



National Association of Conservation Districts

October 8, 2020

Ms. Hilary Smith
Senior Advisor for Invasive Species
Office of Policy Analysis, Office of the Secretary
Department of the Interior
1849 C Street NW
Washington, DC 20240

Re: DOI-2020-0007

Dear Ms. Smith,

The National Association of Conservation Districts (NACD) represents America's 3,000 locally-led conservation districts, working with millions of landowners and operators to help them manage and protect land and water resources on private and public lands. Established under state law, conservation districts share a single mission: to work cooperatively with federal, state and other local resource management agencies and private sector interest groups to provide technical, financial and other assistance to help landowners and operators apply conservation to the landscape.

Invasive species pose a serious threat to our nation's economy and natural resources. Damages from invasive species are estimated at \$120 billion annually in the United States.¹ NACD supports practical, economically feasible, science-based approaches for managing and preventing invasive species. As local government entities, conservation districts are well positioned to extend the DOI's efforts by leveraging on-the-ground expertise and local relationships.

Stakeholder Collaboration, Education and Financial Assistance for Local Projects

NACD is pleased that DOI's Draft Invasive Species Strategic Plan (Plan) emphasizes collaboration and coordination to address the challenges of managing invasive species across jurisdictional boundaries. Close cooperative relationships with local communities are essential for success.

Education efforts on invasive species issues are critical for stronger on-the-ground management. NACD supports efforts elevating the profile of invasive species management and is encouraged to see educational efforts listed in Goal 1 of the Plan.

Under Objective 1.4, the agency addresses expanding knowledge and access to DOI funding opportunities. NACD encourages DOI to ensure financial assistance programs, such as grants, are available to conservation districts as they carry out invasive species management projects. Most conservation districts include noxious and invasive weed control as a primary management priority. NACD recommends that DOI focus on fostering these local relationships with conservation districts. Focusing on agreements and funding for conservation districts allows DOI to leverage additional funds and receive the best return on investment.

Benefits of Database Use for Invasive Species Management

¹ Pimentel, D. et. al, 2005. Update on the environmental and economic costs associated with alien-invasive species in the United States. <https://www.sciencedirect.com/science/article/abs/pii/S0921800904003027>



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Collaboration and information sharing strengthen our ability to better manage invasive species. NACD's Invasive Species Resource Policy Group (IS:RPG) is partnering with the Western Governors' Association (WGA) and applauds their efforts to standardize and centralize invasive species data.

Rapid Response and Biosurveillance

NACD encourages DOI to include and recognize conservation districts as local government entities when coordinating rapid response and biosurveillance efforts with federal agencies, states, tribes, territories and other partners. Many conservation districts across the country are already involved in these efforts and could benefit from additional training and resources provided by DOI. NACD recommends up-to-date training materials be readily available.

Examples of Conservation District Invasive Species Efforts

The McCone County Conservation District plays an important part in preventing zebra mussels from entering the state of Montana and damaging the watersheds on millions of acres of private and public lands held by the BLM. Through the assistance of district employees at check stations, Montana has inspected over 115,000 vessels in 2020, already surpassing last year's total number of inspections.

The Natchitoches Soil and Water Conservation District (SWCD) in Louisiana was one of the first conservation districts in the nation to implement a feral swine control program using state of the art remote cellular monitoring technology, aerial gunning and trapping. Ongoing work and removal contracts on private lands have been successful in decreasing the damage to farm, ranches and native habitat. Properties adjacent to private land such as the Red River National Wildlife Refuge and Sabine/Kisatchie National Forests also reap the benefits of feral swine removal from the landscape.

The San Juan SWCD in New Mexico cleared over 7,000 acres of Russian Olive and Salt Cedar in the past ten years, and chemically treated nearly 10,000 acres of re-sprouts. These projects have removed hazardous fuels for 110 private landowners and cleared firebreaks and improved river access across San Juan County, the Jackson Lake Wildlife Management Area, Navajo Lake State Park, as well as on BLM, U.S. Fish and Wildlife Service (USFWS) and U.S. Bureau of Reclamation (USBR) properties.

