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To: All Field Office Officials (except Alaska and Eastern States)

From: Assistant Director, Resources and Planning

Subject: Setting Priorities for Review and Processing of Grazing Authorizations and Related Livestock Grazing Monitoring

Program Area: Rangeland Management and Wildlife Management.

Purpose: This Instruction Memorandum (IM) provides guidance for prioritizing the review and processing of grazing permits and leases (permits) across all BLM managed lands. This IM also provides guidance on prioritizing monitoring for the effectiveness of livestock grazing management and progress toward achieving land health standards (LHS). The policy in this IM supersedes previous policies regarding the prioritization of grazing permit reviews, including WO IM 2016-141, *Setting Priorities for Review and Processing of Grazing Authorizations in Greater Sage-Grouse Habitat*, and WO IM 2009-018, *Process for Setting Priorities for Issuing Grazing Permits and Leases*.

Policy/Action: This policy is intended to ensure that land health considerations are the primary basis for prioritizing the processing of grazing permits and leases, monitoring the effectiveness of grazing management, and making progress toward achieving land health standards. Field offices (FOs) will prioritize the following, consistent with land use plans:

- Complete LHS Assessments/Evaluations.
- Review and process of grazing permits and leases.
- Monitor compliance with grazing permit/lease terms and conditions.
- Monitor progress towards achieving LHS.

Field offices will focus this work in the highest priority areas, which usually include areas where LHS have not been evaluated, areas not achieving LHS, areas with sensitive plant, wildlife or cultural resources, or where specific issues have been identified. Where possible, FOs should prioritize land health evaluations based on a watershed(s), group of allotments, or other large

geographic areas. This provides information for the National Environmental Policy Act (NEPA) analyses that is used for grazing permit renewals and related management actions. The BLM's goal in managing to achieve LHS is to provide for the long-term sustainability of rangelands for livestock grazing, wildlife habitats, and other uses.

The BLM's decision to prioritize grazing permit renewal using the criteria listed below does not indicate that livestock grazing is more of a management concern than other uses of the public lands. Nor does it suggest that livestock grazing is an incompatible use in any given area, but rather reflects an agency preference to prioritize limited resources to ensure livestock grazing is properly managed for achievement of LHS. The BLM recognizes that livestock grazing is an important component of its multiple use mission and that grazing is sustainable and compatible with conserving wildlife habitat.

Setting Priorities for Reviewing and Processing Grazing Permits

Field Offices must give the highest priority to the work necessary to meet applicable legal requirements (e.g., court orders). The field offices should then consider the criteria listed below to inform their priority-setting process. These criteria are not listed in order of importance, nor are they all-inclusive and the BLM may use additional criteria when setting priorities:

- Areas where LHS are not being met.
- Prioritization criteria identified in applicable land use plans.
For GRSG Plans, allotments with Priority Habitat Management Areas (PHMA) are higher priority than General Habitat Management Areas where preliminary information indicates resource damage may be occurring and has not been evaluated. This information can come from local, national, or external data sources.
- Allotments that are wholly or partially within Greater Sage-Grouse habitats where one or more land use plan adaptive management triggers have been exceeded, and livestock grazing has been identified as a causal factor in exceeding a trigger.
- Areas where modifications to livestock grazing management will facilitate implementation of vegetation treatments (e.g. restoration of areas dominated by noxious and/or invasive species) to make progress toward achieving activity plan objectives.
- Areas with declining special status species populations, e.g., sage-grouse.
- Areas where known threats are impairing habitat availability or suitability (e.g., cheatgrass invasion).
- Areas where LHS have never been evaluated.
- The need to respond to urgent concerns (e.g., wildfire).
- Potential for partnerships that offer opportunities for broader landscape habitat management or other cooperative or coordinated management with adjacent landowners/permittees.

Preparing for Permit Review and Processing

Land health evaluations should be completed and available for any permit that will be fully processed. Field offices should plan in advance to have the land health data collected and the evaluation complete prior to initiating the NEPA process for permit renewal.

