



FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING

Amendment No.: 2209.13-2020-9

Effective Date:

Duration: This amendment is effective until superseded or removed.

Approved:

Associate Deputy Chief

Date Approved:

Posting Instructions: Amendments are numbered consecutively by Handbook number and calendar year. Post by document; remove the entire document and replace it with this amendment. Retain this transmittal as the first page(s) of this document. The last amendment to this Handbook was 2209.13-2005-10 to 2209.13_90.

New Document	2209.13_90	26 Pages
Superseded Document(s) by Issuance Number and Effective Date	2209.13_90 (Amendment 2209.13-2005-10, 09/09/2005) 2209.13,90 (Amendment 2209.13-2004-1, 02/17/2004) Interim Directive 2209.13-97-1 (09/26/1997) (Procedures for Authorizing Grazing)	18 Pages 17 Pages 22 Pages

Digest:

This chapter retains the incorporated and revised direction on range management planning previously located in FSM 2210, 2211, 2212, 2213, 2214, and 2215.

The chapter continues to be renamed Rangeland Management Decision Making to clarify that it includes direction on planning and analysis, decision implementation, monitoring, and modifications in the use or activity based on monitoring results.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

Digest--Continued:

90 - Clarifies the decisions related to rangelands made in Land Management Plans (programmatic planning level) and how Land Management Plans relate to grazing authorizations.

91 - Clarifies the role of the “plan-to-project” NFMA analysis process in rangeland management decision making and the use of adaptive management in decision planning and implementation.

91.3b - Exhibit 01 - Inserts an example of a Plan-to-Project matrix to compare existing condition to desired condition.

91.3g - Provides a concise definition and discussion of Purpose and Need.

91.3h - Adds a new discussion concerning the components of a complete proposed action statement and how it relates to the development or revision of an Allotment Management Plan.

91.3i - Provides expanded discussion and additional examples of adaptive management options and flexibility.

92 - Expands the discussion of site-specific planning or project level decision process for rangeland management.

93 - Retains the method by which requirements of other Federal laws like the Rescissions Act (Section 504), the Endangered Species Act, the National Historic Preservation Act, and the Clean Water Act can be satisfied through site-specific analysis conducted pursuant to the National Environmental Policy Act.

94 - Clarifies the relationship between the project level National Environmental Policy Act decision to authorize grazing and the Allotment Management Plan, the annual operating instructions, and the grazing permit. Continues the requirement that the Allotment Management Plan is attached to and made a part of the term grazing permit.

94.3 - Explains the proper use of Annual Operating Instructions and lists the limited information they should contain in order to avoid further court rulings that they are being used as “final agency action” documents.

94.3 - Further states that Annual Operating Instructions are not required by regulation, are only long-time agency policy and procedure, and serve to document the annual business matters between the grazing permittee and agency personnel for the coming grazing season.

94.31 - Inserts a new section to address attendance in annual meetings by outside parties.

95 - Expands the discussion and direction on monitoring.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

Digest--Continued:

95.3 - Expands the discussion on cooperative permittee monitoring.

96 - Provides direction regarding when existing environmental analysis are sufficient and completion of a new analysis for an allotment(s) is not required. Also explains when monitoring results require adaptive management implementation, and whether further site-specific analysis is required before needed or proposed grazing adjustments can be implemented.

97 - Moves all information regarding allotment administration, inspections, documentation, and compliance to FSH 2209.16, Allotment Management Handbook.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

Table of Contents

90 - RANGELAND MANAGEMENT DIRECTION IN LAND MANAGEMENT PLANNING (PROGRAMMATIC PLANNING LEVEL)	6
90.1 - Consistency with the Land Management Plan	6
90.2 - Relationship of Land Management Plans to the Grazing Permit	6
90.3 - Actions Taken During Routine Grazing Permit Administration	7
91 - PLAN-TO-PROJECT (NFMA) ANALYSIS	7
91.1 - Phases of Rangeland Management Planning	7
91.2 - Relationship of Large Scale Assessments to Project-Level Decisions	8
91.3 - Determinations Made During Plan-to-Project Analysis in Preparation for a Project-Level Proposal	8
91.31 - Description of Existing Conditions	9
91.32 - Description of Desired Conditions	9
91.33 - Identification of Resource Management Needs	9
91.34 - Identification of Information Needs	10
91.35 - Possible Management Practices	11
91.36 - Decision Framework	11
91.37 - Purpose and Need	12
91.38 - Proposed Action	12
91.39 - Proposed Action -- Adaptive Management	13
92 - PROJECT-LEVEL PLANNING AND NEPA COMPLIANCE	14
92.1 - Alternatives	15
92.2 - Effects of Alternatives	15
92.3 - Documentation	16
93 - INTEGRATION OF OTHER LEGAL REQUIREMENTS INTO THE RANGELAND MANAGEMENT DECISIONMAKING PROCESS	16
93.1 - Section 504 of the Rescissions Act of 1995 and the Range NEPA Schedule	16
93.2 - Endangered Species Act (ESA)	17
93.3 - National Historic Preservation Act (NHPA)	17
93.4 - Clean Water Act (CWA)	17
94 - GRAZING AUTHORIZATIONS	18
94.1 - Allotment Management Plans (AMPs)	18
94.2 - Grazing Permits	19
94.3 - Annual Operating Instructions (AOIs) or Other Similar Documents	19
94.31 - Participation and Attendance in Annual Meetings by Outside Parties	20
95 - MONITORING	21
95.1 - Types of Monitoring	22
95.2 - Monitoring and Evaluation Methods	22
95.3 - Permittee Monitoring	23
96 - REVIEW OF DECISIONS AND NEEDED MODIFICATIONS TO GRAZING AND ALLOTMENT MANAGEMENT	24
96.1 - Modifications Not Requiring New Decisions	24

