June 20, 2014

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

Dear Mr. Whitlekiend:

The Wyoming Wool Growers Association (WWGA) appreciates the opportunity to submit comments on the Scoping Notice for High Uintas Wilderness Domestic Sheep Grazing Project (Scoping Letter). This decision will directly impact our members as a number of Wyoming domestic sheep producers, who are permitted for trailing and grazing in the State of Utah, also have base property in Wyoming. We appreciate the Forest providing us with the scoping letter and ask to be included when possible in future actions related to these allotments, such as planning and development of draft alternatives. The following comments are submitted on behalf of our members.

The WWGA is a membership organization that represents the interest of sheep ranchers in Wyoming. Our mission is to assist or support our members in any appropriate activity that would benefit them in the business of sheep, lamb and wool, goat or livestock production in the state of Wyoming and in the management and enhancement of Wyoming’s natural resource base. Some of our members have ranch operations in both Utah and Wyoming and, thus, the permit renewal criteria to be used is of direct relevance to us.

The sheep industry in Wyoming is more than 100 years old. In fact, the WWGA was established the same year as the U.S. Forest Service. Grazing in the area under analysis predates passage of the Wilderness Act of 1964, when populations of both domestic sheep and Bighorns was substantially higher than they are today. In fact, it is interesting to note that the decline in bighorn sheep populations has coincided with the decline in the US sheep inventory. In 1964 when the Wilderness Act was passed, there were approximately 2 million sheep in Wyoming, according to USDA’s National Agriculture Statistics Service. As of Jan. 1, 2014, Wyoming has 355,000.

Nonetheless, the sheep industry remains an important contributor to the economy of Wyoming and particularly to the economies and social structure of Sweetwater and Uinta Counties. Our state ranks number two in the country for wool production. And much of our wool is used in the uniforms of our military personnel. We believe it is essential that the Forest include the economic and historical background of the sheep industry and domestic livestock grazing, including any upland and riparian vegetation trend data, when considering the compatibility of domestic sheep grazing in designated wilderness areas.

Numerous forests across Region 4 are planning to implement the Risk Assessment Model (Model) for bighorn and domestic sheep used in the decision on the Payette forest. We have serious doubt about the Model, which was used in the decision on the Payette. We find the Model assumes an unduly high probability of contact between domestic sheep and bighorn sheep coupled with an equally high probability of disease (pneumonia) transmission if contacts occur. In a natural environment it is unlikely that significant contact between the species occurs to the level predicted by the Model. Furthermore, a growing body of scientific evidence shows that there is no single, identifiable pathogen responsible for the most
common respiratory diseases in bighorn sheep that can clearly be tied to contact with domestic sheep on the range. All of this is well-documented and published in research completed by the U.S. Department of Agriculture’s (USDA) intramural research arm, the Agriculture Research Service (ARS). We believe the ARS and the research produced by its scientists have not been properly utilized by the Forest Service in its decision making process and urgently request that it be included as Forests move forward when completing analysis domestic sheep grazing allotments in bighorn habitat.

Because this analysis may become a template for use in the remaining forests in the Region, it is very important how the Forest proceeds in this case. The forest must clarify terms it uses in the process, such as the term “reasonable” as it is used in the scoping letter: “...permitted to continue in designated wilderness areas subject reasonable regulations deemed necessary by the Secretary of Agriculture.” [emphasis added]. “Viability” is another term that needs to be clearly and adequately defined. Its current use in relation to sensitive plants and animals is terribly ambiguous, to the point that throughout the Forest Service – from the headquarter offices in Washington to local forest staff – no single interpretation exists. Once adequately defined, the concept of viability should apply forest-wide and not simply to a single allotment or group of allotments or, for that matter, to a single species. In addition, the Forest Service must recognize and respect jurisdictional boundaries. For instance, in Utah, the state has jurisdictional authority over state managed species, not the Forest Service or the US Fish and Wildlife Service. The Forest Service manages only the actual habitat, rather than the bighorn population.

