



# THE WILDLIFE SOCIETY

*Leaders in Wildlife Science, Management and Conservation*

15 April 2021

United States Forest Service  
Director, Forest Management, Range Management and Vegetation Ecology  
201 14<sup>th</sup> Street SW, Suite 3SE  
Washington, DC 20250-1124

**RE: USDA-FS-Proposed Changes to Rangeland Management Directives #ORMS-2514  
(Federal Register Notices Dated December 18, 2020, and February 11, 2021)**

Dear Director:

We are submitting these comments in response to the Forest Service's (FS) request regarding proposed changes to its current range management directives. The proposed changes provide revised and additional directives for rangeland management and livestock grazing on the national grasslands and forests, which could have large effects on wildlife populations, wildlife habitat, and their management. The Wildlife Society's Rangeland Wildlife Working Group, experts in the field of rangeland ecology and management, led our review of the directives and we appreciate the opportunity to comment on this important matter.

Founded in 1937, The Wildlife Society (TWS, [wildlife.org](http://wildlife.org)) and our network of affiliated chapters and sections represent over 15,000 wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our members include current and retired wildlife and rangeland educators, managers, plant and grassland ecologists, biologists, scientists and others from state, provincial, tribal, and federal agencies, academic and private institutions. TWS is committed to bringing science to national and international wildlife issues throughout the world.

The Wildlife Society views the Forest Service management directives and proposed changes as being of national significance and scope, given that livestock grazing occurs on over 102 million acres of national forest system lands across 29 states. The national grasslands and forests impacted by these changes provide habitat for a diverse array of terrestrial and aquatic species. Not only is livestock grazing one of the major multiple uses on these lands, it is also a valuable vegetation-management tool.

The Wildlife Society recognizes the administration of livestock grazing on national forest system lands is complex and often controversial. TWS members have seen successful rangeland management outcomes and balanced land stewardship where interdisciplinary teams of rangeland managers work with grazing associations and direct permittees in designing, implementing and monitoring well-planned livestock grazing strategies on the public rangelands. These successful outcomes are possible when rangeland goals, objectives, standards and guidelines in land management plans (LMP) are successfully transferred into well designed allotment management plans (AMP) and implemented on the ground.

Our Rangeland Wildlife Working Group provided comments and recommendations on both current (unchanged) and proposed directives. Many of the comments and recommendations follow the concepts and principles outlined in the following TWS position and issue statements:

*Livestock Grazing on Rangelands in the Western United States*, [TWS Position Statement: Livestock Grazing on Rangelands in the Western United States - THE WILDLIFE SOCIETY](#)

*Incorporating Wildlife Needs in Land Management Plans*, [TWS Position Statement: Incorporating Wildlife Needs in Land Management Plans - THE WILDLIFE SOCIETY](#)

*Conserving Biological Diversity*, [TWS Standing Position: Conserving Biological Diversity - THE WILDLIFE SOCIETY](#)

*The Use of Science in Policy and Management Decisions*, [TWS Standing Position: The Use of Science in Policy and Management Decisions - THE WILDLIFE SOCIETY](#)

*Domestic Sheep and Goat Disease Transmission Risk to Wild Sheep*, a joint issue statement between TWS and the American Association of Wildlife Veterinarians, [TWS and AAJV Joint Issue Statement: Domestic Sheep and Goats Disease Transmission Risk to Wild Sheep - THE WILDLIFE SOCIETY](#)

### **Administered to Standard**

FSM 2205 (Definitions), FSH 2209.16 (Chapter 10, Sections 12 and 12.1). The Wildlife Society recognizes that limited rangeland management staff, including both range conservationists and wildlife management biologists, restricts the number of USFS allotments that can be inspected and monitored annually. This situation requires that a subset of allotments be prioritized for annual inspections and monitoring. While rangeland management directives call for interdisciplinary teams to work with grazing associations, direct permittees, and other interested parties in developing allotment objectives and management strategies, an interdisciplinary approach to monitoring and assessing the effectiveness of management strategies in achieving LMP and AMP objectives, standards and guidelines is not specified in the current rangeland directives. TWS suggests the following modifications (**in bold**) to the 8<sup>th</sup> paragraph under Section 12 (Allotment Administration):

