

Flat Canyon Objection

February 9, 2024

Brian Monroe

Fillmore District Ranger

Subject: **Objection to the Flat Canyon Allotment Management - Environmental Assessment, Finding of No Significant Impact and Draft Decision Notice #64356**

Dear Mr. Brian Monroe,

In the decision and rational section for the Flat Canyon Allotment management EA, you have decided to authorize alternative 2 (conversion to cattle grazing). It also indicates that this alternative meets LRMP goals. And the decision will allow for a change in management. All those things are essential to the process.

Range suitability and capability section based on the capability assessment 454 acres have a high capability. 3755 has a high-moderate capability, a moderate capability of 2634 acres, and a low-moderate capacity of 12,378 acres has a low capability. The capability assessment for cattle estimates that approximately 209 acres have a high capability. 812 acres have a high-moderate capability, and 20 acres have a moderate capability. 382 acres have a moderately low capability, and 17,797 acres have a low capability.

Suppose you calculate the high capability, high-moderate capability, and low-moderate capability. In that case, the sheep capability is 85 Percent higher than the cow capability. Objection: how does the conversion to cattle match the range suitability assessment? Alternative 2 (Conversion to cattle Grazing) Is a 38 percent loss in AUMs county, and state land management plans read no net loss in AUMS.

Objection Conversion to cattle Grazing is loss of AUMs on the Flat Canyon Allotment.

The trend analysis states that the Plant Communities are meeting the desired conditions on the Flat Canyon Allotment. Objection would be the change in management you are looking for. Grazing standards have been met with Alternative 1 (Winter Sheep Grazing)

The EAs done in 1984, 1989, and 1999 indicate that the Flat Canyon Allotment would be more suitable for alternative 1 (current management of winter sheep grazing). The EAs state that winter sheep grazing is the highest and best use.

In the 2023 EA, you recommend alternative 2 over alternative 1 because there was no interest from local sheep producers in utilizing the flat Canyon allotment. This is an untrue statement. Local producers didn't have the opportunity to purchase the permit for a winter sheep grazing permit. Objection: how did the forest service determine there was no local interest from sheep producers?

I understand that local producers were interested and have applied for the Flat Canyon Allotment but have not received a response from Mr. Monroe.

Mr Monroe you indicated in a meeting on August 24, 2020, that the seller had waived the permit with the preferred applicant back to the forest. The purchaser had failed to activate the permit in the 1st year at 90 percent. The Forest Service would let the seller waive the permit without preference because the purchaser had spent too much money on the permit to lose the permit. I would appreciate some clarification through the objection process of why the Forest Service allowed the seller to have the permit waived the second time.

In conclusion, Thank you for the opportunity to comment.

Sincerely,

Wade Eliason