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February 9, 2021

Myra Black  
Program Manager, Forest Management, Range Management and Vegetation Ecology  
U.S. Forest Service  
201 14th Street S.W.  
Washington, DC 20250

Dear Ms. Black:

Thank you for providing Western Governors with an opportunity to provide comments on proposed revisions to the directives governing rangeland management, grazing permit administration, and grazing allotment administration on U.S. Forest Service (USFS) lands (85 FR 82432). Western Governors support the continued use of federal lands for responsible grazing and increased funding for grazing management, monitoring and permit condition compliance. By increasing flexibility for grazing permittees on public lands, a number of updates to the proposed directives reflect Western Governors' priorities on these important issues.

Western Governors address public land grazing in WGA Policy Resolution 2021-03, *National Forest and Rangeland Management*. In the resolution, Governors support sound rangeland management policies that maintain and promote environmental, economic, and social balance and sustainability for rural communities. In WGA Policy Resolution 2019-06, *Biosecurity and Invasive Species*, Western Governors assert that integrated pest management, biocontrol, outcome-based grazing and targeted grazing can be effective tools to control the spread of invasive annual grasses.

Western Governors encourage federal and state land managers to identify opportunities to improve flexibility and integration of grazing management and targeted grazing as tools to achieve restoration and land management goals such as hazardous fuels reduction and invasive grasses mitigation. Federal agencies should promote grazing allotment flexibility on federal lands, within USFS permitting systems and across ownership boundaries, to respond to changing rangeland conditions and environmental considerations.

Several items in the proposed directives would help improve flexibility and integration of grazing management and targeted grazing. By allowing permits to be listed as total number of Animal Unit Months (AUMs) with an average season and average number of head for purposes of waiver and non-use, the proposed directives in Chapter 10 of Forest Service Handbook 2209.13 would help to improve targeted and outcome-based grazing and also help create greater flexibility for the use of grazing as a management tool. Other proposed directives in the chapter would allow for greater flexibility for non-use for resource protection and could provide more flexibility for grazing after droughts and other natural disasters.

Proposed directives in Sections 10.51–10.53 of Forest Service Handbook 2209.16 address decisions to vacate and close grazing allotments. As USFS works to revise directives to reduce, suspend, vacate, or close grazing allotments, we ask that you consider Western Governors' priorities on the issue:

- Western Governors believe that decisions to reduce or suspend grazing should be informed by an appropriate quantitative assessment of long- and short-term trends in rangeland conditions on specific allotments, risk of spread of invasive weeds, diseases to wildlife, or other documented fish

or wildlife impacts. If, after consultation with the state, the federal agency decides to reduce, suspend, close, or modify an allotment due to documented harmful wildlife impacts, a suitable alternative allotment (if it exists), properly authorized pursuant to the National Environmental Policy Act (NEPA), must be made available to the displaced operator prior to adjustment of the original allotment. In order to fully implement this policy, USFS must have alternative allotments properly authorized under relevant planning documents. This ensures that suspensions or modification of grazing permits will not result in a net loss of AUMs and that appropriate alternative allotments are available.

- Federal land management agencies' decisions to reduce or close allotments should only be based upon a full and complete administrative review and analysis, including a complete review under the provisions of NEPA. The decision process must include opportunities for states, livestock grazing permittees and other stakeholders to provide input. Allotments should not be closed due to a pending NEPA review without allowing authorized use of the allotment pending a final decision, or the use of an equivalent amount of forage at reasonably equivalent cost to compliant operators.
- Federal land management agencies must give interested state agencies an opportunity to fully participate in or provide input to grazing permit actions – prior to their initiation. Among other things, states should be able to participate in: generalized review of livestock operations on federal lands; any assessment of grazing conditions as part of a federal planning process; review of past compliance of the operator with grazing allotment conditions; and individual allotment reviews. Grazing permit decisions should not be finalized until after this opportunity for meaningful consultation with the states, local governments, and the affected permittees.

The Western Governors' policy resolutions referenced above have been included as attachments to these comments. We hope you find them useful as you finalize the proposed rangeland management directive updates.

Western Governors submit these remarks through the public notice and comment process for administrative recordkeeping purposes. The Governors, however, maintain that this process is an insufficient channel for state-federal communication on federal actions that may affect state authority or administrative activity. Western Governors strongly urge you to engage in early, meaningful, substantive and ongoing consultation with states in advance of any such decisions or related public processes. Such consultation will result in more effective, efficient and resilient federal policy.

Sincerely,



Kate Brown  
Governor of Oregon  
Chair, WGA



Brad Little  
Governor of Idaho  
Vice Chair, WGA

Attachments



## Policy Resolution 2021-03

### National Forest and Rangeland Management

#### A. BACKGROUND

1. The American West encompasses a huge landmass representing 2.4 million square miles, or over two-thirds of the entire country. Over 116 million people live in these states and they reside in large, densely populated cities, smaller cities and towns, and in rural areas.
2. Western communities share a unique relationship with natural resources. Communities in the West depend upon healthy forests and rangelands for jobs, recreation, and quality of life. Conversely, effective natural resource management is only possible if rural and resource-dependent communities are healthy, vibrant, and prosperous.
3. There are approximately 346 million acres of timber land in the West, of which 104 million acres are privately owned. In the United States, rangelands comprise about 31 percent of the total land area, approximately 761 million acres, which occur mostly in the West.
4. A high proportion of western lands are managed by the Federal government. The U.S. Department of Agriculture (USDA), through the U.S. Forest Service (USFS), manages over 168 million acres of forests, rangelands, and grasslands through the National Forest System (NFS). Approximately 11 percent of all western lands are in the NFS. Western states include more than 75 percent of our national forest and grassland system.
5. Department of the Interior (DOI) agencies, through the Bureau of Land Management (BLM), manage a substantial portion of the West's forests and rangelands. The BLM manages over 245 million acres in the West, of which 155 million acres are managed for livestock grazing.
6. Healthy forests and rangelands provide a number of important ecosystem services and are a vital component of western ecosystems. In addition to providing food, fuel and fiber, forests and rangelands clean the air, filter water supplies, control floods and erosion, sustain biodiversity and genetic resources, and provide opportunities for recreation, education, and cultural enrichment. Properly managed forests and rangelands can sequester greenhouse gases.
7. National forests and rangelands are economic drivers in western states. These public lands serve as critical economic engines and support local economic activities including grazing, wood products, mining, and recreation.
8. Public and private forest managers require forest products infrastructure to achieve community vitality and land management goals, including ecological restoration objectives and healthy and resilient forests.
9. Invasive species have damaged many of the forests and rangelands throughout the West and continue to be a threat to the West's working landscapes. Plant pests, such as the

emerald ash borer, can cause significant environmental, economic, and human health impacts to western forests by destroying urban, suburban, and wildland canopy covers and imperiling the species that depend upon them. Invasive annual grasses, such as cheatgrass, medusahead and ventenata, pose a major threat to western rangelands by increasing the risk of wildfire, outcompeting native grasses, and diminishing soil and water quality. Invasive species management is an essential component of effective forest, rangeland and wildfire management.

