

REPORT OF THE BLUE RIBBON PANEL TO THE NATIONAL PUBLIC LANDS ADVISORY COUNCIL ON

Rangeland

PROGRAM INITIATIVES AND STRATEGIES

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MEMBERS OF THE NATIONAL PUBLIC LANDS ADVISORY COUNCIL'S BLUE RIBBON RANGELAND MANAGEMENT PANEL

The world in which we live is becoming more complex for a variety of changing social, economic and political reasons.

The complexity is especially evident in the issues of public range management in the United States. Increased public involvement, changing public attitudes and improved technology have led to unprecedented competition among users for limited natural resources. Conflicting laws, policies and programs, and perhaps most telling, mounting polarization among special interest groups are some of the consequences. Land use problems are too often being resolved through the court system and not through management based on broad public demands and the needs of natural resource capabilities.

Recognizing that public rangelands are extremely important to an array of users, special interest groups and the general public, and acknowledging that multiple-use management best serves the needs of the American people, the Bureau of Land Management (BLM) initiated the *Range of Our Vision* program as the first step to address and resolve public rangeland issues. Another important step was to establish a Blue Ribbon Panel, comprised of academic, environmental agency and non-agency representatives, to provide recommendations to BLM for implementing a national rangeland strategy.

This report, including the attendant recommendations, is a product of the Blue Ribbon Panel. The report was developed through a consensus-oriented, negotiation process and represents the panel members' collective thoughts on

Without assurances for the future well being of these basic natural resources, there is precious little to squabble about.

issues that need BLM's immediate attention, as well as those that need longterm commitments from the agency and the public. The panel identified six issues (Program Goals, Ecological Basis for Management, Public Affairs, Participation in Planning, Technology and Training, and Funding) and developed recommendations for each of them. The report is not intended to address all rangeland management issues, nor will the recommendations provide immediate solutions to all rangeland management problems. Simply, the report will provide some specific suggestions for a strategy that is directed toward a rangeland management program that the panel members hope will receive wide public support.

Finally, there is total agreement among the panel members that foremost - consideration needs to be given to protecting the basic rangeland components of soil, water and vegetation. Without assurances for the future well-being of these basic natural resources, there is precious little to squabble about.

Using that philosophy as a basis on which to build, the panel offers this report to the National Public Lands Advisory Council (NPLAC) for consideration, approval and use as appropriate.

INTRODUCTION

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Based on a request from BLM Director Cy Jamison, NPLAC established the Blue Ribbon Panel at its July 18-20, 1991, meeting.

The Blue Ribbon Panel began its task of formulating recommendations to guide BLM's range management program by meeting at Golden, Colorado, on November 18-22, 1991. Following remarks from Director Jamison and other BLM personnel, the panel listened to guest speakers discuss a variety of subjects (see Appendix 1). The group proceeded to evaluate current and future rangeland program needs, then discussed and developed draft recommendations for implementing the *Range of Our Vision* initiative. A follow-up meeting was held in San Diego on January 23-24, 1992, to finalize the recommendations and prepare the final report.

The following objectives were provided by NPLAC to the panel as general guidance:

• To develop a comprehensive strategy for the implementation of a *Range of Our Vision* initiative, which could be used to guide BLM into the 21st century.

To provide specific recommendations to BLM through the NPLAC for establishing a comprehensive and publicly supported rangeland management program.

The panel members express their appreciation to Cy Jamison, BLM national director, and to the NPLAC members for providing them the opportunity to help shape BLM's future rangeland management program.

Thanks are also due to Ed Parsons, Glen Secrist and Buddy Arvizo of the Washington Office rangeland staff: Cal McCluskey of the Washington Office wildlife staff: Ted Milesnick of the Washington Office lands staff; the Idaho State Office's public affairs staff: Patti Brunner, also of the Idaho State Office; and special appreciation to the invited guest speakers who found the time to share their vision for a public rangeland management program.

BACKGROUND

Rangeland

OBJECTIVES

ACKNOWLEDGEMENTS

FINDINGS

Based upon presentations to the Blue Ribbon Panel and ensuing discussions during the meeting at Golden, Colorado, six general findings were agreed upon by the members of the group. The findings are the basis for the six issues and their attendant recommendations that comprise the major portion of this report.