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

96.2 - Adaptive Management Modifications 24

96.3 - Determining If a Review of the Existing Project Level Decision is Needed 25

**97 - ALLOTMENT ADMINISTRATION, INSPECTIONS, DOCUMENTATION, AND
COMPLIANCE 25**

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING****90 - RANGELAND MANAGEMENT DIRECTION IN LAND MANAGEMENT
PLANNING (PROGRAMMATIC PLANNING LEVEL)**

Land management plans (LMPs) typically determine what areas are suitable (appropriate) for grazing and browsing animals and establishes programmatic direction and guidance for grazing activities by developing plan components – desired conditions, objectives, standards, guidelines, and suitability. Such direction is complimented through the development of monitoring requirements to ensure and adaptive management approach. Although an area may be deemed suitable for use by livestock in a LMP, a project-level decision evaluating the site-specific impacts of the grazing activity, in conformance with NEPA, is required in order to authorize livestock grazing on specific allotment(s). The terms and conditions in a grazing permit that has expired, or was terminated due to a grazing preference transfer, will be continued under a new permit until the site-specific environmental analysis is completed. (43 U.S.C. §1752(c)(2)). See FSM 1920 and FSH 1909.12 for basic direction for addressing rangeland resources in LMPs.

90.1 - Consistency with the Land Management Plan

Under the National Forest Management Act of 1976 (NFMA), and the Forest Service planning regulations at 36 CFR 219, project-level decisions, which authorize the use of specific NFS lands for a particular purpose like livestock grazing, must be consistent with the broad strategic guidance established in the LMP. Consistency is determined by examining whether the project-level decision meets the established plan components – desired conditions, objectives, standards and guidelines, and suitability.

90.2 - Relationship of Land Management Plans to the Grazing Permit

All grazing permits, new and existing, must be consistent with applicable direction in the LMP. Where necessary, modify grazing permits to ensure consistency with the LMP and any subsequent amendments. Pertinent guidance in LMPs relating to livestock grazing are included directly into Part 3 of the grazing permit if an allotment management plan (AMP) either does not exist or is inconsistent with the LMP. When an AMP exists and is consistent with the LMP, the AMP is attached to and made a part of the term grazing permit and is referenced in Part 3.

The revision or amendment of a LMP does not constitute, in and of itself, relevant new information or changed conditions requiring correction, supplementation or revision of existing environmental documentation and modification of the associated grazing permit(s). In cases where a LMP revision or amendment creates an inconsistency that would require modification of a grazing permit, modify the grazing permit as soon as practicable. Prior to modifying the grazing permit, review any relevant new information or changed conditions to determine if the site-specific environmental analysis needs to be supplemented or revised.

Permit holders may file an objection to a LMP decision associated with a LMP revision or amendment (*see* 36 CFR 219 part B). Project-level decisions implementing the LMP that

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

modify the term grazing permits may be appealed by the permit holder depending on the nature of the decision (see 36 CFR 214.4).

90.3 - Actions Taken During Routine Grazing Permit Administration

In managing rangeland resources over time, there are inevitable changes in laws, regulations, policies, ESA consultation requirements, LMPs, etc. that affect management decisions on the ground. In addition, analysis of monitoring results provides information to the authorized officer regarding status of management in terms of meeting or moving toward the desired conditions set out in the LMP. Examples of actions that may be taken without further environmental analysis may include such things as changes in the class of livestock to be authorized for a given season or adjustments to the specific dates of authorized grazing that are within the overall season of use analyzed within the environmental analysis. The determination on whether additional analysis is needed should be based on whether the actions are within the scope and range of effects considered in the original analysis.

91 - PLAN-TO-PROJECT (NFMA) ANALYSIS

This section clarifies the role of the “plan-to-project” analysis process in rangeland management decision-making and the use of adaptive management in decision planning and implementation.

91.1 - Phases of Rangeland Management Planning

It is important to recognize two distinct phases in the rangeland project planning process: 1) the analysis process leading up to and including the development of a proposed action, sometimes referred to as “plan-to-project” by which LMP consistency must be determined (36 CFR 219.15); and 2) the formal decision documentation process which is focused on site-specific analysis of the proposed action and alternatives in compliance with the Forest Service NEPA regulations (36 CFR 220).

If a plan-to-project (NFMA) analysis is completed prior to initiation of the formal NEPA process, the proposed action is already defined and the NEPA process will move more quickly and efficiently.

A plan-to-project analysis may be conducted on an allotment or group of allotments that share similar ecological conditions and resource issues. There may be one environmental analysis document for the analysis area, with different decisions for individual allotments. Individual AMPs will then be implemented.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

91.2 - Relationship of Large Scale Assessments to Project-Level Decisions

The preferable sequence of project level planning is to complete large-scale assessments, encompassing a watershed or sub-watershed, prior to initiating the project level decision-making process. Upon the completion of large-scale assessments, site-specific analyses, and project level decisions may be scaled down to allotments that share similar ecological conditions and resource issues. Project level decision-making conducted in this manner will be more expeditious and efficient.

91.3 - Determinations Made During Plan-to-Project Analysis in Preparation for a Project-Level Proposal

A plan-to-project analysis may encompass all resources within a specified area or be focused on the specific resource of rangeland allotments. There are determinations that can be made in advance of preparation for a project-level NEPA proposal such as:

1. Identification of existing conditions;
2. Identification of desired conditions;
3. Identification of resource management needs;
4. Identification of information needs;
5. Development of possible management practices;
6. Development of a decision framework;
7. Development of a purpose and need statement;
8. Development of a proposed action;
9. Development of a proposed action – adaptive management.

If an environmental analysis has previously been conducted for the allotment(s) in question, refer to section 96 of this chapter for further guidance on conducting a review of existing project level analysis and decisions. If a decision has already been made to authorize livestock grazing in a specific area, and resource conditions are at or moving toward desired conditions, the decision may last for several years. Watch for new information or changed circumstances that may necessitate a supplementary analysis (see 36 CFR §220 and sec. 96.3).