10. In recent decades, the number, severity and overall size of wildfires has increased across much of the U.S. In that time, wildfire seasons have become longer and more intense. In areas that once experienced a four-month fire season, fire seasons may now last six to eight months. Many longstanding practices of the western wildland fire service, including reliance on “1039 seasonal” and permanent subject to furlough staff, were developed in an era with shorter, less intense fire seasons.
11. The USFS operates five regional research stations that work on a range of biological, physical and social science fields to promote sustainable management of the nation’s forests and rangelands.
12. States have a particular interest in improving the active management of federal forest lands. State governments have trust authority over water, wildlife and forest resources, along with primary authority and expertise to protect community health and safety. Poorly managed forests can have significant and broad impacts on the landscapes and communities of the West, including negative impacts to air quality and public health, degradation of rivers and streams and associated water quality (including drinking water), reduced forage for domestic livestock, wildlife diseases, impaired habitats and water for wildlife and fish, and the loss of forest products and associated jobs.
13. Relative to decades past and other forest landowners, forest managers today operate under a constrained decision space as they work to address contemporary issues such as climate change, invasive pests and diseases, habitat diversity, fuel build-ups and fire risk, fish passage barriers, unmaintained roads, and legacy impacts. Adding to this challenge are concerns about the economic and social vitality of rural communities that experience effects from reduced timber supply and compromised forest health. Displaced workers, declines in school enrollment, aging demographics, property loss, business closures, and revenue effects due to wildfire and high unemployment are not uncommon to these communities.
14. Due to the current USFS funding model, many of the legacy roads and water crossing structures are not being maintained, leading to washouts, mass wasting, and sedimentation of salmonid spawning habitat. Many culverts and bridges installed over the past few decades do not meet current fish passage criteria and are past their design life and now failing. This lack of maintenance has resulted in a significant increase in the number of fish passage barriers, which is limiting fish access to important spawning and rearing habitat.
15. States are managers as well, and many western states own extensive public land holdings that require forest products infrastructure to achieve community vitality and land management goals, including ecological restoration objectives and healthy and resilient forests.

16. The USFS business model has historically been based on a combination of federal appropriations that were supplemented with revenue from resource sales and fees. Until the early 1990s, the USFS was a net contributor to the federal treasury. Over the past 20 years, timber sales have dramatically declined.
17. In addition, the last decade has seen several large, very expensive wildfires, which have increased USFS wildfire suppression costs from 13 percent of the agency's FY 1991 budget to nearly 50 percent over the last several fiscal years. Consequently, under the current agency budgeting framework, forest management, hazardous fuels reduction, habitat improvement, road maintenance, road abandonment, fish passage barrier removals, and outdoor recreation programs have been negatively affected across national forests and DOI lands.
18. An April 2015 USFS study, the "Collaborative Forest Landscape Restoration Program 5-Year Report, FY 2010-2014," found that the past century of wildfire suppression and legacy management practices have contributed to forests being overstocked and primed for larger and more intense blazes, and that changes in land use and increasing social pressures make it difficult for the agency to let fire play its natural role of clearing the forest understory in certain forest types. Active forest management has historically played a pivotal role in the growth and mortality cycle of forests to manage fuel loading, which in turn can reduce fire-fighting costs and improve habitat resilience. Today, the USFS estimates that roughly 90,625 square miles – an area larger than Utah – is at high or very high risk of severe wildfire and in need of treatment.
19. Insect infestation and disease have damaged many of the forests throughout the West. Severe drought conditions that are affecting western states, particularly California, have only exacerbated insect infestations and tree mortality. The effects go well beyond fire risk, and timber and fiber production are negatively affected, threatening the viability of the surviving forest product infrastructure. The significant decline in forest health has also created serious threats and challenges to watershed integrity, wildlife and fisheries habitats, recreational uses, businesses and tourism. All of these impacts present substantial challenges for forest-dependent communities across the West.
20. The dire forest conditions, unmet management needs, and the failure to provide lasting protections for some landscapes have brought diverse stakeholders together to find solutions. Community collaboration on forest health projects is robust in numerous places across the West, forging broad agreements among diverse stakeholders on projects that encompass fuels reduction, fiber production, habitat restoration, long-term protection for critical areas, and other community objectives. It is not uncommon to find mill owners, hunters and anglers, loggers, small business owners, conservationists, and local elected leaders working together around the table.
21. Collaborative planning and project implementation across National Forests and state and private forest lands on a larger scale allows for more diverse interests to address their particular needs for a landscape or a watershed. Taking a broad look at a landscape for planning purposes minimizes the challenges associated with managing lands for the benefit of a particular species or to address a specific need. Well-planned projects that are strategically placed across a landscape can result in a higher level of benefits than those that are more randomly or opportunistically placed. Processes associated with planning and implementing a project have become so time consuming and expensive for National Forests

in particular that a disincentive often exists for their managers to proceed with management actions that are needed to attain desired ecological, social, and economic objectives.

22. The full benefits of collaborative efforts have not been realized on the land. Working constructively with collaborators requires resources to be productive and the federal agencies often lack the necessary staff and funding.
23. Even when collaborative forest health projects enjoy broad support from diverse stakeholders and the agencies, administrative objections and litigation remain a too frequent outcome. One result is that community collaborative efforts become fatigued, and future opportunities are lost. Another outcome is that USFS restoration projects often go through exhaustive, time-consuming analysis, driving up costs and preventing the agency from scaling up management to meet the scope of the problem.
24. Today, the costs associated with planning and implementing a management project on National Forest lands are significantly more than those of the private sector. This cost, along with the time associated with drafting, analyzing, incorporating public involvement, and responding to appeals and/or litigation at the project level, lead many federal managers to focus their limited staff, funds and time on projects with the least likelihood to be challenged. This approach does not adequately address the larger socioeconomic and ecological needs of our National Forests and dependent communities.
25. Rangeland livestock operations were established decades ago, with many operations using forage on private, state and federal lands. These family-based operations are important contributors to the customs, cultures and rural economies of the West.
26. These operations also maintain open spaces and important habitat conditions (e.g., year-round water sources) benefiting wildlife and recreation. Water rights, which are granted by the states for livestock grazing, will not benefit other uses if the agricultural operation ceases to maintain the beneficial use.
27. Ranching operations that are responsibly managed provide valuable, active management of public lands including responsible grazing, maintenance of fences and other infrastructure, managing fuel loads, engaging in wildland fire monitoring and suppression, and cooperative management of noxious and invasive weeds.
28. Federal land management agencies' actions in recent years have resulted in reductions or removal of domestic livestock from federal lands.
29. The USFS and BLM have permanently closed, left vacant without reissuing a grazing permit, and converted into forage reserves or "grass banks" some grazing allotments in recent years. In many instances, the allotments are technically available based upon forage availability, but permits are not issued for reasons including unmaintained rangeland improvements and uncompleted National Environmental Policy Act (NEPA) documentation by USFS or BLM.
30. The USFS and BLM continue to receive pressure to close domestic sheep grazing allotments due to concerns about disease in bighorn sheep.

