

Data Submitted (UTC 11): 2/10/2024 2:06:58 PM

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Organization:

Title:

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

Dear Mr Elson,

I write you in support of Alternative 1 (winter sheep grazing), Alternative 2 is only acceptable if 1. There are no net loss of AUM's and 2. If there are no applicants for Alternative 1. Alternative 3 should not be considered.

The following should be considered

1. The State of Utah has a "No Net loss of AUMs" policy; Alternative 2 and 3 both clearly violate this policy. The Forest Service conducted a "range suitability and capability" assessment as part of the EA, to determine how much of the allotment was usable by cattle. This assessment resulted in the 334 HM (head month) number when the straight conversion number is 537 HMs. Alternative #2 results in a 203 HM decrease.
2. Sevier County has a policy that states "Sevier County will be involved in the process for determining AUMs with federal agencies." The constant overreach of federal agencies with disregard of local government needs to stop. Local government needs to be involved in the decision making process.
3. Implementation of Alternative #2 is unfair to the sheep producers that applied for the allotment. Annabella Land and Livestock waived the permit back to the Forest Service without a preferred applicant, soon after two Utah sheep producers submitted formal written applications, and both written applications were summarily denied.
4. The State of Utah has a policy against relinquishing AUMs in favor of wildlife. Sportsmen for Fish and Wildlife (SFW) and Utah Wild Sheep Foundation (UWSF) have been involved from day one, and their tactics are questionable from an outside perspective. To me it looks like the goal from the beginning has been to remove domestic sheep for the purpose of introducing bighorn sheep. However SFW and UWSF were either unaware of the regulations or chose not to follow them. The SFW and/or UWSF clearly gave money to Annabella Land and Livestock, but there is no mention of a purchase of the base property and/or the permitted livestock that would make them eligible for the new permit or give them preference. It appears that the entire intent of the purchase was to eliminate sheep from the allotment, and to use a back door approach to get wild big horn sheep on the allotment.

The continued disregard of the importance of the domestic sheep grazing, and grazing in general is extremely disrespectful. Please consider the historic use of the Flat Canyon Allotment when making your decision.

Sincerely,

Brandon Yardley