



April 16, 2021

United States Forest Service
Attn: Director, Forest Management, Range Management and Vegetation Ecology
201 14th Street SW, Suite 3SE
Washington, DC 20250-1124

Submitted electronically to: <https://cara.ecosystem-management.org/Public/CommentInput?project=ORMS-2514>

RE: Comments on the United States Forest Service Rangeland Management Directives #ORMS-2514

Dear USFS,

Sublette County Conservation District (SCCD) has the following comments in regard to the United States Forest Service (USFS) **Rangeland Management Directives #ORMS-2514**. SCCD has the mandate to assist, promote, and protect public lands and natural resources, soil, water, and wildlife resources, to develop water and to prevent floods, to stabilize the ranching and agriculture industry, to protect the tax base, and to provide for the public safety, health, and welfare of the citizens within Sublette County, Wyoming. SCCD offers the following general comments.

Forest Service Manual (FSM) 2200

In general, SCCD is supportive of the updates to FSM 2200. These updates should improve successional planning for our constituents and allow greater flexibility in the case of conservation easements and land trusts. The SCCD also appreciates the effort to update the FSM 2200 to come into alignment with new and revised laws, regulations, and court outcomes.

Grazing Permit Handbook; FSH 2209.13

11.2 – Duration of Grazing Permit.

SCCD would encourage the USFS to extend the ***duration of permits*** where resource concerns do not exist from 10 years to 20 years. The current timeline does not allow for any potential management changes to be assessed appropriately.

95.1 – Types of Monitoring.

This section does not describe types of monitoring. The SCCD suggests renaming this section “Purpose of Monitoring”.

95.2 – Monitoring and Evaluation Methods.

The SCCD suggests renaming this section to “Types of Monitoring and Evaluation Methods” as this section *does* describe “types of monitoring” which are Implementation Monitoring and Effectiveness Monitoring.

In addition, “Implementation Monitoring” and “Effectiveness Monitoring” is not necessarily language that is familiar amongst range managers. Monitoring is generally referred to as “Annual Monitoring” and “Trend Monitoring”. Although this could be implied by the methods, the SCCD offers the following clarification language:

Paragraph 3 Currently States: “Implementation monitoring may include but is not limited to...”

Suggested Clarifying language: “Implementation monitoring, *otherwise known as annual monitoring*, may include but is not limited to...”

Paragraph 6 Currently States: “Effectiveness monitoring should include attributes, locations, and methods that are capable of detecting...”

Suggested Clarifying language: “Effectiveness monitoring, *otherwise known as trend monitoring*, should include attributes, locations, and methods that are capable of detecting...”

Allotment Management Handbook; FSH 2209.16

11.11 – Recommended Data for Determination of Rangeland Capability.

Section 11.11 currently states the following:

“The following constitutes the basic information needed to complete a capability assessment. At times not all of this information may be available or required. Where such information is not available in an electronic format, other similar data may be substituted.

1. Land Ownership (from the Land Status layer of GIS)
2. Soil Map Unit - from Terrestrial Ecological Unit Inventory (TEUI), Ecological Site Descriptions (ESD), or other soil inventory
3. Geology - optional -- from TEUI or other inventory
4. Optional - Potential plant community production - from TEUI, Common Vegetation Unit, Common Land Unit, or Integrated Resource Inventory (IRI)
5. Lakes, ponds, reservoirs, and wetlands - from Common Water Unit (CWU) of IRI or the National Hydrography Dataset
6. Rivers/Streams - from CWU of IRI or the National Hydrography Dataset
7. Riparian delineation information – from the Riparian Buffer Delineation Model (www.riparian.solutions)
8. Roads - from designated travel routes
9. Slopes - from Digital Elevation Models (DEM)

10. Optional - Distance to water from Common Water Unit and/or Range Structural Improvement layer.”

The SCCD Committee has the following suggestions:

Item 2. Ecological Site Descriptions are not a “soil map unit” nor is it an inventory. It is more closely related to providing plant community information including potential for production. The SCCD recommends moving Ecological Site Descriptions to Item 4 for those reasons.

Item 4. Vegetation information should be used if available. The SCCD suggests changing from “optional” to “Use If Available”.

Because the soils and vegetation datasets overlap for items 2 & 4, the SCCD may also suggest the USFS consider combining 2 and 4 described as “soils and vegetation information” including TEUI, ESD, or other soil inventory, common vegetation unit, common land unit or IRI.”

The SCCD would also recommend using remote sensing data to delineate suitability and capability classifications in support of “on the ground” datasets.

17.15 Third Party Arrangements

USFS needs to utilize this approach to ensure that the associated infrastructure and monitoring is occurring. This is not utilized on our forest.

SCCD appreciates the USFS giving the opportunity to comment on the USFS Rangeland Management Directives #ORMS-2514 and looks forward further discussions regarding these updates. If you have any questions regarding our comments, feel free to contact Shari Meeks our Range Program Manager or myself at your convenience.

Sincerely,

Michael Henn
District Manager

Cc Wyoming Association of Conservation Districts
Wyoming Department of Agriculture
National Association of Conservation Districts
Sublette County Commission