

Q1. Will grazing continue to be authorized on National Forest System (NFS) lands during the Covid-19 Pandemic?

A1. Grazing on NFS lands is part of the Nation's food supply and will continue in 2020. The Forest Service (FS) is doing everything possible within regulatory restraints to continue to authorize grazing during the Coronavirus Pandemic and beyond. There have already been necessary adjustments and more are expected to be made by both the Forest Service and grazing permittees to make this happen. It is important to note that any adjustments or decisions that are made will stay within the legal space in which grazing of NFS lands is regulated.

The FS understands that there cannot be a one size fits all approach to grazing. Line officers will be relied on to make on the ground decisions while considering recommendations from the Range Management Specialist (RMS) and input from permittees.

Q2. If FS Offices are closed to the public, how do permittees/grazing associations contact their District Ranger and RMS?

A2. There will be instances where FS Offices are closed to the public and/or FS employees are teleworking. During extended teleworking situations, employees will have their computers and will be accessible via email. Employees have also been instructed to update their office phone messages to provide callers with alternate contact methods (e.g., mobile number [if applicable], email address, etc.) that can be used to reach them.

If a permittee or grazing association member does not already have an alternate way to contact their Line Officer or RMS, please reach out to the office immediately to get this information. Likewise, it is also important for the District Ranger and RMS to have the permittee's/grazing association's updated contact information. If the permittee/grazing association member has a phone number or email that they are willing to provide that the FS does not currently have in their records, they should pass that information on. Email is the fastest way to send documents but often times the least used due to the FS not having the address.

Q3. How will Annual Operating Instruction (AOI) Meetings or their equivalent take place?

A3. It is highly encouraged for RMS to hold these meetings over the phone. The RMS will go over the AOI with the permittee as if they were in the same room. Necessary information will be discussed and captured, such as a confirmation of numbers of livestock requested to be grazed on the respective allotment(s), to ensure accurate plans and subsequent bills are completed. The District Ranger and RMS will work with permittees to understand what limitations they may have so there can be an understanding as to how work through them.

There may be limited cases where a face-to-face meeting is required, due to lack of phone service, the need of signatures, or other viable reasons that preclude meeting over the phone. In these instances, all persons attending the meeting WILL MAINTAIN CDC RECOMMENDED DISTANCES from any other person. The health and safety of Forest Service employees, permittees, and grazing association members is of utmost importance.

Q4. How can permittees and grazing associations help in making sure annual meetings take place in a timely manner?

A4. The annual meeting process always works best when both the FS and permittees/grazing associations are responsive to the other party. If/when the FS reaches out to schedule the meeting or any other discussion, please respond quickly as to your availability. Remember, some decisions may require greater punctuality. There will likely be scenarios where there is not time to mail and receive a letter in advance of dates that decisions need to be implemented to be effective.

Outside of planning of the annual meeting the permittee/grazing association may have other needs. In those instances please reach out quickly. The permittee/grazing association member should **ensure that they have the contact information (phone number and email) for the District Office, District Ranger, and Range Management Specialist so they can reach them when needed.**

Q5. Will grazing fees be charged and collected during the Coronavirus Pandemic?

A5. Yes, per regulation, grazing fees shall be charged for all livestock use of National Forest System lands (36 CFR §222.50(a)) and those fees are to be paid in advance (36 CFR §222.50(g)). As a result, the only authorization to graze is a paid for grazing bill. This requires that all grazing fees be charged for livestock use made during the 2020 grazing year without exception.

This requirement is reflected in all Term Grazing Permits issued to individual permittees (FS 2200-10) and Grazing Associations (Grazing Agreement).

Some examples of applicable terms and conditions which are include in Term Grazing Permits are as follows:

- **FS 2200-10**
 - **Bill for Collection.** Each year, after validation and prior to the beginning of the grazing season, the Forest Service will send the permittee a Bill for Collection specifying for the current year the kind, number, and class of livestock allowed to graze, the period of use, the grazing allotment, and the grazing fees. This bill, when paid, authorizes use for that year and becomes part of this permit.
 - **Payment of Fees.** The permittee will not allow owned or controlled livestock to be on Forest Service-administered lands unless the fees specified in the Bill for Collection are paid.
- **Grazing Agreement**
 - Timely pay all fees due the United States under this Agreement.

The requirement to pay grazing fees in advance of livestock use is of utmost importance to adhere to. Failing to do so would result in unauthorized grazing use and could leave both parties in violation of the law and outside the terms and conditions of Term Grazing Permits. This has the high potential to lead to legal issues into the future.

