



**ARIZONA
NATURAL RESOURCE CONSERVATION
DISTRICTS
STATE ASSOCIATION**

**POLICY
POSITIONS
RESOLUTIONS**

2009-2010

**Arizona Natural Resource Conservation Districts
State Association
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Most of the rural and agricultural residents of Arizona have little knowledge about the complexities of water law and lack the financial resources to obtain adequate legal counsel to defend their rights against corporate and governmental downstream water users.

Rural Water for Stock Ponds and Domestic/Livestock Wells: Position (2009)

The Arizona Association of Conservation Districts supports the classification of waters used for rural domestic, livestock, and wildlife as beneficial and minimal uses which are essential to the continued use and conservation of natural resources for the benefit of all residents of the State.

Further, the AZNRCD requests that the Governor, the Arizona Legislature, the relevant State Government Agencies and the State Courts make every effort to establish through policy, regulations, and legislation the beneficial minimal use classification of such waters.



Regulation

Existing and future soil, water and other natural resource conservation management practices within Arizona’s riparian areas should not be hindered or stymied by adverse State or Federal rule, regulation or law.

Water Rights

Clean Water Restoration Act: Background

The United States Congress is considering rewriting the Clean Water Act. S787 would delete the word “navigable” from the Clean Water Act, thus allowing the EPA to control all waters in the United States. Conservation Districts in Arizona were created, among other things, for “the preservation of water rights and the control and prevention of soil erosion” (ARS-1001).

If S787 is enacted, control of all waters, large or small will come under the control of the federal government effectively extinguishing vested water rights in Arizona. Arizona’s Conservation Districts will lose the ability to accomplish their mission.

Clean Water Restoration Act: Resolution (2009)

The Arizona Natural Resource Conservation Districts State Association opposes the removal of the word”NAVIGABLE” from any clean water legislation.

Therefore, the Arizona Natural Resource Conservation Districts State Association opposes S787.

Rural Water for Stock Ponds and Domestic/Livestock Wells: Background

A general adjudication of water rights in Arizona is being carried out by the courts which will ultimately establish all legal rights to use surface water in Arizona. Under present procedures all claimants for surface water rights will have to prove the validity of such rights in court.

The continued use and conservation of rural and agricultural lands are entirely dependent on the productive use and conservation of soil and water resource for the benefit of rural residents and for the larger population dependent on these lands for food, fiber, clean water, recreation, and other economic and ecological benefits.

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Certification of Rangeland Professionals: Background

The Society for Range Management and the Wildlife Society have established programs to certify individuals as professionals in each of these natural resource disciplines.

The purpose of these programs is to assure minimum educational and experiential background for people working in the profession of range management and wildlife management, to encourage continuing education and professional development and to provide a standard of ethical conduct in professional activity.

Ranchers and other landowners are concerned that people involved in rangeland grazing and wildlife management planning and decision making in federal and state agencies should have obtained the required knowledge and skill through education and experience to act in a competent manner.

It is imperative that rangeland and wildlife professionals continue to build on and update their knowledge and skills by continuing education.

Certification of Rangeland Professionals: Position (2009)

The AZNRCD acting on behalf of public land grazing permittees and private landowners urges the Chief of the Forest Service, Director of the Bureau of Land Management, Chief of the Natural Resource Conservation Service, and the Arizona State Land Commissioner to use whatever means they may legally and ethically employ to encourage their professional employees involved in rangeland and wildlife management and decision making to become certified by the appropriate professional society, and

Further, AACD urges that individuals within these agencies who are certified or who are working toward obtaining certification be supported by providing time and /or financial support for them to obtain necessary training and continuing education credits.



Wildcat Dumping: Position (2008)

The Arizona Natural Resource Conservation Districts State Association supports such efforts and commits to actively promote them.

Regulation

Management and Regulation of Arizona’s Riparian Areas: Background

Water is essential to life in arid Arizona. Where water is present, an abundance of life exists. This is especially true of Arizona’s riparian areas. These areas are not only home to a host of plant and animal species, but are also primary sites of both prehistoric and modern settlement. Because water in riparian areas was a magnet to early settlers, much of Arizona’s more accessible areas are in private ownership. The urbanization of some of these lands has generated increasing demands from segments of the environmental community to transfer remaining riparian areas into public ownership or management. Many of the current riparian landowners treasure the riparian values of their lands and believe these values can be better managed under private ownership.

The conflict over riparian ownership and management has escalated; there has been a growing push to control owner activities and management via regulation. A number of riparian area proposals generated at the national level ignore the physical realities of Arizona’s arid environment and threaten the ability to provide restorative or conservation management practices essential to the health and maintenance of Arizona’s riparian areas.

The loss of the ability to enhance riparian areas or generate new areas through land management practices along with the threat to existing property and water rights is of growing concern to Arizona’s Soil and Water Conservation and Natural Resource Conservation Districts.

Management and Regulation of Arizona’s Riparian Areas: Position (2009)

Current land ownership patterns, private property rights, historic water rights (both surface and subsurface) natural resources, management practices, economic, AND operating factors should be granted full consideration in the management and regulation of Arizona’s riparian areas.



Emphasis on long-term conservation goals requires stability of tenure on the land for those making the investment of time and money to accomplish the goals. Recent and pending government policy changes and court decisions have weakened the security of tenure of grazing leases and increased uncertainty about future grazing fees and other costs of operating on both state and federal lands.

State and Federal Grazing Leases: Position (2009)

The Arizona Natural Resource Conservation Districts State Association believes that equitable fees and security of tenure of grazing leases creates incentive for ranchers holding grazing leases to engage in practices and make investments that lead to long-term conservation benefits to the land.