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING****91.31 - Description of Existing Conditions**

The analysis team should examine the existing conditions within the analysis area for all pertinent resources for consistency with the LMP, such as ecological status of the vegetation, composition and arrangement of plant communities, status and function of riparian areas and wetlands, stream bank and stream channel characteristics, wildlife and fish habitat characteristics, cultural resource protection, soil and water conditions, and recreation/human pressures. Existing conditions should be specific and quantified where possible.

Existing conditions may be identified through a myriad of sources, including rangeland inspections, rangeland analyses, environmental analysis documentation for other actions in the area, electronic resource databases, historic survey and monitoring data from various disciplines including wildlife, soils, and aquatics, and anecdotal information from previous or current grazing permittees or other knowledgeable sources such as State natural heritage programs. Historic, current, and desired grazing capacity levels and decisions should be reviewed.

The data and information must be pertinent to identifying differences between existing and desired conditions related to rangeland resources. Do not amass needless information that will not help identify rangeland conditions and resource problems and solutions. Determination of the difference or gap, if any, between current and desired conditions establishes if there is a need to change grazing management and is the primary source for development of the proposed action.

91.32 - Description of Desired Conditions

The interdisciplinary team should identify the desired conditions that are applicable to the analysis area. The desired conditions identified should be a composite summary from the various sections of the LMP (such as management areas and geographic areas.) that apply to the project area and scope of the project. Monitoring conducted on allotment benchmarks and key areas is a means of determining long-term progress in meeting or moving toward the desired conditions.

91.33 - Identification of Resource Management Needs

Identification of resource management needs is simply the comparison of desired conditions with existing conditions to determine the extent and rate at which current management is meeting or moving toward those desired conditions. Where the particular existing and desired conditions are the same, there is no apparent need for change. Conversely, where the existing and desired conditions are not the same or moving towards the desired conditions, then there may be a need for change in management to better move towards or meet the desired conditions.

Exhibit 01 displays the site potential for an area, and then compares existing condition to the desired condition.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
 CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

91.33 - Exhibit 01

Plan-to-Project Matrix

(Comparison of Existing Condition to Desired Condition)

Plan-to-Project Matrix			
Allotment: Grassy Flats, Silver, Gold, and Copper pastures, and Tin Trap			
Designated Area: Volcanic Hills MLRA, 16-20 Inch precipitation zone Clayey Ecological Site (VHCES)			
	Vegetative Resource	Wildlife Resource	Soil Resource
Site Potential	Mixed grassland, warm and cool season grasses, forbs, lesser shrubs and trees.	Habitat diversity for a variety of mountain and grassland wildlife species.	Vegetative ground cover of 21-75%. Rock component of 35-80%. Bare ground of 3-15%.
Existing Condition	Gold and Silver pastures lack perennial cool season grasses. The Tin Trap also lacks cool season grasses due to persistent fall use for weaning. Copper pasture has appropriate species composition based on the ESD.	Forb and grass components are adequate in all pastures. Average cover height of 4 inches for nesting in the Copper pasture is not adequate because it is utilized prior to or during the nesting season each year.	Bare ground averages acceptable levels of 10% in the Copper pasture and the Tin Trap. Bare ground averages (> 30%) exceed acceptable levels in the Silver and Gold pastures.
Desired Condition	Manage to achieve or maintain mid-seral vegetative communities reflective of the Clayey ESD.	Achieve forage and nesting cover of 6 inches in the Copper pasture by grazing outside the nesting season one year out of three.	Manage season and/or numbers to increase vegetation basal area and litter by 10% in the Silver and Gold pastures within 10 years.

91.34 - Identification of Information Needs

1. Evaluate the quality, accuracy, and usefulness of the information being used to describe existing and desired conditions.
2. Identify any important gaps in knowledge that keep the analysis team from understanding and evaluating differences between desired and existing conditions.
3. Estimate what it would cost in terms of time, money, and effort to obtain missing

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

information, and if it is necessary to collect it.

4. Identify how the information gap relates to the decision to be made and associated risks.
5. Resource specialists may make recommendations to the authorized officer regarding the importance of any information gaps as they relate to making an informed decision, but the authorized officer is the one to determine what information needs to be obtained to sufficiently inform their decision.

91.35 - Possible Management Practices

“Resource Management Needs” provide the basis for developing possible management practices that would move existing conditions toward desired conditions. Livestock grazing management practices, including possible changes in class of livestock, should be listed as possible practices where compatible with meeting or moving toward desired resource conditions. One or more possible management practices will form the proposed action for the next phase of rangeland project planning, the formal NEPA process. Possible management practices should be checked for consistency with the LMP. A possible practice that is not consistent with the LMP may not be implemented within the plan area. It does not need to be automatically eliminated from consideration but instead, the inconsistency should be noted and potentially identified as a future need to modify larger-scale LMP direction.

An adaptive management strategy should be considered (*see* sec. 92.3g). Adaptive management may provide the flexibility to respond to continually changing conditions found within natural ecosystems. If monitoring demonstrates that the intended effects are not being achieved through the initial management action, the action can be modified using one or more of the identified adaptive management actions in a way that better achieves the intended effects.

91.36 - Decision Framework

The decision framework is used to implement guidance already identified in a LMP; it is applied at the project level. Before characterizing the nature of a livestock grazing authorization decision, it is important to establish whether or not a valid decision already exists.

