



June 18, 2020

Bureau of Land Management
1849 C Street, NW
Washington, DC 20240

Re: Collaborative Letter on Revisions to BLM Grazing Regulations

Lands managed under the jurisdiction of Bureau of Land Management (BLM) are an integral part of conservation and livestock operations on western landscapes and the BLM is a key partner in their health and productivity. The undersigned groups agree that successful stewardship, conservation and management is achievable when the BLM, grazing permittees and lessees and invested stakeholders work together as partners, focused on shared and synergistic goals: ecosystem health, fish and wildlife habitat and sustainable livelihoods that support resilient rural communities and food and fiber systems. Grazing regulations that work well provide flexibility and resources to meet those goals across large landscapes of matrixed ownership including private, state and federal lands, while valuing economic stability of permittees and rural communities.

We also agree that too often, the current regulations stall proactive permit renewal, limit options for learning, sharing, and adaptive management, and exacerbate avoidable conflict. Livestock grazing is a complementary use of our public lands and can be an accountable tool to suppress threats including from fire and invasive species, improve resource health, and deliver economic prosperity.

The undersigned urge BLM to adopt limited, durable, and strategic revisions to the regulations that enable flexible and collaborative changes to increase effectiveness in livestock grazing management that better allows all partners to optimize ecological and economic benefits for the American public. To assist the BLM, we express a shared belief in the following:

PROMOTING FLEXIBILITY IN RESOURCE AND LIVESTOCK MANAGEMENT

To truly manage for ecological and economic health, the BLM should further promote flexibility in livestock management. The rigidity of existing plans and prescriptive nature of federal programs often prevent managers and producers from responding quickly to the inter-annual variation common in western landscapes. By developing plans tiered to outcomes rather than tied to rulesets, producers can adapt management while meeting rangeland health objectives, such as unexpected grazing and stewardship opportunities in areas not threatened by invasive species, dormant season grazing, or phenology changes due to late snow or early drought.

BLM, in partnership with livestock producers and others, is demonstrating successful management through flexibility. New permitting frameworks developed through outcome based grazing pilots illustrate that promoting flexibility and

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accountability is possible under BLM's current set of regulations. We encourage BLM to build upon this framework and to clarify existing authorities to promote management flexibility as much as possible, rather than adopting new ones. Further, the BLM should explore how step-down direction through policy (manuals and handbooks), Instruction Memorandums, and other tools, can provide the guidance specialists need to promote flexibility.

In promoting flexibility, achieving resource goals and providing accountability must be paramount. However, methods of providing accountability must still ensure flexibility in a timely manner to address resource concerns. In seeking this balance, we agree the BLM can look to make temporary non-renewable permits (TNRs) more useful and timelier. Because different applications of flexibility carry different risks and opportunities – such as impacts to early versus late season vegetation phenology, or native versus invasive vegetation – the BLM should ease use of the TNR process to make this tool workable in a timely way and base approval on the best available science.

As no two situations will be the same, permittees should have the option of pursuing more flexible permits, if the permittee desires, as long as desired outcomes remain the same. We see use of TNRs as an interim step until new permits can be issued with flexibility built for those who want them.

OPTIMIZING FORAGE UTILIZATION

Successful resource management will allow permittees and managers to tailor livestock grazing use to match forage demand to forage supply and quality through adaptive management. This will vary by the realities of both annual variations and short- and long- trends in resource conditions and ranch management needs and realities.

Resting an allotment, in whole or in part, should be encouraged if doing so benefits the resource and/or the permittee. By acting in the best interest of the resource, permittees should not risk losing their preference or access. At the same time, protections are needed to ensure temporary non-use does not erode the role of these pastures as working grazing lands and the long-term ecological value of grazing on these lands by becoming permanent.

To achieve this balance, BLM should revise the regulations with a standard and consistent description of temporary non-use flexibility that protects these lands and permittees from risk. To protect agricultural production and stewardship status, application of that flexibility needs to come at the local level and based on adaptive management, resource condition, and permittee needs. By providing clear regulatory permission but reserving case-specific judgment to BLM professionals and permittees, more users can consider how temporary non-use may benefit their operations and support achieving the Fundamentals.

We believe the option for selective temporary non-use, deferment and TNRs, can serve to bridge traditional livestock grazing permits to more inclusive outcome-based permits for those producers who want and need further flexibility. However, additional tools to increase forage optimization are needed to lower management costs, allow for needed rest, and support producers during drought or following wildfire. Many innovative ideas are being pursued across the range, and BLM should produce clear guidance to allow for specialists to share and support adoption of new tools by interested permittees.

ENSURING USE OF THE FUNDAMENTALS OF RANGELAND HEALTH

The Fundamentals of Rangeland Health (Fundamentals) are foundational range management principles for the Bureau that should guide all management decisions and apply to all permitted users of BLM lands. We support moving the

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Fundamentals to a different part of BLM's regulations – such as Planning – to center them as foundational for assessing rangeland health and to ensure their applicability to other areas of BLM administration, including, but not limited to, fire fuel management, restoration, recreation, energy development, and industry use, as well as livestock grazing.

In moving the Fundamentals, we do not seek their weakening. We ask the BLM to reinforce their importance by including language in the regulations of other permitted uses, including grazing, to the requirements of these Fundamentals. Doing so will 1) reinforce their application at watershed or other appropriate landscape scales; 2) help better distinguish the impacts (beneficial, neutral and detrimental) of one use from another, and; 3) create room for broader application of flexible and adaptive management to adjust use as conditions and circumstances require. This is critical as the Bureau seeks to manage uses across multiple landscape scales and in partnership with neighboring non-BLM parcels. New regulations for the Fundamentals should also explicitly direct BLM to use the best available science and practice, frameworks and other technical tools and resources for use in rangeland health assessments.

We see this move as an opportunity for BLM personnel, livestock producers and invested stakeholders and partners to think about management and permitting in a way that contributes to ecological and economic health across a landscape.

MATCHING MISSION WITH RESOURCES

Our recommendations cannot be implemented and achieve success at scale if the BLM does not have the resources and training needed to fulfill its obligations. The undersigned organizations believe improving the current regulations can create better outcomes for people, the environment and all uses of our public lands. It is essential that the BLM utilize its funding to hire, train and retain a talented workforce capable of fulfilling obligations to manage for rangeland health and provide for flexibility within livestock grazing permits and leases.

Signed,

Arizona Association of Conservation Districts

California Rangeland Conservation Coalition

Malpai Borderlands Group

National Association of Conservation Districts

North American Grouse Partnership

National Audubon Society

Pheasants Forever

Public Lands Foundation

Quail Forever

Rocky Mountain Farmers Union

Society for Range Management

The Nature Conservancy

Theodore Roosevelt Conservation Partnership

United States Cattlemen's Association

Utah Association of Conservation Districts

Western Landowners Alliance

World Wildlife Fund