The findings are listed below.

■ A National Rangeland Management Plan that clearly defines program goals, objectives and opportunities needs to be developed.

■ BLM needs to develop and define a broad-based and ecologically sound rangeland management program which includes all current and future rangeland uses.

An aggressive internal and external public affairs/information/outreach program needs to be developed and put into practice.

■ BLM needs to establish and follow a clearly defined process to ensure agency and public participation and understanding of the decisionmaking, program implementation and monitoring processes.

Rangeland program managers and other appropriate personnel need access to adequate training and the tools necessary to complete assigned tasks.

■ Reliable and publicly supported funding sources need to be established for rangeland program initiatives and maintenance.

Issue

There is a need for well-defined rangeland program goals and objectives that embrace the diversity and sustainability of natural resources and the multitude of issues, values and interests associated with the public lands of the West.

Background

BLM's rangeland program is too often viewed as little more than a livestock grazing program. Given the historical prominence of livestock grazing on western rangelands, that perception, though simplistic, is understandable. In recent years, the view that public rangelands have only a single use has served to fuel the rangeland preservation versus conservation debate.

BLM needs to emphasize the multiple and sustainable uses of public rangelands. Further, those uses should be a major part of BLM's rangeland program goals and objectives. In the past, BLM's failure to stress multiple and sustainable uses has thwarted public support for BLM and assured controversy. BLM's range program must embrace the diversity of natural resources and the multitude of uses, values and interests associated with its rangelands or face the loss of public confidence in the agency's rangeland management ability.

Concerns expressed to or identified by the Blue Ribbon Panel include:

■ Program goals and management objectives that deal holistically with the multiple uses of rangeland resources are lacking.

■ There is a need for program goals and objectives that reflect sustainability of natural systems while providing for human needs and desires.

■ Goals and objectives should be realistic, achievable and understandable; they must be tangible measures of the natural system's well-being. The goals in the *Range of Our Vision* document, for example, are laudable but may not be attainable. Further erosion of public credibility is in the balance.

The program should, in the general public interest, assure good stewardship of the land and resources. In carrying out that program, BLM must strive to be a good neighbor to the local communities which are closely tied to public land.

The program should reflect or accommodate change; natural systems are constantly changing, as are society and human technology.

PROGRAM GOALS

PROGRAM GOALS

Continued

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Recommendations

■ BLM should develop rangeland program goals and objectives that assure protection of the basic resources (soil, water and vegetation) and the sustainability of the rangeland systems. The goals and objectives also should be multiple-use oriented to supply human needs and desires, consistent with resource capabilities.

Program goals need to holistically reflect the values associated with rangelands. They should encourage integrated planning and management activities related to livestock grazing, fish and wildlife habitat, and wild horses and burros.

Goals should focus on tangible and achievable results yet recognize the dynamic nature of natural systems, human needs and technology.

BLM's range program must embrace the diversity of natural resources and the multitude of uses or face the loss of public confidence in the agency's rangeland management ability.

■ Program goals should foster good neighbor relationships with local communities by:

— encouraging a community/agency sense of shared responsibility for good stewardship of the land and community;

— providing direct involvement of the local community in management planning, implementation and evaluation; and,

— providing opportunity for economic enterprises based on access to sustainable levels of resource use, both consumptive and non-consumptive.

■ Finally, BLM should use the recommendations developed in this report as a foundation to develop a long-term strategy to implement the principles and goals in the *Range of Our Vision* document.

Issue

Present approaches to range condition and trend are not consistent with modern ecological thinking, and current BLM goals are often ill-defined and unattainable.

Background

BLM's rangeland management program must have a sound ecological foundation and be based on the principles of multiple use and sustained yield. It must be generally acceptable to conservation groups, commodity users, other agencies and the scientific community. It should — and will — be evaluated on the basis of credibility, achievability and accountability and must be a visible and consistent program.

The present approaches to range condition and trend were consistent with ecological thinking when they were introduced. Yet ecological thinking has changed through the years and the approaches currently in use haven't always kept pace.

