Society for Range Management

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April 17, 2021

U.S. Forest Service
Director,
Forest Management, Range Management and Vegetation Ecology,
201 14th Street SW, Suite 3SE,
Washington, DC 20250-1124

RE: *Proposed Rangeland Management Directives Updates*

The Society for Range Management (SRM) is the professional scientific society and conservation organization whose members are concerned with studying, conserving, managing and sustaining the varied resources of rangelands, which comprise nearly half the land in the world. Established in 1948, SRM has hosted over 4,000 members in 48 countries, including many developing nations.

SRM's members are land managers, scientists, educators, students, producers and conservationists–a diverse membership guided by a professional code of ethics and unified by a strong land ethic.

SRM supports USFS efforts to improve the effectiveness and efficiency of management on rangelands under its jurisdiction. SRM does recognize that successful rangeland management requires both art and science. This means planners and managers are knowledgeable in rangeland science and can effectively adapt management plans to changing conditions of rangeland ecosystems. In addition, many livestock producers' operations include mixtures of federal, state, and private lands and SRM encourages the USFS to use this opportunity to ensure uniformity of tools used to classify, inventory, monitor, and assess rangeland planning and management.

SRM appreciates the opportunity to comment on the Proposed Rangeland Management Directives. Please find our recommendations included herein.

Sincerely,

Dr. Poncho Ortega, Ph.D.
President,
Society for Range Management

SRM Comments to Proposed Rangeland Management Directives

SRM's comments and recommendations span four areas: General Comments, FSM 2200 – Rangeland Management, FSH- 2209.13 - Grazing Permit Administration Handbook, and FSH 2209.13 – Allotment Management Handbook

General Comments

There are several natural resource tools that that have been developed on an interagency basis that should be utilized to improve the coordinated management of rangelands. SRM recommend these tools be fully incorporated into these publications to support the interagency efforts of coordinated rangeland management. They include:

1. Multiple Indicator Monitoring (MIM) of Stream Channels and Streamside Vegetation, Technical Reference 1737-23, 2011, Department of Interior, Bureau of Land Management, National Operations Center, Denver, CO. A joint United States Forest Service and Bureau of Land Management publication.
2. Interpreting Indicators of Rangeland Health, Version 5. Tech Ref 1734-6. 2020. U.S. Department of the Interior, Bureau of Land Management, National Operations Center, Denver, CO.
3. Rangeland Ecological Site Descriptions:
    a. Rangeland Interagency Ecological Site Manual (*https://directives.sc.egov.usda.gov/OpenNonWebContent.aspx?content=27123.wba*)
    b. Interagency Ecological Site Handbook for Rangelands (*https://directives.sc.egov.usda.gov/OpenNonWebContent.aspx?content=33943.wba*)

FSM 2200 - RANGELAND MANAGEMENT

Chapter Zero Code

Section 2202 - Consolidates objectives for national forests and national grasslands into one section.

The terms ecological diversity and environmental quality under Objective 1 are not defined.

Any determinations whether ecological diversity is provided, and environmental quality is maintained or improved to achieve Objective 1 is entirely dependent upon how these terms are defined and evaluated. These terms must be clearly defined so the public knows what the expectation under Objective 1 is.

Section 2205 - Definitions

Add:

- Rangeland Health - "the degree to which the integrity of the soil, vegetation, water, and air, as well as the ecological processes of the rangeland ecosystem, are balanced and sustained." Integrity in this context means the "maintenance of the functional attributes characteristic of a locale, including normal variability."

- Rangeland Management - "manipulation of rangeland components to obtain optimum combination of goods and services for society on a sustained basis." Holechek et al

Section 2206 - References

Add the citations:

- Multiple Indicator Monitoring (MIM) of Stream Channels and Streamside Vegetation, Technical Reference 1737-23, 2011, Department of Interior, Bureau of Land Management, National Operations Center, Denver, CO. A joint United States Forest Service and Bureau of Land Management publication.
- Interpreting Indicators of Rangeland Health, Version 5. Tech Ref 1734-6. 2020. U.S. Department of the Interior, Bureau of Land Management, National Operations Center, Denver, CO.
    a. Rangeland Interagency Ecological Site Manual (*https://directives.sc.egov.usda.gov/OpenNonWebContent.aspx?content=27123.wba*)
    b. Interagency Ecological Site Handbook for Rangelands (*https://directives.sc.egov.usda.gov/OpenNonWebContent.aspx?content=33943.wba*)

FSH 2209.13 Grazing Permit Administration Handbook

95.1 – Types of Monitoring.

