



STATE OF NORTH DAKOTA  
DEPARTMENT OF AGRICULTURE  
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BISMARCK, ND 58505-0020

DOUG GOEHRING  
COMMISSIONER

Allen Rowley, Director  
Forest Management, Range Management, and Vegetation Ecology  
U.S. Forest Service  
201 14<sup>th</sup> Street SW  
Washington, DC 20250-1124

RE: Proposed updates to the rangeland management directives

Dear Director Rowley,

Thank you for the opportunity to comment on the proposed updates to the rangeland management directives. The Dakota Prairie Grasslands and Grazing Associations Working Group (DPGGA) has made significant progress in the relations between the Grazing Associations and the Forest Service. The proposed updates to the rangeland management directives are in direct contradiction with the work done by the DPGGA.

I have concerns with the National Grasslands being lumped together with the National Forest System (NFS) for purposes of management decisions. The grasslands established by the Bankhead Jones Act have specific purposes and management practices authorized by Congress that are not compatible with the guidelines for the NFS. The National Grasslands could be more effectively managed with separate rules and regulations that address the specific needs and challenges that differ from the NFS.

The DPGGA worked tirelessly to reach consensus on a Standardized Grazing Agreement (SGA) that not only meets the requirements for the Forest Service, it does not violate the laws or court rulings that govern the Grasslands. This agreement is not included in the proposed updates as one of the accepted templates. The SGA signed by the members of the DPGGA do not include all nine clauses set forth in the other templates, but the clauses are addressed in the individual management plans for each Grassland.

I would appreciate consideration of either reworking the proposed updates to treat the National Grasslands differently, with separate chapters from the NFS. Alternately, a more substantial solution would be to remove all reference to the National Grasslands from the NFS Handbook and undertake a formal rulemaking process specific to the National Grasslands.

Respectfully,

A handwritten signature in blue ink, appearing to read "Doug Goehring".

Doug Goehring  
North Dakota Agriculture Commissioner

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