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Comments on Grazing Permit Administration Handbook

Having looked through the almost 400 pages of documents pertaining to grazing, application, etc., and studying the 177 page proposed Grazing Permit Administration Handbook, the first thing I have to say is TOO MUCH. The entire handbook could be reduced to few pages by simply allowing each rancher to manage the lands within his allotment with minimal oversight by the Grazing Associations, which in turn would have minimal input from the Forest Service. All the minutia is not necessary and distracts from the main purpose of caring for the land and the livestock. Although not mentioned in this, it should not be necessary to fill out numbers and dates on annual applications. A simple form with total numbers of livestock on each ranch would be sufficient.

Nowhere in these many pages did I see any reference to the "Good Neighbor" policy. This should be included as it makes it clear that ALL landowners must adhere to state laws and common courtesy. This would be especially advantageous in regards to prairie dogs and fencing. Also there does not seem to be any mention of preexisting rights, which are very important to those of us who are here on the ground. These are included in all relevant documents concerning management of the grasslands.

The section on NGOs and NPOs having permits is good in that it spells out that they are required to have permitted numbers of livestock and must "actively manage the allotment and carry out normal livestock management operations". I am disturbed 17.1 as NGOs could use this to decrease livestock numbers to zero, thus furthuring their objective to remove all grazing on some allotments.

Another thing that needs to be considered is that National Grassland are not forestlands and need to be managed differently.

I am enheartened to see that a permit to graze the lands is a privilage--a right or immunity granted as a peculiar benefit, advantage or favor--perrogative--an exclusive or special right or privilege.

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