

MEMORANDUM OF UNDERSTANDING
between the
UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
and
THE PUBLIC LANDS COUNCIL

This MEMORANDUM OF UNDERSTANDING (MOU) replaces the 2017 MOU, as previously extended, between the PUBLIC LANDS COUNCIL (PLC) and the BUREAU OF LAND MANAGEMENT (BLM), Department of the Interior (DOI), that established a framework for cooperative monitoring.

I. AUTHORITY

Section 307(b) of the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1737(b), authorizes the Secretary, subject to the provision of applicable law, to enter into contracts and cooperative agreements involving the management, protection, development, and sale of public lands.

Section 4 of the Public Rangelands Improvement Act of 1978, 43 U.S.C. 1903(a), provides that *“the Secretary of the Interior and Secretary of Agriculture shall update, develop (where necessary) and maintain on a continuing basis thereafter, an inventory of range conditions and record of trends of range conditions on the public rangelands, and shall categorize or identify such lands on the basis of the range conditions and trends thereof as they deem appropriate.”*

II. PURPOSE

The purpose of this MOU is to establish an updated framework for cooperative monitoring and the exchange of information on public rangelands administered by the BLM. The BLM and the PLC agree to work together to achieve the common goal of rangeland stewardship through joint, cooperative monitoring at the pasture, allotment, watershed, and landscape levels.

The signatories to this MOU agree that cooperative monitoring on BLM-administered public rangelands provides mutual understanding, exchange of information, and collaboration among the interdependent goals and interests of the grazing permittees, lessees, and cooperators (collectively referred to as “grazing operators”) served by PLC and the BLM, assisting the BLM to make integrated rangeland management decisions.

Both the BLM and the PLC aim to utilize science-based monitoring to evaluate, achieve, and sustain desired rangeland conditions. The BLM and grazing operators benefit from the exchange of information when monitoring data is collected, analyzed, and interpreted in a transparent and candid setting. This MOU builds on the current, historic, operational, and practical experience of grazing operators to help make resource management more efficient. This MOU creates a framework to share data analysis results, biologic concepts, and professional judgements made by BLM rangeland resource professionals.

III. ESTABLISHMENT OF RESPONSIBILITY

This MOU is not intended to, and does not create any right, benefit or trust responsibility, substantive or procedural, enforceable by law or equity, by a party against the United States, its agencies, its officers, or any person. In all actions taken under this MOU, the BLM will comply with the Federal Advisory Committee Act to the extent it applies.

IV. ROLES AND RESPONSIBILITIES

THE PLC AND THE BLM WILL JOINTLY:

1. Inform grazing operators and BLM employees of the content and purpose of this MOU.
2. Encourage grazing operators and BLM employees to share monitoring information and data between and among them. Data sharing should include science-based, long-term trend monitoring where feasible as well as short-term monitoring to guide and document season-of-use, stocking, permit/lease compliance, and annual allotment decisions in a collaborative setting. However, this MOU also encourages collaborative long-term monitoring.
3. Seek to promote, achieve, and maintain healthy rangelands in accordance with the BLM's Rangeland Health Standards.
4. Promote and support the integration of cooperative monitoring into grazing decisions that will allow for the effective implementation of greater flexibility in public land grazing authorizations.
5. Promote and support training opportunities for cooperative monitoring including using standard monitoring methods and data collection platforms where feasible.
6. Include a discussion between the PLC and the BLM on cooperative monitoring as an agenda item at each annual PLC meeting.
7. At least annually, assess the level of participation in cooperative monitoring. The PLC and BLM will make every reasonable effort to track grazing operator participation to demonstrate the level of cooperation achieved between grazing operators and the BLM.

THE PUBLIC LANDS COUNCIL WILL, AS APPROPRIATE:

1. Publicize, distribute information related to, and otherwise support joint, cooperative monitoring among its members, including emphasis of monitoring across landownership boundaries, and in the context of the larger landscape, where practical.

2. Encourage grazing operators to work cooperatively with the BLM to develop a monitoring plan which, at a minimum, addresses those items outlined in Appendix A (attached).
3. Work with the BLM to emphasize and implement consistent monitoring methods, protocols, and compatible data management approaches between PLC members and cooperators and the BLM.

THE BUREAU OF LAND MANAGEMENT WILL:

1. Continue working with grazing operators who have actively participated with the BLM in collecting and analyzing monitoring data.
2. Survey previously active monitoring partners to assess their ongoing interest in conducting joint, cooperative monitoring.
3. Work with all affected interests, including grazing operators new to cooperative monitoring, to collaboratively achieve monitoring objectives, to the maximum extent feasible within the limits of available funds and BLM priorities, prioritizing instances where cooperative monitoring would support the effective implementation of flexibility in a grazing authorization.
4. Work in collaboration with interested grazing operators to develop cooperative monitoring plans. The plans should address those items outlined in Appendix A for, at a minimum, the portion of the grazing operation on land managed by the BLM.
5. Involve grazing operators in existing, consistent monitoring methods, protocols, and compatible data management approaches for data collection and evaluation processes, and provide copies of evaluations to collaborating grazing operators.
6. Continue to coordinate with the Natural Resources Conservation Service to perform soil surveys and develop Ecological Site Descriptions.
7. Maintain decision authority concerning the planning, collection, analysis and interpretation of the monitoring data collected under this MOU. The BLM retains its responsibility to make decisions relating to public land management, including livestock grazing, and to comply with public involvement requirements in the grazing regulations.