Further the AZNRCD believes that the policies which result in loss of state and /or federal grazing leases, or the threat of such loss will discourage ranchers from participating in conservation management, and will encourage the development or sale of private lands of non-agricultural purposes resulting in loss of open spaces and wildlife habitat through urban sprawl, and

The AZNRCD urges state and federal lawmakers and land management agencies to adopt legislation and policy which will promote incentives for ranchers on both private and government leased land to invest in conservation practices and maintain the land in agricultural use.

Wildcat Dumping: Background

Illegal dumping is a statewide problem that affects all of our conservation districts.

The Winkelman NRCD has been working on legislation in consultation with many affected parties, and proposed legislation may include

1. reducing the burden of proof obstacles to conviction
2. establishment of a state cleanup fund, funded among other things by fines and surcharges
3. eliminating language in state grazing and ag leases that puts lessees at risk if an illegal dump is found on their respective lease
4. a substantial increase in fines



Office of Personnel Management Standards for Natural Resource Specialists Involved in Rangeland Management : Background

The federal government has established educational and other requirements for employment in various professional classifications, including rangeland management specialist, these requirements are administered by the office of Personnel Management for all federal agencies.

The purpose of such requirements is to ensure minimum qualifications for individuals employed for technical rangeland management and/or technical assistance in the federal agencies.

Landowners, grazing permittees and other people whose livelihoods may be affected by the decisions or advice given by federal employees on range management issue have a right to expect a certain level of professional qualifications.

There is evidence that in recent years some agencies have not strictly adhered to the standards of professional employment established by the Office of Personnel Management, and that has resulted in actions inconsistent with accepted professional principles to the detriment of some landowners or public land permittees.

Office of Personnel Management Standards for Natural Resource Specialists Involved in Rangeland Management: Position (2009)

The AZNRCD does hereby request the Congressional Delegation of Arizona to investigate the extent to which federal agencies are adhering to the OPM standards for employment in the position of range Conservationist, and further to direct these agencies to follow these requirements in the future.

Recreational Fees for State Lands: Background

Arizona’s State Trust Lands are managed by the Arizona State land Department on behalf of the public schools and other beneficiaries of the revenues generated from these lands. These lands are not “public lands” like Forest Service and BLM lands because, unlike federal lands, their purpose is to generate revenue for beneficiaries of the Trust. Accordingly, any use of State land for agriculture (including grazing), would cutting, rights of way, or sand and gravel is done



only by permit from the State Land Department which charges a fee for such permitted activity. The money collected, less administrative costs, goes to the beneficiaries.

Recreational use of State land also can only be made by purchasing a permit for such use from the State land Department, although many people are either unaware of this requirement or ignore it on the expectation that it will not be enforced. One problem with the recreational permit program is that money collected from the sale of permits does not go to the beneficiaries of the Trust as other revenues do, but goes directly into the general revenue fund of the State. Thus, the State Land Department has a responsibility to collect such fees, but no source income to administer and enforce the program.

Recreational Fees for State Lands: Position (2009)

The AZNRCD recommends to the Governor of Arizona and to the Arizona Legislature, that necessary changes in the law or regulations be made to require that recreational fees for use of State Trust Lands go to the beneficiaries of the Trust, and that the State Land Department be authorized to use a portion of the receipts from such permits to administer and enforce the requirement for recreational permits on State land. Further, we recommend that purchase of recreational permits be facilitated by making them available in outlets similar to those that sell hunting and fishing licenses, to make it easy for people to comply with the law in a timely fashion.

Livestock Management

Restocking after Drought: Background

The current drought in Arizona has resulted in widespread reductions in grazing or total destocking of rangelands. Livestock reductions have been voluntary on private, state and some federal lands. In other cases, federal land management agencies have mandated reductions or destocking. Federal agencies have, or are considering, policies for restocking after the drought. These policies have important consequences not only for the federal lands to which they apply, but to associated private and state lands as well. Therefore, AZNRCD believes it is imperative for federal land management agencies have a sound approach to this question.



4. AZNRCD believes that the permit buyout program has only one objective—the elimination of grazing on public lands, and therefore, the virtual elimination of livestock production in the western states. We believe that properly conducted range livestock production is not only ecologically sound but provides a source of income to both the federal government and local economies that otherwise would come out of the taxpayer's pocket.
5. AZNRCD does not support “permanent retirement” from grazing of any land managed by the U.S. Forest Service or the Bureau of Land Management.

State and Federal Grazing Leases: Background

A large percentage of land in Arizona is rangeland or forestland grazed by domestic livestock. These lands are not only important for the economic benefits of livestock production, and Arizona's rural communities, these lands represent the highest single source of income from agriculture in Arizona. They are the habitat for most of the State's wildlife, the source of water for farms and cities, and provide open space for aesthetic enjoyment.

Most livestock production in Arizona is done on ranches which usually include a complex and interdependent pattern of privately owned land along with State and/or Federal grazing leases. The private land portions of these ranches are associated with prime riparian habitat for wildlife as well as property rights to both surface and sub-surface water. It is the proper management of these lands with domestic livestock that produces functioning stable watersheds, diverse habitat and a clean, dependable water supply downstream. Non-grazing on arid land promotes loss of biodiversity, erosion, fire and floods.

Many of these ranches are dependent on state and/or federal grazing leases to make a ranch a viable operating unit, both in terms of economics and balance of seasonal forage resources. Loss of these grazing leases would force most of these ranchers to sell their livestock and develop their land for non-agricultural purposes to recoup the value of their private lands.

