Comments on Proposed Revisions to

USFS Rangeland Management Directives

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| Section | Topic | Proposed Comment |  |
| seriatim | Proposed revisions | We have reviewed the Proposed Revisions to the USFS Rangeland Management Directives. It is an extensive document. It would be appropriate to include a redline to identify and evaluate the changes. |  |
| **Chapter 2210--Rangeland Management Planning** | | | |
| 2210.2 | Objectives: Those in section 2202 are supplemented. No. 3: “Provide for management of rangeland ecosystems and efficient accomplishment of land management goals and objectives in coordination with user groups and individuals.” | Section 2210.2: There is a reference to a “user group” or “user individual” What are these? They are not defined in section 2205. |  |
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| **Chapter 2250—Rangeland management Cooperation** | | | |
| 2252.21 | “Most Allotment Management Plans and Annual Operating Instructions (or similar document) address the disposal of dead animals, but that has typically applied to an animal dying of “natural causes” or being struck by lightning, etc. In such cases, burying and burning are no longer acceptable forms of disposal of the dead animal; instead, the permittee needs to remove the animal or call a rendering service to do so.” | Section 2252.21: To the extent APHIS is responsible for investigating deaths to determine if a wolf, for example, killed the animal, the animal must be left in place. Even thereafter, this is a burdensome obligation to place on ranchers in remote locations for which doing so is impractical. |  |
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| **Chapter 90—Rangeland Management Decision Making** | | | |
| 90 | Discusses Land Management Plans (LMPs) | Chapter 90: Is the Land Management Plan the same as a Forest Plan? If so, you should define Land Management Plan in section 2205 to include a Forest Plan. |
| 91.38 | “It is strongly recommended to analyze conditions in vacant allotments in the project area in case conditions or resource needs in the future could allow for intermittent grazing or restocking of the vacant allotment. | Section 91.38: We concur that vacant allotments should be assigned or made available for use on a routine basis so that fences and improvements are maintained. |
| 91.39 | Relatively extensive discussion of “adaptive management.” Defined as “system of management practices based on clearly identified intended outcomes and monitoring to determine if management actions are meeting those outcomes; and, if not, to facilitate management changes that will best ensure that those outcomes are met or re-evaluated. Adaptive management stems from the recognition that knowledge about natural resource systems is sometimes uncertain.” | Section 91.39: The description of “adaptive management” is vague; it would appears to authorize the USFS to do whatever it wants. |  |
| 94.31 | Inserts a new section to address attendance in annual meetings by outside parties. Provides that “AOI meetings are not open to the public.” | Section 94.31: We agree. If grazing has been authorized, the AOI meeting should not be sabotaged by groups opposed to grazing. |  |