



---

February 12, 2021

U.S. Forest Service  
Ms. Kara Chadwick, Director  
Forest Management, Range Management and Vegetation Ecology  
201 14th Street SW  
Washington, DC 20250-1124.

Electronically submitted to:

<https://cara.ecosystem-management.org/Public/CommentInput?project=ORMS-2514>

**RE: Proposed Updates to the US Forest Service (USFS) Rangeland Management Directives comprised of Forest Service Manual (FSM) 2200, Forest Service Handbook (FSH) 2209.13 and FSH 2209.16**

Dear Ms. Chadwick:

The Arizona Game and Fish Department (Department) appreciates the opportunity to review the proposed updates to the United States Forest Service (USFS) rangeland management directives in the Forest Service Manual (FSM) 2200, Forest Service Handbook (FSH) 2209.13 and FSH 2209.16. The Department understands that the updates are intended to modernize directives, clarify guidance, and incorporate recent legislation and case law.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission (Commission), has jurisdictional authority and public trust responsibilities to protect and conserve the state fish and wildlife resources. In addition, the Department manages threatened and endangered species through authorities of Section 6 of the Endangered Species Act and the Department's 10(a)1(A) permit. It is the mission of the Department to conserve and protect Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

Additionally, the *Master Memorandum of Understanding between the U.S. Department of Agriculture, Forest Service, Southwest Region, and the Arizona Game and Fish Commission and Department* describes extensive opportunities for cooperation, collaboration, and coordination on management of fish and wildlife habitats on USFS land in Arizona. For your consideration, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and recreation.

The Department appreciates efforts to update the Rangeland Management Directives and the opportunity for USFS emphasis on coordination, cooperation, and collaboration with the state fish and wildlife agencies due to their special expertise, state trust responsibilities, and

---

azgfd.gov | 602.942.3000

5000 W. CAREFREE HIGHWAY, PHOENIX AZ 85086

GOVERNOR: DOUGLAS A. DUCEY COMMISSIONERS: CHAIRMAN KURT R. DAVIS, PHOENIX | LELAND S. "BILL" BRAKE, ELGIN  
JAMES E. GOUGHNOUR, PAYSON | TODD G. GEILER, PRESCOTT | CLAY HERNANDEZ, TUCSON DIRECTOR: TY E. GRAY DEPUTY DIRECTOR: TOM P. FINLEY

jurisdictions across rangelands within the directives. This includes, but is not limited to: rangeland capability, suitability, fencing and wildlife related improvements standards and specifications, recreational access, transmittable disease and vegetation management. Further, the Department would like to encourage the USFS to implement the National Environmental Policy Act (NEPA) process (the analysis of impacts and the decision) where feasible as it ensures decision making is based on the best available science. Any deviations from NEPA process should be avoided to maintain transparency and consistency of the actions. The Department offers page specific comments in the attached matrix to assist in providing clarity to our comments in relation to the regulations.

Thank you for the opportunity to provide input on the proposed updates to the rangeland management directives. For further coordination, please contact Tracy C. Bazelman at [tbazelman@azgfd.gov](mailto:tbazelman@azgfd.gov) or 623-236-7513.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Luke Thompson', with a stylized flourish at the end.

Luke Thompson  
Habitat, Evaluation, And Lands Branch Chief

AZGFD # M20-12213232

**M20-12213232 AZGFD Comment Matrix - Proposed Updates to the US Forest Service (FS) Rangeland Management Directives Forest Service Manual (FSM) 2200, Chapters Zero, 10, 20, 30, 40, 50 and 70; Forest Service Handbook (FSH) 2209.13, Chapters 10, 20, 30, 40, 50, 60, 70, 80 and 90; and FSH 2209.16, Chapter 10**