V. GENERAL PROVISIONS

- A. Information related to the location, identity, permitted activities, and business addresses of current permittees and lessees are available through the public

Rangeland Administration System Reports to assist PLC in the distribution of cooperative monitoring information.

- B. Use of Data: Data submitted to the BLM for consideration when making decisions on public lands will be available to the interested public, including grazing operators, to the extent consistent with law and subject to any restrictions on public disclosure, such as in the case of personally identifiable information or cultural site data. The BLM shall accept for consideration monitoring data collected using standard BLM methods and protocols when the data meets the BLM's data quality requirements, even if collected prior to implementation of this agreement. The BLM reserves the right to reject or limit the use of monitoring data not collected using such methods or found not to accurately reflect on-the-ground conditions.
- C. Prior to implementing joint cooperative monitoring, both parties shall agree to the methods for collecting data in accordance with Appendix A. Priority should be given to methods found in the most recent version of the Technical Reference 1734-8, Interagency Monitoring Manual for Grassland, Shrubland, and Savanna Ecosystems, Herrick, J., et al. (2022), Technical Reference 1735-2, AIM National Aquatic Monitoring Framework: Field Protocol for Wadeable Lotic Systems (2021), Technical Reference 1735-3, Field Protocol for Lentic Riparian and Wetland Systems (March 2024), and those techniques found in statewide Rangeland Monitoring Guides. Additional resources found in Technical Reference 1730-1, Measuring and Monitoring Plant Populations, Technical Reference 1734-3, Utilization Studies and Residual Measurements, Technical Reference 1734-4, Sampling Vegetation Attributes, and Technical Reference 1734-7, Ecological Site Inventory may also be considered.
- D. Nothing in this agreement may be construed to obligate the BLM or the United States to any current or future expenditure of resources in excess of authorization and appropriations available.
- E. The BLM has a responsibility to coordinate, consult, and communicate with many different entities concerning management of the public lands. This MOU addresses interaction between the BLM and the PLC which represents members of the livestock industry operating on public lands. This MOU does not preclude or restrict other public land users, interested public, or other public or private agencies, organizations or individuals from participating in cooperative monitoring.
- F. This MOU does not require the BLM to notify or include interested public when cooperative monitoring is initiated by the permittee or lessee.
- G. Nothing in this agreement shall be construed to conflict with any existing statute, regulation or policy of the United States.

- H. As long as local cooperative monitoring agreements are consistent with the terms of this MOU and Appendix A, the BLM must approve implementation without revision of the plan.
- I. This agreement shall be effective upon the date of the last signature, for a period of five years.
- J. This agreement may be re-negotiated, amended, extended, or modified by a written amendment through an exchange of correspondence between authorized officials of PLC and the BLM.
- K. Either party may terminate this agreement by written notice to the other party. Each party will obtain prior approval from the other prior to releasing all press releases, published advertisements, or other statements intended for the public that refer to this MOU or to the parties, the DOI, the name or title of any employee of the DOI, or other cooperating individuals in connection with this MOU.
- L. Nothing in this MOU may be interpreted to imply that the United States, the DOI, or the BLM endorses any product, service, or policy of PLC. The PLC will not take any action or make any statement that suggests or implies such an endorsement.

APPROVED:

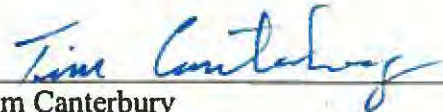
U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT



William Groffy
Exercising the Delegated Authority
of the Director

2/2/26
Date

THE PUBLIC LANDS COUNCIL



Tim Canterbury
President

2-2-26
Date

Cooperative Monitoring Plans

The following should be considered when developing a monitoring plan with a grazing permittee or lessee. Cooperative monitoring plans should be considered dynamic documents and reviewed and modified as necessary when new information is available or data needs change. Caution should be taken when modifying long-term monitoring plans where legacy data exist and the value of trend data is reliant on re-reading existing monitoring sites. Where Allotment Management Plans (AMPs) or other landscape management plans are used, consider augmenting these documents with joint cooperative monitoring plans. The general steps for developing and implementing effective monitoring plans are also described in the BLM's Inventory and Monitoring of Ecological Resources manual section 1735 (Rel. 1-1832, pages 1-18).