The mission of the Natural Resource Conservation Districts in Arizona is to foster the sustainable, productive use and conservation of all natural resources. Accomplishing that mission requires developing goals, commitment, and investment with a long-term view rather than emphasis on short-term gains.



process established by federal law. It is not the right of the permit holder or the land

management agency to retire grazing without going through the appropriate legal processes. A permittee who does not wish to graze should be required to relinquish the permit, and it should be granted to another qualified applicant.

Purchase of Grazing Permits for Permanent Retirement from Grazing: Position (2009)

1. Although lending institutions and the real estate market recognize that federal grazing permits have a value (i.e. the ranch is worth more with the permits than without it), the land management agencies have maintained that grazing permits are a privilege, not a right. The courts have upheld this interpretation. AZNRCD believes that use of public money to purchase public land permits is not consistent with this interpretation. If the permittee has the right to sell the permit then he/SHE should also have the right to compensation if the government reduces his permit for the benefit of other public land users.
2. AZNRCD believes that a buy out program will encourage some ranchers to sell their permits for financial gain, then proceed to subdivide their private lands that are no longer viable as ranches. Encouraging such fragmentation of open space should not be supported by public money.
3. AZNRCD believes that the supposed financial benefits to the government of removing grazing are based on unfounded assumptions for three reasons. One is that the benefits of livestock grazing on public lands to local communities and the nation cannot be quantified by simply comparing the costs and returns to the federal land management agencies. The benefits of public land grazing go far beyond the direct return to the federal government in grazing fees. Second, it is difficult to establish what portion of the land management agency's budget is actually devoted solely to grazing. One of the major costs of administering grazing on the public lands is related to litigation or the threat of litigation by the very groups who claim they have an interest in reducing the costs to the government. Third AZNRCD does not believe that, even if grazing were eliminated on all public lands, the cost of administering public lands would be significantly reduced. Government just doesn't operate that way.



Restocking in stocking rates due to drought is the result of one or more of three main factors:

1. Reduced forage production – Dry conditions (below average effective rainfall) reduce the amount of forage produced by plants during the growing season. Such reduction is part of the “normal” cycle of plant production. A “drought” occurs when forage production will not support normal stocking rates without jeopardizing animal production and/or vigor of forage plants, thus requiring a reduction in stocking until the sufficient forage is available to support average numbers.
2. Lack of water - Stocking may have to be reduced if water is not available in certain parts of the range.
3. Plant mortality – Extreme and/or extended drought may result in death of some forage plants. Obviously, this reduces forage production. The length of time the range needs to recover from loss of forage production due to death of forage plants depends on the kind of plants involved, i.e. how quickly new plants become established when good conditions return.

The most difficult aspect of dealing with drought is the problem of identifying when a drought begins, and when it ends. Generally, the sooner reductions are made for drought the less reduction is required and the less impact there is on both livestock and the range. Ranchers are sometimes more reluctant to reduce stocking on federal grazing permits than on their state and private lands because of the perceived uncertainty of restoring numbers after the drought. There is no way to know when the drought has ended. If a reasonable amount of moisture is received in a growing season, forage is produced that could be utilized to some extent, but that does not mean the drought is over. From a practical standpoint the decision to restock or increase stocking has to be made on existing conditions and the foreseeable prospects for forage production. A flexible and cooperative approach to both destocking and restocking will be beneficial to the livestock operator and the condition of the rangeland.

Restocking after Drought: Position (2009)

AZNRCD believes that a realistic restocking policy after drought will increase the incentive for permittees to reduce stocking on federal permits when drought occurs. Decisions to either reduce stocking due to drought or increase stocking rates due to end of drought should be made cooperatively with each individual permittee and should consider the entire ranch operation including private and state lands. Decisions should be made on a site-specific basis and should



consider the existing forage conditions in all pastures to be used within the foreseeable future. Rigid requirements on utilization levels, ground cover, forage production, or other factors applied over a broad area should be avoided. After each growing season the permittee and the agency should decide whether numbers can be increased or should be reduced given the amount of forage produced and available over the entire ranch and a plan worked out for utilization of existing forage. Use of all classes of forage (perennial grass and forbs, annuals, and browse) should be considered. In Arizona, this decision may have to be made twice a year, i.e. in fall and in spring. Both the agency and the permittee should monitor conditions to adjust the plan as needed. AZNRCD believes that this flexible, cooperative approach will improve the ability of both ranchers and agencies to deal with drought.

Introduction of Livestock into the San Pedro Riparian National Conservation Area for Improvement and Enhancement To Natural Resources: Background

The San Pedro Riparian National Conservation Area (SPRNCA) is the first of only two Riparian National Conservation Areas in the nation. The Arizona-Idaho Conservation Act of 1988 (Public Law 100-696) established SPRNCA to protect the riparian area and its aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources. SPRNCA is located in Cochise County, AZ and contains approximately 56,500 acres of public land. Forty miles of the San Pedro River fall within it. A large portion of SPRNCA is within the Hereford Natural Resource Conservation District (NRCD).

WHEREAS the land within the SPNRCA, most of which was used for grazing, was acquired from private landowners by the Bureau of Land Management (BLM). Currently, within the Hereford NRCD portion of SPRNCA there are four ranchers with allotments totaling 6,521 acres. All grazing was removed from the remaining areas of SPRNCA,

WHEREAS as stated in the BLM Fact Sheet on the BLM’s Management of Livestock Grazing, updated March 2009, livestock grazing can result in impacts on public land resources, but well-managed grazing provides numerous environmental benefits as well. For example, while livestock grazing can lead to increases in some invasive species, well-managed grazing can be used to manage vegetation. Intensively managed “targeted” grazing can control some invasive plant species or reduce the fuels that contribute to severe wildfires. Besides providing such traditional products as meat and fiber, well-managed rangelands and other private ranch lands support healthy watersheds, carbon sequestration, recreational opportunities, and wildlife habitat. Livestock



promoted the concept of “permit buyout” as a means of accomplishing this objective. Permit buyout involves two different approaches.

