

COMMENT	MANUAL OR HANDBOOK	RECOMMENDED CHANGE
1.	FSH 2209.13 Chapter 10 – Term Grazing Permits	Chapter 10 tries to fit National Grassland Grazing Associations’ Grazing Agreements into a kind of term grazing permit. The DPG Grazing Associations’ comments requested 123 times that Chapter 10 – Term Grazing Permits identify when a proposed directive apply to National Forests or to National Grasslands.
2.	FSH 2209.13 Chapter 20 – Grazing Agreements	Chapter 20 fails to recognize that the National Grasslands were founded under the Bankhead Jones Farm Tenant Act (BJFTA) and that 36 CFR 213.1(c) maintained the National Grasslands were to be managed by the FS “only so long the rules were consistent with the purposes of the BJFTA. Chapter 20 forces Grazing Agreements into “term grazing permits” for National Forests. The DPG Grazing Associations’ comments requested 80 times in Chapter 20 to delete “term grazing permits” or identified where the proposed directive did not apply to the National Grasslands.
3.	FSH 2209.13 Chapter 30 – Temporary Grazing and Livestock Use Permits	Chapter 30 applies to National Forest users. The DPG Grazing Associations comments request 24 times that the Forest Service identify what was specific to National Forests’ term grazing permits and what was specific to National Grasslands’ Grazing Agreements.
4.	FSH 2209.13 Chapter 60 – Records, Chapter 70 - Compensation for Permittee Interest in Rangeland Improvements	Chapter 60 & Chapter 70 apply to National Forest permittees; however, both chapters refer to the National Grasslands Grazing Associations. The LMGA supports the DPG Grazing Associations’ request to that the FS remove all reference to National Grasslands, Grazing Associations,

		Conservation Practices and Grazing Association members. A separate FSH for National Grasslands should be developed.
5.	FSH 2209.13 Chapter 80 – Grazing Fees	Chapter 80 contains 12 requests from the DPG Grazing Associations’ comments that the FS specify or identify how the National Grasslands fees differ from the National Forests.
6.	FSH 2209.13 Chapter 90 – Rangeland Management Decisionmaking	Chapter 90 contains 9 requests from the DPG Grazing Associations’ comments that the FS specify or identify how the National Grasslands rangeland management differs from the National Forests.
7.	FSH 2209.13 Chapter 20 - Grazing Agreements	“ Successional ” bae property is a phrase introduced in this chapter. Successional has never been defined before and is not in any regulations. Please drop “ successional ” from the directives.
8.	Conservation Practices	Conservation practices are land treatment and improvement measure necessary to carry out the provisions of the Grazing Agreement. The practices are structural and nonstructural that are necessary to administer a grazing program. Funding does not come from the Range Betterment Fund, which is specific to the National Forests. This is another reason why the National Grasslands should have separate regulations, policies, and procedures.
9.	FSH 2209.13 Chapter 80 – Grazing Fees Page 36, procedure #9 (Fee Credit Carried Forward for Approved Conservation Practices)	“The fees credited, because they are Forest Service funds, must be deposited in the project-specific account at the beginning of each grazing year...” The LMGA objects to the FS mandating this directive to the Grazing Associations. As documented in our DPG SGA: “Grazing Associations will maintain records related to the

		<p>administration of livestock grazing activities authorized by this Agreement that would otherwise be retained by the Forest Service if it were directly administering livestock grazing through Forest Service term grazing permits. Said records must include, but are not limited to: Association Member eligibility and qualification requirements; base property; Association grazing permits; documents pertaining to the investigation and enforcement of Association grazing permit terms and conditions; bills for collection; actual use records; lease agreements; <i>and land use practice costs to include detailed conservation practices, and administrative costs.</i></p>
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