



August 2, 2023

Brian Monroe
Fillmore District Ranger
390 South Main Street
Fillmore, UT 84631

Dear Ranger Monroe:

On behalf of the Wild Sheep Foundation and our Utah Chapter, please accept these scoping comments regarding the Flat Canyon Range Management Allotment on the Fillmore Ranger District of the Fishlake National Forest. As you know, WSF and our Chapters & Affiliates have long been involved with National Forest management direction across the West, commenting when and where appropriate on issues and concerns, especially relative to wild sheep habitat management. WSF acknowledges and appreciates that under the 1982 USFS Planning Rule, bighorn sheep have long been designated as a Sensitive Species by the USFS Region 4 Regional Forester, which calls for the agency to provide habitat to maintain viable populations well distributed throughout their current range, and to avoid or minimize impacts to the species (FSM 2620.1, 2622.01, 2670.22, 2670.32, 2672.1).

Bighorn sheep once existed on the Fishlake National Forest, but do not at the present time. One of the short-term objectives of the State wildlife agencies includes re-establishment or establishment in available habitat of selected species, including bighorn sheep.

The Flat Canyon grazing permit has been waived back to the USFS, this allotment does not have a current grazing permit, and is without a preferred applicant, creating a need and opportunity to evaluate livestock grazing on the allotment. The Fishlake National Forest will analyze three alternatives, including two action alternatives and the No Action Alternative, to inform a management decision on the Flat Canyon Allotment. As detailed in your Notice of Proposed Action (NOPA), these alternatives are: 1) Current Management (Winter sheep grazing), 2) Conversion to Cattle Grazing, and 3) No Grazing. The Wild Sheep Foundation highly recommends pursuit and adoption of either Alternatives #2 or #3.

Without risk of disease transmission from domestic sheep grazing on this allotment, an opportunity would be created to re-establish bighorn sheep where they once existed. The Utah Bighorn Sheep Management plan indicates bighorn sheep are considered one of the most sought after and highly prized big game animals in North America. Demand for bighorn sheep hunting opportunities far exceed the availability of permits. Currently in Utah, applications exceed permits by 2,599:1 for non-resident hunters. Demand has also increased substantially for bighorn sheep viewing and photography opportunities. Bighorn Sheep are an important part of Utah's fragile ecosystems, and should be managed for their intrinsic value. There is a real opportunity here for the USFS to contribute significantly to Utah's bighorn sheep portfolio.

We realize there are challenges for livestock grazing due to current lack of water, but feel there is adequate moisture for bighorn sheep. And, opportunities for targeted water development to assist bighorn sheep and other resident wildlife could be investigated, once domestic sheep grazing and attendant pathogen transfer risk is addressed.

WSF believes a conversion to cattle or a no-grazing alternative would be a decision consistent with multiple use management, consistent with current Fishlake NF Forest Direction, and meets the requirements for individual management areas on the Forest.

Thank you again for the opportunity to comment on the proposal for the Flat Canyon Range Management Allotment. We look forward to hearing about the next step(s) in your analysis and decision-making process.

Sincerely,



Gray N. Thornton
President & CEO



Kevin Hurley
Vice-President for Conservation

cc: Travis Jenson, UT-WSF President