

Data Submitted (UTC 11): 2/10/2021 5:56:46 PM

First name: Jeffrey

Last name: Burgess

Organization:

Title:

Comments: Below are my comments regarding your proposed Forest Service Manual revisions:

FSM 2200

Chapter 2230

2230.3 - Policy, 5.

"Execute grazing agreements with State-recognized grazing associations, where possible and practical, to facilitate more integrated management of rangeland resources on NFS lands and on lands owned or controlled by the grazing association and its members."

These types of private agreements may violate the Federal Advisory Committee Act.

2230.3 - Policy, 9.

"Provide compensation for the current permittees' interests in authorized permanent rangeland improvements on NFS lands in the sixteen contiguous Western States as well as on the national grasslands in Texas, in cases where a permit is cancelled, in whole or in part, in order to devote the lands covered by a permit to another public purpose that precludes livestock grazing as provided in FSM 2248."

This proposed policy fails to mention that many range improvements were paid for in part, or entirely, by government assistance programs. Permittees should not be compensated for anything more than what they personally contributed to their construction.

2231 - Term Grazing Permits, 5.

"Provide opportunities that support the continued presence of working ranches and farms as they are necessary to maintain the open spaces that are needed for vistas, recreation opportunities, and to retain habitat and migration corridors for native species."

This is a red herring argument. There is little real connection between preserving public land ranches and "open spaces." For example, even if public land ranching is ended, the public land will remain undeveloped. Also, ranch base properties are already "developed" so replacing ranch buildings with houses isn't a very big difference in regards to open space and wildlife habitat.

Chapter 2240

2247.31 - Permittee Contributions

"Permit modifications need to (1) specify any degree of cost-sharing (50 percent is the generally accepted contribution); and (2) accept contributions in the form of labor, materials, and/or equipment, as well as direct funding."

Permittees should not be able to count the cost of labor towards meeting their 50% contribution for range improvement projects. They are already laboring on their ranches. An exception might be made for when they have to hire additional help to get the project completed. Furthermore, permittees should not be allowed to hire neighboring permittees for labor.

2248.2 - Compensation Determination

"Any portion of improvement funding derived from appropriated funds, including Range Betterment Funds, is not eligible for compensation under this provision."

This should be clarified to include all Federal assistance, such as Environmental Quality Incentives Program (EQIP) monies. Furthermore, it should be clarified to include any state government financial assistance that was used to help fund the construction of the range improvement.

Chapter 2250

2250.3 - Policy

This policy should explicitly state that range cooperation includes keeping the general public regularly informed online about each Forest's ongoing livestock grazing management decisions.