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**File Code:** 2210**Date:** March 25, 2020**Route To:****Subject:** FSM 2210 - Grazing Management**To:** Regional Foresters

In our response to the COVID-19 pandemic and our planning efforts for our 2020 operating season, each day brings a greater understanding of the work in front of us. Grazing on National Forest system lands is part of the Nation's food supply and will continue in 2020. We know our grazing community has concerns with potential impacts to their operations from this situation. We want to share some guidance we believe will help limit impacts to our permittees and continue our stewardship work. Our focus is on the safety of our employees and slowing the spread of this virus while we seek ways to reduce impacts to those whose livelihoods depend on using our National Forest System lands. We believe we have the ability to adjust our normal approach to permit management to allow for a normal grazing season.

We ask you to follow the guidance you find in the enclosed document. Strong and regular communication will be the most critical aspect to successfully operating within the constraints we currently have. This guidance is intended to provide maximum flexibility to this important industry by providing different ways of managing our documentation and records, as well as working closer with our permittees to ensure resource conditions are maintained at appropriate levels. We will also be sharing these best practices with national grazing industry groups.

We ask Line Officers to engage as appropriate with their permittees to understand local challenges. In this way, we will work together to ensure we provide both our employees and the dedicated ranchers operating on National Forest System as much safety as possible to reduce their exposure while still supporting continuation of their operations.

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Signed by: CHRISTOPHER FRENCH

**CHRISTOPHER B. FRENCH**  
Deputy Chief, National Forest System

Enclosure



## ATTACHMENT

### Supplemental Guidance

#### Range Management and Grazing during USDA Forest Service COVID-19 response.

*This guidance may be updated or rescinded at any time. For the purposes of planning, this guidance is anticipated to remain in place for calendar year 2020.*

Grazing on National Forest system lands is part of the Nation's food supply. Units, using a risk based approach, should make necessary adjustments to ensure sustained service in support of this program.

To meet this, units should:

1. Update all job hazard analysis incorporate measures to reduce exposure to COVID -19.
2. Plan ahead to have time to accomplish pre-season work prior to respective turnout dates.
3. State and Local Orders regarding sheltering in place are not anticipated to impact permittee operations due to the nature of their business and isolation of most operations.
4. If you are teleworking for extended periods, ensure the voicemail message on your office phone is updated and directs people to alternate contact methods.
5. Avoid person to person interactions without proper social distancing. If in person meetings are required **MAINTAIN CDC RECOMMENDED DISTANCES** from any other person present. The health and safety of Forest Service employees, permittees, and grazing association members is of utmost importance.
6. Annual Operating Instruction (AOI) Meetings
  - a. As soon as possible send a letter out to permittees or Grazing Association Board of Directors (BOD) explaining how grazing planning will be conducted this year.
  - b. Work with permittees to understand what limitations they may have so we can find ways to help permittees work through them. For example, sheep permittees may be short herders. Consider the possibility of larger bands (fewer total herders required) that may graze a couple of allotments in a combination that would typically be grazing individually as an option to allow grazing to occur.
  - c. Maintain social distancing. Unless it is not feasible, aim towards doing all meetings over the phone.
  - d. If meetings need to happen in person due to mandatory paper signing, complexity, or multiple stake-holders make sure proper social distancing is taking place. Follow any local unit guidance.
  - e. If a hardcopy signature is required consider sending documents through the mail with a self-addressed stamped envelope for return or using electronic signatures with telephone confirmations. If signatures cannot be obtained while ensuring proper adhere to health and safety guidance, postpone signature, confirm acceptance with signee on the phone, and note rational in administrative files.

- f. AOI Meetings and documents, or their equivalent, are meant to inform the permittee. Permittee signature is not necessary for an AOI to be valid. A phone call would be adequate.
  - g. District Rangers will sign the AOI and a copy will be emailed/mailed to the permittee or BOD prior to turnout.
  - h. On units that work with Grazing Associations this letter should also include a description of how Land Use Practices (administrative costs and conservation practices) will be planned and approved.
7. Billing - Payment of the bill is authorization to graze.
- a. In the same AOI letter to the permittees or BOD, include an Annual Authorized Use Request Form or equivalent preliminary package if working with Grazing Associations to document requested Land Use Practices (LUPs) and livestock numbers.
    - i. The permittee or BOD will fill out the form and any other necessary paperwork and send it back to the Forest Service.
    - ii. This form provides a paper trail for the numbers applied for and LUPs if working with Grazing Associations.
    - iii. Keep a blank copy of the Annual Authorized Use Request Form or equivalent preliminary package.
      - 1. In this unique situation, line officers may allow for livestock numbers and requested LUPs to be taken over the phone.
      - 2. This will be useful if mail services get delayed.
  - b. When the Annual Authorized Use Request Form or equivalent preliminary package is filled out, a bill will be produced and mailed/emailed to the permittee.
  - c. Permittees or Grazing Associations will pay the bill.
    - i. Day to day operations of offices may prevent permittees from paying the bill at the office.
      - 1. **Highly encourage permittee or Grazing Association to pay the bill online.**
      - 2. Permittee or Grazing Association can pay the bill through the mail. However, mail services and receipt of the payment could get delayed.
      - 3. If the first two options cannot be done look for ways, such as a drop box, for permittees or grazing association to drop off payments at an office to be processed.
      - 4. Let the permittee and grazing association know their options so they can give themselves sufficient time to pay the bill.
      - 5. Regular communication with permittees, whether on line or over the phone, will help head off some potential issues.
  - d. Permittees will be notified when payment has been received.
8. Range Readiness Monitoring

- a. Recommended to complete range readiness checks alone. However, follow local district guidance. For example, follow Check-in/Check-out policies.
  - b. Range staff should maintain social distancing and go with permittees only if absolutely necessary.
    - i. Take separate vehicles.
    - ii. Maintain CDC recommended distances from any other person present.
9. Counting livestock onto the Forest
- a. In 2020 should only take place when:
    - i. A permit must be validated (confirm the new permittee is running 90% or more of permitted numbers).
    - ii. Non-compliance issues that are being resolved.
  - b. Maintain CDC recommended distances from any other person present when counting.
  - c. CAN BE WAIVED BY LINE OFFICER

### **Permittee Assistance**

- 1. Be clear with permittees the roles they can play in helping ensure records for the season are up to date:
  - a. Day to day operations of District Office may be hindered, which may cause Forest Service employees not to make it to the field as often. Depending on the extent of restrictions, this may be the case for extended periods of time.
  - b. Being responsive to phone calls, letters and emails from FS will support good communications.
  - c. Letting the Forest Service know when they are out on the allotment; and taking notes and reporting what they see can be helpful in ensuring range stewardship.
  - d. Paying bills early.
    - i. Look for ways to pay bills online.
    - ii. Let the Forest Service know when bills are paid.
  - e. Playing an active role in monitoring.
    - i. Take pictures before and after grazing.
    - ii. Take measurements of stubble heights and utilization. Ocular utilization is perfectly acceptable.
    - iii. Keep records of when livestock are moved.
    - iv. Send any monitoring to Forest Service Range Specialist.