

PUBLIC COMMENT SUBMISSION

Federal Rulemaking and Administrative Data Transparency

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TO: USDA Forest Service, Director, Natural Resources
Attention: Gilbert Jackson, Mailstop Code: 1103
1400 Independence Ave. SW, Washington, DC 20250-1103
Submitted via Email: SM.FS.RngMgmtWO@usda.gov

RE: **Notice of Information Collection: Grazing Permit Administration Forms including new Grazing Agreement Form (OMB Control Number: 0596-0003; 91 FR 13273)**

This comment is formally submitted in response to the request for public input published by the Forest Service in the Federal Register on March 19, 2026, regarding the proposed extension of the information collection for Grazing Permit Administration Forms and the introduction of the new Grazing Agreement form (FS-2200-XXXX). As an advocate for transparent federal administrative procedures and balanced public land stewardship, this submission focuses on specific informational deficiencies within the current notice, outlines constructive mechanisms to enhance public data utility, and strongly reinforces the value of domestic livestock grazing within authorized federal land management frameworks.

Support for Sustainable Grazing on National Forest System Lands

Domestic livestock grazing across approximately 93 million acres of National Forest System lands represents a foundational, statutory component of the federal multi-use mandate. Authorized under critical frameworks such as Title III of the Bankhead-Jones Farm Tenant Act of 1937, the Granger-Thye Act of 1950, and the Federal Land Policy and Management Act of 1976, properly administered grazing programs support rural economies while actively sustaining working and natural landscapes. Cooperating directly with localized grazing associations and districts is an exceptionally efficient mechanism for federal land management. By transferring specific administrative tasks to recognized associations, the Forest Service significantly reduces its internal operational burdens and leverages generations of localized, practical expertise to foster cross-boundary rangeland health and conservation practices.

A rigorous, clear, and standardized information collection system is not a barrier to these operations; rather, it is a vital enabler. Reliable administrative forms ensure that legal grazing privileges are secure, fee structures are accurately computed, and resource allocation remains stable. Therefore, the effort to maintain and renew these information collections is highly commended as a necessary function to preserve the long-term viability of public land ranching and ensure that federal resources are administered in a lawful, predictable manner.

Concerns Regarding the Critical Lack of Publicly Available Information

While the administrative intent behind the information collection renewal is sound, the notice as published suffers from a significant deficiency regarding transparency and public disclosure. Specifically, the Forest Service announces the creation of an entirely new instrument—the Grazing Agreement form (FS-2200-XXXX)—intended to formalize long-term relationships with grazing associations and establish uniform data protocols. The notice outlines a high-level summary of the fields to be collected, such as permitted head months and specific grazing allotments. However, the exact text, mandatory standard clauses, terms of compliance, and structural layout of this proposed form have been completely omitted from the Federal Register notice and are not accessible within the public rulemaking docket at Regulations.gov.

This lack of primary documentation creates an insurmountable obstacle for the public to provide fully informed, substantive feedback. In accordance with the Paperwork Reduction Act of 1995, the public is explicitly invited to evaluate whether the proposed collection is clear, concise, and designed to minimize administrative burdens while maximizing utility. Without access to the actual draft text and standard boilerplate language of the new Grazing Agreement form, stakeholders cannot objectively assess whether the specific legal clauses are overly burdensome, whether they create unintended regulatory ambiguities, or whether they adequately protect the historical rights of association members. Transparency requires that the precise instruments of federal collection be made visible before they are finalized.

***Administrative Note:** Effective public comments must point regulators toward missing elements. Providing the explicit text of proposed agency forms is a fundamental requirement under the Administrative Procedure Act to ensure that the public can meaningfully participate in the regulatory process.*

Constructive Recommendations for Open Data and Enhanced Public Utility

To rectify these concerns and enhance the practical utility of the collected information, the Forest Service should adopt a proactive approach to public data sharing. The detailed information gathered across these eight administrative forms—spanning permit transfers, temporary authorizations, corporate ownership structures, and allotment-level head months—represents an invaluable baseline dataset for public land ecology. Rather than treating this information as an internal, siloed administrative ledger, the Forest Service should integrate a clear commitment within this collection request to compile and publish aggregated, anonymized versions of this grazing data into an open-access, public digital repository or geospatial database.

Making aggregated allotment boundaries and permitted head-month allocations easily accessible to the public would yield profound benefits for intergovernmental coordination and public land transparency. Local communities, adjacent property owners, conservation groups, and intergovernmental resource managers often operate with overlapping mandates. For example, wildlife biologists tracking vulnerable species or native plant groups propagating regional flora require precise data on historical and active rangeland use to prevent conflicts and maximize habitat restoration. Publicly sharing this data ensures that multi-use coordination occurs

seamlessly on the ground. Crucially, by publishing this data automatically, the Forest Service would drastically reduce the administrative burden of processing repetitive Freedom of Information Act (FOIA) requests, thereby streamlining agency workflow while actively promoting the statutory integration of working landscapes.

Conclusion

In conclusion, the administration of livestock grazing is an essential and valuable use of our federal lands that must be preserved and optimized through clear administrative processes. The Forest Service's initiative to standardize and stabilize its grazing forms via OMB Control Number 0596-0003 is a positive step toward maintaining durable working landscapes. However, to satisfy the core tenets of the Paperwork Reduction Act and the Administrative Procedure Act, the agency must immediately place the complete, unredacted draft text of the new Grazing Agreement form into the public docket for review. Furthermore, the agency should leverage this collection to establish an open-data framework, ensuring that the critical resource data collected on our federal lands is shared transparently with the public to foster informed, collaborative, and long-term land stewardship.

Respectfully submitted,