31. Restrictions and closures can have negative economic impacts on ranchers and ranch dependent communities. Ranchers who have used the same federal grazing allotments for generations may be abruptly forced to find new forage for their livestock when allotments are restricted or closed.
32. Restrictions and temporary closures, when implemented to mitigate natural events like drought, wildfires and wildlife impacts, should be factored into ongoing, regular reviews and renewals of individual livestock allotments, individual livestock operators' use of the allotments or the total amount of grazing allotments available for ranchers.
33. Inconsistent interpretation of operational policies across the West by local and regional federal land managers compounds difficulties in managing livestock grazing on public lands. For example, federal policy on acceptable types of supplemental feed, feed placement, and watering of livestock is interpreted without regard for localized rangeland conditions or the economics of local ranching operations. Failure to adapt policies to local conditions affects the ability of livestock grazing permittees to properly manage their livestock herds while achieving permit standards, goals, and objectives.
34. USDA launched a Shared Stewardship Strategy in 2018 to work collaboratively with states to set priorities and co-manage risk across broad landscapes. Through the strategy, USDA coordinates with states to set priorities and increase the scope and scale of critical forest treatments that support communities and improve forest conditions. To date, fourteen Western states have entered into individual Shared Stewardship agreements with USDA to identify landscape-scale priorities and build capacity to improve forest conditions.
35. In December 2018, the Western Governors' Association (WGA) and USDA signed a Memorandum of Understanding (MOU) to establish a framework to allow the USFS and WGA to work collaboratively to accomplish mutual goals, further common interests, and effectively respond to the increasing suite of challenges facing western landscapes. Under this agreement, WGA and USDA have pursued several collaborative campaigns to improve the management and restoration of western forests and rangelands.
36. In 1908, when Congress created the NFS, it also passed the National Forest Revenue Act, which directs the USFS to share 25 percent of gross revenues with local governments. Then in 1976, Congress passed "Payments in Lieu of Taxes" (PILT) legislation providing federal payments to local governments regardless of gross revenues that result from timber harvest and other forest management activities. After revenues from the sale of timber dropped substantially, Congress passed the Secure Rural Schools and Self Determination Act (SRS) in 2000, allowing counties to choose between a payment based on historical average and the 25 percent revenue share. SRS has expired several times, and PILT has been subject to funding uncertainty as well.
37. The 2014 Farm Bill provided the Forest Service with several new tools to accelerate forest restoration. Among them were Good Neighbor Authority (GNA), which allows USFS to enter into agreements with state forestry agencies to implement this critically important management work on national forests when USFS is unable to do the work alone. Since GNA was first authorized, 32 states have initiated more than 130 GNA projects. In the 2018 Farm Bill, GNA authorities were expanded to allow tribes and counties to enter into GNA agreements. The 2014 and 2018 Farm Bills also gave USFS and BLM Stewardship Contracting Authority (SCA), which allows communities, the private sector, and others to

enter into long-term contracts to meet land management objectives. SCA allows forest products to be exchanged for ecological restoration services, which may include thinning and brush removal.

38. In the Federal Land Assistance, Management, and Enhancement Act of 2009 (FLAME Act), Congress directed DOI and USDA to develop a national cohesive wildland fire management strategy to comprehensively address wildland fire management across all lands in the United States. The National Strategy explores four broad challenges: 1) managing vegetation and fuels; 2) protecting homes, communities, and other values at risk; 3) managing human-caused ignitions; and 4) effectively and efficiently responding to wildfire.
39. The Consolidated Appropriations Act of 2018 contained a new “fire borrowing fix,” a comprehensive remedy to budgeting for wildfire costs at DOI and USFS. The fix provides a new funding structure from Fiscal Year (FY) 2020 through FY 2027. Beginning in FY 2020, \$2.25 billion of new budget authority is available to USDA and the DOI. The budget authority increases by \$100 million each year, ending at \$2.95 billion in new budget authority by FY 2027. For the duration of the eight-year fix, the fire suppression account will be funded at the President’s FY 2015 Budget request - \$1.011 billion. If funding in the cap is used, the Secretary of Agriculture must submit a report to Congress documenting aspects of the fire season that led to the expenditures.
40. Several federal programs assist state and local fire and land managers in their efforts to manage western lands. Among these are:
  - State Fire Assistance (SFA): The SFA program assists states and local fire departments in responding to wildland fires and conducting management activities that mitigate fire risk on non-federal lands. The program also helps train and equip state first responders, who are the first to arrive at a wildfire (on any land ownership) 80 percent of the time. The program also assists communities in risk assessments and completing fire management planning projects.
  - Volunteer Fire Assistance (VFA) programs: The VFA program provides support to rural communities and is critical to ensuring adequate capacity to respond to wildfires, reducing the risk to communities, people, homes and property, and firefighters.
  - Hazard Mitigation Assistance Grants (HMAGs), administered through the Federal Emergency Management Agency, provide funding for eligible mitigation measures that reduce disaster losses. These grants include the Building Resilient Infrastructure and Communities (BRIC) program, which support states, local communities, tribes and territories as they undertake hazard mitigation projects, reducing the risks they face from disasters and natural hazards.

## **B. GOVERNORS’ POLICY STATEMENT**

1. Western Governors support sound forest and rangeland management policies that maintain and promote ecologic, economic, and social balance and sustainability.
2. Western Governors support the creation of mechanisms to support and enhance cross-boundary collaborative work. To this end, Western Governors have established the



Working Lands Roundtable (WLR) as a platform for collaborative work on cross-jurisdictional, cross-boundary natural resource issues. The WLR allows Western Governors to draw on the expertise of a wide range of resource management experts, landowners, and conservation professionals to devise strategies that enhance the resiliency of western working landscapes and the communities they support.