Much of today's rangeland management is based on theories developed in the first half of this century by Frederick Clements, a renowned plant ecologist. His theories suppose that a given site, in the absence of *abnormal disturbance*, has a single persistent state or *monoclimax*. According to his theory, succession proceeds toward climax as a steady, predictable process. All states of vegetation can be arrayed on a single continuum, from early successional poor-condition ranges to climax ranges in excellent condition.

Range condition is the technical term for vegetation's position on the continuum and *trend* is the term for the change in direction the vegetation is taking. These linear concepts of range succession apply well to North American prairies but there are exceptions when they're applied on and and semi-arid rangelands.

Yet ecological thinking has changed through the years and the approaches currently in use haven't always kept pace.

For example, vegetation changes caused by grazing, fire, exotic species invasion and other disturbances are often irreversible or unpredictable. In many cases, when livestock has been removed from desert shrublands and desert grasslands, vegetation hasn't changed at all or not in the direction predicted by the range succession model. In short, the predictable, orderly and stable model developed by Clements doesn't always hold on public rangelands for a variety of reasons. ECOLOGICAL BASIS FOR MANAGEMENT

ECOLOGICAL BASIS FOR MANAGEMENT

Continued

Clearly, a new approach is needed to address the problem of rangeland inventory and assessment. It needs to accurately portray the status of rangelands and meet the needs of multiple-use management.

The use of ecological or *range sites* meets those requirements. Range sites are units of land which differ significantly in their ability to produce specific kinds and amounts of vegetation. They are well suited for the purposes of inventory, assessment and prediction of management practices. Identifying range sites is a fundamental step for predicting what will happen to vegetation because of drought, fire, grazing and other natural factors and management practices. The range site concept is valid regardless of the type of land being considered and is not restricted to any particular use.

Recent studies, reports and publications recommend that multiple-use management objectives for rangelands should be categorized in terms of a Desired Plant Community (DPC) for each range site. A DPC is defined as the one plant community occupying a site that best meets the management plans as developed by a multidisciplinary team. DPCs must be realistic in considering the site potential and be appropriately detailed for the

Conserving a site's ability to produce vegetation is the key to sustainability and must be management's fundamental goal.

planning intensity and effectiveness of management. Vegetation status can be reported in terms of similarity and trend toward or away from the selected DPC.

The DPC's value is that it's clearly defined — including economic considerations — and not in terms of *pristine* or *abstract* conditions that may have existed at some arbitrary point in the past. The DPC approach potentially avoids some of the major obstacles of using *climax* or *Potential Natural Communities* (PNC). For instance, we assume that we know what the climax or PNC is, that they are the most desirable communities (most productive, most diverse, least erosive), and that they can be maintained under management. But these assumptions are not always correct. DPC should consider plant community structure or architecture as well as species composition. Species composition cannot always be predicted with a high degree of accuracy, and structure or architecture is important to many species of wildlife.

Conserving a site's ability to produce vegetation is the key to sustainability and must be management's fundamental goal. A method should be developed that will indicate whether the productive capacity of a given site is being maintained. Such a measure of site protection is called the *Site Conservation Rating* (SCR), and the point at which erosion accelerates due to management influences is called the *Site Conservation Threshold* (SCT).

The SCR would be *satisfactory* when site protection is above the SCT and *unsatisfactory* if below. Trend should be indicated as up, down or static, depending on the measured or apparent change of site protection. Any plant cover or community which is capable of maintaining the site above the SCT could be selected as the DPC for the site. DPCs could include introduced species.

The concepts of DPC and SCR are compatible with most theories of range ecosystems and vegetation change processes (succession). Adopting these concepts, however, is a change from the way most resource managers and environmentalists are accustomed to looking at natural resources.

Several other activities are important when considering an ecological basis for BLM's rangeland management program. They are monitoring, vegetation manipulation, livestock grazing and research.

Monitoring is essential for evaluating any management system. Soil protection, forage and wildlife habitat are often used as indicators of an ecosystem's overall health. Sometimes, a particular species (the desert tortoise, for example) or qualities (such as wilderness) may need more direct monitoring. Microflora or invertebrates could, at times, be candidates for monitoring. Other ecosystem functions, including productivity, food webs, decomposition rates and nutrient cycling may also need to be assessed through monitoring.

