Data Submitted (UTC 11): 4/16/2021 11:00:00 AM
First name: Tiffany
Last name: Rivera
Organization:
Title:
Comments: New Mexico Farm and Livestock Bureau [NMF&LB] is the largest and oldest advocacy organization in New Mexico representing more than 20,000 members across the state. NMF&LB is a grassroots advocacy organization guided by policy developed by volunteer members involved in a variety of agricultural industries in New Mexico[rsquo]s 33 counties. As the Voice of New Mexico Agriculture, we appreciate the opportunity to voice our concerns and recommendations for the Rangeland Management Directives.

NMF&LB recognizes the need for change as the existing Forest Service manual and handbooks have not been amended in over 30 years. Multiple uses for the forest have expanded. One thing has not changed, farmers and ranchers continue to be good stewards of the land. Grazing continues to be an important contributor to healthy forests and establishing and maintaining good and productive relationships between allotment owners and the Forest Survive is essential. NMF&LB provides the following comments and suggestions on the proposed revisions.

Chapter 70, Section 71.2-Permitee Compensation for Rangeland Improvements

NMF&LB supports compensation for improvements on rangelands permittees graze on. Allotment owners are good stewards of the land and its resources. Any improvements such as fencing should be first conducted by the Forest Service, however, should any improvements be conducted by the current allotment owner, then those improvements should be adequately compensated to the permittee. Rangeland improvement costs should not be burdensome on ranchers.

FSM 2244- Rangeland Improvements

We reaffirm our stand in opposition to any increase in wilderness areas and wilderness study areas and support any efforts to manage these areas according to the original Wilderness Act. Livestock grazing is an important tool in managing healthy forests. Continued grazing throughout the forests, especially in wilderness areas can aid in forest fire prevention by reducing the amount of fuel load on forest floors. NMF&LB recommends the Forest Service provide clarification on exactly what restrictions and prohibitions do not apply to grazing permittees. Grazing in a wilderness area poses challenges with the prohibited use of motorized vehicles. A clear explanation of activities can assist line officers when working with permittees and in managing allotments correctly.

NMF&LB encourages the Forest Service to state guidelines for notifying and working with impacted or neighboring allotment owners at all times but especially during the process of modifying a permit. Language should be provided to clarify the basis for modifying the permit. Vacant allotments should be utilized for grazing purposes and offered to other permittees especially during times of severe drought. Furthermore, clear guidelines for considerations should be taken into account in determining which types of entities are eligible to hold a Forest Service grazing permit. NMF&LB does not support third parties utilizing allotments for non-grazing or endangered species recovery programs.

A major challenge farmers and ranchers face is effective succession planning. We appreciate changes in this document and actions going forward that facilitate a process which works to keep farms and ranches in operation for generations to come. We commend the Forest Service for the inclusion of sessional grazing as well as the recommendation which would allow children and grandchildren the ability to run more than 50% of the older generations permitted numbers. We do not support the proposed decrease in permitted numbers for future generations of permitted holders.

Thank you for the opportunity to comment on this proceeding. Please feel free to contact me at 575.532.4706 or at tiffanyr@nmflb.org with any questions.

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