

April 17, 2021

U.S. Forest Service  
Director  
Forest Management  
210 14th Street SW, Suite 3SE  
Washington, D.C. 20250

To whom it may concern:

Following are the Western Landowners Alliance's comments regarding the U.S. Forest Service's (USFS) proposed changes to the Rangeland Management Directives governing rangeland management, grazing permit administration, and grazing allotment administration. We appreciate the opportunity to provide comments and for the effort by USFS to update and provide clarification within guidance documents. In general, WLA supports the much needed updates, and encourages policies that support adaptive land management with accountability on the part of all resource management partners.

The Western Landowners Alliance (WLA) is made up of members from 10 western states. Our organization represents over 14 million deeded and leased public acres in the West. WLA works to advance policies and practices that sustain working lands, connected landscapes, and native species. We recognize that healthy landscapes - including healthy public lands - and healthy economies go hand-in-hand. National Forest System lands are an integral part of livestock operations, conservation and rural economies in the West.

***Grazing Permit Administration Handbook***

**Chapter 10 – Term Grazing Permits**

Sections 12.21 - 12.3 - *Succession Planning*: Clarification of terms and specified allowance of grandchildren is important for families to continue ranching operations. We recommend further inclusion of family members that are not direct descendants of current permit holders, such as nieces and nephews.

Section 13.6 - *Forage Reserve Allotments*: WLA supports the update to Forage Reserve Allotments and would encourage guidance that these be a pathway to Term Permits or provide opportunity for beginning and underrepresented or socially disadvantaged livestock operators. In addition, we would recommend that the terms of use for reserves provide for optimal flexibility in order for their use to be available in response to a need for forage in unforeseen circumstances.

Section 13.7 - *Inserting Official Agency Policy on Third-Party Buyouts*: WLA believes it is critical to resource management that allotment closures be at the discretion of the Forest Service following appropriate environmental review. We concur that "buyouts" must not be assigned only to satisfy the request of an external third party or entity that has no legal authority to manage National Forest System lands.

We support guidance that provides for flexibility in grazing to support resource management. Under changing climatic conditions, and with increased fire risk and the continued spread of invasive species, flexibility on season of use and livestock numbers to offer both non-use and more intensive management, where appropriate, is necessary for sustainable forest resource management.

April 17, 2021

Section 15.43 – WLA supports the insertion of the Archeological Discovery Clause to provide for maintenance of improvements without additional cultural surveys. Maintenance of improvements is critical for supporting adaptive management.

Section 17.2 – Adaptive management is necessary for improving resource conditions in dynamic systems. We support the updates in that they provide flexibility for non-use during and following drought or other impactful events while allowing for long-term planning for livestock operators. We encourage guidance on flexibility in good years, as well. Flexible and trial options on shifting season of use, animal units, and class or type of livestock can provide for improved resource management in response to both good and bad years or changing weather events that can influence fuel loads and noxious/invasive plant populations.

#### **Chapter 30 – Temporary Grazing & Livestock Use Permits**

Section 36.2 - WLA supports the revisions and encourages further guidance on use of grazing for fire prevention and recovery, along with forest restoration through temporary grazing and livestock use permits in combination with or in addition to term permits. We recommend guidance on the use of temporary grazing and livestock use permits where term permits are not sufficient to meet resource management objectives, particularly in response to fire risk, invasive/noxious species, and large carnivore conflict.

#### **Chapter 90 – Rangeland Planning and Decision-Making**

WLA supports the clarification of proper use of AOI and clarification of the purpose of AOI meetings and similar permittee meetings.

Further, WLA encourages guidance on the use of formal cooperative monitoring agreements. Monitoring is a key component of resource management and we believe permittees along with qualified partners (e.g. University Extension and Conservation Districts) are well suited to conduct allotment monitoring in coordination with USFS staff.

#### ***Allotment Management Handbook***

Section 10.2 - *Creating, Modifying, or Closing Allotments*: WLA urges the Forest Service to carefully consider implications of allotment closure. To sustain healthy forests and grassland systems into the future, we will need all tools available to resource managers, with livestock grazing being a primary management tool for restoring and maintaining healthy landscapes.

#### ***Rangeland Management Manual***

Section 2251.21 - *Cooperation Regarding Contagious Diseases*:

We appreciate that under circumstances of contagious disease and as required by the State veterinarian or other official, burying or burning of carcass may be necessary. A prohibition of these forms of carcass disposal under other circumstances limits options for permittees to appropriately manage dead stock. This is unnecessary from a forest resource management standpoint. Due to the remote nature of most allotments, in addition to predator management concerns, we recommend that all viable carcass management options should be available for permittees.

Thank you for your consideration,

April 17, 2021

Lesli Allison  
Executive Director  
Western Landowners Alliance