Administered to standard also requires inspection of the allotment at least once during the grazing year or grazing season, making a determination of whether the management is in compliance with resource management direction and grazing permit terms and conditions. **An interdisciplinary team of qualified resource management specialists should conduct compliance inspections. Where workforce capacity is limited, interdisciplinary teams should conduct inspections on at least the highest priority allotments. Ideally, the interdisciplinary team should consist of range conservationists, wildlife management biologists, soil and water specialists and other resource specialists as needed.** The results of the inspection(s) must be documented, and also include annual monitoring results.

FSH 2209.16 (Chapter 10, Section 12). Item 3 in this section discusses allotment evaluations to determine the effectiveness of management actions in *meeting or moving towards* desired conditions in a timely manner. The assessment of “meeting or moving towards” in a timely manner is also used in FSH 2209.13 (Chapter 90) and in multiple other locations in the rangeland management directives. To remove some of the ambiguity associated with “moving towards”, TWS recommends that this terminology be modified (**in bold**) throughout the directives to read “meeting or moving towards desired conditions in a **measurable** and timely manner. Adding the word **measurable** to the determination implies that monitoring data have been collected and evaluated in making the determination and is not merely a subjective determination vulnerable to legal or procedural challenges.

### **Rescissions Act of 1995 and Allotment NEPA Schedule**

FSH 2209.13, Chapter 90 (Section 93.1). It is our understanding that there are grazing allotments going through an entire LMP revision cycle without being scheduled for revision and NEPA analysis. The result is current LMP goals, objectives, standards, and guidelines are not incorporated into all AMPs. We are unaware of the actual number of allotments that are being deferred indefinitely from LMP direction and compliance. As indicated in this directive, the criteria for determining the priority and timing for NEPA analysis for grazing allotments are provided in 43 U.S.C. 1752(i). Because of this, it is important that interdisciplinary teams evaluate allotments to make recommendations to the deciding official on which allotments should be prioritized in the National Allotment NEPA Schedule for NEPA analysis. TWS suggests the following addition be located in this directive following the two prioritization criteria listed at the end of this directive:

Interdisciplinary teams consisting of range conservationists, wildlife management biologists and preferably other resource specialists will develop and provide the deciding official a recommended priority allotment list for each national grassland and forest with a significant livestock grazing program. Preferably, team members should be qualified at the journey-level for their area of expertise and have training in the livestock grazing permit and allotment administration systems.

The Wildlife Society also recommends that, in response to the backlog of AMP revisions to incorporate LMP direction, the determination of “administered to standard” be modified and expanded to read “administered to AMP standard” or “administered to AMP and LMP standard”. This would address the issue of an allotment being classified as “administered to standard” when rangeland resource conditions in the allotment may not meet LMP direction that is yet to be incorporated into the AMP.

### **Management Flexibility**

FSH 2209.13, Chapter 10 (Section 15.32). To increase the likelihood of successful resource management outcomes with the “variable numbers and seasons” strategy, TWS recommends

criteria that clarify when variable numbers and seasons will be considered and approved. As a minimum, TWS recommends adding the following criteria:

- a). Allotment is already being administered to standard.
- b). Grazing association member or direct permittee has demonstrated a willingness and ability to manage the allotment(s) in compliance with LMP and AMP direction and in the public interest.

The phrase “in the public interest” is also used in FSM 2203 (Policy #13) where the directives state that it is the policy of the rangeland management program “to encourage user groups to assist in administering rangeland resources on NFS lands where such groups clearly demonstrate the experience and ability to participate in resource management in the public interest.”