Monitoring must be a high priority in BLM. It needs to be multidisciplinary in nature, adequately funded, and staffed by a core of range management graduates with strong training in soils, plant ecology, taxonomy and physiology and management principles.

Vegetation manipulation techniques must be an option for reaching the DPC when grazing management alone will not accomplish the goal. Protection from or exclusion of grazing may not be appropriate or result in significant improvement on many range sites. Some sites may require herbicides, fire, chaining or selective grazing in order to reach the DPC.

Good science, widely understood and distributed, will help to defuse many controversial issues.

Rangeland

ECOLOGICAL BASIS FOR MANAGEMENT

Continued

ECOLOGICAL BASIS FOR MANAGEMENT

Continued

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Livestock grazing can be a useful management tool. It may be needed to change species composition, reduce the incidence of fire and improve wildlife habitat. Conversely, there may be times or areas where livestock grazing is inappropriate. Options should be determined on an individual site or situation basis. The designation and use of ephemeral ranges is a management option that should be continued where appropriate. The concept or determination of *submarginal* rangeland should be carefully evaluated.

There is an urgent need for additional basic and applied research and technology transfer, particularly at the district and area levels. There is also a need to use the professional judgment and experience of field personnel to develop and guide research projects. Good science, widely understood and distributed, will help to defuse many controversial issues.

Recommendations

■ Establish as the top priority and major concern of the rangeland program the conservation of the basic soil, water and vegetation resource.

■ BLM should define the resource objectives for rangeland multipleuse management in terms of a Desired Plant Community (DPC) for each ecological or range site.

■ BLM should participate in the development of field application . criteria for the Site Conservation Threshold (SCT) concept.

The DPC and SCT concepts should be used in conjunction with existing range condition and trend methodologies during a phase-in period.

■ Increase and expand the inventory and monitoring efforts by BLM and ensure that they are adequately staffed and funded.

■ Efforts to develop a common set of terminology and concepts in conjunction with other federal agencies and organizations should be supported by BLM.

■ The DPC is not static; it may change as values, technology or economics do. BLM should adapt management options, tools and decisions which reflect a changing world and evolving technologies.

PUBLIC AFFAIRS

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Issue

BLM is the largest land manager in the country, with stewardship for more than 270 million acres, most of it rangeland. The values and uses of BLM-managed land, though, are generally unrecognized and unappreciated by all but a small segment of the public.

Background

The very nature of BLM-managed land invites misunderstanding and unfair characterization. Big, wide-open spaces, usually far away from population centers, the public lands are ripe for myth and misperception. There is little wonder that most Americans even today have only a hazy idea of what the public lands are and still often associate them with cowboys and covered wagons. The real values of public land resources — for recreation, grazing, fish and wildlife habitat, energy production and many other uses — just aren't widely known. To put it simply, BLM has an identity problem, with roots that date back more than 150 years.

A related obstacle is that there is no accepted system for the flow of scientific or technical information to the public other than the formal National Environmental Policy Act (NEPA) analysis process. As a result, information is lacking concerning choices and options for the non-scientific community. Further, the lack of an efficient technology transfer system within BLM clogs the flow of information to field offices concerning new trends, research and techniques.

There is little wonder that most Americans even today have only a hazy idea of what the public lands are and still often associate them with cowboys and covered wagons. To put it simply, BLM has an identity problem, with roots that date back more than 150 years.

PUBLIC AFFAIRS

Continued

Recommendations

Develop a comprehensive public affairs strategy that includes information, education and outreach efforts stressing the agency's total rangeland management program. The strategy should include:

— information efforts to show activities that were not successful, to demonstrate agency integrity and increase credibility;

— a method of assessing the needs and expectations of diverse interest groups;

— methods to increase public participation above and beyond what is required by the NEPA process; and,

— an assessment of ways to improve service to the users of public rangelands.

Commit funds and personnel to support technology transfer needs within BLM.