The decision to be made is whether livestock grazing should be authorized on all, part, or none of the project area. If the decision is to authorize or continue some level of livestock grazing, then what management prescriptions will be applied (including standards, guidelines, grazing management) to ensure that resource objectives are being met or that movement occurs toward those objectives in an acceptable timeframe. For non-allotment rangeland management areas, the decision to be made would be tailored to the specific purpose and need for the area.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

If a decision has already been made to authorize livestock grazing in a specific area, and resource conditions are at or moving toward desired conditions, the decision may last for several years. Watch for new information or changed circumstances that may necessitate a supplementary analysis (*see* 36 CFR §220 and sec. 96.3).

91.37 - Purpose and Need

The need for action discusses the relationship between the desired condition and the existing condition in order to answer the question, “why consider taking any action?”. “Purpose” and “need” may be discussed separately, but normally they are discussed as one because the purpose of an action will be to respond to the stated need.

The breadth or narrowness of the need for action has a substantial influence on the scope of the subsequent analysis. A well-defined “need” or “purpose and need” statement narrows the range of alternatives that may need to be considered. In terms of livestock grazing, the purpose may include the authorization of livestock grazing to achieve desired resource conditions and/or to utilize forage available for livestock grazing as identified in the LMP while meeting other resource objectives. Where existing resource conditions are meeting or moving toward the desired condition objectives, the need may simply be to authorize livestock grazing in a manner that will continue to meet or move toward direction in the LMP while meeting other resource objectives.

It is critical that the responsible official and interdisciplinary team members all understand and agree on the need for action. An informed decision can only be made when everyone is working together to solve the same problem. For context on the development of the “purpose and need” of a project or activity please refer to FSH 1909.15, sec. 11.21.

91.38 - Proposed Action

The proposed action is developed during the plan-to-project analysis and is carried forward to the initiation of the NEPA process. Comparison of existing resource conditions to desired resource conditions should frame the purpose and need for the proposed action. Proposed management practices needed to achieve desired resource conditions can be wide-ranging, variable, and adaptive, but should be attainable in a reasonable timeframe. If the plan-to-project analysis and assessment indicated that livestock grazing was an acceptable and desirable management practice, then the proposed action should include the authorization of livestock grazing and the required livestock grazing management practices necessary to attain desired resource conditions. The proposed action should address management of all active, vacant, and forage reserve allotments within the project area, and may address management actions associated with non-allotment areas within the project area. 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. Depending on the site-

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

specific circumstances (such as available information and/or issues) a consideration to open a closed allotment might require a separate analysis and decision.

A proposed action which includes authorization of livestock grazing should also include the basic elements of an AMP which are: 1) management objectives in terms of the condition and trend of the rangeland resources; 2) required livestock management practices including maximum amount of use in terms of authorized use levels to achieve management objectives; 3) analyze the earliest on-date possible for the allotment and the latest off-date that might be allowed, even though the existing term permit is written for a specific and shorter season of use, thereby providing the flexibility needed to respond to annual climatic conditions (thereby providing that any early on-dates or extensions of use are within the effects previously analyzed); 4) structural or non-structural improvements that are or may be necessary and ready for implementation; and, 5) appropriate monitoring to determine if management objectives are being met or if adaptive management alterations are needed (*see* sec. 91.3i).

Term permits written with variable numbers and/or variable seasons can provide for considerable management flexibility. However, they must still conform to the sideboards analyzed within the applicable environmental analysis and still need to be written for an average annual use within those boundaries.

91.39 - Proposed Action -- Adaptive Management

Adaptive management (*see* 36 CFR 220.3) is a 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.

When an adaptive management strategy is proposed for livestock grazing, the proposed action should describe the outer limits of what is allowed in terms of timing, intensity, frequency, occurrence and period of livestock grazing along with various management tools such as rangeland improvements. This ensures that the environmental analysis clearly identifies the adjustment(s) that may be made when monitoring during project implementation indicates that the action is not having its intended effect. When using adaptive management, display the proposed action as an initial management action and a collection of possible adjustments or acceptable tools to be used to modify the initial action to achieve the intended effects. Disclose the site-specific effects of all of these actions, adjustments, or use of acceptable tools in the analysis along with the monitoring methods to be used to determine the effectiveness of each. If monitoring demonstrates that the intended effects are not being achieved through the initial management action, the action can be modified using one or more of the identified adaptive management actions in a way that better achieves the intended effects.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

So long as monitoring indicates that the environmental effects of each action do not exceed the bounds of those anticipated in the original environmental analysis and the actions serve to move the project toward the intended effects, implementation continues using the “implement-monitor-adapt” cycle without the need for a new environmental analysis or NEPA review. In circumstances where changes in conditions warrant implementation of a management option that has not been considered in the environmental analysis and authorized by decision, or when monitoring shows that predicted effects of implementation are greater than the effects originally predicted, a new environmental analysis or NEPA review may be needed.

Examples of some possible adjustments or acceptable tools that could be used to modify the initial action to achieve the intended effects include but are not limited to: determination of specific dates for grazing, specific livestock numbers, class of animal, grazing systems, range readiness and rangeland improvements (structural and nonstructural). The list of possible management practices developed in the plan-to-project analysis may provide a source for adaptive management actions.

The focus of adaptive management is to make decisions that are pertinent to management on the ground. Historically, decisions to authorize a specific number, kind or class of livestock with a specific grazing season, under a specific type of grazing system, have restricted management flexibility and limited the ability to respond to management needs to meet desired conditions and project objectives. Updated science suggests that these considerations are often not the key factors in managing rangeland resources and that it is more effective to focus on factors that are essential to ensuring management objectives are met. Some examples of critical factors may be timing restrictions in specific areas to manage conflicts with fisheries, big game, or recreation; or allowable use guidelines to ensure retention of defined levels of cover or riparian residual vegetation to trap and retain sediments. The focus should be on defining practices that are critical to management success and efforts should be made to move away from decisions that unduly restrict flexibility.

