



National Association of Conservation Districts

December 9, 2020

Mr. Kevin Washburn
Team Lead, DOI Review Team
Biden-Harris Transition Team
1401 Constitution Ave NW
Washington, DC 20230

Dear Mr. Washburn,

The National Association of Conservation Districts (NACD) represents America's nearly 3,000 conservation districts and the more than 17,000 men and women who serve on their governing boards. Conservation districts are local units of government established under state law to carry out natural resource management programs at the local level. Conservation districts work with millions of cooperating landowners and operators to help them manage and protect land and water resources on private and public lands in the United States.

Conservation districts are devoted to conserving natural resources on all landscapes across our nation through proper stewardship of the land. America's diverse landscapes – from Eastern forests to Western rangelands – have their share of unique natural resource challenges. Additionally, NACD recommends and supports common sense, ecologically-sound management practices for all Department of Interior actions to ensure healthy wildlife and rangelands are preserved for future generations.

Endangered Species Act

It is critical that updates be made to bring the Endangered Species Act (ESA) into the 21st century. Although ESA is often linked to challenges in the Western U.S., natural resource managers and industry professionals across the country work under outdated ESA requirements, rules, and statutes. Land management decisions are best made locally and by the communities impacted by them. Local experts offer unmatched expertise and knowledge. All too often, decisions made in Washington, D.C., even those in good faith, hinder management on the ground and leave a bevy of red tape.

NACD has advocated for modernizing ESA and has supported comments through the National Endangered Species Act Reform Coalition (NESARC) to federal rulemakings from U.S. Fish and Wildlife Service (FWS). FWS should continue to work in a way that creates a sound environment for natural resource managers to engage in locally-led species conservation. ESA success stories such as the black footed ferret should serve as a prime example of coordination between industry, local and federal government. In 1981, a Wyoming rancher discovered the species, which had previously been deemed extinct, on his ranch. Collaborative efforts between the rancher, federal and local government, tribal and additional partners ultimately led to recovery of the black-footed ferret. Unfortunately, ESA often leaves species on life support, keeping them from achieving recovery that would allow for downlisting or delisting of the species. With the proper amendments to ESA, species can flourish. Local management efforts can help move this process forward and lend to species recovery.



Wildfire and Livestock Grazing

The 2020 wildfire season has inflicted severe harm to natural resources, communities and the economy. A fully stocked toolbox is required for natural resource managers to minimize wildfire risk; one of those tools includes livestock grazing. Targeted grazing has been proven to reduce hazardous fuel loads. A recently released study¹ found that the 1.8 million beef cattle grazing on California's rangelands have notably reduced fuel loads on the landscape. On average, the study found that cattle grazing reduced the fuel load by 596 pounds per acre. NACD supports responsible grazing and asks that the Bureau of Land Management (BLM) continue to work with local government and industry to ensure legally required multiple use aspects of public lands are met.

Wild Horse and Burro Management

Wild horse and burro populations have been allowed to grow at a rate that, in many places, exceeds Appropriate Management Level (AML). This has not only led to widespread degradation of the West's public lands but has led to devastating effects to the health of the animals that often face starvation and dehydration. Additionally, overpopulation can negatively impact endangered species, and degraded rangelands offer opportunities for invasive plant species to be established. While both the BLM and U.S. Forest Service (USFS) have been executing programming targeted at bringing wild horse and burro population numbers under control. In 2009², it was reported there were roughly 36,940 wild free-roaming horses and burros on federal lands. In 2020³, over three times as many animals are on public lands than the AML is able to support. BLM has determined that the AML for wild horse and burro populations is approximately 26,770 animals. BLM's most current data states, as of March 2020, an estimated 95,114 animals are on federally managed public lands. Current overpopulated population levels are stressing our nation's rangelands beyond the point of recovery. With the added stress of continued weather extremes occurring, our nation's public lands and the animals themselves will continue to suffer.

NACD is a member of the [National Wild Horse and Burro Rangeland Coalition](#) and supports its population management proposal "The Path Forward for Management of BLM's Wild Horses & Burros." While NACD has policy stating support of full implementation of the Wild and Free Roaming Horses and Burros Act, we have a strong preference for solutions that bring excess horses to levels conducive to rangeland health without using unconditional sale and lethal management. "The Path Forward for Management of BLM's Wild Horses & Burros" is the only proposal we have seen that takes this approach and not only models the ability to reach AML, but seeks to leverage private resources to do so as opposed to relying solely on taxpayer funding.

Public Lands Management

Land management decisions are best made locally by those directly affected and familiar with diverse landscapes and rural community needs. NACD was pleased to see BLM's now final rule on the Programmatic Environmental Impact Statement (PEIS) for Fuels Reduction and

¹ <http://www.ucanr.org/blogs/blogcore/postdetail.cfm?postnum=43533>

² https://www.blm.gov/sites/blm.gov/files/wildhorse_quickfacts_doc5.pdf

³ https://www.blm.gov/sites/blm.gov/files/wildhorse_2020_HAHMA_Stats.pdf



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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. NACD also supported the Council on Environmental Quality (CEQ)'s NEPA revisions and hopes to see continued efforts by the Department and corresponding agencies on streamlining NEPA related efforts.

Conservation districts were created to be the link between the federal government's various natural resource agencies and local communities across the country and in many states are legally considered as having special expertise by state law. Decisions and actions taken by agencies within the Department of Interior that recognize this unique relationship will ultimately be more effective. NACD and our nation's conservation districts look forward to working with the incoming Biden Administration on these and other efforts to protect our nation's natural resources.

Sincerely,

A handwritten signature in black ink that reads "Tim Palmer".

Tim Palmer
NACD President

A handwritten signature in black ink that reads "Michael Crowder".

Michael Crowder
NACD President-Elect