3. Western Governors point to the WGA-USDA Shared Stewardship MOU as an example of an effective framework to establish shared state-federal priorities for forest and rangeland management, and encourage the development of similar MOUs with other Executive Branch agencies for other areas of natural resource management.
4. Effective forest and rangeland management is only possible through collaboration between federal, state, local, and tribal land management agencies. These agencies should strive to find new ways to collaborate on forest and rangeland management projects, as well as to explore ways to improve state-federal coordination on existing management projects. State funds can be directed to targeted federal projects to augment capacity, expedite project approvals and implementation, and add key state project priorities (including socioeconomic elements) to the federal program of work. State and local governments, municipalities, water utilities and corporate partners should be encouraged to collaborate on, and co-invest in, forest and rangeland restoration – including the support of collaborative groups – across ownership boundaries in key water supply source watersheds.
5. Federal, state, local, and tribal land managers should work to support effective collaboration on federal projects and all-lands initiatives. Federal agencies should look to local communities as a source of strength, knowledge, and support during the planning and implementation of forest and rangeland management projects, and should be encouraged to work with local communities while planning forest and rangeland management projects.
6. Local fire protective associations play a critical role in wildfire response and mitigation, and state and federal agencies should look for ways to further incorporate these groups into regional wildfire dispatch and coordination centers.
7. Western Governors support cost-share grants to local governments and local and non-governmental organizations (NGOs) to enable their participation in federal project planning and implementation. Federal agencies should facilitate the participation of local governments in federal decision making by dedicating staff to develop and provide technical assistance and enhance communications across local, tribal, state and federal partners. Congress and the Administration should support critically important programs that enable state and local wildfire protection, such as the SFA and VFA programs, as well as the Emergency Management Assistance Compact and the All Hazards National Mutual Aid System. Western communities are encouraged to take advantage of federal pre-fire mitigation programs, such as BRIC and HMAG. Federal agencies are encouraged to work with western states to ensure that communities' access to these grants is as efficient and streamlined as possible.
8. The USFS should continue to support states' efforts to operate within the Shared Stewardship Strategy, and federal agencies should continue to provide support to states as they implement projects undertaken as part of the Shared Stewardship Strategy and state-level Shared Stewardship agreements. Implementation of these projects could benefit from

enhanced governance and transparency around federal funding, as well as the use of block grants to states through USFS State and Private Forestry for project implementation. States are often the conveners of collaborative interagency forest and rangeland management efforts. Federal agencies should provide funding and support to states for cost incurred during this convening role.

9. It is important to retain citizens' rights to question governmental decisions through administrative and legal means. Western Governors believe there may be an opportunity to further streamline appeals and litigation associated with National Forest decision making in association with other changes designed to incentivize collaboration and provide more certainty as to outcomes.
10. Effective forest and rangeland management requires a network of forest and rangeland infrastructure to manage, maintain, and restore western forests and rangelands. Federal and state agencies should strive to find ways to support and expand critical forest and rangeland management infrastructure, including mills, biomass facilities, and roads. Also critical is the workforce, including the rural workforce, needed to support and operate forest and rangeland management infrastructure.
11. Western Governors support the expansion of stream restoration projects in forest and rangelands, including repair or removal of culverts and other barriers to fish passage. Federal and state agencies should strive to find ways to support and expand cost-effective means of supplying restoration projects, such as with large woody material from adjacent overstocked forests, which in turn supports the rural workforce needed to implement large-scale watershed and stream restoration efforts.
12. A thriving wood-based product market is essential to support critical forest management infrastructure. Western Governors support the expansion of wood-based product markets, and encourage USFS to develop and help fund new technologies and wood-based markets for some non-traditional products. USDA's Forest Products Laboratory is a hub for research and innovation. Supporting innovative technologies, such as cross-laminated timber and biofuels to replace diesel or jet fuel, would help bolster woody biomass utilization. Western Governors encourage the application of their knowledge and experience in a practical way in the West so that some of the federally funded infrastructure that develops from such efforts could first be demonstrated on private lands. Federal land managers should work to ensure that wood product producers have increased certainty of supply, as well as a broader suite of outlets, in addition to traditional sawmills and existing biomass facilities. Governors should work with USDA to explore mechanisms to expand low-interest loans in the forest products and woody biomass sectors to help develop rural businesses around sustainable industry. States can also work with USFS and other federal land managers to establish more long-term stewardship agreements to ensure a long-term feedstock supply.
13. Authorities granted to the USFS in the 2018 Farm Bill, including GNA and SCA, are powerful tools to boost forest and rangeland management, promote collaboration, and limit the effects of administrative objections and litigation. Western Governors encourage federal agencies to fully implement the tools provided in the 2018 Farm Bill and encourage all state and federal land managers to continue to expand the use of these tools in other areas of land management. Federal agencies should expand the use of GNA agreements and other 2018 Farm Bill tools to achieve all-lands restoration objectives across federal, state, local government and privately-owned lands. Federal agencies should use GNA authority and

program income to support additional stewardship objectives such as invasive species management and rangeland conifer encroachment. Where programmatic agreements are already in place, federal agencies should use GNA agreements to address priority restoration needs.

14. Western Governors believe clear, coordinated and consistent application of federal vegetation management practices is integral to maintaining the health of western forests, preventing dangerous and damaging wildfires, and maintaining grid reliability. The Governors support effective and efficient cross-jurisdictional coordination that enables utilities to undertake necessary vegetation management actions on federal transmission rights-of-way. Effective implementation by BLM and USFS of the FY 2018 Consolidated Appropriations Act's sections related to vegetation management, in consultation with states and utilities, would make progress towards improving vegetation management in the West. Special attention should be paid to the law's direction to USFS to pair the Wildfire Hazard Potential index and map with spatial data for use at the community level, as well as its language encouraging USFS and BLM to develop training programs on vegetation management decisions relating to electrical transmission and distribution systems. Electrical utilities and state and federal land managers should examine ways to further utilize GNA and SCA to improve vegetation management in the West.
15. Western Governors believe it is possible to reform the USFS business model in a manner that reduces project planning costs, sources funds from non-federal partners and recognizes that the agency no longer generates large revenues from commodity programs. Federal agencies can accomplish this by:
  - Striving to identify business practice barriers to cross-boundary projects;
  - Developing training on state and federal contracting procedures and administration for all partners to improve implementation of cross-boundary projects;
  - Utilize Service First authorities, which allow multiple agencies to partner to share resources, procurement procedures and other authorities;
  - Streamlining and consolidating agency processes with partners; and
  - Establishing multi-agency pilot projects, which can suggest models for subsequent formal agreements.
16. Western Governors support efforts to improve the effectiveness of NEPA in a forest and rangeland management context. Federal agencies should engage with Governors and states in early, meaningful, and substantive consultation throughout the NEPA process. Western Governors support allowing federal agencies to analyze only the action and no-action alternatives when a project is collaboratively developed, unless a third alternative is proposed during scoping and meets the purpose and need of the project. Western Governors also support rewarding successful implementation of collaborative projects through funding, retained-receipt authority, or other capacity to pursue subsequent projects.
17. State and federal agencies should look to expand the use of prescribed fire and should look for ways to reduce the statutory and regulatory barriers to its expanded use on western

forests and rangelands. State and federal air quality specialists should work together to identify reforms that reduce barriers to prescribed fire and reduce overall health impacts from smoke, improve interagency use of smoke management best practices, and examine liability protection for fire managers and compensation for private property owners negatively affected by escaped prescribed burns. Land managers across the West should strive to increase workforce capacity for prescribed fire activities, as well as science-based vegetation management activities, oversight and planning. State and federal agencies should work to identify ways to increase the cultural acceptance of the use of prescribed fire in the West. Traditional Native American cultural burning and tribal practices are an important part of forest management in the West and may be incorporated more effectively into federal and state planning management processes.

