

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

Ms. Anne-Marie Fennell
Director
Natural Resources and Environment
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

JUN 21 2016

Dear Ms. Fennell:

Thank you for the opportunity to review and comment on the Government Accountability Office (GAO) draft report titled, *Unauthorized Grazing: Actions Needed to Improve Tracking and Deterrence Efforts* (GAO-16-559). The Department of the Interior (Department) appreciates the GAO's review of the Bureau of Land Management's (BLM) livestock grazing program regarding detection and resolution of unauthorized livestock grazing.

Rangeland management focuses on maintaining and improving public land health, including the administration of grazing use through permit renewals and compliance inspections. The program has formidable challenges. The BLM currently faces a significant backlog of more than 6,000 grazing permits and leases that remain unprocessed. These backlogged permits represent 34 percent of the total grazing permits and leases nationwide.

Field offices regularly review and prioritize workloads for the rangeland management program. The grazing permit backlog has continued to grow as workload becomes more complex and staffing levels decline. The rangeland management program aims to meet the highest priority workload demands, considering the parallel challenges of an increasing backlog and decreasing staff levels. Prioritizing tasks and finding fresh and effective ways to meet program objectives is an ongoing effort in this era of fiscal limitations.

The GAO issued a total of six recommendations to the BLM and to the U.S. Forest Service to improve the effectiveness of each agency's efforts to track and deter unauthorized grazing. Three of the recommendations were specific to the BLM. Below is a summary of BLM's response to the relevant recommendations and the actions planned to implement them. The Department provides technical comments in separate cover.

Recommendation 1: Amend the regulations on unauthorized grazing use—43 C.F.R. Subpart 4150—to establish a procedure for the informal resolution of violations at the local level, or follow the existing regulations by sending a notice of unauthorized use for each potential violation as provided by 43 C.F.R. § 4150.2(a).

The BLM concurs with this recommendation. The BLM will revise the agency's Unauthorized Grazing Use Handbook to better describe procedures for following the existing regulations. As part of this effort, the BLM will clarify the process for documenting and recording incidents of unauthorized grazing, including those resolved informally (as discussed below in the response to

recommendation 2). In 2006, the U.S. District Court for the District of Idaho enjoined the BLM's most recent effort to revise the grazing regulations and the 1995 regulations have been in effect since the enjoinder was issued. That revision included the incorporation of the GAO's 1990 recommendations. It is not necessary or desirable to attempt another revision of the regulations solely to address this issue.

Recommendation 2: Record all incidents of unauthorized grazing, including those resolved informally.

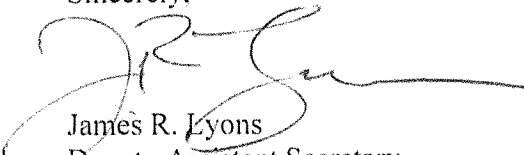
The BLM concurs with this recommendation. As stated above, the BLM will revise the agency's Unauthorized Grazing Use Handbook to clarify the definition of unauthorized grazing. In the Handbook, the BLM will outline the procedures for documenting and recording incidents of unauthorized grazing, including those resolved informally.

Recommendation 3: Revise the agency's Unauthorized Grazing Use Handbook to make it consistent with 43 C.F.R. pt. 4100.

The BLM concurs with this recommendation. The BLM will revise the Unauthorized Grazing Use Handbook to make it consistent with 43 C.F.R. part 4100.

If you have any questions, please contact Kristin Bail, Acting Assistant Director, Resources and Planning, at 202-208-4896, or LaVanna Stevenson, BLM Audit Liaison Officer, at 202-912-7077.

Sincerely,



James R. Lyons
Deputy Assistant Secretary
Land and Minerals Management