When adaptive management actions include structural improvements, all new structures would have heritage and biological clearances prior to implementation (placement and construction) and all LMP standards and guidelines would be followed. This phased approach allows for efficiencies in the process and management flexibility while ensuring important resource concerns are addressed prior to implementation. It is recommended this approach be stated in the site-specific decision.

For more information about adaptive management and the “implement-monitor-adapt” cycle please refer to FSH 1909.15, sec. 14.1.

92 - PROJECT-LEVEL PLANNING AND NEPA COMPLIANCE

Once the plan-to-project analysis has been completed, there should be a clearly defined proposed action and purpose and need statement to begin NEPA process. General environmental analysis

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

requirements are set forth in regulations adopted by the Council on Environmental Quality at 40 CFR 1500 *et seq.*, Forest Service NEPA regulations at 36 CFR 220, and in the Forest Service directives system at FSM 1950 and FSH 1909.15. Special features as applied to rangeland management and livestock grazing are described below in order to clarify FSH 1909.15 for situations unique to rangeland management and livestock grazing decisions.

92.1 - Alternatives

Agency direction for development of alternatives is found in FSH 1909.15, sec. 14.

The Forest Service may contrast the impacts of the proposed action and alternatives with the current and expected future conditions of the affected environment in the absence of the action, which constitutes consideration of a no action alternative. For range allotment analyses, the no action alternative is typically described and analyzed as a no grazing alternative. Analyzing an alternative that provides a contrast to other action alternatives (such as no grazing) can compare the potential impacts from grazing to those associated with no grazing. A “no grazing” alternative should only be selected as the proposed action if it best meets the purpose and need.

Current management will normally be analyzed in detail as an alternative if current management will meet the stated purpose and need for action. This alternative is based on the current management actions being implemented (or in the case of vacant allotments, those actions that were in use most recently). Current management direction may be contained in an allotment management plan, annual operating instructions, a biological opinion, or a combination thereof. The current management alternative may be the proposed action. This would be appropriate when current management is determined to be consistent with the LMP and has been shown to be effective in meeting resource objectives through monitoring over time.

However, if current management does not fully meet the purpose and need because one or more allotment management changes are required, the current management alternative might not be analyzed in detail. Instead, consider developing an adaptive management alternative to identify and analyze the needed changes. The adaptive management alternative should become the proposed action and analyzed in detail. The proposed action may change or be modified based on public comment.

92.2 - Effects of Alternatives

Agency direction for estimating effects of each alternative is found in FSH 1909.15, sec. 15.

Section 92.39 of this chapter and FSH 1909.15, sec. 14.1 provide further guidance on how to address the estimated effects of adaptive management.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING****92.3 - Documentation**

Consideration of the level of analysis for Forest Service projects is, in part, guided by Agency NEPA procedures for documentation of environmental analyses (*see* FSH 1909.15, chapters 20 and 40).

93 - INTEGRATION OF OTHER LEGAL REQUIREMENTS INTO THE RANGELAND MANAGEMENT DECISIONMAKING PROCESS**93.1 - Section 504 of the Rescissions Act of 1995 and the Range NEPA Schedule**

The Rescissions Act of 1995 (P.L. 104-19) became law on July 27, 1995. Section 504 addressed allotment analysis, grazing permit issuance, and compliance with NEPA and other environmental laws. Section 504 included the following requirements: Subsection (a) of section 504 states that "...each NFS unit shall establish and adhere to a schedule for the completion of environmental analysis and decisions on all allotments for which environmental analysis is needed." Section 504(a) requires the Forest Service to 1) determine which grazing allotments need environmental analysis and documentation in order to support the continuation of permitted grazing activity; 2) develop a schedule for each NFS unit for the completion of the environmental analysis and documentation on those allotments where environmental analysis is needed; and 3) adhere to the schedule.

Section 504(b) provided guidance for issuing term grazing permits pending NEPA compliance "...term grazing permits which expire or are waived before the environmental analysis and decision pursuant to the schedule... shall be issued on the same terms and conditions and for the full term of the waived or expired permits. Upon completion of the scheduled environmental analysis and decision for the allotment, the terms and conditions of existing grazing permits may be modified or re-issued, if necessary, to conform to such environmental analysis."

Congress' primary goal in enacting Section 504 was to prevent disruption to permitted livestock operations that would have occurred if grazing permits expired prior to completion of the environmental analysis required to reauthorize the activity. While Part A of the Rescissions Act required the establishment and adherence to the NEPA schedule, Part B of the Act required the Forest Service to issue new grazing permits if the old permits expired or were waived prior to completion of the scheduled environmental analysis in order to prevent such disruption to the permitted livestock operations. Therefore, new permits issued pursuant to Section 504 would include exactly the same terms and conditions as were contained in the expired or waived permit, no more and no less, until such time as the scheduled environmental analysis is completed. As an example, permitted numbers, kind and class of livestock, and seasons of use are not to be changed. Congress further specified that the duration of permits issued under Section 504 will be for the full term of the expired or waived permit.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

The National Defense Authorization Act for Fiscal Year 2015 (P.L. 113-291) contains similar language relative to the continuation of terms and conditions under a new permit as well as the priority and timing for the completion of environmental analysis. The National Defense Authorization Act for Fiscal Year 2015 amended Section 402 of the Federal Land Policy Management Act of 1976 (*see* 43 U.S.C. §1752). Direction is now codified at 43 U.S.C. §1752 relative to the priority and timing for completion of environmental analyses and the continuation of terms under a new permit.

Allotment NEPA planning and management is a dynamic on-going process due to fluctuations in budget, emerging issues, and changing environmental conditions; thus, there will continue to be a NEPA workload to accomplish in the future. The priority and timing for completion of environmental analysis should be based on those aspects identified at 43 U.S.C. §1752(i) which are:

1. The environmental significance of the grazing allotment or permit; and
2. The available funding for the environmental analysis.