■ Institute an information effort for BLM's own diverse workforce to keep employees current on the challenges, issues and progress of the rangeland management program.

Issue

Current land management planning, NEPA and activity plan processes are often not effectively and consistently used to assure broad and meaningful participation from those interested in management decisions and program implementation and evaluation.

Background

Healthy rangeland ecosystems benefit many individuals and groups in a variety of ways. To ensure that these benefits continue, it is critical that groups and individuals, both within and outside the natural resource agencies, be involved in rangeland management. Decisions developed and carried out with the assistance of well-informed and actively engaged people and groups prove to be the most successful, meaningful and long-lasting. The same is true for the implementation and evaluation of those decisions. Conversely, the lack of involvement of people in a substantial way from the initial stages through the final decision often results in mistrust and inappropriate programs.

> Decisions developed and carried out with the assistance of well-informed and actively engaged people and groups prove to be the most successful.

Individual comments and concerns expressed to or identified by the Blue Ribbon Panel dealing with planning participation are:

■ BLM plans should be developed, implemented and evaluated with the participation of individuals and groups knowledgeable of local facts and familiar with local considerations.

Support for advisory committees at all levels is necessary.

There is a greater need today for various interests to work together than at any time in the past.

Compliance with NEPA is essential.

Rangeland issues need to be better understood by society at large.

Coordinated Resource Management (CRM) is an important tool to resolve land use issues.

PARTICIPATION IN PLANNING, IMPLEMENTATION AND EVALUATION

PARTICIPATION IN PLANNING, IMPLEMENTATION AND EVALUATION

Continued

Colorado's Habitat Partnership Program is an example of a constructive process through which wildlife/livestock conflicts are being reduced.

Rangeland management is the concern of many people and not just range managers.

Local participation and decisionmaking (with authority and responsibility) is critical throughout the entire process.

■ Public participation needs to occur from the very beginning in a meaningful way.

Resolution of conflicts are enhanced when all the affected parties meet "on-the-ground."

Recommendations

Assemble a team that includes members of the public to evaluate the *Range of Our Vision* document and determine if changes in current direction are needed.

Establish a multi-interest team to evaluate current BLM rangeland management public participation processes. If needed, the team should propose changes that strengthen appropriate, early and meaningful participation in processes leading to key decisions.

Develop dialogue with interested parties to gain understanding and input to the potential adoption of concepts of Desired Plant Communities (DPC) and related evaluation techniques.

Encourage responsible and informed participation.

Encourage multi interest and interdisciplinary participation in activity planning and monitoring processes, with BLM maintaining full responsibility and authority.

Improve agency employees' understanding of and commitment to use NEPA processes regarding public participation.

TECHNOLOGY AND TRAINING NEEDS

Issue

BLM needs modern technology and properly trained people to manage its rangeland resources and deal effectively with current and future challenges.

Background

As BLM prepares to enter the 21st century, it must assure that agency employees who manage its vast rangeland resources are well prepared with

Technology advances are expected to increase at even faster rates.

basic and continuing education, plus have access to the modern tools that allow limited funding to produce needed results. Range technology is expanding rapidly. Remote sensing techniques provide needed information with minimum field time. Computers assure efficient handling of large volumes of data, and Geographic Information Systems (GIS) make possible mapping and data analysis unheard of in the past. Technology advances are expected to increase at even faster rates. BLM range managers must be prepared to deal with these technological improvements and increasing demands.

Specific concerns expressed to or identified by the Blue Ribbon Panel are:

Morale of range conservationists is generally low. They are frequently criticized from all sides. Provisions for in-service training and continuing education are inadequate.

■ Numbers of range conservationists available for hining from universities have been low. That is due to agency budget outlook, poor communication among agencies and universities concerning job availability, and perceptions about career advancement opportunities in rangeland management.

Career opportunities for range conservationists have been limited because of outdated Office of Personnel Management standards, budget constraints for rangeland management and inadequate training provisions.

■ Range conservationists need practical field skills, the ability to communicate effectively with rural people and applied ecological training to help them prepare for the job.

