



**Shoshone Conservation District**

359 Nevada Avenue • Lovell, Wyoming • 82431

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April 16, 2021

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

U.S. Forest Service  
Director, Forest Management, Range Management and Vegetation Ecology  
201 14th Street SW  
Washington, DC 20250-1124

**Comments Re: Forest Service Manual 2200, Chapters Zero, 10, 20, 30, 40, 50 and 70; Forest Service Handbook 2209.13, Chapters 10, 20, 30, 40, 50, 60, 70, 80 and 90; and Forest Service Handbook 2209.16, Chapter 10; Rangeland Management; Public Notice and Comment for Changes to Forest Service Directives**

Dear Sir/Madam:

On behalf of the Shoshone Conservation District, representing the northern part of Big Horn County, Wyoming, we appreciate the opportunity to submit comments on the above referenced documents.

The District, formed pursuant to Wyo. Stat. §§ 11-16-101 *et. seq.*, is statutorily charged with providing leadership and natural resource conservation, including soil, water, range, and wildlife habitat. Further, the District has the responsibility to work to conserve natural resources for economic stability and sustainability. As such, we have taken leadership roles in natural resource assessment, planning and implementation. We have statutorily recognized responsibility and special expertise (Wyo. Stat. §§ 11-16-135) of all subject matters directly or indirectly related to stabilization of the agriculture industry and protection of natural resources. We have extensive knowledge of local conditions and work extensively with landowners, producers, and stakeholders. It is with this long history, knowledge and relationship with the resources, that the Shoshone Conservation District offers the following comments on the above referenced documents:

- Sec. 11.5 - The SCD requests association permits remain. Association permits allow more flexibility to manage the health of the resource. For example, if one member has less numbers one year another member can run on their portion. Association permits are a valuable custom and culture resource to the areas they are in use and the Forest Service is responsible to recognize and maintain that.
- Sec. 11.52 - The SCD maintains policy opposing waiving the rights of private land to the federal government as this would be detrimental to the health and prosperity of the local economy. It is totally unacceptable for the United States to state that a private landowner must waive exclusive grazing management of private land to the USFS. It is a violation of private property rights for the Forest Service to require landowners to allow them to manage private property.
- Sec. 12.18 It is inappropriate for NGO's or NPO's to hold term grazing permits. It should not be allowed. These are usually highly funded environmental Organizations with the goal of "cattle free". If allowed they must be required to hold title to both permitted livestock and base property. They must actively manage the allotment and carry out normal annual livestock operations.

- Sec. 13.6 - SCD opposes Forage Reserves; In our experience it has historically been used as a way of closing allotments and are rarely if ever restocked. This is contrary to the multiple use and sustained yield directive the Forest Service must operate under.
- Sec. 13.7 - The SCD requests there should be no third-party buyouts allowed and not a policy on how to handle them. Allotments must not be closed. It is contrary to the Shoshone Conservation District's Land Use and Natural Resource Management Plan that deems it essential to the resource conditions and local economy that the forest service-managed lands Provide forage for livestock while managing to meet desired conditions; and to provide forage for livestock at a level that strives to maintain or exceed the year 2004 permitted stocking level.
- Sec. 15.8 - It is not ok for private land to be waived to USFS for exclusive grazing use.
- Sec. 81.5 - It would be better if the Forest Service billed like the BLM on actual use after the grazing season. SCD does not agree with paying for permitted numbers and season and not getting a refund if the full numbers and season are not used.
- Secs. 17 –17.15 - SCD opposes Forage Reserves; In our experience it has historically been used as a way of closing allotments and are rarely if ever restocked. This is contrary to the multiple use and sustained yield directive the Forest Service must operate under.
- Sec. 2201.1 SCD agrees with not closing active or vacant grazing allotments. SCD is opposed to including the option to still do so. This is contrary to the multiple use and sustained yield directive the Forest Service must operate under.

General comment: In our review of these documents we do not find anywhere recognition of the forest health and management benefits of grazing. It seems the Forest Service is intent on cutting AUMs. In our experience this will result in the increase of building fuels to burn in wildfires to the detriment of our economy, resource conditions and the safety and welfare of our communities.

Our local Bighorn National Forest Management Plan 2005: "Provide forage for livestock while managing to meet desired conditions. Provide forage for livestock at a level that strives to maintain or exceed the year 2004 permitted stocking level of 113,800 Animal Unit Months (AUMs) while recognizing that stocking levels may be adjusted through the implementation of allotment management plans (AMPs) and administration of grazing permits." Today the AUMs on the Bighorn Forest are about 75,000 AUMs, caused mainly by lack of funding necessary to meet the Healthy Forest Initiative, and funding to address conifer and sage brush encroachment. Timber sales are stymied by the incomplete roadless rule inventories that have eliminated 50% of the 2005 forest plan timber harvest. There is a lack of funding to manage blow down timber harvest. Grazing is a tool for overcoming these shortages and must not be hindered. This is important to our community's health and welfare and the health of our forests' natural resources. In our opinion, from our experience the Forest Service staffing and funding is becoming administration office heavy and field operations starved!

Thank you again for the opportunity to provide comment.  
 The Shoshone Conservation District Board of Supervisors  
 Lovell, Wyoming