18. Western Governors support efforts to improve a broad range of pre-fire mitigation practices. State and federal agencies should work to develop tools to support mechanical hazardous fuels reduction, especially the removal of underbrush and understory, which are economically unviable in many instances. Expanding the use of spatially complex restoration treatment would help create more resilient forest through greater forest structural heterogeneity. Thinning and spatially complex treatments both address wildfire and post-fire erosion risks, but spatially complex restoration also provides habitat and biodiversity benefits that thinning does not. Invasive species, including invasive annual grasses, can be one of the greatest drivers of wildfire on western rangelands. Land managers should work to further integrate invasive species data and management practices into hazard fuels management and planning.
19. Efforts should be made by state, federal, local, and tribal agencies to modernize the wildland fire service and adapt it for the West's increasingly long and intense fire seasons. Federal agencies should examine their reliance on 1039 seasonal staff, shift a higher percentage of wildland fire staff from seasonal to permanent and permanent subject to furlough positions, evaluate policies related to the use of Administratively Determined emergency firefighters, and authorize hazard pay for federal firefighters performing prescribed fire operations. Incident command teams are valuable resources in the region, and efforts should be made to ensure that these resources have adequate access to training and preparedness activities and are, as necessary, utilized for prescribed fires in a manner similar to suppression fires.
20. Western Governors support improvements to interagency communication, fire response capability, and coordination, including the sharing of firefighting resources. Fire management activities should support fire prevention, rapid response capabilities, full suppression strategies and management of wildfire for resource benefits. Agencies and stakeholders should continue to seek opportunities, including revisions to forest plans, to enhance safety and reduce costs in suppression decisions while protecting communities. Incentives should be created for local governments to take voluntary actions to support the creation and expansion of fire-adapted and smoke-ready communities and resilience, including the promotion of education, fuels management projects and improved integration of community wildfire protection plans with land use decisions when compatible with local goals. Additional analyses should be provided to help communities evaluate the full costs of suppression associated with development in the wildland urban interface.
21. Western Governors support increased attention to the challenges posed in post-wildfire landscapes and wildfire-affected communities. Restoration of forests and rangelands is an overlooked and underfunded aspect of land management activity. Cross-boundary and

cross-jurisdictional collaboration is crucial to properly managing restoration efforts. Western Governors also encourage better awareness of post-wildfire restoration funding opportunities available to wildfire-affected communities and more sophisticated coordination of restoration activities to achieve restoration objectives.

22. The West's forests and rangelands are changing: historical fire suppression patterns have altered the composition of western forests, invasive species have moved across western rangelands, and changing patterns of industry, recreation, and land-ownership have shifted the way Westerners interact with and manage forests and rangelands. Federal agencies, including the USFS and BLM, must work to build agency cultures that can adapt quickly and responsively to these changes. Climate change can accelerate many of these changes by increasing the frequency and severity of fire, altering hydrologic patterns, and expanding the potential range of invasive species, and can pose a threat to the ecosystem services derived from forests and rangelands, such as watersheds, recreation, ranching, and agriculture. Federal agencies must be prepared to adapt to changing patterns in revenue generation, increased need for restoration activities, and a changing workforce. Increasing the pace and scale of restoration work like prescribed fire, fuels reduction, and active management can help reduce the effects of climate change. Western Governors support the creation and expansion of assistance to landowners for carbon sequestration and conservation activities on private forests and rangelands.
23. Federal agencies need to ensure adequate monitoring, assessment, and analysis of federal forests and rangelands, including data on wildlife, water, soil, and forage. Federal agencies should strive to further improve the collection of socioeconomic data related to forest and rangeland management decisions, and to further incorporate that data into management decisions. The Administration should provide federal funding to develop detailed state rangeland action plans addressing invasive species, wildlife and fish habitat, and water quality and quantity as a complement to State Forest Plans. These rangeland plans should include resource analyses of soil health, water, plants, animals and productive capacities to inform management decision-making. The Administration should target funding from USFS, BLM, the Natural Resources Conservation Service and state sources to address cross-boundary management goals (and support monitoring and assessment frameworks) in priority areas. Projects using this targeted funding should be consistent with State Forest Action Plans, wildlife action plans, community wildfire protection plans, and projects in other priority areas determined by federal, state, local and tribal partners based on the best available science.
24. Western Governors urge Congress and the Administration to support the research needed for responsible and effective forest and rangeland management in the West. Investments in widespread spatial imaging and data analytics, LiDAR or hyperspectral imaging, would improve predictive analytics and planning tools for fire and forest health. Federal agencies conducting research should also work to ensure that public research projects are focused on research that supports on the ground management needs. Western Governors urge Congress and the Administration to support USFS Research Stations, which play a key role in forest and rangeland management in the West.
25. The outbreak of the SARS-CoV-2 virus in 2020 posed a significant challenge to those working to manage the West's forests and rangelands, particularly wildland firefighters. State, federal, and local wildland fire managers should be encouraged to learn from the pandemic response and, as appropriate, implement effective new management principles

developed during that pandemic into permanent practice. Efforts should be made to ensure that emergency response personnel are prepared for similar situations in the future, as well as other potential risks.