Q6. How will grazing fees be collected?

A6. At this time online payment is the preferred method of grazing fee payment. Online payment is not only the quickest form of payment, but also reduces the need for person to person interaction. Payment through the mail will still be available, but there may be delays in mail

service. In person grazing fee payments at local FS offices may or may not be available or only available in limited circumstances or hours depending on Federal, State, or local restrictions.

During the annual spring meeting with the permittees or grazing association, the RMS will confirm the number of livestock planned to be grazed on the allotment(s). The RMS will then enter the information into the database and generate the bill. The FS will work diligently to ensure bills are provided as soon as possible to enable payment in advance of turn out.

Q7. How can permittees/grazing associations help in making sure grazing fees are processed?

A7. It is important that permittees/grazing associations prepare in advance of any scheduled meeting to ensure you are able to accurately report the number of livestock they would like to graze and any other request or concerns they may have. This will allow any planning meetings to be as efficient as possible and bills to be generated as quickly as possible. Furthermore, the FS **HIGHLY RECOMMENDS** that permittees or grazing associations find a way to pay their grazing fees on line. This will be the most reliable way to process grazing fees at this time. Paying online also promotes social distancing between the FS, permittee and other members of the public.

Grazing fees may still be paid through the mail, though depending on the area and evolving situations, may not be as reliable as online payments.

Under normal circumstances, the FS can take payment of grazing fees at local District or Forest offices. Depending on the State and Local direction, this may not be the case, thus should not be relied on.

Let the RMS or District Ranger know when you have sent in payment by any method above. They can then track the database to confirm payment has been received.

Q8. How will the FS continue to monitor allotments?

A8. Monitoring will continue to be a focal point of the range program though there will be adjustments made. Monitoring that is mandated by decisions will still be a priority for the RMS to complete. If more than one person is monitoring at the same location, CDC recommended distances will be maintained at all times.

Besides mandatory monitoring, FS range personnel will be out conducting pasture inspections as often as possible to ensure grazing standards are being met, grazing rotations are being followed, and improvements are being maintained.

Q9. How can permittees and grazing associations play an active part in monitoring?

A9. This is a great opportunity for the permittee/grazing association members to continue to take an active role in making sure grazing continues on NFS lands. Grazing permittees and association members are often times on the allotment more than the RMS. Each time permittees/members are on the allotment it is encourage that they take notes and photos to document what they see. This would include such things as livestock locations and distribution, and condition of range improvements. Permittee/members may consider conducting any monitoring they are familiar with. This might include such efforts as estimating ocular utilization or riparian stubble height. Any measurement recordings, notes, and pictures should provide a

date and explanation of conditions observed. This will be important documentation for the allotment files.

Q10. What flexibilities in permit and allotment administration does the FS have in decision making?

A10. FS Line Officers will use their judgement on the day-to-day decision making on grazing allotments. Line Officers will be relying heavily on the RMS and grazing permittees/associations to provide them with the best available information to make their decision. Decisions will still need to fit within all laws, regulations, and the terms and conditions of the respective Term Grazing Permits and/or Grazing Agreements.

Some examples of how line officers can show flexibility are:

- Waiving counting on livestock to validate a permit.
- Not requiring the permittee/grazing association to sign their AOIs or equivalent documents to reduce the need for face to face meetings and/or mail correspondence. The other option would be the use of electronic signatures if permittees/associations have access to the applicable technology.
- In instances where hardships are realized as a result of the Covid-19 Pandemic, permittees may have challenges that limit their ability to fully utilize their grazing permits. These challenges may include a lack of help and/or resources such as sheep herders.
 - Consider the possibility of larger bands (fewer total herders required) and plan the grazing to utilize a couple of allotments in combination/rotation that would typically be grazing individually as an option to allow grazing to occur while staying within permitted head months.
 - In order to address these unforeseen challenges, the FS line officer may provide flexibility relative to Non-Use for personal convenience. In specific instances where a permittee is unable to fully stock his/her grazing allotment, non-use for personal convenience may be approved but not counted against the requirement that limits non-use for personal convenience to 3 consecutive years or four years in any 10 year period. In these instances, hardships due to covid-19 must be cited as the reason for non-use for personal convenience.

Q11. How will Land Use Practices, such as, conservation practices (CPs) and administrative costs, be approved?

A11. The RMS will work with the grazing association over the phone and/or through email correspondence to develop the preliminary package that captures the requested CPs and administrative costs. The package will then be reviewed by the District Ranger and approved along with the initial grazing bill.