93.2 - Endangered Species Act (ESA)

See FSM 2670 for direction on compliance with the ESA.

93.3 - National Historic Preservation Act (NHPA)

See FSM 2364.11 for direction on compliance with the NHPA and the National Programmatic Agreement between the Forest Service and the Advisory Council on Historic Preservation.

93.4 - Clean Water Act (CWA)

Compliance with the CWA of 1948 is achieved through the proper site-specific design, implementation and monitoring of Best Management Practices (BMPs). BMPs are State- and nationally approved practices that are intended to result in compliance with State water quality standards. Some States have issued BMPs for grazing, some have not, and some are voluntary. Some have been developed by the grazing industry for voluntary application.

The Forest Service National Core BMP Technical Guide describes BMPs for water quality as methods, measures, or practices selected by an agency to meet its nonpoint source control needs. BMPs include but are not limited to structural and nonstructural controls and operation and maintenance procedures. BMPs can be applied before, during, and after pollution-producing activities to reduce or eliminate the introduction of pollutants into receiving waters (*see* 36 CFR 219.19).

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

As approved practices they are typically elements of each environmental analysis and AMP. A key concept of BMPs is that if monitoring identifies any circumstance of noncompliance with State water quality standards, then the Forest Service is obligated to respond to the situation to move toward or restore compliance.

When an allotment contains streams or lakes included on a State's 303(d) list of impaired waters (these waters are also included in the State's bi-annual 305(b) report), it means that a State-led Total Maximum Daily Load (TMDL) process for restoration will be developed. The process is the responsibility of the State to design the TMDLs, in cooperation with the Forest Service and other affected parties. The Forest Service is responsible for implementing specific restoration and monitoring requirements on NFS lands and ensuring that any management actions that are taken, and/or are occurring on NFS lands, are in compliance with the CWA and NEPA.

94 - GRAZING AUTHORIZATIONS

The project-level decision to authorize grazing on one or more allotments is made by the authorized officer upon completion of site-specific environmental analyses.

94.1 - Allotment Management Plans (AMPs)

The decision, including the design criteria and monitoring elements may directly incorporated into the AMP or constitute the components needed to update the existing AMP. This decision may require a modification of the term grazing permit if changes are identified in the decision. The new or updated AMP is attached to and becomes a part of the term grazing permit. Issuing a new term grazing permit and its accompanying new or updated AMP are administrative actions that implement the project-level decision to authorize grazing.

The AMP contains the detailed direction from the decision for managing livestock to achieve and maintain desired vegetative and other resource conditions. AMPs should be developed in coordination with the grazing permittee following the completion of the site-specific analysis and project-level decision.

An AMP is an administrative instrument used to implement a project-level or programmatic decision. AMPs should not contain any direction that is outside of what was authorized by the project-level or programmatic decision. When AMPs are drafted in a manner that is consistent with the applicable decision, it is the decision and *not* the issuance of an AMP that is seen as the final Federal agency action. Decisions that result in the modification of a term grazing permit may be subject to appeal under 36 CFR §214.

Many AMPs in the 2210 folders precede site-specific decisions and still reflect appropriate on-the-ground management. The requirement to conduct an updated, site-specific analysis and decision does not always require an updated AMP or a changed grazing permit. Consider the reason that a new site-specific analysis is being completed and if any new management

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

requirements will be applied to the allotment that would need to be reflected in an updated AMP and/or in the terms and conditions of the grazing permit to determine if a change to the AMP and/or grazing permit is warranted.

94.2 - Grazing Permits

A grazing permit is the instrument that authorizes a specific holder the use and occupancy of on certain National Forest System lands or other lands under Forest Service control for the purposes of conducting livestock grazing activities. Term grazing permits are issued for the sole purpose of livestock production on such lands.

The provision codified at 43 U.S.C. §1752(c)(2) that requires the terms and conditions of an expired grazing permit to continue until a new environmental analysis under NEPA is completed does not exempt or exclude grazing permits from the requirements of NEPA; it merely allows for a limited grace period for the agency to conduct the required environmental analysis. Where a permit is issued in accordance with the cited provision and a site specific analysis and project-level decision are completed prior to the end of the grazing permits term, the permit may need to be modified or reissued to incorporate any new terms and conditions detailed in the project-level decision.

94.3 - Annual Operating Instructions (AOIs) or Other Similar Documents

The annual operating instructions (AOIs) or other similar documents specify those annual actions that are needed to implement the management direction set forth in the AMP or underlying decision for that grazing season. Actions in the AOI must be consistent with the AMP and the project-level decision. The AOI is not a new decision. The AOI is bound by the project-level decision and AMP and simply identifies the grazing management or operations that will be utilized in a given season consistent with the project-level decision, AMP, and current conditions. The AOI need not reiterate terms and conditions from the grazing permit.

AOIs are not required by the Forest Service grazing regulations; issuance of AOIs or other similar documents is recommended, but optional. The AOI is an administrative action implementing a project-level decision through the AMP. Per 36 CFR §214.4(a)(1), issuance of annual operating instructions does not constitute a permit modification and is not an appealable decision.

The AOI is normally developed with the permittee during the annual winter or spring coordination meetings. AOIs should clearly and concisely identify the obligations of the permittee and the Forest Service, clearly articulate annual grazing management requirements, and monitoring necessary to document compliance.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

The AOI should set forth:

1. The grazing use authorized on the allotment for the current grazing season and specifies numbers, class, type of livestock, and timing and duration of use;
2. The planned pasture rotation on the allotment, including *estimated* move dates between pastures, and adaptive management prescriptions and monitoring that will be used to make any needed changes;
3. Structural improvements to be constructed, reconstructed, or maintained and who is responsible for these activities;
4. Allowable use or other guidelines to be applied and followed by the permittee to properly manage livestock;
5. Monitoring for the current season that may include, among other things, documentation demonstrating compliance with the terms and conditions in the grazing permit, allotment management plan, and annual operating instructions; and
6. In addition, the permittee may be asked to provide information regarding actual use, livestock distribution, forage utilization, or the condition of improvements. Where adaptive management prescriptions are being followed, this section will detail those monitoring items and decision points needed to determine when a change is needed and in what direction (*see sec. 97*).

