



National Association of Conservation Districts

December 2, 2020

Chief Vicki Christiansen
U.S. Forest Service
Forest Management Range Managed and Vegetation Ecology
201 14th Street SW, Suite 3SE
Washington, DC 20250

Re: Assessing Fees for Excess and Unauthorized Grazing Proposed Rule

Dear U.S. Chief Christiansen,

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.

Responsible livestock grazing is an integral part of natural resource stewardship. Grazing practices have proven to reduce fuel loads, thus reducing wildfire across western landscapes. As local units of government, conservation districts have seen firsthand the importance of strong relationships between government and those whom it serves. NACD encourages the United States Forest Service (USFS) to continue to work toward a grazing permitting system that is flexible, meets the needs of USFS customers, and ensures strong natural resource stewardship.

In a 2016 report submitted to Congress, titled "*Unauthorized Grazing, Actions Needed to Improve Tracking and Deterrence Efforts*," the United States Government Accountability Office (GAO) found that informal resolutions, including phone calls and face-to-face meetings, were not recorded by USFS when these issues were solved. The Bureau of Land Management (BLM)'s internal policy is allowed to informally resolve un-willful grazing and solve the incident without a monetary requirement. In the report, GAO recommended that USFS move to nonmonetary settlement in order to improve the effectiveness of USFS efforts to deter unauthorized grazing. NACD believes consistency among federal agencies is vital for successful programs and is in favor of USFS's efforts to revise 36 CFR part 222 in order to match current BLM policy.

The updates for USFS policy will ensure smooth facilitation between regulations across multiple agencies, thus resulting in better natural resource management on the ground. NACD looks forward to continuing to work with USFS on important updates to federal regulation such as this.

Sincerely,

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

Tim Palmer
President
National Association of Conservation Districts