The South Caddo Conservation District in Oklahoma is working with landowners through the State Conservation Practice Cost Share Program on invasive brush management projects. These projects on private land in the district are frequently adjacent to Bureau of Indian Affairs (BIA) holdings and assets. Removal of the Eastern Red Cedar on an estimated 500 acres of the landscape served to decrease the severity of wildfire and restore the natural hydrology of the area.

The Tualatin Soil and Water Conservation District in Oregon works with urban and rural landowners in the shadow of Mount Rainer National Park to eradicate and prevent the spread of Garlic Mustard and several other harmful invasive plant species. Garlic Mustard is an invasive that invades and dominates the native understory of forested areas, appears to alter habitat suitability for native birds, mammals, and amphibians, and effects the natural regeneration of native forests.

Examples such as the above provide insight into how conservation districts are able to provide effective invasive species management by working across jurisdictional bounds. Conservation districts are well equipped to work with DOI agencies to address invasive species management and look forward to continued engagement as this plan is further implemented.

Invasive Annual Grasses



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Invasive annual grasses, mainly cheatgrass, are a major factor in the increased frequency and size of rangeland wildfires in the west. The 2020 wildland fire season has devastated local communities, destroying rangeland wildlife communities and local economies that depend on them. Wildfires that are made worse by non-native warm season grasses can be mitigated and minimized by land managers using grazing permits, as livestock grazing has been noted to reduce fuel loads. Local communities bear the most direct, immediate and long-lasting natural resource and socioeconomic impacts from these wildfires. Because these annual grasses thrive in fire disturbed ecosystems, invasive grass continues to propagate and expand as part of a vicious cycle of fire, more invasive grasses, more fire.

Although a serious issue, invasive annual grasses are not the only problematic invasive plants on DOI-managed lands. Other noxious and invasive weeds, including those listed on the state noxious weed lists, have been determined to also create detrimental effects to our environment and economy, including impacts to recreation, real estate value, agriculture and land health. NACD commends DOI's recognition of emphasizing the benefits of livestock grazing on public lands as a fuel-reduction technique and an invasive species management tool.

Wildfire Management and Livestock Grazing

Objective 4.2 specifically highlights livestock grazing as a management tool to mitigate wildfire risk. NACD appreciates and strongly supports the recognition of outcome-based prescribed livestock grazing as an effective tool for reducing fuel loads and managing invasive species. NACD encourages DOI to continue to work with local communities to explore opportunities to use prescribed livestock grazing to help manage fuel loads and invasive species.

Rehabilitation and Restoration

At times, land rehabilitation and restoration projects are most feasibly completed with non-native species. Additionally, USDA's Natural Resources Conservation Service (NRCS) has previously provided language on when non-native species can and cannot be used, making it possible to use non-native species when applicable and in accordance with this language. Strict use of native species for land rehabilitation can limit the size and effectiveness of restoration, especially on arid and semi-arid rangelands. Desirable non-native, long-life, perennial species (e.g., crested wheatgrass, Siberian wheatgrass and forage kochia) that are more readily available, more cost effective and more competitive with non-native annual grass species, and provide similar ecological functionality should also be encouraged for use. Use of proven, beneficial non-native, non-invasive species would be a more cost-effective way to reconcile Goal 4 with Strategy 4.1.c: "Restore impacted species and habitats to enhance their resilience to disturbance and resistance to future invasive infestation" as well as Objective 4.2. There are volumes of scientific research supporting this approach. An example of this is the work completed by USDA's Agricultural Research Service (ARS) Great Basin Rangelands Research Unit² regarding combating cheatgrass and other invasive species.

Clarification on Existing DOI Management Tools and National Environmental Policy Act (NEPA)

It is crucial for DOI agencies to coordinate with conservation districts to ensure actions not requiring site-specific NEPA analysis are consistent with local conservation districts' land use and weed control plans and programs to balance the need for expedient treatment with local knowledge and local priorities.

