



The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

June 20, 2014

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

Dear Mr. Whittekiend,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to scoping for the High Uintas Wilderness Domestic Sheep analysis on the Ashley National Forest and the Uinta-Wasatch-Cache National Forest (Forest).

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this project impacts our agriculture industry, our natural resources, and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions, including appeals and objections, and continue to provide us the opportunity to express pertinent issues and concerns.

There are a number of Wyoming domestic sheep producers who are permitted for trailing and grazing in the State of Utah. This decision will directly impact our producers. The WDA appreciates the Forest including us in the scoping and accepting our comments pertaining to this project. We ask the Forest to include us in all future planning meetings, development of draft alternatives, and other meetings pertaining to these allotments. We offer the following comments to address and include in the upcoming National Environmental Policy Act (NEPA) process:

Scoping indicates the Forest will analyze the project in an Environmental Assessment (EA). WDA urges the Forest to re-consider and develop an Environmental Impact Statement (EIS). We believe the number of issues and impacts associated with this decision warrants a more comprehensive analysis. The EIS process will also allow Cooperating Agencies to assist in the development of the alternatives.

WDA is genuinely concerned with the complexities and implications with the process the Forest is using to manage for multiple-use, including sensitive species and domestic livestock grazing. There are numerous forests within Region 4 planning to develop a Risk Assessment Model (Model) for bighorn and domestic sheep. We believe Region 4 should use the Model at a forest wide scale instead of at the allotment level. This ensures the entire bighorn sheep population is considered, rather than on a localized micro-population in a small and isolated area. We insist the Forest ensures the Model utilizes scientific data to make the best scientific based decisions.

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We ask the Forest ensure scientific data is collected and analyzed prior to implementing the Model and before the range of alternatives is developed. This data should include baseline data for sensitive species, such as Canada Lynx. We believe it is inappropriate to make any management decisions or changes, including additional terms and conditions on domestic sheep permittees without comprehensive data. Should the Forest use additional research as recommendations, we insist the research is peer reviewed. We strongly oppose using "white papers" in lieu of peer reviewed science.

This is also true when analyzing the impacts of domestic sheep grazing on designated wilderness areas. WDA asks the Forest provide historical background information for domestic livestock grazing in these allotments as it predates the designation of the Wilderness Act of 1964 as well as the designation of the High Uintas Wilderness Area by act of Congress in 1984. Specifically WDA requests the Forest utilize all data for upland and riparian vegetation trend data to make scientific based decisions regarding compatibility of domestic livestock grazing in designated wilderness areas. The scoping indicates *"...permitted to continue in designated wilderness areas subject reasonable regulations deemed necessary by the Secretary of Agriculture."* WDA requests all regulations are transparently included in the analysis and define the term "reasonable."

Another important term WDA insists the Forest defines is "viability." WDA is concerned the term viability for sensitive plants and animals is ambiguous and interpreted differently between forest service staff, ranger districts, and regional forest offices. It is inappropriate for the Forest to require viability at the allotment scale, but rather on a forest wide basis. Also, the Forest must recognize the State of Utah, not the forest service or the US Fish and Wildlife Service has jurisdictional authority over state managed species. The Forest is required only to manage the actual habitat, not the population.

While the Forest may choose to implement the Model across Region 4 forests, with the intent of ensuring "viability" for bighorn sheep, the Model neglects to consider management actions on public and private lands outside of the forest service system. For this reason, WDA believes the Forest will greatly benefit from working cooperatively with adjoining landowners, permittees, and Cooperating Agencies to manage species such as bighorns cooperatively on a landscape scale, not on an allotment by allotment basis.

The Forest must consider the ramifications and negative impacts beyond the scope of the analysis. WDA believes the scope of the analysis should include the domestic sheep industry as a whole. Those families remaining in the domestic sheep industry have ranches built around federal lands. Removing domestic sheep from these allotments will likely have significant economic consequences for the individual permittees as well as the communities in which they reside. The Forest must analyze these consequences and also consider the unintended consequences of the sale and development of private lands, including in holdings. Livestock grazing provides open spaces as well as cultural and historical values, of which the Forest must include in the analysis.

We strongly support working closely with the grazing permittees and Cooperating Agencies to develop a permittee proposed alternative. WDA reminds the Forest to consider the broad range of management options, including herding, guard dogs, topography, and season of use when developing the preferred alternative. We urge the Forest to have and include comprehensive data and planning in place for the

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trailing of domestic sheep to these allotments. Trailing is a permitted use of forest lands. We caution the Forest from proceeding without adequate data and planning regarding trailing in the NEPA document.

Finally, we are very concerned the Forest will develop and implement the Model prior to clearing and analyzing the various grazing options. The completion of the Model will undoubtedly create additional management actions affecting livestock grazing. We insist the Forest proactively consider all options, including previously closed allotments, conversions, vacant allotments, and forage reserves. In order to ensure NEPA is adequate, the Forest must begin data collection on rangeland vegetation, sensitive species, etc.

We appreciate the opportunity to comment. WDA is confident we can work cooperatively to find solutions to ensure grazing continues on the High Uintas. Please feel free to contact us with questions or concerns.

Sincerely,



for Jason Fearneyhough
Director

JF/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
Wyoming State Grazing Board
Wyoming Association of Conservation Districts
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