



National Association of Conservation Districts

March 06, 2020

Seth Flanigan
Project Manager, Bureau of Land Management
3948 S. Development Ave
Boise, ID 83702

RE: Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Revision of Grazing Regulations for Public Lands

Dear Mr. Flanigan,

The National Association of Conservation Districts (NACD) represents America's 3,000 locally-led conservation districts, working with millions of landowners and operators to help them manage and protect land and water resources on private and public lands. Established under state law, conservation districts share a single mission: to work cooperatively with federal, state and other local resource management agencies and private sector interest groups to provide technical, financial and other assistance to help landowners and operators apply conservation to the landscape.

NACD recognizes and supports the multiple benefits that managed grazing can have on the landscape and appreciates BLM's efforts to ensure that grazing on public lands will continue to exist by streamlining and updating the agency's grazing regulations. When rewriting any grazing regulations, BLM must continue to follow federal law that requires public lands to be managed for multiple uses to include recreation, wildlife resources, energy development and timber resources alongside grazing.

Properly managed grazing provides multiple benefits to rangeland resources and with the increasing frequency and size of wildfires, BLM should continue to focus on the ability for grazing to provide for fuels reduction activities on public lands. With proper utilization, livestock grazing is a unique and readily available tool to mitigate catastrophic wildfires to complement the agency's other activities to control wildfire. NACD believes that careful management, good monitoring and adaptive science and techniques can utilize grazing as one of the most important tools in the national effort to reduce high-density fuel loads and catastrophic fire damage.

However, in some instances when increased forage and fuel loads occur, it can be difficult for a permit holder to access those acres through temporary non-renewable (TNR) permits in a timely manner. In many cases, the evidence of these excess fuels and forages are not apparent well in advance. When these conditions do exist, permit holders should be provided a flexible and clear process to ensure that livestock are able to quickly mitigate those fuel loads and take advantage of the excess forage. TNRs are issued directly in response to changing circumstances on the landscape, and flexibility in the application of these permits is needed to ensure resources are managed properly. The grazing regulation should develop a streamlined process with certainty built in to allow TNR, or a TNR-type process, to utilize excess forage when it is available and can be responsibly grazed. This would apply to annual grasses (e.g. cheatgrass) and both native grasses and non-native perennial grasses (e.g. crested wheatgrass).

NACD is also supportive of BLM's focus on outcome-based grazing through demonstration projects, which aim to provide permit holders greater flexibility to respond to conditions on the ground while still ultimately meeting land health standards. The updated grazing regulations should memorialize this approach so that BLM can more broadly authorize grazing based on outcomes and expand from the demonstration phase. Due to the ability of grazing to respond to on-the-ground conditions such as



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drought, wildfire or excess forage and fuel loads, permit holders should have additional flexibility to ultimately achieve the overall land health objectives rather than have overly prescriptive plans that do not work or do not provide all the tools necessary for success on these dynamic landscapes. A true outcome-based grazing approach should ultimately include the goals of flexibility outside of rigid permit dates and terms and conditions. The results on the ground – the outcomes, as discussed above – are what truly matter. Any new proposals on grazing regulations should continue to mirror the good work that BLM is already doing to ensure that these efforts apply to all BLM grazing allotments.

Overall, while BLM moves through the scoping process, the agency must ensure that any changes to grazing regulations be grounded on the premise that flexibility and adaptive management is the key to ensuring projected environmental outcomes are achieved while still providing the socioeconomic stability for communities reliant on the ranching taking place under these permits. Overly prescriptive grazing plans that do not allow permit holders to meet changing climactic conditions on unpredictable landscapes will not achieve desired natural resource management goals.

Finally, we wish to remind BLM that conservation districts are local government entities, and in states where BLM grazing permits exist, they have the recognized and demonstrated special expertise to be a tremendous resource to BLM in managing landscapes and coordinating activities and rangeland improvements with the ranchers that hold grazing permits. The grazing regulations should ensure that coordination with local governments, including conservation districts, is bolstered and these local governments recognized as playing a role in proper management of public lands and relationship building with ranchers for consensus-based management.

Sincerely,

A handwritten signature in cursive script that reads "Tim Palmer".

Tim Palmer
NACD President