One approach is for a “conservation” group to buy an entire ranch thereby acquiring the private land and improvements as well as the federal grazing permit. Then they attempt to persuade the Forest Service and/or BLM to “retire” the permit, i.e. to put in into permanent non-use. An attempt was made to legitimize this approach in the revised BLM grazing regulations promoted by Secretary of the Interior Babbitt.

The second approach is the effort by a coalition of environmental/anti-grazing groups to get Congress to pass legislation providing federal taxpayer money to pay ranchers to relinquish their federal permits and to have the management agency put the permitted rangeland into perpetual non-use. In this case, the rancher would retain his private land. The anti-grazing groups have claimed that removal of grazing would save the government money because the costs of administering grazing exceed the revenues from grazing fees. Some ranchers have supported this approach, apparently for strictly financial reasons.

Retirement of Grazing Permits by Permittee: Position (2009)

1. AZNRCD supports the right of any private individual or group to sell or buy private property on a willing buyer/willing seller basis. The buyer of a ranch should have the right to acquire federal grazing permits attached to that property if they meet all requirements to hold such permits.
2. AZNRCD believes that the only interest acquired in the federal grazing allotment is the right to graze it under terms and conditions established by the land management agency, and any legal rights to water or improvements that may have transferred to the new owner by the previous owner.
3. AZNRCD believes that grazing, and all other uses of public land, should be governed by laws enacted by Congress and by the public planning process established under those laws. Any decision to graze or not graze public land grazing allotments must be consistent with direction in land use plans. Neither individuals nor government agencies have the right to make land use decisions not consistent with existing land use plans, government policy and federal law.
4. AZNRCD believes that future livestock grazing on the allotment should be determined by federal law and the land management planning



The federal agencies must amend their management plans to consider eligibility nominations for river segments. Adding these plans requires public input as part of the planning process.

National Wild and Scenic River Act: Policy (2009)

The position of the AZNRCD is that the ability of landowners and operators to implement conservation practices on private lands should not be impeded if the lands are determined to be eligible for or become included in the National Wild and Scenic Rivers System. In addition, acquisition of land by eminent domain should not be permitted.

Further, comments from duly organized Conservation Districts in Arizona be given full consideration during the required federal agency public comment period.

Public/State Lands Policy

Grazing Permit Buyouts: Background

Federal rangelands administered by the U.S. Forest Service and Bureau of Land Management are grazed by livestock by permits issued to private ranchers. Congress has directed that federal rangelands be grazed by livestock where the land has been determined suitable for grazing and when carried out consistent with land management objectives established by resource management plans. Federal grazing permits are essential to the economic viability of many ranches and to the balanced use of private, state, or other lands that are intermingled with the federal land. Federal policy generally allows the permit holder to take “non-use” (i.e. to remove all or part of the livestock) for a limited period for personal reasons, but provides that after a certain period the grazing may be offered to other qualified livestock operators if the permit holder does not make substantial grazing use the public land. In other words, a grazing permit authorizes the holder to graze public land under specified conditions and upon payment of a grazing fee, but the permit holder does not have the right to not graze the land unless the administering agency agrees this is necessary for resource protection.

Anti-grazing interests are attempting to remove livestock grazing from public lands by various means. In recent years, these interests have



grazing on public lands helps maintain the private ranches that, in turn, preserve the open spaces that have helped write the West’s history and will continue to shape this region’s character in the years to come.

Introduction of Livestock into the San Pedro Riparian National Conservation Area for Improvement and Enhancement to Natural Resource: Policy (2009)

THEREFORE the Arizona Natural Resource Conservation District support BLM’s position on the positives of livestock grazing and recommends that it be used as a management tool to enhance and maintain SPRNCA natural resources within the Hereford NRCDC.

Management Practices

Forage Allocation:Background

The U.S. Forest Service, and some other agencies, continue to use forage allocation approaches to determine livestock stocking rates on public land grazing allotments. This approach involves estimating the total amount of forage available in a pasture for livestock grazing at a given time and dividing the forage by an animal unit dry matter requirement to come up with estimated stocking. This process involves estimating total annual production of vegetation, adjusting for relative preference of animals for different species, adjusting for effects of slope and distance from water on animal grazing distribution, allocating a portion of the forage base to wildlife, and allocating a portion of plant production to insure litter production, plant vigor and reproduction. All of these factors are based on generalities and assumptions rather than quantitative, site-specific measurement. As a result, the estimated “proper” stocking rates are highly subject the validity of such assumptions and have an unknown, but high probability of, error. The forage allocation approach can be useful if no other information is available or to set relative carrying capacities of different areas as a basis for evaluating effects of proposed range improvements, e.g. creating several pastures of roughly the same capacity. Deficiencies of this process are further discussed in the attached statement.

The range science profession does not support the use of forage allocation approaches or one-point-in-time inventories for establishing carrying capacity of rangelands unless no other information is available for that purpose. The range science profession supports a “stock and monitor” approach based on monitoring of animal numbers, utilization, trends in vegetation and/or soil



conditions, and effects on other resource values such as wildlife habitat. This is called “adaptive management.”