We recognize the complexities that accompany the management of lands for multiple-use. Balancing sensitive species and domestic livestock grazing is a delicate act and if it is not handled carefully could have unintended and lasting consequences. Therefore we believe that it is the Forest Service’s responsibility to ensure that management decisions are based on good, sound science. This requires adequate data is in-hand and properly analyzed before decisions are made. If data is insufficient, the fact should be acknowledged; not ignored or downplayed in order to achieve a pre-determined goal. Making decisions based on a precautionary principle can hurt everyone - individuals, economically important industries and wildlife. A case in point: twenty years after the decision to eliminate logging from U.S. Forests to preserve the Spotted Owl we have science that shows the action has significantly hurt populations of Spotted Owls. It did not help them. As the Chief of the U.S. Forest Service, Tom Tidwell, told attendees at the Public Lands Council in April, 2014, “we must move away from managing for a single species”. For this reason, we must insist that the Forest ensure that it has adequate data to make science based decisions regarding the use of the Model.

We ask the Forest to make certain it has adequate data and analysis prior to implementing the Model and before developing any of the range of alternatives. It is inappropriate for the Forest to make any management decisions or changes, including additional terms and conditions on domestic sheep permittees unless it has comprehensive and scientifically sound data to justify its actions. Peer-reviewed research should be used when necessary and the use of “white papers” should be avoided. Peer reviewed research allows the researchers’ data and conclusions to be evaluated together whereas white papers are too often contain information that is difficult to trace or verify.

The Forest Service must also consider the ramifications and negative impacts beyond the scope of the analysis. An evaluation of the impact on the domestic sheep industry as a whole must be included. Many of our producers have ranches intertwined with federal lands. For decades, they have relied on lands managed by the Federal government for grazing. Removing domestic sheep from these allotments will have significant economic consequences for the individual permittees as well as the communities in which they reside. These consequences must be considered and included in the Forest analysis. As mentioned about, the unintended consequences must be considered, including but not limited to the potential outcome of private lands and holdings if ranchers are forced out of business, which very likely will include the sale and development of private lands. The benefits of livestock
grazing must also be considered in the analysis, including benefits to natural vegetation and the control of invasive species, open spaces as well as cultural and historical values. Once that vital agriculture infrastructure is gone, especially if the land is developed, it is lost forever.

We also strongly recommend the Forest consider the broad range of management options, including herding, guard dogs, topography, and season of use when developing the preferred alternative. We gently remind the Forest Service that trailing is a permitted use of forest lands and urge the Forest Service to have and include comprehensive data and planning in place for the trailing of domestic sheep to these allotments. We again caution the Forest from proceeding without adequate data and planning regarding trailing.

The Forest Service is strongly encourage to work openly and cooperatively with permittees, and in good faith. Transparency is vital in this process. The USDA as a whole has regularly insisted that all stakeholders be included and made aware of its decision making process. However, it appears that the Forest Service exempts itself from this when it comes to forest management decisions. We refer to the secretly negotiated agreement between the agency and an entity that publicly declares its goal to eliminate cattle and sheep from public lands¹. This type of situation only serves to create distrust and anger.

Finally, we ask the Forest Service to take its time and not take immediate action in following the Model. Should it be determined necessary and beyond any other option to close a grazing allotment, the Forest Service should work diligently to find a variety of reasonable allotment alternatives and locations for existing permittees to graze, before final action is taken. Such options might include, but would not be limited to, opening forage reserves on a permanent basis or trading with and conversions of cattle allotments. Further, in keeping with the principles of multiple use, we would ask that the Forest Service to establish a mechanism for timely and regular re-evaluation of closure decisions with the goal of re-opening the allotments to sheep grazing.

Again we thank you for the opportunity to weigh-in on this important issue. If you have questions or would like further clarification, please don’t hesitate to contact me.

Sincerely,

Amy W. Hendrickson
Executive Director

¹ www.westernwatersheds.org; last accessed, May 2014