



April 15, 2021

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

Dear Director,

The Washakie County Conservation District (WCCD), as the only locally elected board charged specifically with the responsibility of representing local people on natural resource issues, would like to submit our comments regarding the United States Forest Service (USFS) Rangeland Management Directives revisions.

The livestock industry accounts for a large portion of Washakie County's agricultural income and is the oldest continuing industry in the county and is still the single largest land user with 88% of the acreage in WCCD utilized for grazing. Federal land grazing is an integral part of many ranching operations in Washakie County and the majority of the grazing permits are associated with federal lands.

Our comments are derived from our mission and are directed by our Long Range Natural Resource Land Use Plan policies which can be found at <https://www.washakiecd.com/publications.html>.

FSM 2200: RANGELAND MANAGEMENT MANUAL

2231: TERM GRAZING PERMITS

WCCD strongly supports all five (5) objectives as listed in policy FSM 2231 in accordance with a framework of laws, including the Multiple-Use Sustained Yield Act.

1. Provide for the orderly and proper utilization of forage resources by livestock, and for coordination of livestock grazing with other multiple uses and values.
2. Manage grazing allotments and permitted livestock operations to meet or move toward desired rangeland vegetation conditions across the landscape.
3. Provide stability for livestock operations dependent on NFS lands and other livestock operations in the vicinity.
4. Manage for sustainable rangelands to provide for the continued presence of family ranches and farms and contribute to the social and economic structure of the rural communities of which they are a part.
5. Provide opportunities that support the continued presence of working ranches and farms as they are necessary to maintain the open spaces that are needed for vistas, recreation opportunities, and to retain habitat and migration corridors for native species.

2240: RANGELAND IMPROVEMENTS

WCCD recommends language in this policy regarding the responsibility by NFS for the annual maintenance and inventory of range improvements on allotments in the absence of a permittee due to closure, vacancy, or forage reserve.

2243: MAINTENANCE OF IMPROVEMENT

WCCD recommends changing "all improvements" to "assigned improvements" where it is reference in the section regarding rangeland improvement maintenance and repair.

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Working to Improve Our Quality of Life

FSH 2209.16: ALLOTMENT MANAGEMENT HANDBOOK

10.2 CREATING, MODIFYING, VACATING OR CLOSING ALLOTMENTS

WCCD strongly recommends that closures on allotments only be employed as a last resort due to unusual circumstances. WCCD supports that these decisions should NOT be made on an administrative level, and closures are done explicitly through Land Management Plan level decisions. It is recommended this direction be clear across all sections pertaining to allotment closures.

FSH 2209-13: GRAZING PERMIT ADMINISTRATION HANDBOOK

CHAPTER 10-TERM GRAZING PERMITS

13.61 DESIGNATION OF A FORAGE RESERVE ALLOTMENT

WCCD recommends revising #2 in this section to state "The Forest Service *will* be responsible for maintenance..." instead of *may*.

13.7 OFFICIAL AGENCY POLICY ON THIRD PARTY ARRANGEMENTS OR PERMIT BUYOUTS BY EXTERNAL GROUPS

WCCD supports this policy and agrees that the USFS should not recognize or accept buyouts that include permanent allotment retirement. Should a buyout occur, and a grazing allotment is vacated, it should be retained in vacant status and not closed.

16.51 EXPECTATIONS OF MEDIATION

WCCD recommends removing this section as it does not provide any benefit to the success of the mediation process and sets a precedent that undermines the process.

16.6 PERMIT CANCELLATION TO DEVOTE THE LANDS TO ANOTHER PUBLIC PURPOSE

WCCD recommends removing the reference to bighorn sheep in the first paragraph of this section.

17.21 NON-USE FOR RESOURCE PROTECTION PRIMARILY DUE TO DROUGHT OR OTHER CLIMATIC CONDITIONS

WCCD requests clarification on what would be an extreme circumstance since this can be subjective. Should the use of the word extreme relate to emergency situations, we ask that extreme be replaced with emergency.

18.39 PERMIT WAIVER WITH NO PREFERRED APPLICANT

WCCD requests that when an interested qualified permittee is available, that allotments are to remain active and not moved into vacant or forage reserve status.

CHAPTER 30-TEMPORARY GRAZING AND LIVESTOCK USE PERMITS

36.3 VEGETATION MANAGEMENT

WCCD supports the use of Livestock Use Permits for the use of targeted or outcome-based grazing as a method in establishing fuel breaks or reducing fire hazards by removing biomass, removing competing vegetation to improve wildlife habitat, reducing competing vegetation for timber regeneration, site preparation to facilitate establishment of trees or a different forage vegetation type, or to consume or control noxious weeds or other undesirable vegetation.

Overall, WCCD supports the recommended changes and updates and would urge the USFS to continue to engage with WCCD in future planning efforts through cooperating agency agreements and public comment opportunities.

Sincerely,


Amanda O'Keefe
WCCD Director