Although AOIs are not required, annual permittee meetings and AOIs help to maintain open communications between the Forest Service and the grazing permittee and assure understanding of required annual allotment management actions/operations.

It is highly preferable, but not required, that the grazing permittee and the authorized officer sign the AOI. Regardless of whether the permittee signs the AOI, as direction to the permittee, the authorized officer or the rangeland management specialist should sign and date each AOI and any amendments provided during the grazing season.

94.31 - Participation and Attendance in Annual Meetings by Outside Parties

AOI meetings are held for the purposes of discussing grazing operations in prior seasons as well as the up-coming season, and certain business matters that concern the permit holder's eligibility to participate in the grazing program, such as: financing, business organization, and livestock ownership. This meeting could also potentially include a discussion of confidential information that may be protected from disclosure by the Privacy Act. For these reasons, the AOI meetings are *not* open to the public.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

However, some permittees may wish to have participation from individuals whom they designate to represent them in the AOI meetings. They may request participation from elected officials such as a county commissioner or a State agency employee. Such individuals may represent the position of the agency in relationship to county or State land use plans. If the permittees desire to have the participation from these elected officials, preferably they will notify the authorized officer in advance of the meeting. The following are important aspects to consider for AOI meetings:

1. The AOI meeting is not a forum for discussing Forest Service grazing management policy or for soliciting public participation in decision making. Input and suggestions by these elected officials for these purposes need to occur in public meetings or by other means as appropriate and consistent with the NEPA, Federal Advisory Committee Act (FACA).
2. If the nature of the AOI meeting changes from a discussion on implementing annual grazing management direction to addressing general Forest Service grazing policy issues, the authorized officer should end the AOI meeting and schedule a different meeting for this unrelated discussion.
3. If individuals not previously identified by the permittee(s) or other uninvited parties arrive with the intent of participating in the AOI meeting, the authorized officer may exclude their attendance and participation; or should reschedule the AOI meeting.

95 - MONITORING

The need for monitoring shall be included in the project-level decision. Implementation and effectiveness monitoring are both critical in determining when or if adaptive management changes are needed. Monitoring is also critical in tracking movement toward achieving resource management objectives. Attributes to be monitored and protocols for monitoring may be described during the formulation of desired conditions and resource management objectives.

A monitoring plan is part of the AMP and is comprised of five key components:

1. Purpose for monitoring;
2. Attributes or indicators to be monitored;
3. Method(s) selected to monitor those attributes;
4. Frequency that monitoring will be conducted; and
5. The location, benchmark or key area where monitoring will take place.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

The purpose(s) for each monitoring activity should be well documented in the project record and the 2210 allotment folder. Attributes to be monitored should be tied to the resource management objectives documented in the project-level decision and the AMP. Monitoring methods that are appropriate for attributes associated with resource management objectives or a desired condition should be selected. Determine the frequency of monitoring based on the potential for detectable changes in the attributes to be monitored, and available forest/grassland staffing and budgets. Short-term implementation monitoring of forage production and utilization should occur at key areas. Long-term effectiveness monitoring often occurs at benchmarks or permanent plots. In many instances, the key areas and permanent plots are one and the same.

Allotment monitoring should be an open, cooperative, and inclusive process. Invite participation from permittees to conduct independent monitoring and in conjunction with District Rangeland Management Specialists. After being properly trained in the monitoring method(s), permittees may be able to assist in independently conducting allotment monitoring.

95.1 - Types of Monitoring

Monitoring helps the manager to determine whether the project-level decision is being implemented as planned (implementation monitoring) and, if so, whether the objectives identified in the LMP and AMP are being achieved in a timely manner (effectiveness monitoring).

Monitoring is critical in tracking movement toward achieving resource management objectives. Implementation and effectiveness monitoring are both utilized to determine when or if adaptive management changes should be made and to guide the direction that those changes take.

95.2 - Monitoring and Evaluation Methods

The monitoring plan should be flexible and should be consistent with forest-wide and grassland-wide monitoring goals.

Interagency Monitoring Technical References (such as Sampling Vegetation Attributes and assessing stream and lake riparian areas) provide common monitoring methodologies (*see* FSM 2206). National and regional rangeland assessment and monitoring handbooks are used in addition to technical references and technical publications (*see* FSM 2209).

Implementation monitoring may include but is not limited to such items as: 1) actual use in each pasture; 2) condition of range improvements; 3) seasonal utilization, annual utilization, or stubble heights; or 4) other annual monitoring methods such as the Landscape Appearance Method, the Grazing Response Index, or photographs.

Depending on the plant community types in the allotment, the key areas will normally be 1/4 to 1 mile from water. They should be located on productive soils on level to intermediate slopes and

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

be readily available for grazing. Key area size is usually 20 to 500 acres; but in some situations, such as high elevation meadows with perennial streams, key areas could be less than 20 acres. Within key areas, select appropriate key species to monitor for use or all key species may be measured for use.

A critical area is an area which must be treated with special consideration because of inherent site factors, size, location, condition, values, or significant potential conflicts among uses. In some cases, critical areas will be monitored because of their significance. But critical areas should not be designated as key areas because they are not representative of the overall grazing use on a pasture or allotment.

Effectiveness monitoring should include attributes, locations and methods that are capable of detecting movement toward resource management objectives or a desired condition. Long term quantitative monitoring, such as rereading Parker 3-steps, cover frequency transects, or repeat photography at an identified permanent location can depict changes over time.