BLM needs greater field expertise in equine science and management for its wild horse and burro program. TECHNOLOGY AND TRAINING NEEDS

Rangeland

Continued

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Employee development interviews and resulting Individual Development Plans (IDPs) have failed to adequately identify training needs and opportunities.

• Too many range conservationists fail to avail themselves of training opportunities and benefits available through professional society membership and active participation.

The awards and incentives system for superior performances is inadequate for range managers as well as range users.

BLM has not kept pace with modern technology advances such as remote sensing and GIS because of budget constraints and shortages of trained personnel.

■ Items to be emphasized in continuing rangeland education should include the following areas: socio-economic/political leadership; communications/public relations; and applied multiple use for ecosystem management.

Recommendations

■ BLM needs to work with professional societies and other agencies to develop universities' range management curricula and accreditation to meet needs for fully competent, broad-based, modern range management professionals. Addition of practical courses in outdoor range skills needs to be encouraged, as does more effective communication with universities about hiring outlook and new employee needs.

■ BLM should aggressively pursue its cooperative efforts with the U.S. Forest Service to develop a range management continuing education program to revitalize capability and qualifications of its current and future range managers and other specialists. Consider additional needs of wild horse and burro program managers, such as training in equine studies.

Encourage professional society participation to take advantage of training and professional updating opportunities.

■ More emphasis should be placed by BLM on complete career counseling and Individual Development Plans.

Recognize fully the skills, experience and capabilities of range conservationists in career advancement opportunities for both staff and line positions.

Establish a regular and continuing awards program to recognize and encourage superior performance in range management for both employees and rangeland users.

Issue

BLM lacks a reliable funding base adequate to implement a sound rangeland management program.

Background

BLM has a historic problem in obtaining sufficient personnel and funding to meet the needs of the rangeland management program. In recent years, the management task has grown even more demanding under the pressure of new laws, new conflicts and new public demands on the resource base, making funding constraints even more acute. In spite of the growing need, funding for the rangeland management program has actually declined from \$56.158 million in 1982 to a current level of \$27.482 million in constant 1982 dollars. Additional funding and personnel will be needed if BLM is to carry out an adequate program of rangeland management in the 1990s. To date, however, efforts to broaden the funding base have been hampered by controversies over whether the various rangeland users — including livestock operators and recreationists — have been paying their fair share.

In recent years, the management task has grown even more demanding under the pressure of new laws, new conflicts and new public demands on the resource base, making funding constraints even more acute.

Concerns identified by the Blue Ribbon Committee include:

Recent field assessments show a need of about \$65 million, but the BLM director regards that level as unrealistic in today's budget climate.

- BLM cannot look to dollars to solve all its rangeland problems.
- Should BLM charge for recreational use of rangelands?

■ The National Public Lands Advisory Council is on record as supporting the BLM foundation as one way to build partnerships in the funding arena.

■ The controversy over an appropriate grazing fee has drained resources from the task of rangeland management on public lands and has polarized individuals and interests. Greater cooperation is vital if BLM's rangeland and riparian goals are to be achieved.

FUNDING SOURCES



FUNDING SOURCES

Continued

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Mechanisms to help fund management activities or provide financial incentives for improved stewardship of rangelands might include:

— a grazing fee increase coupled with a rebate to every permittee who is meeting management prescriptions as demonstrated by monitoring;

— a two-tier grazing fee structure, with lower fees paid by permittees who employ conservative stocking rates or other stewardship practices;

— a moderate grazing fee surcharge adequate to pay for BLM's maintenance of range improvements; or,

— other arrangements that would provide a financial incentive for livestock permittees to practice a high standard of rangeland management on their allotments.

Recommendations

BLM should assess the utility and feasibility of a program to charge appropriate fees to all public rangeland users.

Congress should establish a National Resource Lands Foundation.

BLM should develop, in coordination with the U.S. Forest Service, a long-term strategy to address the grazing fee issue.

■ BLM should consider creative mechanisms to capture a part of the grazing fee to help fund management or provide financial incentives for stewardship of public land.

■ BLM should strive for cooperative arrangements with other public and private entities to encourage volunteensm and investment in resource management on public lands, as well as challenge costshare or other innovative funding sources for rangeland research or management.