Forage Allocation: Position (2009)

The AZNRCD supports the use of a “stock and monitor” or adaptive management approach to adjusting numbers of grazing animals (both livestock and wildlife) permitted on public grazing allotments. AZNRCD does not support the use of one-point-in-time inventories of forage and forage allocation approaches to estimation of permitted carrying capacity for either livestock or wildlife on public lands unless no other information is available for that purpose. In almost every situation there exists a record of stocking rates, weather data, and various kinds of monitoring information that can be used to adjust grazing management to achieve goals of the agency and the livestock operator. Where such information is lacking or inadequate it can be supplemented by professional opinion. Where professional opinion rather than site-specific data is the basis for decision, that fact should be documented along with the professional qualifications of the individuals rendering such opinion.

Forage Utilization and Residual Vegetation Measurement: Background

Estimates of forage utilization and/or residual vegetation are useful tools in managing grazing of livestock and wildlife. Utilization is defined as the percentage of the current growing season’s production utilized by grazing or browsing animals. Residual vegetation is measured as the weight per unit area of vegetation remaining after grazing or the “stubble height” of grazed plants remaining after grazing.

Percentage utilization can only be measured after the total growth of plants for the year is complete. Total production is best determined at the end of the growing season. Utilization, as defined above, cannot be measured during the growing season because the total growth for the season is not yet known. Any measure of utilization that is based on less than total yearly production should be referred to a “relative” or “seasonal” use to indicate it does not meet the definition of utilization.

Residual measurements, e.g. stubble height, concentrate on the amount of material remaining, not the amount removed. Some think residual measurements are better indicators for soil protection and wildlife cover than percentage utilization.



reviewed potential impacts of the National Heritage Areas and have chosen to withdraw their support for such designation. Such areas will result in federal jurisdiction over private and state lands. Management plans for such areas are developed by a group appointed by the U.S. Park Service having no accountability to the public or landowners for management of these areas. If the landowner does not wish to be in the area he/she must opt out, and therefore is automatically included in the boundary unless otherwise stated. Private property rights and the landowner’s ability to take management actions for his/her property will be impacted by the buffer areas surrounding these designations.

National Heritage Areas: Position (2009)

It is the position of the Arizona Natural Resource Conservation Districts State Association to oppose creation of new National Heritage Areas within the State of Arizona

National Wild and Scenic River Act: Background

The National Wild and Scenic River Act was instituted over twenty-five (25) years ago and is designed as a protection tool for segments of American rivers. The Act classifies river segments for various levels of protection based on established criteria and designates them as Wild, Scenic or Recreational.

Currently, there is increased activity in Arizona in response to Congressional interest in completing Wild and Scenic River evaluations on public lands. The result of this activity is that river segments are being evaluated for eligibility and nominated for designation.

The Act has provisions for including adjacent private lands in eligibility determinations as long as the landowner supports the findings and is committed to participating with the federal agency in the suitability evaluation and day-to-day management. Eligibility does not confer designation, but it does place the river segment under protective management until such time as it is determined unsuitable in a record of decision or Congress designates the river to the system.

The result of designation is a limitation of some activities along the river segments based on the type of classification it receives. These limitations could have an impact on the ability to perform some conservation activities on public lands and may indirectly affect private lands.



general public as well as economic benefits to their own operations.

Land and livestock management designed to produce benefits in terms of water quality, wildlife/endangered species HABITAT, or other environmental services for the benefit of society may require management investments that produce no increasing direct income or other benefits to the landowner.

Cost share and incentive payments to farmers and ranchers have made it possible for sound conservation practices to be implemented, however, many farmers and ranchers are reluctant to participate in these programs, due to concerns of releasing private business information under the Freedom of Information Act.

Conservation Incentive Payments for Ranchers: Position (2009)

The Arizona Natural Resource Conservation Districts State Association supports continued and increased funding of programs through the U.S Department of Agriculture, the Environmental Protection Agency, the Department of Interior, the State of Arizona, and any other organization that provide incentive payments or grants to private land owners and/or federal/state land lessees to compensate them for the portion of investments made and/or income forgone to implement management to obtain environmental or public benefits rather than for personal gain.

Further that current language in any Farm Policy Legislation must protect all private business information. Similar protection should be extended to other state and federal agencies involved in funding and/or providing technical assistance for rangeland management.

Property Rights

National Heritage Areas: Background

Proposed National Heritage Areas are currently being considered which will cover large tracts of land within the State of Arizona. Within the state, several jurisdictions have



Two main factors influence the level of utilization measured: one is stocking rate and one is weather in relation to plant growth. Utilization and residual measurements can be made by a variety of valid techniques. Some of these involve direct estimates of dry matter removed or remaining, and some involve indices such as

percentage of plants or stems grazed and un - grazed. Key species should be relatively abundant and relatively preferred by the grazing animal.

Utilization by grazing animals also varies spatially over the range due to such factors as plant distribution, topography, water locations, weather, insects, predators, and fencing.

“Proper” or “allowable” utilization levels are sometimes established as guidelines for grazing management on rangelands. Proper utilization may refer to the amount of utilization on preferred forage plants that will provide for continued productivity, vigor and reproduction of the species. Proper use depends on the species of plant and its ability to withstand grazing, but even more so on the recovery time provided that plant to re-grow and recover from grazing before it is grazed again.

Utilization may not always be used as a means of addressing a plant’s physiological response to grazing, but rather to other needs such as bird nesting areas or bank protection.

The Interagency Technical Reference entitled Utilization Studies and Residual Measurements (adopted in 1996 by USDA Forest Service, USDI BLM, USDA NRCS and Cooperative Extension Service) lists three uses for utilization studies:

1. To identify use patterns.
2. To help establish cause-and-effect interpretations of range trend data
3. To aid in adjusting stocking rates when combined with other

monitoring data.