A. Identify Management Objectives

Management objectives should be identified and listed to assist in defining appropriate short- and long-term monitoring objectives. Management objectives typically are found in land use plans, other management plans, or implementation decisions. Landscape management goals, desired plant communities, and animal habitat types are examples of management objectives to use when selecting rangeland attributes and monitoring indicators.

When fully processing grazing permits, new decision documents should list or refer to applicant-committed measures; livestock grazing (i.e., actual use information), rangeland, vegetation, wildlife, and riparian and stream monitoring objectives or requirements; archaeological site locations and protection requirements; and other resources associated with livestock grazing.

Note that management objectives may be site-specific and dependent on the affected resources or resource concerns and management approaches.

B. Define Monitoring Objectives

Identification of specific, measurable, achievable, relevant and time-bound (i.e., SMART) monitoring objectives is recommended when developing a monitoring plan. Objectives can be informed by compiling and reviewing all available monitoring data and summaries from prior inventory efforts including watershed assessments, any recent rangeland health evaluations, or other reports or decisions that might include a monitoring plan or outline resource issues. Where available, review vegetation cover maps (e.g. RAP), NRCS soil survey descriptions of soil series, local geology and regional climate, as well as ecological site descriptions (ESDs), vegetative community state and transition models, and any applicable GIS-based vegetative cover information. Review of this information can help prioritize the types and locations of data to be collected. An effective monitoring plan may identify short and long-term monitoring objectives. The following examples should not be considered all-inclusive.

For short-term monitoring, consider using data sources such as local climate-related records, actual-use/season of use stocking records, utilization surveys, previous photo-point records, ocular estimate stubble height data, and other sources of information collected from methods using state Rangeland Monitoring Guides and/or livestock association Resource Monitoring Guides. Additional resources include but are not limited to BLM Technical Reference 4400-

22, Actual Use Studies; and Interagency Technical Reference 1734-3, Utilization Studies and Residual Measurements.

For long- or short-term monitoring, consider gathering fire occurrence mapping and metadata, vegetation treatment information, state habitat data (especially vegetation mapping), ecology and weather-related records, actual-use/season of use stocking records, utilization surveys, and photography. Additional cooperative monitoring data needs can be identified to meet management objectives, desired plant community objectives, and other considerations such as noxious weed and invasive species presence, or special status species habitat condition.

C. Monitoring Attributes & Protocols

1. Agree on the appropriate interpretation and use of cooperative monitoring data and results, and review applicable BLM data quality requirements and data standards ahead of time with all cooperators and agencies. Review and agree on joint calibration of estimated data and qualitative data definitions, adjusted for local conditions and species.
2. Describe and agree on location(s), timing, attributes to be measured, protocols, and tools to be used. All parties should agree on whether the data will be used for long- or short-term monitoring, adjustments during the season of use, or both, if appropriate.
3. Cooperative short-term monitoring should include measuring and assessing indicators or attributes appropriate for evaluating the pasture/allotment/watershed or landscape-level management objectives. These can include repeat or new measurements recorded by photography, utilization estimates or residual measurements (stubble height), vegetation structure (height, pattern), age class distribution of plant species, vegetation production and/or vigor, erosion indicators, ground cover, vegetative species composition, and other relevant indicators measured at a seasonally-appropriate time for the method.
4. Monitoring data should be collected in a manner that is repeatable and as quantitative as practical. Where landscapes have undergone forage or state transitions, monitoring should account for current ecological status. Monitoring protocols may be adjusted post-transition to account for current ecological conditions. Photography should be clearly labeled and include at least one photo that includes distinctive horizon features and coordinates.
5. When interpreting and extrapolating long-term trend data and monitoring results, characteristics that influence site potential such as soil, moisture, aspect, and slope should be considered. The landscape should be stratified to account for differences in land potential and current capability. Ecological sites and soil types may provide an appropriate basis for stratification. Ecological site descriptions should be reviewed for information that can provide a basis for application of indicators and benchmarks.
6. Long-term monitoring should consider the long-term trends of specific rangeland indicators within the area of interest, and whether they are at or trending toward the desired condition given the potential of the area (e.g., the trend of perennial bunchgrass frequency, forb diversity, or annual grass cover).

D. Data Evaluation, Analysis and Interpretation

Long-term monitoring can also inform departure from the desired condition based on the ecological site potential. Insight into appropriate indicator benchmark values may be determined by reviewing the range of indicator values for similar locations within AIM datasets. Benchmark values derived from AIM data can be supplemented with professional judgement and other information provided through cooperative monitoring with the permittees or other stakeholders.

1. All parties involved in cooperative monitoring should receive copies of field data, results, and summaries. Consider follow-up sessions to further monitor, evaluate, and discuss data findings, as appropriate.
2. No single attribute or point-in-time measurements should be used as stand-alone information for trend monitoring or consideration of obtainment/non-obtainment of rangeland objectives.