



Society for Range Management

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The Honorable Deb Haaland
Secretary of Interior
U.S. Department of the Interior
1849 C St NW
Washington, DC 20240

Submitted via eRulemaking Portal

RE: Docket No. DOI-2021-0016; *Request for Information to Inform Interagency Efforts to Develop the American Conservation and Stewardship Atlas*

Dear Secretary Haaland;

The Society for Range Management (SRM) is the professional scientific society and conservation organization whose members are concerned with studying, conserving, managing, and sustaining the varied resources of rangelands, which comprise nearly half the land in the world. Established in 1948, SRM has hosted over 4,000 members in 48 countries, including many developing nations. SRM's members are land managers, scientists, educators, students, producers and conservationists—a diverse membership guided by a professional code of ethics and unified by a strong land ethic. We appreciate the opportunity to provide testimony to inform interagency efforts to develop the American Conservation and Stewardship Atlas (the Atlas).

BACKGROUND

Section 216(a) of Executive Order 14008 identifies a national conservation goal, calling for the conservation of “*at least 30 percent of U.S. lands and waters by 2030.*” In accordance with Executive Order 14008, the Department, USDA, DOC, and CEQ released the *Conserving and Restoring America the Beautiful* report on May 6, 2021.

The report specifies that an interagency working group will develop an Atlas through interagency collaboration to develop and track a clear baseline of information on lands and waters that are conserved or restored. The Atlas is intended to be an accessible, updated, and comprehensive tool through which to measure the progress of conservation, stewardship, and restoration efforts in a manner that reflects the goals and principles of the initiative.

SRM believes that rangeland ecosystems should be managed to provide optimum sustained yield of tangible and intangible products and benefits for human welfare. This can only be achieved through the sound use of ecological and economic principles. The use of valid resource inventories and monitoring are a basic requirement for planning and management of rangeland resources. Management practices, including prescribed grazing, fire and integrated pest management may be employed to create positive changes in the landscape through development of sustainable, desired plant communities.

To that end, SRM affirms that conservation is not a static goal. Past policies have prioritized setting land aside as a means of conservation. It is not healthy to maintain a “hands-off” management approach on rangelands. Ultimately, conservation values are dependent on land management. Management actions themselves need to be recognized as conservation and stewardship.

RESPONSES to QUESTIONS POSED

In the Federal Register notice, the interagency working group posed the following questions to stakeholder for their review and feedback. SRM responds below.

- ***Science and Data.*** What data sources, standards, and technical approaches should be applied to data included in the Atlas to ensure that it is an authoritative and useful tool for the public?

The Society for Range Management is the foremost leader on the science that defines rangeland monitoring and management. Any data sources, standards, and technical approaches should be the best available knowledge and information as researched, published, and adopted by leading rangelands professionals and practitioners.

Use the broad definition of rangelands when establishing vegetation monitoring protocol to be useful across Federal and non-federal land. A land-based hierarchy or classification is most efficient for management. Among federal agencies there is limited commonality as to the method for site specific classification and monitoring. Use of Ecological Site Descriptions to classify and evaluate land management options uniformly across the landscape will increase the efficiency of monitoring and assessing resource issues at all levels local to national. Consider expanding efforts of the Natural Resources Conservation Service (NRCS), Forest Service (FS), Bureau of Land Management (BLM) and Agricultural Research Service (ARS) in development and implementation of Ecological Site Descriptions (ESD) nation wide. ESDs provide land managers the information needed for evaluating the lands suitability for various land-uses, responses to varying management activities and disturbance processes, potential ecosystem services, and ability to sustain productivity over the long term.

- ***Conservation as a Continuum.*** How can the Atlas reflect the meaningful conservation work already underway in America?

The NRCS National Resources Inventory (NRI) Rangeland protocol provides one of the most comprehensive developed and applied national inventory of rangeland. NRCS,

BLM, FS, and ARS collaboratively tested national inventory procedures that that are now used to inventory all non-federal rangelands and now applied to support the BLM AIM program and National Grasslands.

Expansion of the NRI inventory to all the nation's rangeland will provide a comprehensive set of data depicting benefits of conservation over time and identify emerging resource concerns.

- What stewardship actions should be considered, in addition to permanent protections, to capture a more complete picture of conservation and restoration in America?

According to the NRI nearly 33% of the nation's 770 million acres of rangeland are not in private ownership. One third of the nation's rangelands are managed by numerous public agencies including BLM, USFWS, FS, USGS, DOD, NPS, and others. NEPA provides that land managed under federal jurisdiction should currently meet the 30% goal of protected rangelands.

Rangelands are fragile native plant communities that evolved over eons adapting to changing ecological stressors such as fire, drought, flooding, and human use. Much of today's rangeland found in the arid West still retain carbon sequestered in their soils that would require a lifetime to restore should the plants communities be destroyed by mis-management.

Federal leadership is needed to increase staffing of qualified range management specialists to support conservation efforts on both federal and private lands to maintain ecological integrity and provide economic sustainability for landowners and local communities.

CONCLUSION

Natural resource professionals are key allies in tackling climate change and improving the overall health and resilience of ecosystems across public and private lands. Accordingly, we urge you to consider the ongoing role our members will play as America the Beautiful initiative is implemented. SRM supports maintaining a continuing education program that emphasizes the importance of participation of federal employees in professional societies, like SRM, the Society of American Foresters, The Wildlife Society, and others.

Rangeland professionals should continue to play a key role in decisions about the future of our nation's rangelands. As you continue to develop this initiative, we encourage you to support policies that foster the ability of these scientists and practitioners to create and implement management plans and activities that can adapt to changing conditions and needs.

SRM appreciates the opportunity to provide this feedback to the Department of the Interior, on behalf of an interagency working group co-led with the Council on Environmental Quality

(CEQ), Department of Agriculture (USDA), and Department of Commerce (DOC) through the National Oceanic and Atmospheric Administration (NOAA).