The Society for Range Management has a position statement that agrees with these uses.

Forage Utilization and Residual Vegetation Measurement: Position (2009)

AZNRCD supports the measurement of utilization and residual vegetation as valuable tools for managing public grazing allotments, but not as management objectives or bases for compliance with term and conditions of permits. As stated in the Interagency Technical Reference on Utilization (1996) and



supported by the Society for Range Management there are 3 legitimate uses for such data:

1. To identify use patterns.
2. To help establish cause-and-effect interpretations of range trend data.
3. To aid in adjusting stocking rates when combined with other monitoring data.

AZNRCD believes that when utilization or residual vegetation guidelines are included in management plans or other documents the following criteria should be documented:

1. The method of measurement
2. The season of measurement, i.e. whether utilization (based on entire growing season's production) or relative use (based on less than annual production) will be measured.
3. Where the measurement will take place, i.e. where are key areas and why were they selected.
4. Which species (key species) or group of species (browse, perennial grasses, annuals, etc.) will be measured, and why.
5. Studies that establish the relationship of the proposed measurement to the goals of management in terms of soil, vegetation composition or amount, wildlife values or other factors.
6. Consultation and agreement among grazing permittees and other parties with legitimate interests in the allotment on the protocol and interpretations to be used.

AZNRCD does not support the use of rigid utilization and/or residual measurement standards to determine compliance with management plans or annual operating plans, or to trigger automatic livestock moves among pastures and/or removal from an allotment. Such actions should consider all pertinent information, including weather and forage conditions in the whole ranch operation, outlook for the rest of the grazing season, and the economic consequences of any proposed action.

Forest Management: Background

A series of disastrous wildfires and widespread die-off of forest trees due to bark beetles, both exacerbated by several years of extreme drought, have focused attention on the need to improve management of Arizona's forestlands. These forestlands are mainly under the control of the U.S. Forest Service.



Equine Management: Background

Horses and burros are considered to be a part of our heritage in the American West. Because of this, their management succumbs to human emotion. In recent years legislative actions have been taken in order to stop the sale and transportation of horses and burros for slaughter. As a result of these actions the horse market in the United States has been severely impacted to the point that horses are nearly impossible to dispose of and the market, whether for slaughter or pleasure, has become saturated. Horses are now being dumped by their owners on public trust and private lands to be left to their own devices. This creates many unintended consequences, to include: natural resource degradation on rangeland and in riparian areas, inhumane treatment and health hazards where they congregate leading to disease and death in wild and domestic animal populations.

Equine Management: Policy (2009)

The AZNRCD supports legislation to allow for horse sale, transportation, and processing in order to restore a healthy equine marketing system so as to eliminate equine problems on federal, tribal, state, and private lands.

Conservation Incentive Payments for Ranchers: Background

A majority of the state of Arizona and most other western states is rangeland or farmland used and managed for the production of livestock and agricultural crops. These lands not only furnish the basis for one of the State's major industries, but they also comprise most of the watersheds, most of the wildlife and endangered species habitat, much of the outdoor recreation, and most of the "open space" increasingly appreciated and valued by all citizens.

Many of the public's concerns about wildfires, invasive species (weeds), clean water and air, and other environmental issues depend on sound management of these lands. Ranchers, farmers and other landowners are uniquely qualified to implement the management necessary to provide environmental benefits to the



effective weed control program must work on entire landscapes regardless of land ownership. Therefore, the conservation districts are the logical entity to assume responsibility for weed management programs, i.e. to assume the role of weed management areas for the state. The districts are already established under state and tribal law, represent local landowners, and have access to technical assistance to aid in this effort. They represent the people most directly affected by the invasive weed problem. Further, the districts have a state organization AZNRCD that can help to organize and coordinate such efforts on a statewide basis.

Noxious and Invasive Species Management: Position (2009)

It is the position of the Arizona Natural Resource Conservation Districts State Association (AZNRCD) that Conservation Districts in Arizona are the logical vehicle for the implementation of measures designed to prevent and control invasive weeds on all categories of land ownership, and to coordinate efforts of interested individuals, agencies and organizations for their local areas. Further, AZNRCD can and should be the organization to receive and manage government funding, grants or other resources to coordinate implementation of weed management statewide through the conservation districts.

Weed Management Areas: Background

There are few Weed Management Areas in Arizona and very little awareness of noxious and invasive weeds and their potential impact on conservation in Arizona.

There are limited efforts at the state level to deal with local noxious weed and invasive plant problems and the establishment of Weed Management Areas. There are existing conservation districts that define relevant communities and issues. The conservation districts best understand local people and problems concerning invasive plants and noxious weeds.

Weed Management Areas: Position (2009)

The AZNRCD supports the concept of using conservation districts as the initiating body for creating Weed Management Areas when beneficial to landowners, land managers, and the conservation district. AZNRCD supports the concept of using the Tonto Weed Management Area as a template and that AZNRCD serve as an overarching group that helps with communications.



Historically, Arizona’s forests burned at intervals of 5-20 years due to the dry conditions and high incidence of lightning. These fires maintained a relatively open forest with a grassy understory that provided good soil protection. Fuel loads were light and intense crown fires were unusual.

During the 20th century the forest have been managed mainly under a policy of fire suppression to protect property and timber and to encourage reproduction of trees.

The result has been a tremendous increase in the density of forest trees, increased shrubby vegetation, decreased grass cover, and increased amounts of litter and other fuels on the forest floor. These conditions greatly increase the intensity of fires when they do occur. High intensity fires often kill all the trees and leave the soil exposed to erosion. They are also a threat to human life and property, especially since the spread of residential areas into the forest.