### **Forage Reserves**

FSH 2209.13, Chapter 10 (section 10.13); FSH 2209.16, Chapter 10 (sections 17, 17.1, 17.12, 17.13). We are aware that making provision for forage reserves is not a new strategy. It was not uncommon prior to the 1980s for USFS to make provision for swing pastures (forage reserves) on NFS lands for displaced livestock. Swing pastures also provided opportunities for enhancing rangeland heterogeneity (rested and lightly-grazed areas) when not needed for displaced livestock. However, use of swing pastures diminished beginning in the 1990s with the forage capacity in many of those areas eventually being committed to annual grazing through term grazing permits. These actions resulted in reduced management flexibility for the USFS to respond to changing resource conditions and management needs. We also understand that maintenance of rangeland infrastructure in forage reserves can be an issue. However, TWS sees these expanded directives for authorizing forage-reserve allotments on national grasslands and forests as an opportunity to add to the tool box and increase management flexibility.

The Wildlife Society recommends an additional directive be added to FSH 2209.16, Chapter 10 (section 17.13) that calls for each national grassland or forest with a significant livestock grazing program to address forage reserve allocations during LMP revisions or amendments. In this manner, the need for increased management flexibility through forage reserves (and other strategies) could be assessed and addressed proactively at broader landscape scales.

### **Third Party Permit Buyouts**

FSH 2209.13, Chapter 10 (Section 13.7), FSH 2209.16, Chapter 10 (Section 10.6). The proposed directives and policy prevent the use of third party permit buyouts to close allotments to mitigate resource conflicts on public rangelands. Permit buyouts commonly involve disease transmission issues between livestock and wild sheep. Some stakeholders view permit buyouts to close allotments as the only option on the table and available to them for resolving otherwise unresolvable conflicts. Although the directives and proposed changes fail to clearly articulate other conflict-resolution alternatives, the directives and discussions in FSH 2209.16 on rangeland

capability and suitability determinations during LMP revisions seem to indicate that NFS lands capable of supporting livestock grazing can be classified and determined unsuitable for livestock grazing to resolve conflicts involving livestock. We assume that an unsuitable determination could be considered and made during either LMP revisions or amendments for those NFS lands where the conflict is occurring. TWS does not have any specific recommended changes to the directives at this time but recommends the USFS attempt to provide better clarification in the final directives on viable and reasonable alternatives to permit buyouts, in step with the current focus on increasing management flexibility to address changing resource conditions and conflicts. Alternatives for increasing management flexibility should also include viable and reasonable options for enhancing rangeland heterogeneity, such as annual rest and light grazing intensities.

Science supporting rangeland and grassland heterogeneity as a basis for rangeland management planning is becoming more prevalent and reflects a changing perspective on rangeland management<sup>1</sup>. TWS recommends the USFS also provide better clarification in the final directives on viable and reasonable alternatives to permit buyouts to better support rangeland heterogeneity management strategies.

### **Disease Risk to Wild Sheep**

There are considerable directives in FSM 2252.2 on contagious and transmittable livestock diseases, some of which pose risks to humans. However, there is no mention of disease risks to wild sheep resulting from comingling with domestic sheep or goats. TWS suggests additional consideration of disease transmission from domestic sheep and goats to wild sheep on or near NFS lands.

FSM 2252.3. To help reduce disease risks to wild sheep from comingling with livestock, TWS recommends the following directive be added to this section:

Upon locating stray livestock (domestic sheep or goats) in areas on or near NFS lands known to be occupied by wild sheep, Forest Service staff shall immediately contact and inform state wildlife officials.