Page	Chapter	Section	Topic	Action Requested
5	FSH 2200 Chapter 2240	2240.3	Policy	The Department recommends language be added to state, to the extent practical, "improvements should avoid, minimize and/or mitigate for adverse impacts to fish and wildlife resources."
9	FSH 2200 Chapter 2240	2242.1	Vegetation Management	The Department recommends that animals with the largest probability to carry disease like sheep and goats be discouraged for vegetation control; unless emphasis is placed on the appropriateness and feasibility with the least potential for outbreak spread. Utilization of these species would require close management to ensure disease transmission would not occur.
6	FSH 2200 Chapter 2250	2251	Cooperation	The Department recommends including the state wildlife agency as a cooperator in this list per their state trust authority and jurisdiction.
9	FSH 2200 Chapter 2250	2252.22	Cooperation regarding transmittable disease	The Department recommends language be added to work with state fish and wildlife agencies to control outbreaks to prevent the potential spread of disease from domestic livestock to wildlife. This section should also be expanded beyond cattle disease transmission to include domestic sheep and goat, etc.
22	FSH 2209.13 Chapter 90	95	Monitoring	"After being properly trained in the monitoring method(s), permittees may be able to assist in independently conducting allotment monitoring." As stated in this section, monitoring is critical to achieving rangeland management objectives. Consideration should be given to allowing for shared responsibility in monitoring and/or a process for independent ground truthing conditions. This would provide transparency and consistency to the data to ensure decision making is based on rigor.

**M20-12213232 AZGFD Comment Matrix - Proposed Updates to the US Forest Service (FS) Rangeland Management Directives Forest Service Manual (FSM) 2200, Chapters Zero, 10, 20, 30, 40, 50 and 70; Forest Service Handbook (FSH) 2209.13, Chapters 10, 20, 30, 40, 50, 60, 70, 80 and 90; and FSH 2209.16, Chapter 10**

Page	Chapter	Section	Topic	Action Requested
104	FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK CHAPTER 10 – TERM GRAZING PERMITS	16.11	Modification Procedure	<p>"If there is no current and sufficient project level NEPA analysis and decision, the authorized officer may still make an administrative decision to increase or decrease permitted numbers and/or seasons, provided appropriate and sufficient monitoring information indicates such action is warranted. The authorized officer should not wait for NEPA analysis to modify a permit when sufficient monitoring and rationale documentation indicates a need for modification. The authorized officer will follow guidance in sections 16.12 through 16.15."</p> <p>It is unclear how providing for an authorized officer to take an action (increasing permitted numbers and/or seasons) without current and sufficient NEPA analysis and decision is consistent with NEPA, even if "sufficient monitoring and rationale documentation indicates a need for modification". Please clarify what constitutes "sufficient monitoring and rationale".</p>
20	FSH 2209.16 Chapter 10	11.11	Rangeland Capability, 7. Riparian delineation	The Riparian Buffer Delineation Model used to determine Riparian delineation information appears to be outdated. The Department recommends the USFS consider using more recent USFS's models such as the Regional Riparian Mapping Project (aka RMAP) used in the Southwest Region's Riparian and Aquatic Ecosystem Strategy (2019). In addition, the soil mapping should consider previous fire soil burn severity within fire scares leading to habitat conversions and invasive species encroachment.
23	FSH 2209.16 Chapter 10	11.21	Rangeland Suitability	The Department recommends wildlife areas, special management areas, and riparian areas etc. as designated under the forest plan also be included as basic information needed to complete the suitability portion of the capability assessment.
45	FSH 2209.16 Chapter 10	15.42	Standards and Specifications, Fences	Some of the regionally approved standards and specifications appear to be outdated. Consider updating Standards to reflect the best available scientific information. In addition, the Department recommends language be included to encourage the regional staff to work with state fish and wildlife agencies where appropriate for projects such as wildlife friendly fencing and water for wildlife etc. for cooperative funding to benefit rangeland health, and the equitable sharing of resources among livestock and wildlife.

<b>M20-12213232 AZGFD Comment Matrix - Proposed Updates to the US Forest Service (FS) Rangeland Management Directives Forest Service Manual (FSM) 2200, Chapters Zero, 10, 20, 30, 40, 50 and 70; Forest Service Handbook (FSH) 2209.13, Chapters 10, 20, 30, 40, 50, 60, 70, 80 and 90; and FSH 2209.16, Chapter 10</b>				
<b>Page</b>	<b>Chapter</b>	<b>Section</b>	<b>Topic</b>	<b>Action Requested</b>
47	FSH 2209.16 Chapter 10	15.45	Cooperation with other agencies	The Department recommends there be a greater emphasis to encourage collaboration and cooperation with the state fish and wildlife agency. Such collaboration is often essential for working through agreements such as Coordinated Resource Management Plans and other plans as required through Natural Resources Conservation Service for some grant processes. This can provide essential early coordination and potential for cooperative funding.
50	FSH 2209.16 Chapter 10	15.5	Recreation	Maintaining recreational access is a priority for the Department, and recommends language be added to encourage working with the state fish and wildlife agency for access agreements to allow access to the public, fund signage and gating options, and maintain fencing.