Setting Priorities for Livestock Grazing Management Monitoring

The frequency of monitoring will be influenced by field office capacity and should be based upon the level of resource concerns and uncertainties associated with each allotment or grazing permit/lease. For example, after issuing a new fully processed grazing permit, it may be appropriate to monitor an allotment more frequently in the first two or three years of implementing a new grazing management system, whereas less frequent monitoring would be needed where a livestock grazing management system has been in place for several years and is making significant progress toward achieving LHS, or is achieving LHS. Monitoring plans should be tied to indicators that inform land health standards.

Monitoring priority should be based on local knowledge of the resource issues involved, such as areas with a recent history of non-compliance, lotic and lentic riparian areas, allotments where management thresholds and responses and effectiveness monitoring have been incorporated into grazing permits/leases, or areas where livestock use has the potential to negatively affect special status species habitats, e.g., sage-grouse.

Consultation and Coordination

As required in 43 CFR 4110.3-1(c), 4110.3-3(a), 4110.3-3(b), 4120.2(c) and (e), 4130.2(b), and 4130.6-2,¹ field offices will consult and coordinate with grazing permit holders, the interested public, state agencies, tribes and other appropriate federal agencies when comparing current conditions to land health standards and resource objectives; developing alternatives for NEPA analysis, particularly when considering adjustments in authorized use; and developing a monitoring plan, particularly if other parties will be collecting data to determine the effectiveness of any changes in management. In addition to the consultation and coordination with the entities required by regulation, field offices will also include relevant federal, state and local government regulations as appropriate.

Timeframe: This policy is effective immediately.

Budget Impact: The BLM will continue to consider several criteria when prioritizing the review and processing of livestock grazing permits. The BLM's emphasis on reviewing and processing higher priority grazing permits (e.g., where they have the potential to affect Special Status Species, such as sage-grouse) will affect its ability to process and issue permits in lower priority areas. Monitoring requirements and workloads may increase to ensure effective implementation of grazing management plans associated with renewed grazing permits, particularly when management changes or thresholds and responses and effectiveness monitoring are implemented.

Background: This policy is intended to ensure that land health considerations are the primary basis for prioritizing the processing of grazing permits and leases, monitoring the effectiveness of grazing management, and making progress toward achieving land health standards. The BLM has issued previous policy including WO IM 2016-141, *Setting Priorities for Review and Processing of Grazing Authorizations in Greater Sage-Grouse Habitat*, issued September 7,

¹ All citations using 43 CFR Part 4100 refer to the version of the grazing regulations published in the October 1, 2005, edition of the Code of Federal Regulations.

2016, and WO IM 2009-018, *Process for Setting Priorities for Issuing Grazing Permits and Leases*, issued October 31, 2008.

The 2015 Greater Sage-Grouse Approved Resource Management Plans and Amendments (GRSG Plans) include management direction stating that BLM will prioritize the review of grazing permits/leases in PHMAs. The GRSG plans also provided direction for giving precedence to areas not achieving land health standards. However, the GRSG Plans preserved the BLM discretion to use additional criteria for prioritization. On August 4, 2017, the BLM delivered a Response to Secretarial Order 3353 “Greater Sage-Grouse Conservation and Cooperation with Western States” (June 7, 2017) that identified issues related to the 2015 GRSG plans and subsequent policies. This policy update is a result of the Response to SO 3353 as well as feedback from internal staff and external federal, state, and local partners.

Section 3023 in Public Law (PL) 113-291, National Defense Authorization Act (NDAA), 2015, amends Section 402 of the Federal Land Policy and Management Act of 1976 (FLPMA) and includes seven provisions related to livestock grazing. Two of the provisions address completing NEPA requirements on an allotment or multiple-allotment basis and for setting priorities for completing NEPA on the environmental significance of the grazing allotment, permit, or lease, and the available funding for the environmental analysis.

Manual/Handbook Sections Affected: Manual Section 4100 Grazing Administration (Rel. 4-109) in regard to setting priorities; Handbook 4130-1 Authorizing Grazing Use (Rel. 4-75) in regard to setting priorities, completing environmental assessments, reviewing and modifying grazing authorizations; and Handbook 4180-1 Rangeland Health Standards (Rel. 4-107) in regard to criteria for selecting assessment and evaluation areas, and prioritizing assessment and evaluation areas.

Coordination: This IM was prepared in coordination with the BLM Division of Fish and Wildlife Conservation, and the Solicitor’s Office.

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