FSH 2209.13, Chapter 10 (Section 16.14). To help reduce disease risks to wild sheep from comingling with livestock, TWS recommends the following modification (**in bold**) to the 4<sup>th</sup> paragraph of this section:

The permit and the AMP must be updated to reflect any conversion in kind or class of livestock. **Upon request from a grazing permittee to convert a grazing permit to domestic sheep or goats in an area on or near NFS lands known to be occupied by wild sheep, Forest Service staff shall notify state wildlife officials for early input prior to a final decision on modifying the permit.**

## **Adaptive Management and Monitoring Workload**

FSH 2209.13, Chapter 90 (Sections 91.39 and 96.2). TWS is aware and recognizes that the current AMP monitoring workload already exceeds workforce capacity and that some monitoring to support traditional and existing adaptive management AMPs is not getting done. The workload associated with assessing rangeland health, rangeland productivity, riparian and wetland conditions, soil stability, water quality, wildlife habitat, upland cover, and other resource values remains a daunting task. This monitoring backlog will only grow with the increasing use of adaptive management that is by nature monitoring-intensive. In some cases, allotment management decisions involving controversial resource issues defer difficult decisions in favor of additional years of monitoring under an adaptive management approach. When the future monitoring fails to get completed on these allotments, resource degradation and unresolved conflict can continue indefinitely. TWS recommends the following addition to these directives:

New decisions to use adaptive management approaches to allotment management planning and administration should be supported by a relatively high certainty and commitment to future prescribed monitoring, without sacrificing other existing AMP monitoring priorities on the Ranger District.

## **Rangeland Management Cooperation**

FSM 2253. There are interagency memorandums of understandings (MOU) between each state wildlife agency and respective Regional Forester that document formal agreements involving management of wildlife and wildlife habitat on NFS rangelands, wetlands and forests. TWS recommends these MOUs be highlighted and included in the national directives and suggests the following addition:

There are existing MOUs between each Regional Forester and state wildlife agency containing formal agreements on the management of wildlife on NFS rangelands, wetlands, and forests. These MOUs also detail the processes of interagency cooperation and collaboration.

## **Workforce Capacity and Training:**

FSM 2203, Chapter Zero Code (Policy #15). The Wildlife Society recognizes the USFS needs expanded workforce capacity to better meet its rangeland management responsibilities. TWS recommends the USFS seek to develop and implement rangeland management cross-training to increase the number of wildlife management biologists and other resource specialists that are knowledgeable in working within the grazing permit and allotment administration systems. With the accelerated hiring of wildlife management biologists beginning in the 1970s, both the USFS and Bureau of Land Management initially provided cross-training opportunities for new staff in the livestock grazing permit system and how to effectively participate in the allotment management planning process. In line with these observations, TWS recommends the following modification (**in bold**) to this directive:

15. Optimize rangeland management specialist expertise within the Forest Service by recruiting and retaining strong candidates from land grant universities and other colleges, encouraging transfers from other agencies and organizations, involving permittees and others in training and monitoring efforts, and through attendance and involvement with professional societies, industry groups, and other organizations. **Develop and provide cross-training opportunities in the livestock grazing permit and allotment administration systems for wildlife management biologists and other resource specialists. This training should focus on, as a minimum, how to effectively participate in the allotment management planning and administration processes.**

TWS recognizes the challenges the USFS faces as a public land management agency in a complex multiple-use arena. We hope the comments and recommendations from our Rangeland Wildlife Working Group help the USFS in updating and developing directives that support the name change in FSM 2200 from range to the broader context of rangeland management.

Any questions on these comments can be directed to Caroline Murphy, government relations manager at The Wildlife Society (301-897-9770 x 308). We appreciate your review of these comments, and look forward to seeing the final directives.

Sincerely,



Carol L. Chambers, PhD  
President, The Wildlife Society

<sup>1</sup> Fuhlendorf, S. D., R. W. S. Fynn, D. A. McGranahan, and D. Tidwell. 2017. Heterogeneity as a basis for rangeland management. Pages 169-196 in D. D. Briske, editor. Rangeland systems: processes, management and challenges. Springer Open, Cham, Switzerland.