



# National Association of Conservation Districts

June 1, 2020

John F. Ruhs  
State Director, Bureau of Land Management  
1387 S. Vinnell Way  
Boise, ID 83708

RE: DOL-BLM-ID-0000-2017-0003-EIS (Programmatic Environmental Impact Statement for Fuels Reduction and Rangeland Restoration in the Great Basin)

Dear Mr. Ruhs,

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 welcomes the opportunity to provide comments on the Bureau of Land Management's (BLM) Draft Programmatic Environmental Impact Statement (PEIS) for Fuels Reduction and Rangeland Restoration (FRRR) in the Great Basin. NACD recognizes the benefits for streamlining the National Environmental Protection Act (NEPA) processes to implement important, and much needed conservation actions. This PEIS will benefit local BLM Field Offices by allowing them to meet the timelines and page limits set forth by the national BLM office. Though the above referenced PEIS is specific for the Great Basin, NACD urges BLM to expand more programmatic NEPA analysis for other BLM managed public lands improvement projects.

This PEIS advances the management of rangeland resources and public lands relied upon and enjoyed by many. Providing adequate management, including proper proposed actions, analyses and management alternatives enhances the sagebrush ecosystem while sustaining and protecting the multiple use of rangelands required by law that serve as the underpinnings of rural communities' socioeconomic vitality. Therefore, NACD encourages BLM to work closely with state and local governments within this Great Basin, including conservation districts. Conservation districts have worked with their communities for decades and are well equipped to provide insight and assistance and BLM should coordinate with them as on-the-ground actions and the implementation of projects moves forward under this PEIS

Public lands are required to be managed for multiple-use and play an essential role in the success of local economies. Local expertise should be sought by BLM in order to ensure any project does not bring unwarranted harm to these communities. Developing local support for projects is vital in order to maintain the strong relationships with those using public lands. Conservation districts have those local relationships and should be utilized for this purpose. The PEIS must draw from the experience land users possess in order to develop workable projects and solutions.



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Additionally, projects should be designed to provide local economic opportunities to keep project dollars within local areas when possible.

Catastrophic wildfires continue to imperil public landscapes destroying wildlife habitat, outdoor recreation and local economies. The most cost-effective tool for fuels management, especially for fine and flashy fuels, is livestock grazing. Properly managed and targeted livestock grazing are among the most valuable and fiscally responsible tools available to achieve fuels reduction. Cheatgrass (*Bromus tectorum*) monocultures, or perhaps more accurately, “near monocultures”, provide an important forage resource when managed with strategic and targeted grazing. While conversion to cheatgrass is not desirable, it would be a mistake for BLM to ignore the biomass produced where cheatgrass is present. This PEIS should better address how cheatgrass biomass can be used and should also provide treatment and management options permitting grazing or other economic uses of cheatgrass. NACD encourages BLM to utilize creative and innovative solutions allowing the use of cheatgrass, particularly when it can be done in a manner benefiting rangelands. Targeted grazing could reduce the need for herbicide treatment and more robust comparisons should be made when comparing grazing with herbicides and other treatments in order to determine the cost/benefit for the ecological site. By applying fuels reduction and rangeland treatments to public lands, BLM can protect and potentially increase the health of sagebrush communities, while improving their resistance to invasive annual grass and protecting them from future wildfires. Functioning and viable sagebrush communities provide multiple use opportunities for all user groups and provide habitat for sagebrush-dependent species.

When developing projects under this PEIS, it is important to note that native seed is often difficult to obtain, expensive and ineffective when competing with non-desirable invasive species such as cheatgrass or other noxious weeds. The use of desirable adapted nonnative species, such as Crested Wheatgrass (*Agropyron cristatum*) and Forage Kochia (*Bassia prostrata*), should not be discounted and should be allowed in areas where such species maintain ecological function or stabilize degraded landscapes. Limiting treatment to only the use of native species would eliminate an important tool and only exacerbate the likelihood of further invasive species encroachment.

If and when possible, projects should allow for responsible use and removal of biomass, especially when addressing encroaching and infilling pinion-juniper woodlands. Novel and innovative approaches and opportunities to use the biomass created in these areas allow for the creation of energy and other economic benefits. This PEIS should better analyze these approaches, and language should be written to allow the use of new technologies as available. NACD encourages BLM to include mechanisms in this specific PEIS to analyze and adopt innovative solutions without preparation of an additional EIS, or unnecessary, additional NEPA.

Additionally, this PEIS should provide flexibility for more gathers, if necessary, of wild horses and burros to maintain the desirable Appropriate Management Level (AML). Wild horses and burros must be managed within the AML. BLM has determined that the total ALM for wild horse and burro populations can support approximately 26,770 animals. An estimate of 95,114 animals are currently on BLM managed public lands.<sup>1</sup> Current population estimates are over three times the population numbers that can be supported by the AML. When lacking proper

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<sup>1</sup> “Heard Area and Heard Management Area Statistics as of March 1, 2020”

[https://www.blm.gov/sites/blm.gov/files/wildhorse\\_2020\\_HAHMA\\_Stats.pdf](https://www.blm.gov/sites/blm.gov/files/wildhorse_2020_HAHMA_Stats.pdf)



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management all other vegetation management actions within Heard Management Areas (HMA) are susceptible to increase failure. Overpopulation of wild horses and burros negatively impacts land health standards, and diminishes habitat quality, riparian plant communities and watershed function and will preclude success of projects under this PEIS if not addressed.

NACD encourages BLM to consider word choice when drafting rangeland improvement projects. Although this PEIS is declared a “restoration” project, it will not “restore” rangelands to any historical or pre-settlement condition. Though it is not possible to “restore” many ecological sites, all sites can be managed to improve resource values given their current ecological condition. All projects should be designed to manage resources to meet desired objectives within the current capability of any given ecological site. By strict definition, restoration would serve to preclude certain technologies, such as the use of non-native plants in fire breaks. However, doing so could prevent ecologically positive site properties benefiting the whole ecosystem. Focusing on the whole ecosystem should remain a top priority. Regardless of if a management tool technically “restores” a site, tools allowing for the opportunity to regain or retain attributes of rangeland health should be considered. Tools focused on soil/site stability, hydrologic function and biotic integrity have been used to achieve rangeland health on sites that were not suitable for “restoration” to pre-settlement conditions and should not be disregarded or precluded.

NACD appreciates the opportunity to provide BLM with feedback regarding this PEIS. NACD recognizes the critical need to streamline NEPA for faster implementation of conservation on the ground. Conservation districts are local government entities that can provide local expertise and they look forward to working with BLM to continue to achieve healthy sagebrush ecosystems.

Sincerely,

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

Tim Palmer  
President  
National Association of Conservation Districts