Increased tree density has had other damaging effects. Competition among the trees for moisture and nutrients results in slow growth and increases the frequency of drought stress. Drought-stressed trees are more susceptible to disease and insect attack, as illustrated by the infestation of bark beetles in the current drought. Denser tree canopies increase loss of water to interception and evapo- transpiration, resulting in lower flow of springs and creeks and reduced ground-water recharge. The increased tree cover has also reduced forage for livestock and habitat for many species of wildlife.

Foresters have realized for some time that forest thinning and prescribed fire was needed to improve the condition of the forests in Arizona. However, their ability to implement these practices has been hampered by public opinion, inadequate budgets, concern over liability for loss of property, and threats of litigation based on endangered species and air quality standards. The virtual elimination of harvest of forest products in Arizona has not only contributed to the increase in forest density but also has reduced income to the government and to local communities that could offset some of the expense of prescribed burning and forest thinning.

Forest Management: Policy (2009)

The objectives of the Conservation Districts in Arizona are to promote conservation of soil and wildlife, to promote the sustainable use of natural resources for the benefit of people, and to support the economy and tax base of local communities. Therefore, the AZNRCD fully supports the policies and



positions of the National Association of Conservation Districts (cited below) and efforts by the state and federal government TO improve the management of our forestlands. Further, AZNRCD urges the Arizona Congressional Delegation and Governor of Arizona to support federal and state policy and legislation that will facilitate thinning, prescribed burning, and prescribed grazing to improve the condition of Arizona’s forest and rangeland watersheds. AZNRCD also supports development of markets for sale of products derived from such treatments and/or exchange of wood and forage for services performed by private entities to offset the costs of these management actions. Income from these sources will save the taxpayers money and benefit the economy of local communities.

**National Association of Conservation Districts
Selected Policy Statements on Forest Management
(Quoted from NACD Policy Positions 2002)**

“The BLM, through the FEHRF, should utilize silvicultural treatments consistent with the 1998 congressional expanded authority to improve the health of forested ecosystems on public lands. Projects should also restored watershed conditions and improve forest ecosystem health and integrity through density reduction and an aggressive fuels management program...” (Section II, B, 4)

“NACD urges the USFS to support salvage timber sales and other sales wherever stands of trees require this to maintain a healthy, viable forest and the reduce the amount of dead wood accumulation with National Forests (Section II, B, 6)

“Because of past management practices and fire suppression, many of our forest administered by Federal agencies have accumulated fuel loads and developed stand structures susceptible to catastrophic fires that destroy the soil and increase the risk of insect and disease attack. Silvicultural practices such as prescribed fire, density control of harvest of commercial forest products can reduce the frequency and intensity of extreme fire events, while benefiting local, regional, and national economies. NACD supports changes in legislation and agency policies budgets that allow conducting effective prescribed fire, pre-suppression activity, and silviculture treatments to accomplish that end.” (Sect II, J, 1)

“NACD supports the Secretary of Interior and Secretary of Agriculture in their efforts to conduct fuel reduction treatments in the urban wildland



Lack of qualified technical assistance makes it difficult or impossible to implement and monitor conservation practices based on incentive payments.

Technical Assistance for Conservation Practices: Position (2009)

The AZNRCD requests the Arizona Congressional Delegation to work to insure that in addition to incentive payments to rangeland and cropland owners to implement conservation practices adequate funding is included for technical assistance to landowners to insure that such practices are correctly planned, implemented, and monitored.

Further that such funding be granted either to the Natural Resource Conservation Service or the Natural Resource Conservation Districts, or both, with specification of required professional credentials for people providing technical assistance either as agency personnel or contractors.

Noxious/Invasive Species

Noxious and Invasive Species Management: Background

Noxious and invasive weeds are one of the top resource management concerns across the West, including Arizona. These plants create problems on farmland, rangeland, forestland, and riparian areas. Weeds have long been an important problem on cultivated lands, reducing yields and quality of crops and increasing costs of production. More recently invasive plants have become an increasing problem on other kinds of lands. These plants can affect wildlife and fish habitat, increase soil erosion, compete with desirable native plants, serve as hosts for crop diseases, reduce the yield and/or quality of water from watersheds, and negatively affect other land uses. Although the problems have not yet reached the proportions of some northern states, the potential for greatly increased impacts exists. As yet, Arizona has not taken much coordinated statewide action to implement preventative or control measures, such as the establishment of weed management areas.

The Natural Resource Conservation Districts (and the Soil and Water Conservation Districts on tribal lands) are entities of state or tribal government with the responsibility for education and implementation on all aspects of resource management. This authority extends to all kinds of land and classes of land ownership (private, state, federal, tribal). Conservation districts cover the entire state of Arizona. Weeds do not respect property boundaries. An



and/or tree cutting. In addition, large areas of range and forestland have been converted to rural subdivisions where grazing or tree cutting are eliminated, resulting in increased fire danger for residences.

AZNRCD believes that any comprehensive fire management policy should include consideration of the beneficial effects of planned grazing. Properly managed grazing for livestock production will not prevent forest and range fires, but it can reduce the intensity of fires and make fires easier to control. Such grazing management not only reduces the costs of preventing and controlling fires, but facilitates the use of prescribed burning, while returning money to the land owner. Grazing can also be prescribed specifically for purposes of creating or maintaining fire breaks as has been successfully in some areas.

Role of Grazing in Wildfire Control: Policy (2009)

Therefore, the AZNRCD takes the position that any comprehensive fire management policy for Arizona should include consideration of the role of livestock grazing in reducing fire risks and mitigating the damage caused by fire.