26. Western Governors support the continued responsible use of federal lands for grazing and increased funding for grazing management, monitoring, and permit condition compliance.
27. We support sound, science-based management decisions for federal lands – including adaptive management – and believe these decisions should be based upon flexible policies that take into account local ecological conditions and state planning decisions for fish and wildlife and other human needs.
28. Federal and state land managers should identify opportunities to improve flexibility and integration of grazing management and targeted grazing as tools to achieve restoration and land management goals, including fish and wildlife habitat improvements, drought and wildfire mitigation and resilience, water quality and watershed health, soil health management, promotion of perennial plant health, and control of invasive species such as cheatgrass. They should also promote grazing allotment flexibility on federal lands, within USFS and BLM permitting systems and across ownership boundaries, to respond to changing rangeland conditions and environmental considerations.
29. Livestock grazing on federal lands is compatible with recreation and wildlife management and fulfills the multiple use and sustained yield mission of both the USFS and BLM. Policies, analyses, or planning decisions that lead to closing allotments must be based on science, documented threats and causal factors consistent with state policies and programs as well as federal multiple use missions.
30. Decisions to reduce or suspend grazing should only be made assisted by an appropriate quantitative assessment of long- and short-term trends in rangeland conditions on specific allotments, risk of spread of invasive weeds, diseases to wildlife, or other documented fish or wildlife impacts. If, after consultation with the state, the federal agency decides to reduce, suspend, close, or modify an allotment due to documented harmful wildlife impacts, an alternative allotment, properly authorized pursuant to NEPA, if a suitable alternative allotment exists, must be made available to the displaced operator prior to adjustment of the original allotment. In order to fully implement this policy, the BLM and USFS must have alternative allotments properly authorized under relevant planning documents. This ensures that suspensions or modification of grazing permits will not result in a net loss of Animal Unit Months and that appropriate alternative allotments are available.
31. Grazing permit renewal decisions should be assisted by current site-specific, quantitative data. Federal agencies should engage in meaningful consultation, coordination and cooperation with livestock grazing permittees, state and local governments, tribes, and stakeholders, prior to initiation and throughout the entire permit renewal process.
32. Federal land management agencies' decisions to reduce or close allotments should only be based upon completion of a full and complete administrative review and analysis, including a complete review under the provisions of NEPA. The decision process must include opportunities for states, livestock grazing permittees and other stakeholders to provide input. Allotments should not be closed due to a pending NEPA review without allowing

authorized use of the allotment pending a final decision, or the use of an equivalent amount of forage at reasonably equivalent cost to compliant operators.

33. Federal rangeland specialists should have an understanding of the economics and management of ranching operations dependent upon federal lands, and should receive the necessary training to comprehensively monitor rangelands, conduct objective analysis, and write sound environmental documents.
34. Clear directives and accountability throughout all levels of the USFS and BLM should be required so that interpretation and implementation is practical and predictable from office to office and individual to individual, and informed by an understanding of localized rangeland and ecological conditions, and economic health of ranch operations.
35. Federal land management agencies must give interested state agencies an opportunity to fully participate in or provide input to grazing permit actions – prior to their initiation – including: generalized review of livestock operations on federal lands; any assessment of grazing conditions as part of a federal planning process; review of past compliance of the operator with grazing allotment conditions; and individual allotment reviews. Grazing permit decisions should not be finalized until after this opportunity for meaningful consultation with the states, local governments, and the affected permittees.
36. Governors possess primary decision-making authority for management of state resources. States also have knowledge and experience that are necessary for the development of effective plans. Accordingly, it is essential that Governors have a substantive role in federal agencies' planning processes and an opportunity to review new, revised, or amended federal land management plans for consistency with existing state plans. Federal agencies should:
  - Provide Governors with sufficient time for a full and complete state review, especially when federal plans affect multiple planning areas or resources.
  - Align the review of multiple plans affecting the same resource, especially for threatened or endangered species that have vast western ranges.
  - Afford Governors the discretion to determine which state plans should be reviewed against federal plans for consistency, including State Wildlife Action Plans, conservation district plans, county plans, and multi-state agreements.
  - Maintain Governors' right to appeal any rejection of recommendations resulting from a Governor's consistency review.
  - Create a database of federal forest and rangeland management projects, available to states and other collaborators, that includes planned, current, and past projects.
37. The federal government should honor its historic agreements with states and counties in the West to compensate them for state and local impacts associated with federal land use and federally owned, nontaxable lands within their borders, such as the PILT and SRS programs.

38. The federal government should be a responsible landowner and neighbor and should work diligently to improve the health of federal lands in the West. Federal actions or failures to act on federal lands affect adjacent state and privately-owned lands, as well as state-managed natural resources.
39. Congress and federal agencies should provide opportunities for expanded cooperation, particularly where states are working to help their federal partners to improve management of federal lands through the contribution of state expertise and resources.
40. Western Governors support efforts to examine rural communities' relationships with natural resources, such as forests, rangelands, croplands, wildlife, and source water, as well as the important role that rural communities play in the management of these resources. Policy makers in the West should be encouraged to identify barriers to growth and sustainability in western communities, including a lack of restoration infrastructure, disaster mitigation challenges, dependence upon a single natural resource, and issues related to local capacity, expertise, and funding, and identify best practices to help rural communities overcome these barriers.

**C. GOVERNORS' MANAGEMENT DIRECTIVE**

1. The Governors direct WGA staff to work with congressional committees of jurisdiction, the Executive Branch, and other entities, where appropriate, to achieve the objectives of this resolution.
2. Furthermore, the Governors direct WGA staff to consult with the Staff Advisory Council regarding its efforts to realize the objectives of this resolution and to keep the Governors apprised of its progress in this regard.

*This resolution will expire in December 2023. Western Governors enact new policy resolutions and amend existing resolutions on a semiannual basis. Please consult <http://www.westgov.org/resolutions> for the most current copy of a resolution and a list of all current WGA policy resolutions.*





## Policy Resolution 2019-06

### Biosecurity and Invasive Species Management

#### A. BACKGROUND

1. Per Executive Order 13751, “invasive species” means “with regard to a particular ecosystem, a non-native organism whose introduction causes or is likely to cause economic or environmental harm or harm to human, animal, or plant health.” This definition can include aquatic and terrestrial plants and animals, forest and agricultural pests, and pathogens.
2. The 2017-2027 Hawai'i Interagency Biosecurity Plan defines biosecurity as “the set of measures taken to manage the risk from invasive species to the economy, environment, and health and lifestyle of the people.” This includes pre-border measures, border measures, post-border measures, and measures that increase public awareness about invasive species.
3. The Plant Protection Act of 2000 (Pub. L. 106–224) defines “biological control” (biocontrol) as the use of biological control organisms as an “enemy, antagonist, or competitor used to control a plant pest or noxious weed.” When used properly, biocontrol can be an effective tool in efforts to manage and eradicate invasive species.
4. States have different definitions of biosecurity, biological control and invasive species. They also may use regulatory and nonregulatory terms that are related to, but not synonymous with, the term invasive species, including pest, nuisance species, noxious weed, and injurious wildlife.
5. Invasive species have substantial negative effects on ecosystems, economies, and communities in the West. Studies have found that invasive species cost the U.S. more than \$120 billion every year, and the National Wildlife Federation estimates that 42 percent of threatened or endangered species are at risk due to invasive species. Invasive annual grasses such as cheatgrass, medusahead, fountain grass, and ventenata pose a major threat to western rangelands by increasing the risk of wildfire, outcompeting native grasses, and diminishing soil and water quality. Aquatic nuisance species, including invasive quagga and zebra mussels, decrease water quantity and quality, impair native wildlife, harm hydroelectric and irrigation systems, and can impede maritime transport by fouling vessel hulls. Invasive pathogens affect human health and welfare, and invasive species, such as mosquitoes, can vector human diseases. Invasive species damage multiple types of environments, from virgin forests to urban tree canopies. Invasive species harm a wide variety of economies dependent on natural resources, including agriculture, ranching, tourism, energy production and transmission, and forest products. Invasive species threaten many native plants central to western life and the cultures of Native Americans, Native Hawai'ians, Alaska Natives, and other indigenous peoples.