² USDA-ARS Great Basin Rangeland Research Unit
<https://www.ars.usda.gov/pacific-west-area/reno-nv/great-basin-rangelands-research>



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Management tools and NEPA already exist. Land management practices that are efficient, timely and flexible are generally supported by NACD. For example, NACD was generally supportive of the Bureau of Land Management (BLM)'s recent suite of tools geared at expedient and efficient rangeland management. Additionally, NACD submitted comments to the BLM Programmatic Environmental Impact Statement for Fuels Reduction and Rangeland Restoration in the Great Basin³. NACD recommends DOI clarify how the agency would use existing tools and NEPA.

Under Goal 4, Objective 4.4, NACD recommends DOI direct all agency departments to increase efficiency by using NEPA categorical exclusions, or pair proposed actions to align with existing programmatic NEPA analysis and management tools. While Objective 3.2 addresses streamlining management, it seems to limit streamlining to early detection and rapid response actions. NACD suggests that DOI incorporate language regarding "streamlining" to the "Crosscutting Principles" as well, to ensure it applies to all goals and objectives of the Plan.

Feedback Mission, Vision, Goals and Objectives

NACD recommends that DOI continue to clarify the goals, objectives and strategies within the management plan. These items are separate in the Plan, yet the objectives often read as goals. While NACD understands that many priorities are important and that the agency must somehow categorize each item, the management alternatives in the Plan must be built on a common and clear definition and application of visions, goals and objectives. These items should be revisited and reworked to increase clarity and to ensure consensus and understanding of all users and land managers.

Established handbooks, including the BLM Planning Handbook (H-1601-1) p. 12; Adaptive Management: The U.S. Department of the Interior Technical Guide, Writing Refuge Management Goals and Objectives: A Handbook. U.S. Fish and Wildlife Service; and the Nevada Rangeland Monitoring Handbook (2018), have already defined the differences between vision, goals and objectives. To ensure consistency between previously existing documents and the Draft Management Plan, NACD recommends that DOI use SMART (Specific, Measurable, Achievable, Realistic/Related/Relevant and Time-fixed) metrics.

S – Specific: They describe what will be accomplished, focusing on limiting factors, and identifying the range of acceptable change from the present to the proposed condition.

M – Measurable: The change between present and proposed condition must be quantifiable and measurable.

A – Achievable: Are the objectives set achievable in the current setting? Consider environmental constraints, societal expectations, economic parameters, legal requirements and technological limitations.

R – Realistic/Related/Relevant: Set objectives that can be realistically achieved given the natural and management context of the situation. They are related in all instances to the land use plan

³ NACD Comments to BLM Programmatic Environmental Impact Statement for Fuels Reduction and Rangeland Restoration in the Great Basin
<https://www.nacdnet.org/wp-content/uploads/2020/06/NACD-Comments-to-DOL-BLM-ID-0000-2017-0003-EIS-.pdf>



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goals and relevant to current management practices. Thus, they must be worthy of the cost of the management needed to achieve them and the monitoring needed to track them.

T – Time-fixed: They must be trackable over time and must include a specific and definite timeframe and location for achievement, monitoring and evaluation.

NACD supports DOI's effort to "demonstrate accountability" for their agencies under their Crosscutting Principles. NACD suggests modifying the language to require development and use of specific, measurable, achievable, results-oriented and time-fixed (SMART) performance metrics.

NACD thanks DOI for their efforts on this issue and for the opportunity to submit written comments. As local government entities, conservation districts are well suited to provide assistance when carrying out invasive species management. Conservation districts possess the local relationships that are essential when carrying out cross-jurisdictional efforts. NACD looks forward to continuing to work with the agency on important issues impacting our nation's natural resources.

Sincerely,

A handwritten signature in cursive script that reads "Tim Palmer".

Tim Palmer
President
National Association of Conservation Districts