NOTE: As monitoring methods used may change over time, and Parker 3-steps are a good example, do not remove stakes and other markers identifying transect locations. Even though they may not continue to be read, all the legacy data gathered over decades remains as invaluable information for evaluating rangeland trend and condition. See FSH 2209.16, Allotment Management Handbook, for more detailed information.

Monitoring must be conducted at locations and with methods that assure credible connections can be made between annual management and its effects on achieving desired conditions.

Monitoring for trend towards achievement of resource management objectives is the foundation for any adaptive management project level decision.

95.3 - Permittee Monitoring

Cooperative permittee monitoring is of high importance with many States and livestock industry groups. The Public Lands Council (PLC) continues to emphasize and initiate a Memorandum of Understanding (MOU) every five years with the Forest Service, Bureau of Land Management, and Natural Resource Conservation Service for voluntary cooperative permittee monitoring. Several States not only emphasize but help fund permittee monitoring efforts on private, State, and Federal lands. Some States have MOUs to conduct third-party monitoring with cooperative groups. Some forests/grasslands allow trained third-party interests to conduct vegetation monitoring, following Forest Service protocol. In all cases, monitoring must be verified by the agency and conducted according to standardized methods. The monitoring methods to be used as well as where and when monitoring actions are to be conducted, will be documented. Monitoring data that is not collected in the agreed upon manner or that cannot be verified by the agency, may not be accepted or used in allotment planning and adaptive management decisions.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

An authorized officer may require the permittee to monitor livestock numbers and movements and report information on compliance with the grazing permit, AMP, and AOI, as terms and conditions of the term or temporary grazing permit, including parts 2 and 3. Such monitoring could include actual use, time of grazing, livestock distribution, condition and maintenance of improvements, forage utilization or residual vegetation, and other relevant information related to the permitted livestock grazing activity. Some permittees are trained and want to assist in conducting long-term condition and trend monitoring. Permittees should not be required to monitor activities unrelated to the permitted grazing activity or activities in which they have no background, training, or specialized expertise. These monitoring and reporting requirements and voluntary cooperative efforts should be detailed in the AMP and/or AOIs.

The final responsibility for conducting adequate and appropriate monitoring, managing quality and accuracy of collected data, and interpreting monitoring results rests with the Forest Service.

96 - REVIEW OF DECISIONS AND NEEDED MODIFICATIONS TO GRAZING AND ALLOTMENT MANAGEMENT

See FSH 1909.15 sec. 18 for direction on correction, supplementation, or revision of environmental documents and reconsideration of decisions to take action. The process described at FSH 1909.15 sec. 18, allows the responsible official to determine if existing environmental analysis and decision documents remain valid in support of the ongoing authorization of permitted livestock grazing. Under this process, an interdisciplinary team evaluates the results of monitoring and any other new information to determine if livestock grazing, as currently permitted and administered, is consistent with the scope and extent of effects disclosed under the most recent environmental analysis and decision authorizing the grazing activity.

96.1 - Modifications Not Requiring New Decisions

A project-level decision remains valid as long as the authorized activity complies with laws, regulations, LMP, and remains within the scope and range of effects considered in the original analysis. If, after an interdisciplinary review and consideration of new information within the context of the overall project, the responsible official determines that a correction, supplement, or revision to an environmental document is not necessary, implementation should continue.

96.2 - Adaptive Management Modifications

The basic principle behind adaptive management is to monitor and analyze whether an initial management option is or is not effective at meeting or moving toward desired conditions, if the management is not effective another management option is put into place—in lieu of, or in addition to, the initial efforts.

Monitoring of forage availability, forage utilization, range readiness and resource conditions is used to determine if management is being properly implemented and if the actions are effective

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

at meeting or moving toward desired conditions. Such changes may include administrative decisions within the adaptive management framework such as the specific number of livestock authorized annually, specific dates for grazing, class of animal or modifications to pasture rotations.

If monitoring indicates that grazing management is not meeting or moving toward desired conditions, an adaptive management action identified in the original analysis and decision will be used to modify management at any time throughout the grazing season in response to unforeseen resource or environmental conditions such as drought or other management related concerns.

Because these modifications have already been analyzed no further environmental analysis and decision is required to implement these modifications.

Adaptive management also includes monitoring to determine whether identified structural improvements are necessary or need to be modified. If the original adaptive management analysis disclosed the potential effects of future range improvements, a new environmental analysis and decision would not be needed to implement the range improvements. All new structures would have surveys and clearances for heritage and biological resources prior to implementation.

96.3 - Determining If a Review of the Existing Project Level Decision is Needed

Project-level decisions may be reviewed periodically to determine if the effects analysis and documentation remain valid or if new information requires further analysis and potential modification of the decision.

The occasion of a permit waiver and a change in ownership in base property or livestock does not automatically require a review of the site-specific analysis and decision unless the new permit application proposes a significant change from the waived permit.

If and when a new or supplemental environmental analysis is determined necessary, implementation of the existing decision should continue until the new analysis is completed. Alternatively, when the current analysis is determined to be sufficient, the findings of this sufficiency review should be documented in the project file. See FSH 1909.15, sec.18, for further direction on this review and analysis of existing project level decisions.

97 - ALLOTMENT ADMINISTRATION, INSPECTIONS, DOCUMENTATION, AND COMPLIANCE

Detailed information and procedures concerning rangeland assessment, inventory, and monitoring is found in FSH 2209.14 Rangeland Ecosystems Inventory, Analysis, and Monitoring handbook.

**FSH 2209.13 - GRAZING PERMIT ADMINISTRATION HANDBOOK
CHAPTER 90 - RANGELAND MANAGEMENT DECISIONMAKING**

Policy, procedures, and guidance regarding types of grazing allotments, conducting allotment inspections, and documentation of monitoring and compliance is found in FSH 2209.16 Allotment Management handbook.