



National Association of Conservation Districts

April 17, 2021

United States Forest Service

Attn: Director, Forest Management, Range Management and Vegetation Ecology

201 14th Street SW, Suite 3SE

Washington, DC 20250-1124

Submitted electronically to: <https://cara.ecosystem-management.org/Public/CommentInput?project=ORMS-2514>

RE: U.S. Forest Service Rangeland Management Directives #ORMS-2514

To whom it may concern:

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.

NACD welcomes the opportunity to provide comments on the U.S. Forest Service (USFS) proposed changes to the Forest Service Manual (FSM) 2200, Forest Service Handbook (FSH) 2209.13, and FSH 2209.16 ("the directives") that affect permitted grazing on forest and grassland units of the National Forest System (NFS).

The updated directives advance the management of rangeland resources and public lands relied upon and enjoyed by many. Providing adequate and sustainable grazing management enhances the health of NFS lands while sustaining and protecting the multiple uses that serve as the underpinnings of rural communities' socioeconomic vitality. Therefore, NACD encourages USFS to work closely with state and local governments, including conservation districts. Conservation districts have worked with their communities for decades and are well equipped to provide insight and assistance, and USFS should coordinate with them as on-the-ground grazing actions move forward under the updated directives.

NACD supports the updates to the directives and agrees that the updates are needed. We recognize there have been some incidental updates over the years, but the USFS' documents which guide administration of grazing generally have not been updated for consistency with current science or circumstances.

Outcome-Based Grazing

NACD appreciates USFS grounding the directives on the foundation of flexibility and adaptive management with a focus on outcome-based grazing. The directives should be improved to recognize and leverage current science that has shown livestock grazing can help reach certain objectives such as riparian habitat enhancement, weed control, fire reduction and wildlife habitat improvement. USFS should properly incorporate current science and studies that have clarified



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how flexibility in grazing with a focus on outcomes nearly always results in positive or neutral impacts on rangelands. It is crucial for these outcomes to be based on proper management objectives.

Related to adaptive management and outcome-based grazing, the current 10-year term of grazing permits may not allow for any potential management changes to be assessed appropriately. The directives should allow for extending the duration of grazing from 10 years to 20 years in certain circumstances. The time it takes to follow the current permit renewal process is extensive and currently can take up to 5 years or more for a permit to be fully processed. A true adaptive management approach under the directives would help overcome some of these difficulties.

Grazing Based on Current Science

It is crucial for the directives to mandate reliance on current rangeland science and the scientific recognition that many ecological sites have an ecological potential that is no longer able to meet pre-settlement "reference state." An understanding and description of the ecological shifts or transitions that have occurred due to disturbance, such as wildfire, or legacy management are imperative in order to frame management objectives under any grazing permit. Ecological Site Descriptions (ESD) and their associated State and Transition Models/Disturbance Response Groups should be relied on, when they are available, to inform objectives and differing levels of grazing allowed. Depending on the given state of any ecological site, grazing influences the site dynamics in different ways. Any given ecological site has a range of "potential" states (i.e., vegetation characteristics) based on climatic conditions, past and present disturbance, and other field conditions. Each ecological site has multiple states it can exhibit. An understanding and description of the ecological shifts or transitions that have occurred due to legacy management are imperative in order to frame management objectives under a grazing permit renewal or any other grazing decision.

Monitoring

NACD agrees that monitoring is a key component of proper grazing management and should inform decisions associated with adaptive management and other grazing adjustments. The directives should ensure that any long-term grazing decision or permit renewal is based on long-term (not "snapshot" in time), objective quantitative data through valid monitoring protocols, acceptable under current rangeland science standards. Qualitative data is appropriate and should be used for short-term and day-to-day decision making through adaptive management. We believe the directives would be strengthened by better defining the extent to which monitoring done by the agency or by permittees may inform the decisions of the appropriate authorized officer or rangeland management specialist related to changes in authorized grazing activities.

Private Land Considerations

The directives should include and consider the strong connection with private land. While evaluating grazing use, consideration should take into account the linkage between private ranch lands and USFS permits. The potential negative cascading consequences to private lands if livestock grazing under USFS' permits is unduly restricted or reduced must be stressed in the directives. In order to maintain business operations, possible conversion of private land holdings may result from not being able to make economic use of NFS lands. In areas where private lands



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make up a significant portion, this increase in fragmentation would undoubtedly have a detrimental impact.

Closure of Grazing and Reauthorizing Grazing on Vacant Allotments

NACD appreciates the clarity provided in the directives to ensure USFS maintains future authority over grazing when there are third-party buyouts by external groups. NACD has clear policy supporting grazing on federally-managed lands and reauthorizing grazing on vacant allotments. NACD has policy of not supporting purchase and retirement of grazing permits.

Resources to Meet Obligations

NACD understands that USFS is chronically understaffed and underfunded for grazing management. The directives cannot be implemented and achieve success at scale if USFS does not have the capacity and resources needed to fulfill its obligations. While NACD believes improving the directives can create better outcomes for people, the environment and all uses of NFS lands, it is essential that USFS receives and dedicates the resources to hire, train and retain a talented workforce capable of fulfilling obligations to manage for NFS land health and provide for flexibility within livestock grazing permits and leases.

Conclusion

NACD again thanks USFS for the opportunity to engage in ongoing dialogue about the best management of grazing on NFS lands that are integral to the lives and livelihoods of those communities our member conservation districts serve. We look forward to further refinement of the rangeland management directives and offer our continued commitment for coordinated and productive relationships between ranchers, the public and the USFS.

Sincerely,

A handwritten signature in black ink that reads "Michael Crowder".

Michael Crowder
President
National Association of Conservation Districts