6. The spread of invasive species results from a combination of human activities, susceptibility of invaded environments, climate change, biology of the invading species, and dispersal. These characteristics are not dictated by geopolitical boundaries, but rather by ecosystem-level factors, which cross state and national borders. Scientists, private landowners, and state and federal land managers across the West have expressed the need to develop a more aggressive and cohesive strategy for invasive species management that includes prevention, monitoring, control, and eradication.
7. The impacts of invasive species on natural resources and human health and welfare are similar in scope and intensity to the threats posed by wildfire. Wildfire management on federal, state, tribal, and local land is coordinated through a sophisticated planning and response network, which includes the National Interagency Fire Center (NIFC).
8. Many invasive species were introduced, or their distribution was expanded, due to inadequate federal and state regulations dealing with interstate transport, international trade and interstate commerce, and a lack of communication and coordination between land management agencies.
9. Early Detection and Rapid Response (EDRR) is a coordinated set of actions to find and eradicate potential invasive species in a specific location before they spread and cause harm. The Incident Command System (ICS) is a management system designed to enable effective and efficient incident management, including invasive species rapid response, by integrating a combination of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure.
10. In the West, biosecurity and invasive species management is the responsibility of a wide network of state, federal, and local agencies. Federal agencies manage invasive species on federal lands and waters under a complex system of mandates and authorities.
11. Cooperative agreements, grants, and procurement contracts between federal agencies and state and local invasive species management authorities are effective in establishing structured partnerships for collaborative invasive species management. The use of cooperative agreements lessens the burden on local federal land managers, while increasing the efficiency of invasive species management programs utilizing local collaborative goal setting. Additionally, cooperative agreements simplify project-based contracting utilizing the authorities of state and local government agencies. This can be extremely useful, especially where infestations extend across multiple landownerships or EDRR is the management objective.
12. Good Neighbor Authority (GNA) allows states to enter into agreements with the U.S. Forest Service (USFS) or Bureau of Land Management (BLM) permitting them to perform various land management activities on federal lands. These tools have been successfully used by forest and rangeland managers to achieve various land management objectives across federal, state and local government, and privately-owned lands
13. U.S. Department of Agriculture (USDA) regulation of interstate movement of commodities via airlines is focused on the protection of agricultural industries in the contiguous United States. This is particularly evident in Hawai'i, where baggage destined for the U.S. mainland is subject to federal inspection, while baggage moving from the mainland to Hawai'i is not.

14. Environmental DNA (eDNA) is DNA present in an environmental sample, as differentiated from traditional sampling of DNA directly from an intact organism. eDNA frequently is thought of as DNA in tissue and cells that have been shed by an organism but can also refer to DNA within an intact organism, if that organism is collected in the environmental sample. eDNA can be used to detect a wide range of organisms, including those that are endangered or invasive, and be used for both research and monitoring purposes.
15. The West includes a number of highly important seaports on the U.S. mainland and across the Pacific region. Maritime vessels represent a primary pathway for the movement of aquatic invasive species. With the passage of the Vessel Incidental Discharge Act in 2018, regulations regarding ballast water and other discharges are centralized under Section 312 of the Clean Water Act with the Environmental Protection Agency setting environmental standards, the U.S. Coast Guard (USCG) setting vessel requirements to meet those standards, and the USCG and interested states enforcing those requirements.
16. State invasive species councils and invasive plant councils provide policy level direction, planning, and coordination for state-level biosecurity and invasive species prevention and management actions in the West. Councils are led by state agencies, non-profit organizations, industry, private landowners, and public-private partnerships. These groups empower those engaged in the prevention, detection, and eradication of invasive species, and serve as forums for invasive species education, communication, and strategic planning. Invasive species councils can collaborate on regional-level issues and benefit from mechanisms that help them to coordinate and solve cross-boundary, cross-jurisdictional challenges.

**B. GOVERNORS' POLICY STATEMENT**

1. Western Governors support the creation of a Western Invasive Species Council (WISC) to help enhance coordination between existing state invasive species councils, improve communication and collaboration on regional biosecurity and invasive species control efforts, and to advocate for regional needs at the federal level. The WISC should be initially coordinated through the Western Governors' Association and should work to address cross-boundary and cross-jurisdictional challenges identified in this resolution.
2. Western Governors urge Congress and the Administration to support state, territorial, and tribal invasive species prevention, control and management programs and redouble efforts on federal lands. This should be accomplished through accountability and oversight of programs administered by the USDA, the U.S. Department of the Interior, the U.S. Department of Defense, the USCG, and the National Oceanic and Atmospheric Administration. These programs provide valuable services in the detection and elimination of invasive species, as well as coordination, public outreach, and communication.
3. Western Governors support research as needed to provide understanding of invasive species life potential range distribution, and to develop geographically-appropriate control measures. Western Governors urge Congress and the Administration to support much-needed research on biosecurity and invasive species, including programs under the National Institute of Food and Agriculture and to facilitate funding mechanisms that enable land grant universities to conduct research and development of new pesticides. Institutions conducting research on biosecurity, biocontrol and invasive species control methods should look for opportunities to pool funding resources and exchange information across

administrative lines. Invasive species managers and policymakers should be encouraged to develop new decision-making tools and economic analyses, as well as build and improve upon the decision-making tools and analyses currently in use. Invasive species managers should strive to incorporate economic analyses and regional-level, science-based decision-making tools into management decisions.

4. Western Governors strongly encourage expansion and creation of partnerships – such as invasive species councils with representation from local weed and pest districts, conservation districts, county governments, non-profit and industry organizations, local stakeholders, state, island, tribal, federal, regional and international agencies – committed to preventing the spread of invasive species, averting new unauthorized introductions, responding rapidly to new introductions, and working together to find creative regional approaches for protecting and restoring natural, agriculture, power and water conveyance infrastructure, and recreational resources. Federal agencies should build a more sophisticated and centralized biosecurity and invasive species management network, including a National Biosecurity and Invasive Species Management Center based on the model of the NIFC.
5. Congress and the federal government should ensure that invasive species funding, including support for emergency response, is sustainable, flexible and able to be maximized by federal, state and local agencies with pooled resources and collaborative funding mechanisms. Federal funding, cooperative agreements grants, and procurement contracts for state and local biosecurity and invasive species management should be structured in a deliberate and transparent way that allows for the greatest amount of flexibility and long-term planning. When possible, federal agencies should look for collaborative projects and funding opportunities that multiply state resources and support state-led biosecurity and invasive species management projects.
6. Western Governors call upon Congress to promote state-directed programs to combat invasive species. Regional leadership and state-directed programs provide place-based solutions tailored to unique regional or local conditions in land and aquatic ecosystems. The federal role should be one of partnership and policy-making that strengthen states' on-the-ground efforts and mitigates risks associated with the movement of invasive species between states.
7. Federal agencies are encouraged to expand the use of cooperative agreements with state and local governments and should ensure that they are approved in a timely manner and in collaboration with implementing state agencies. Federal agencies can also support invasive species management efforts by encouraging contract recipients to coordinate with state and local invasive species management agencies, regulatory programs, and cooperative weed and invasive species management areas. State invasive species managers should consider using Good Neighbor Authority on USFS and BLM lands for cross-boundary collaborative invasive species control, management and eradication programs.
8. Federal actions should support state biosecurity and invasive species management efforts by ensuring the timely approval of state permits for biosecurity, quarantine, biocontrol, and rapid response actions. Federal agencies should consult with Governors early and substantively regarding biosecurity or invasive species management decisions that affect state resources and state actions.

