices_to_Risk_of_Contact_Tool_User_Guide_2021.pdf](#)

User Guide_Risk_of_Contact_Tool_2020.pdf