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First name: Clare

Last name: Hydock

Organization:

Title:

Comments: General Comments

Wherever the terms [ldquo]his[rdquo], [ldquo]his/hers[rdquo], [ldquo]he/she/they[rdquo] or [ldquo]him/her[rdquo] is used please replace those with [ldquo]they[rdquo], [ldquo]their[rdquo], [ldquo]theirs[rdquo] or [ldquo]them[rdquo].

There seems to be several places where a paragraph break should be but isn[rsquo]t. It[rsquo]s probably just a formatting issue that will hopefully be cleaned up in the finalized directives.

Shouldn[rsquo]t the definition of permittee (FSM 2200, Zero Code, 2205 definitions, page 42) include married persons? If for no other reason, to be consistent throughout the rest of the directives.

I noticed that in many/all examples of married persons holding a term grazing permit, they are referred to as [ldquo]Tom and Mary[rdquo] or other male & female names; the traditional idea of married persons being a man and woman. If the Forest Service truly wants to be inclusive with these directives, as evidenced by removing the term [ldquo]husband and wife[rdquo] as an entity [ldquo][hellip]since most States now recognize same-sex marriages.[rdquo] (FSH 2209.13, Chapter 10, page 3), why not use same-sex names in some examples? It matters, especially given that these revised directives will most likely be in place for another 30 years or so.

Most exhibits or permittee references in Chapter 10 and elsewhere are also strongly male dominated: exhibit 15.1 on page 76; exhibit 16.31 on pages 115-116 and 118-119; exhibit 16.43 pages 137-138; section 18.3 page 158, paragraph 2 ([hellip]Mom and Dad add a son [hellip]); Chapter 60 page 8; Chapter 80 pages 52-55. To be truly inclusive some or all of these can be gender neutral, same-sex or female dominated. Again, it matters.

The 1990 MOU with the Farm Credit Banks needs to be updated again, to be gender neutral.

FSH 2209.13, Chapter 10, Section 12.21(a) [ndash] Conservation Easements & Agricultural Land Trusts

The last paragraph on page 42 says [ldquo]For example, if the husband and wife who have owned[hellip][rdquo] (emphasis added).

Replace [ldquo]husband and wife[rdquo] with [ldquo]married persons[rdquo] or [ldquo]married couple[rdquo].

FSH 2209.13, Chapter 10, Section 12.22 [ndash] Livestock Ownership Requirements

The last paragraph on page 44 talks about a modification to livestock ownership requirements and why it[rsquo]s not an exception since the older generation still retains ownership of the base property and a majority of the permitted livestock (emphasis added). Page 45 goes on to say that the permit holder[rsquo]s children or grandchildren may own up to 50% of the permitted livestock.

Shouldn[rsquo]t that percentage be something less than 50% (49% for example) since a 50/50 split doesn[rsquo]t leave a majority of the permitted livestock in the older generation[rsquo]s ownership?

Paragraph 5 on page 45 defines ownership of a majority of the permitted livestock as [ldquo](over 50%)[rdquo]; emphasis added. Therefore, the percentage in paragraph 1 must be/should be reduced.

FSH 2209.13, Chapter 10, Section 12.3 [ndash] Livestock Branding

The last paragraph on page 47, second sentence says: [ldquo]Since Colorado allows leasing of brands, the permittee could lease his brand to his neighbor.[rdquo] Emphasis added.

Replace [ldquo]his[rdquo] with [ldquo]their[rdquo].

FSH 2209.13, Chapter 10, Section 14.32 [ndash] Trusts and Estates

The first sentence of the second paragraph (page 69) has the wrong punctuation. You need a comma not a period after [ldquo][hellip]Freedom of Information Act of 1966 (5 U.S.C.552). He/she must retain[hellip][rdquo] Also replace [ldquo]he/she[rdquo] with [ldquo]they[rdquo].

FSH 2209.13, Chapter 10, Section 14.6 [ndash] Application and Approval of Grazing Involving Designated Driveways and Other Crossing of National Forest System Lands

The third paragraph (page 72) seems to belong under paragraph 1, since it[rsquo]s an example of how to include the crossing periods for current term permit holders.

Paragraph 2 addresses how to authorize a crossing permit for entities that aren[rsquo]t current term permit holders, so having that example follow this paragraph makes no sense since it addresses grazing on the Cabeza Allotment. If this entity doesn[rsquo]t have a term permit, wouldn[rsquo]t the crossing permit just show the dates of crossing (ex: Gravy Driveway 6/1-6/2 and 10/30-10/31)?

FSH 2209.13, Chapter 10, Section 15.1 [ndash] Permit Applicant and Preferred Applicant Status

Can you please make Exhibit 01, Sample Preferred Applicant Letter either gender neutral or female? The whole exhibit is male dominated (permit applicant Jim, current permittee Bob, and range specialist Brian) and while this might not seem like a big deal, it is! Research has shown that women (and people of color and members of the LGBTQ community) who don't see examples of themselves in policy documents tend to feel excluded.

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I found only one exhibit with a woman's name: exhibit 16.43 page 139.

FSH 2209.13, Chapter 10, Section 18.7 [ndash] Escrow Waivers

The first sentence of that paragraph says: [ldquo][hellip]where it is required of him by the lending[hellip][rdquo]. Replace with [ldquo]them[rdquo].

FSH 2209.13, Chapter 90, Rangeland Management Decisionmaking

Shouldn't [ldquo]Decisionmaking[rdquo] be two words?

First paragraph on page 6 has a typo in the second sentence: [ldquo]Such direction is complemented through[hellip]to ensure and adaptive management[hellip][rdquo] Should be [ldquo]an[rdquo].

Another typo on page 9, section 91.32, second sentence [ldquo][hellip](such as management areas and geographic areas.) that apply to[hellip][rdquo] Delete the period after [ldquo]areas[rdquo].

This concludes my comments. Thank you for the opportunity.

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