Technical Assistance for Conservation Practices: Background

The U.S. Department of Agriculture has provided incentive payments to farmers and ranchers for building and implementing conservation practices on rangelands and agricultural lands.

Implementation and monitoring of such practices to ensure they are done properly and achieve desired results often requires, either by law or necessity, technical assistance to private landowners.

Incentive funding for conservation practices has continued to be available, but the staffing levels for qualified professionals in the Natural Resource Conservation Service and other agencies has declined significantly in the past several years.



interface within the vicinity of federal lands that are at risk from wildfire.” (Sect II, J, 5)

“There are more than five million acres of overly dense stands of public forestlands at high risk of loss due to catastrophic disease infestation and wildfire. NACD encourages Congress to pass legislation that commands federal agencies to take aggressive action to restore Western forests without size restrictions on cut trees and promotes a policy of private enterprise.” (Section II,J,7)

“The National Association of Conservation Districts urges the Secretaries of Agriculture and Interior to develop management policies that include consideration of the beneficial effects of planned grazing. NACD also urges Congress to support adequate additional appropriations for the purpose in the next fiscal year.”

Interagency Memorandum of Understanding for Rangeland Assessment: Background

Rangelands are increasingly recognized as valuable not only for production of food and fiber but also for a myriad of other values and ecological services.

Sound public policy, budgeting and management of these rangelands depends on scientifically based information as to their condition and trends collected and interpreted in a consistent manner across all kinds of rangelands and categories of rangeland ownership. The development of such a process depends on communication and cooperation among the several federal agencies involved in management, research and technical assistance on rangelands.

An interagency Memorandum of Understanding was established in 1997 between the Forest service, Bureau of Land Management and Natural Resource Conservation Service to promote unified approaches to rangeland monitoring and assessment. That MOU is currently being considered for renewal and will provide the basis for interagency cooperation in the event that proposed language in the Interior Appropriations bill is passed and funded.



Interagency Memorandum of Understanding for Rangeland Assessment: Position (2009)

The AZ NRCDC does hereby support the concept of this MOU and urges the Chief of the Forest Service, the Chief of the Natural Resources Conservation Service, and the Director of the Bureau of Land Management to ratify and support this Memorandum of Understanding.

The AZ NRCDC urges the heads of the above agencies to seek to obtain support and involvement of other federal land management and research agencies such as the National Park Service, the U.S. Fish and Wildlife Service, the Department of Defense, the U.S. Geological Survey, the Environmental Protection Agency, and the Bureau of Indian Affairs in the Memorandum of Understanding and in the development of a National Rangeland Survey.

National Cooperative Rangeland Survey: Background

The rangelands of the United States comprise over 40% of the nation’s land, the sound management of these lands is critical for sustainable production of food and fiber, provision of clean water and air, enhancement of wildlife habitat, protection of endangered species, maintenance of open space, recreational uses, production of wood products, control of invasive weeds, reducing risks of damaging wildfires, and various other ecological services.

There is a continuing controversy over the ecological condition and trend of such lands whether in public or private ownership, this controversy is fueled to a considerable degree by lack of adequate soil surveys, ecological classification of rangelands, and mapping of rangelands based on this information.

There is no consistent procedure for carrying out rangeland classification, mapping and assessment to provide a nationwide evaluation of the ecological condition and management problems that can be applied across all types of rangeland regardless of the ownership or management objectives.

Until a consistent approach to collection and interpretation of data on all the nation’s rangelands is developed, policy and budgets for the various agencies involved in rangeland management, research, and technical assistance will continue to be based on inconsistent and incomplete information.

The development and implementation of such an effort would be best carried out by an interagency effort similar to the National Cooperative Soil Survey



involving the U.S. Forest Service, the Natural Resource Conservation Service (representing private, state, and tribal lands), the Bureau of Land Management, the U.S. Fish and Wildlife Service, the National Park Service, the Department of Defense, and any other relevant federal agencies. Such an effort will require additional funding and personnel for these agencies.

National Cooperative Rangeland Survey: Position (2009)

The AZ NRCDC urges its Congressional Delegation to support the language included in the Interior Appropriations House Report directing the Secretaries of Agriculture and Interior to establish an interagency committee to develop a National Cooperative Rangeland Survey, and encourage similar language in the Agriculture Appropriations Report.

We urge the Arizona Congressional Delegation to support adequate additional appropriations for that purpose in the next fiscal year.

Role of Grazing in Wildfire Control: Background

Drought conditions across much of the West have created conditions conducive to intense fires that are difficult to control. Damage to resources and property and risk to human safety have been substantial. Costs of suppression have amounted to millions of dollars. In addition, diversion of federal and state land management personnel and budget into emergency fire suppression has seriously hampered the ability of these agencies to carry out their other land management responsibilities and this has resulted in unknown but substantial costs to the people and communities depending on use of the lands affected.

Drought has exacerbated fire conditions, but it is not the underlying cause. Years of strict fire control have allowed increase of woody plants and fuel loads in many areas. Although these effects have been recognized by some agencies for several years, the necessary effort to use prescribed fires has been stymied by lack of budgets, environmental restrictions (e.g. Clean Air standards), concern over liability for property damage, public opinion, litigation aimed blocking forest logging, thinning and grazing in forests, and the lack of flexibility in moving quickly on burning projects when conditions are favorable.

Other land management factors that have contributed to increased risk of fire and intensity of fires are lack of thinning in forests and reduction and/or elimination of livestock grazing over large areas of public lands and lands owned by “conservation” organizations with policies opposed to grazing