

April 16, 2021

U.S. Forest Service  
Director  
Forest Management  
Range Management and Vegetation Ecology  
20114th Street SW, Suite 3SE  
Washington, DC 20250-1124

RE: Updates to the USFS rangeland management directives

The American Farm Bureau Federation (AFBF), the nation's largest and most diverse agricultural organization in the nation, welcomes the opportunity to submit comments to the United States Forest Service (USFS) on proposed updates to the rangeland management directives, including Forest Service Manual (FSM) 2200, Forest Service Handbook (FSH) 2209.13 and FSH 2209.16.

AFBF appreciates the USFS' efforts to update these directives, and the public outreach reflected in the request to provide comments and the interactive webinars held in January and February of 2021.

Public benefits provided by science-based grazing management include thriving, sustainable rangelands; quality watersheds; productive wildlife habitat; viable rural economies; reduction of wildland fire hazards; and tax base support for critical public services. Public lands grazing also provides additional services such as facility maintenance, road maintenance such as culvert clearing, and trash removal. Federal grazing permittees are also another presence on public lands serving as fire lookouts, law enforcement attentiveness, and public outreach at a time of limited funding and staffing at federal agencies. In addition, grazing is an important management tool used to improve range conditions, manage for fire, and control invasive species.

Generally, AFBF suggests that the most effective way to improve livestock grazing regulations is through the development and adoption of a framework built upon flexibility, adaptive management, and outcome-based grazing.

AFBF works closely with our partners at the Public Lands Council, who represent the cattle and sheep producers who hold public lands grazing permits. They have submitted extensive comments and AFBF supports these comments.

AFBF appreciates the effort to update these directives to help with succession planning and permit eligibility. We note that in FSH 2209.13, Chapter 10, Section 12 on Term Grazing Permits, there are several positive changes to update directives and provide more flexibility. The nature and types of entities organized for farming and ranching operations can vary, and

continued flexibility on the part of the USFS regarding uniformity on discrete identities on documentation, as well as a recognition that business entities may evolve as the operation changes, would be beneficial for permit holders.

In Section 16 of the same chapter there is discussion of changes of terms and the process for suspensions and cancellations. AFBF supports the use of proven and accepted scientific analysis in making changes, as well as working with the permit holder and making decisions on an allotment-by-allotment basis. As mentioned above, grazing is a key component of fuels management. USFS should consider restoring suspended Animal Unit Months (AUMs) on grazing permits as a necessary tool to reduce fuel loads and increase flexibility in management actions and, again, focus on accepted scientific methods and require them in the decision-making process when not restoring suspended AUMs.

We also appreciate the inclusion of an informal dispute resolution process in Section 16. AFBF would additionally offer that establishment of a local arbitration board, with representation of the involved federal agency and local livestock grazing permit owners, to hear appeals of disputes over grazing practices would be beneficial.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Sam Kieffer". The signature is stylized with a large, sweeping "S" and "K".

Sam Kieffer  
Vice President of Public Affairs