9. Federal agencies should identify individuals within district and region offices that can be contacted and assist in the planning and implementation of local cross-boundary invasive species management programs.
10. The threats that invasive species pose to western landscapes and communities are serious and should be met with a sophisticated and coordinated response commensurate with the level of their impacts.
11. Prevention is the most efficient and cost-effective method of invasive species management. Effective biosecurity, prevention, and containment methods can mitigate the need for more expensive and burdensome control and eradication programs. Prevention strategies should be coordinated across state, national, and international lines. Federal and state agencies should increase the use of innovative biosecurity prevention and detection programs, including increased use of electronic manifesting in interstate shipments for the purposes of inspection, and the use of canine detection resources.
12. Western Governors support the EDRR framework as a method to limit or eliminate new introductions and existing species expansion. Programs for the control and/or eradication of invasive species must result in more on-the-ground prevention, management and eradication. The ICS should be evaluated for use in instances of fast-spreading invasives and used as part of EDRR; state, federal, and local agencies can opt to practice and implement the ICS as part of rapid response. The Federal Emergency Management Agency can support these efforts by working with western states to create an ICS training module for invasive species rapid response. The Executive Branch can support state-led rapid response programs by: 1) increasing federal funding for state-led aquatic invasive species rapid response programs, including those that provide mechanisms for flexible, long-term support of state early detection rapid response efforts; 2) streamlining federal permitting and approval processes for treatment and management actions for new mussel detections; 3) creating a single federal authority for aquatic invasive species treatment permitting and approval in freshwater systems; and 4) simplifying reporting on new invasive mussel infestations by creating a single federal point of contact for new mussel detections.
13. Federal agencies should support states' effort to identify, study and approve the use of biological control organisms. Federal permitting models should be structured to ensure biocontrol can be utilized by states in a safe and timely manner. Biocontrol research is encouraged at a regional level, with biocontrol research information being encouraged to move freely between institutions and across state lines. Invasive species managers in the West would benefit from the creation of a new, state-of-the-art biological control facility, as well as a collaborative, multi-agency plan for maintaining and staffing new biocontrol facilities at a level that more adequately meets the expanding needs of the region. Furthermore, effective biocontrol, biosecurity, and invasive species research depends upon a highly-skilled workforce. State and federal agencies should collaborate with universities to support programs essential to biosecurity and invasive species management, such as botany, zoology, plant pathology, taxonomy, systematics, and related fields.
14. The containment of invasive quagga and zebra mussels at infested waters in the West depends upon the collaboration and mutual effort of federal, state and local agencies. Many state-led containment programs benefit from federal cooperation and funding, and state and federal agencies should be encouraged to sustain and expand these effective partnerships as necessary. However, to adequately protect the West from the movement of

aquatic invasive species, federal agencies must be able to act as full partners in invasive species containment efforts and must have the funding and authorities necessary to contain invasive species within lands and waters under their jurisdiction. To this end, federal agencies, including the National Park Service and BLM, should be vested with clear authority to manage watercraft upon their departure from infested waterbodies under federal jurisdiction.

15. Integrated pest management, biocontrol, outcome-based grazing, and targeted grazing can be effective tools to control the spread of invasive annual grasses. Federal, state, and local agencies should view invasive annual grasses as a regional threat and strive to identify and implement cross-boundary projects to control invasive annual grasses at a regional level. Such projects should include those utilizing alternative management techniques such as outcome-based grazing.
16. Agricultural industries in the Pacific Islands need to be similarly protected from the risk of interstate movement of invasive species as the contiguous U.S. mainland. USDA quarantines and commodity inspections should incorporate the priorities of the West, including non-contiguous states and territorial islands in the western region. This includes maintaining federal quarantines on pests that have not yet reached the West, like the emerald ash borer, and adopting policies that adequately protect Pacific states and territories, such as inspection of baggage moving from the contiguous U.S. to non-contiguous areas.
17. State, federal and local agencies and regional coordinating groups should develop and implement a set of best practices for conducting eDNA monitoring and incorporating positive detection results into rapid response strategies.
18. To effectively prevent, contain, and control invasive species, federal, state and local invasive species managers need federal laws that support on-the-ground action. Western Governors support a states-led review of federal biosecurity and invasive species statutes, including the Lacey Act and the National Invasive Species Act, to evaluate how they support on-the-ground management, identify any gaps in their application, and ensure that their structure and implementation are able to address 21<sup>st</sup> century biosecurity and invasive species challenges. Of particular interest are opportunities to expand the taxonomic scope of the Lacey Act to benefit U.S. biosecurity.
19. As directed by the Vessel Incidental Discharge Act, the U.S. Coast Guard and the Environmental Protection Agency should consult with Western Governors and work closely and collaboratively with states on the implementation of that act to ensure that state and regional aquatic resource protection needs are met across the West and the Pacific. Federal and state partners should collaborate on the development of evidence-based risk assessments and should work together to assess the efficacy of policies and tools that may be used in mitigating the impact of various types of discharges, including hull biofouling. Western Governors believe that protecting the diversity of marine habitats in western states and Pacific territories is best accomplished by working with states that have the greatest knowledge of their ecosystems and invasive risks.
20. Accurate, standardized, and accessible geospatial data is essential to biosecurity and invasive species management in the West. Western Governors support efforts to standardize and centralize invasive species occurrence data, streamline the exchange of

data between the nation's major invasive species data aggregators, and increase the accessibility of data to federal, state, and local land and resource managers.

**C. GOVERNORS' MANAGEMENT DIRECTIVE**

1. The Governors direct WGA staff to work with Congressional committees of jurisdiction, the Executive Branch, and other entities, where appropriate, to achieve the objectives of this resolution.
2. Furthermore, the Governors direct WGA staff to consult with the Staff Advisory Council regarding its efforts to realize the objectives of this resolution and to keep the Governors apprised of its progress in this regard.

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