BLM should make an expanded effort to present an accounting of benefits and funding needs for the rangeland management program to interest groups and society at large.

■ To improve administrative efficiency and ensure that the maximum amount possible is expended at the resource area level, BLM's allocation of rangeland management funding should be reviewed.

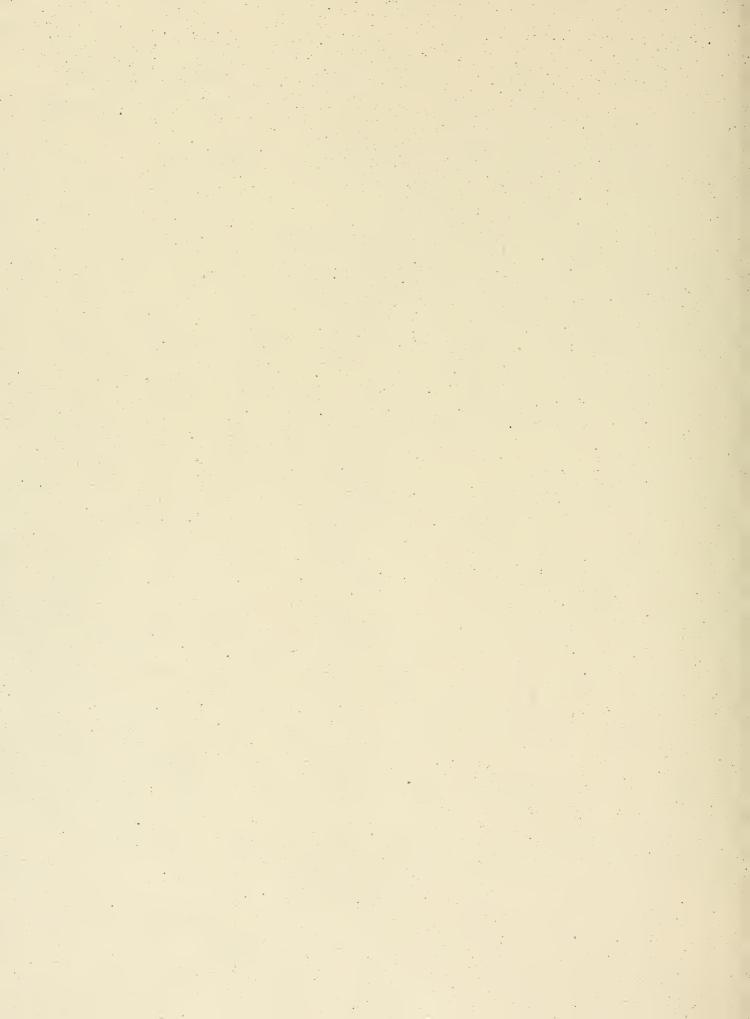
The six issues discussed in this report and the 33 recommendations that are included in it can be the foundation for tomorrow's rangeland management program in BLM. The Blue Ribbon Panel envisions that program as one that conserves the basic soil, water and vegetation resources while still providing for the economic needs of the people who depend on rangelands.

It is not easy to find the elusive balance point where resources are managed wisely and human needs are met. The members of the panel realize this report is only a starting point toward that goal. It will take a strong commitment and the best efforts of many dedicated people both inside and outside of BLM to transform these recommendations into reality and achieve a widely supported rangeland management program.

But we believe not only that it can be done, but that it *must* be done.

Rangeland

SUMMARY



Speakers at the Golden, Colorado, Meeting of the NPLAC Blue Ribbon Rangeland Management Panel

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APPENDIX 1

APPENDIX 1

Continued

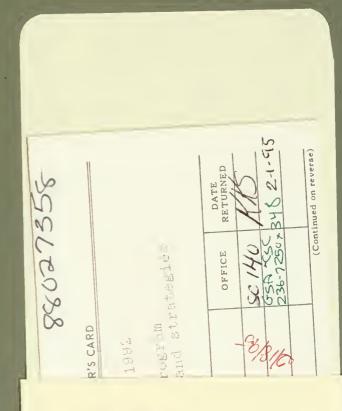
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