



August 2, 2019

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Submitted via Email and US Mail

Re: Notice of Availability for the Draft Environmental Impact Statement; High Uintas Wilderness Domestic Sheep Analysis; Evanston-Mountain View Ranger District, Uinta-Wasatch-Cache National Forest and Roosevelt-Duchesne Ranger District, Ashley National Forest (FS Project ID 44503)

The American Sheep Industry Association (ASI) appreciates the opportunity to comment in the matter of the above referenced Draft Environmental Impact Statement (DEIS). Since 1865, ASI has been the national trade organization representing the interests of the over 90,000 sheep ranchers located throughout the country who produce America's lamb and wool. ASI is a federation of forty-five state sheep associations representing a diverse industry. ASI and its affiliates the Wyoming Wool Growers Association and the Utah Wool Growers Association represent the interests of not only the greater sheep industry, but also individual sheep producers directly impacted by the Agency's decision in this matter.

ASI strongly supports the Forest Service proposed action in the DEIS to continue current livestock grazing management to permit up to 10,300 ewe/lamb pairs and up to 3,000 dry ewes and continue the use of the sheep driveway. Further, we commend the Service and the Interdisciplinary Team for their thorough consideration of a myriad of factors considered in the DEIS, and their compilation of a strong regulatory record. Conversely, we strongly oppose Alternative 1 - the No Action alternative, and the third alternative of reducing the number and/or size of allotments.

ASI concurs that permitted domestic livestock grazing as contemplated in the DEIS maintains and moves the Service toward achieving overall Forest Plan objectives and desired conditions. As the DEIS noted, impacts of sheep grazing to soil, horticultural, silvicultural and riparian management are consistent with field studies and grazing research demonstrating the minimal impact of sheep grazing. Specifically, the DEIS cites that "sheep do not prefer to graze in riparian areas", and in numerous areas, that there has been little to no change in head cutting during the time sheep have been grazing. The DEIS also references "healing and an increase in ground cover concurrent with livestock grazing" on the Gilbert Peak Allotment. Sheep grazing controls noxious and invasive plant species, preserves the mosaic vegetation and reduces fuel loads which in turn lessens the likelihood for catastrophic wildfire. While these considerations were accounted for in the proposed Alternative 2, the absence of these benefits of grazing should be considered as a detriment to range health in the No Action Alternative.

Further, ASI appreciates the notation that while trailing areas, riparian crossings and certain bottlenecks show small areas (less than 3% of the total driveway) of moderate to high impacts; many of these same trails are used recreationally. In fact, continued grazing offers additional benefits to recreation as the few primitive sheep camps predating the Wilderness designation are frequented by recreationists. Moreover, we appreciate the acknowledgement that the permittees have cleaned up and packed out garbage left over from the recreational use of these camps. We also support the conclusion that with continued sheep grazing, opportunities for visitors to find solitude and primitive camping experiences remain high. While the toll taken by recreational users may not be appropriate for consideration in an EIS looking at sheep grazing, the public comments make it clear that this context is necessary for a full understanding of range conditions on our public lands.

Pathogen transmission and the potential resultant disease is a complex issue. ASI supports the inclusion of additional scientific information as cited from Dr. Thurmond and Dr. Highland that the potential for pathogen transmission is uncertain. On review of modeling the risk of pneumonia epizootics in bighorn sheep, it was concluded that factors associated with risk of pneumonia epizootics are complex and may not always be from the most obvious sources (Sells et al. 2015). Current and past Appropriations language has directed the Forest Service and other land management agencies to use the best scientific understanding of pathogen transmission in cooperation with the USDA Agricultural Research Service to guide decisions to ensure both the health of the domestic sheep industry and state bighorn sheep herds. ASI believes that bighorn sheep conservation and the legacy of domestic sheep operations are mutually compatible and appreciates the consideration of the most recent science and the impact to rural economies in this DEIS.

ASI maintains that the Risk of Contact (ROC) Tool is flawed in that it greatly oversimplifies a complex and multi-faceted issue by attempting to place a value on the inherently unquantifiable nature of pathogen transmission. This ROC has far too often been the sole basis for the removal of domestic sheep grazing by land managers and the Courts. ASI agrees in large part with the analysis in the DEIS that the ROC only attempts to predict estimated contact; it does not predict viability and it is only one factor among several. Therefore, we appreciate and agree with the DEIS consideration of other factors, including but not limited to: private land use, climate/weather and the acknowledgement that *Mycoplasma ovipneumonia* has been detected in all five bighorn sheep herds in the Unita mountains. Even with bighorn translocation/herd augmentation pathogen transmission among and between bighorn sheep remains a concern as research in Wyoming and Montana has shown that *Mycoplasma ovipneumonia* was detectable in 77% of study populations (Butler, et al 2018). ASI believes the DEIS should reflect under the No Action Alternative that even if all domestic sheep were removed from the Forest Service lands, not only would there still be overlap between bighorn sheep and domestic sheep on private lands, but the pathogen would still be present in existing bighorn sheep herds.

America's sheep producers pride themselves on their stewardship of the range, both private and federal, and rely on those resources for their long-term livelihood. The DEIS acknowledges that the "[m]ajority of the project area has remained stable with approximately 100 years of livestock grazing." This is not by chance. ASI supports the Forest Service's proposed action and believes for the foregoing reasons that continuing grazing supports the rural communities intangibly in

excess of the estimated \$2.5 million per year and aids the Service in meeting its management goals.

ASI again appreciates the opportunity to comment on this DEIS. We look forward to working with you and your staff on this project. If you have any questions, please contact Chase Adams, ASI Senior Policy Director at chase@sheepusa.org or (202) 815-1411.

Sincerely,

A handwritten signature in black ink that reads "Benny Cox". The signature is written in a cursive, flowing style.

Benny Cox, President
American Sheep Industry Association