This section does not describe types of monitoring. Rename this section "Purpose of Monitoring".

95.2 – Monitoring and Evaluation Methods.

Rename this section "Types of Monitoring and Evaluation Methods" as this section does describe "types of monitoring" which are Implementation Monitoring and Effectiveness Monitoring.

"Implementation Monitoring" and "Effectiveness Monitoring" are 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, SRM suggest 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…"

2210 RANGELAND MANAGEMENT PLANNING

2210.2 - Objectives

In addition to the objectives set forth at FSM 2202, rangeland management planning should be carried out to further the following objectives:

- Ensure recognition and consideration of rangeland ecosystem health and rangeland management in Land Management Plans (LMPs).

Currently neither rangeland ecosystem health nor rangeland management are defined in the proposed directives. SRM recommends revising Objective 1 to read:

- Ensure recognition and consideration of *rangeland health* and rangeland management in Land Management Plans (LMPs).

Include the following in Chapter Zero Code 2205 Definitions:

- Rangeland Health- "the degree to which the integrity of the soil, vegetation, water, and air, as well as the ecological processes of the rangeland ecosystem, are balanced and sustained." Integrity in this context means the "maintenance of the functional attributes characteristic of a locale, including normal variability."
- Rangeland Management- "manipulation of rangeland components to obtain optimum combination of goods and services for society on a sustained basis." Holechek et al

CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING

The chapter continues to be renamed Rangeland Management Decision Making to clarify that it includes direction on planning and analysis, decision implementation, monitoring, and modifications in the use or activity based on monitoring results.

FSH 2209.16 – Allotment Management Handbook

The purpose of the Allotment Management Handbook is to provide assistance to forest officers in the management of rangelands, associated livestock grazing allotments, and other uses of rangelands.

Chapter 10 – Allotment Management and Administration

11.11 – Recommended Data for Determination of Rangeland Capability, page 20

4. Optional - Potential plant community production - from TEUI, Common Vegetation Unit, Common Land Unit, or Integrated Resource Inventory (IRI)

- Recommend changing from Optional to 'Use If Available' and including Ecological Site Description as a source.

11.12 – Recommended Process for Determination of Rangeland Capability, page 20

3. Subtract soil types that are not inherently capable of producing more than 200 pounds of forage/acre within their potential natural vommunity (such as badland outcrops, nutrient-poor

soils, shallow soils, or alkali salt flats). If a figure other than the "200 pounds per acre" is used, document the rationale.

In Section 11.11 (4) – Potential plant community production was listed as Optional. If not using TEUI, Common Vegetation Unit, etc., where does the justification for 200 pounds of forage/acre come from?

Community is misspelled. Shown as 'vommunity'.

11.21 – Recommended Data for Determination of Rangeland Suitability, page 23

2. Percent tree or unpalatable shrub canopy cover for NFS lands in the West (Regions 1-6) - from Field Sampled Vegetation (FSVeg) or from Common Vegetation Unit of IRI.

> "For example, timber stands with canopy cover greater than 70% mIRay be considered unsuitable. For NFS lands in the East (Regions 8-9), historic range of variability or potential for forage production may be substituted."

The word 'may' is misspelled. Shown as 'mIRay'.

16.3 – Conversion Based on Animal Weights, page 57

Conversion tables (16.4 below) are based primarily on forage consumption. For example, one Animal Unit (AU) is defined as the amount of forage consumed in a one-month period by a 1,000 pound cow, either dry or with calf up to six months of age, or the equivalent, based on a standardized amount of forage consumed (SRM 1989 – Third Edition, A Glossary of Terms Used in Range Management). An Animal Unit Month (AUM) is therefore one Animal Unit (AU) grazing for one Month. Generally, a figure of 26 pounds of air-dry forage per day (or 780 pounds per month) is used although this can vary significantly depending on the literature source cited.

26 pounds of air-dry forage per day (or 780 pounds per month) is not consistent with SRM Glossary. SRM Glossary states ' 26 pounds of oven-dry forage per day. Would recommend 30 pounds of air-dry forage per day. Below is definition from SRM Glossary:

Animal Unit: Considered to be one mature cow of about 1000 pounds (450kg) either dry or with calf up to 6 months of age, or their equivalent, consuming about 26 pounds (12kg) of forage/day on an oven-dry basis. Abbr. AU. cf. animal -unit-equivalent