



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 #ORMS-2514

The Colorado Farm Bureau (CFB) is pleased to submit the following comments in connection with the United States Forest Service (USFS) proposed rangeland management directives and the regulations for implementing the procedural provisions of the law and the onground applications. Regulations published by the agency have a significant impact on farmers' and ranchers' ability to operate their businesses in Colorado. We look forward to working with the USFS and strongly urge the continued improvement of these resources, which are critical for many ranching operations and the health of local ecosystems

CFB is Colorado's largest agriculture organization representing more than 24,000 member families from around the state. Our diverse membership is a great representation of adapting to and embracing new technologies on the ever-changing landscape. The resources made available through federally managed lands provide opportunities for ranchers to add value to their businesses and access to land that may not otherwise be available to new or burgeoning businesses. It is important that any rules and regulations foster the growth of industry and responsible use of taxpayer-owned natural resources, consistent with statutory mandates for multiple use.

CFB welcomes updates and modernizations to the directives and management objectives found within the USFS handbooks and policies contained within. It is CFB's concern as to how these changes will be implemented and what is the plan of the USFS to provide public outreach for broader understanding of how these changes will impact public lands users. As CFB works closely with our industry partners we would enjoy the opportunity to be a conduit for information to our members and partners. Conveyance of such a robust change in tactics and information is incredibly important in updates such as these, as it is vital to prioritize the permittees, the continued multiple uses, and proper administration of the public lands for the benefit of all.

A great deal of benefit is achieved through the multiple uses of the rangelands and public lands grazing; providing increased habitat improvement of multiple species, both animal and non-animal; rural economic driver, reduction in biomass and fuel loads. With the benefits in mind that is certainly room for further clarifications and inclusions of stakeholders and permittees.

CFB appreciates the agency's efforts to improve upon the ways in which succession of operations may occur and ensure the availability of necessary grazing for generations to come. However, increased and continued





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flexibility from the USFS to create continuity and maintain privacy in documentation is imperative in multi-generational successions.

Much thought should be given to the conflict resolution processes contained in Section 16, where it concerns terminations of contracts and suspensions of continued uses. Sound fact-based, science should always be used by the agency as well as effective and informative discovery with the land-users. Any existing suspensions or limits of uses should also be taken into great account in considering future grazing availability for reductions in fuel loads and improvements on the landscape.

CFB greatly appreciates and points¹ to the details of the document outlined by the Public Lands Council (PLC), American Farm Bureau Federation and other industry partners. Many of changes to the handbooks reach across multiple guidances and are pointed out independently by the comments made within PLCs document and without repeating these CFB recognizes the importance of these points and asks that the USFS give thought to the same key areas. These partners recognize the importance of collaboration and working together to accomplish common goals and better outcomes for all where it concerns the uses of the federally managed lands.

We also feel it would be beneficial to all involved to extend the comment period further and do more public outreach as well as better streamlining the conveyance of information.

CFB would like to express its appreciation for the opportunity to participate in this process and the extension that was afforded to the public by the agency. We look forward to further dialogue and engagement with the agency and advancement of the interactions positively with public lands users and those that grow our nation's food supply.

Sincerely,

A handwritten signature in black ink, appearing to read "Chad Vorthmann", written in a cursive style.

Chad Vorthmann
Executive Vice President

¹ Submitted online portal, Public Lands Council, Apr. 17, 2021, U.S. Forest Service Rangeland Management Directives #ORMS-2514, pgs 4-12

