US Forest Service
Secure Rural Schools Program

The Secure Rural Schools program provides critical funding for schools, roads, and other municipal services to more than 700 counties across the U.S. and Puerto Rico.

The Forest Service was established in 1905 with 56 million acres of land. By 1910, the amount of National Forest System land tripled to 172 million acres. Today, the agency manages approximately 196 million acres. Congress ratified the Act of May 23, 1908, as a measure to support rural counties whose tax base was limited by the growing amount of Federal land. A portion of Forest Service funds generated through multi-use activities, such as grazing, timber production, and special use permits, are distributed to eligible counties to help maintain local roads and schools.

Payments are divided into three distinct categories, or Titles: Title I for roads and schools, Title II for projects on Federal lands, and Title III for county projects.

Information from the National Center for Public Lands Counties:
The Forest Service has initiated the FY2026 Secure Rural Schools payment election cycle. FY2026 SRS Payment Election - Key Takeaways:

- Election forms were sent to State Treasurer offices via email on June 3, 2026
- **Aug. 1, 2026:** Payment election deadline - counties elect SRS or 1908 Act 25% payment
- **Sept. 30, 2026**: Title allocation deadline - counties choosing SRS set their Title I, II, and III percentages
- The Forest Service provides estimated payment reports to help counties compare options - these are estimates only, not guaranteed amounts
- Counties that elect the 1908 Act 25% payment forfeit Title II and III funding (search and rescue, wildfire risk reduction, community wildfire protection planning)
- Each state manages its own process for collecting and transmitting county decisions
- USFS Training PowerPoint
- USFS SRS History and Election Form Training

Payment Election - Due Aug. 1, 2026: Each eligible county must elect to receive either the SRS payment or the 1908 Act 25% timber payment. The Forest Service provides estimated payment reports to help counties compare both options, though these are estimates only and should not be used for budget planning. Counties are encouraged to model both scenarios before making an election, particularly given the SRS income adjustment, which squares each county's per capita income ratio against the national median and can significantly reduce payments for higher-income counties. Counties that elect the 1908 Act 25% payment forfeit access to Title II & III funding for search and rescue, wildfire risk reduction and community wildfire protection planning.

Title Allocation - Due Sept. 30, 2026: Counties electing SRS must also determine how their payment is allocated among Title I (roads and schools), Title II (federal land projects), and Title III (county-level projects, including search and rescue and wildfire risk reduction). The Forest Service encourages states to submit both the payment and title allocation elections by the Aug. 1 deadline.

Counties allocate their SRS payment across three titles based on total distribution size:

SECURE RURAL SCHOOLS PAYMENT ALLOCATION REQUIREMENTS[xxv]

Title Number	Minor Distribution (<$100,000)	Modest Distribution ($100,000-$349,999)	Major Distribution ($350,000 and above)
Title I	100% OR 80%-85% AND	80%-85% AND	80%-85% AND
Title II	15%-20% between Titles II & III	15%-20% between Titles II & III	8%-20%
Title III	15%-20% between Titles II & III	15%-20% between Titles II & III	<7%

The Forest Service notifies states to begin the election process and supplies all required documentation and estimated payment information for them to use when working with their eligible counties. Each state has its own process for collecting and transmitting county decisions.

For more information, including an election training presentation and recording, visit the Forest Service SRS page: https://www.fs.usda.gov/working-with-us/secure-rural-schools SRS payments are counted as "prior year payments" in the PILT formula, which can reduce a county's PILT allocation. Decisions made as it relates to the allocation of FY26 SRS payments will impact the **FY28 PILT (June 2028) payment.** The share of SRS funds, or 1908 25% payments, retained by the county versus distributed to schools will also affect how much is counted toward the deduction.

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June 26, 2026

Via Federal eRulemaking Portal

ATTN: Steve Pearce, BLM Director
U.S. Department of the Interior, Director (630)
Bureau of Land Management
1849 C Street NW, Room 5646
Washington, DC 20240

Subject: Comments to Revision of Regulations for Grazing Administration, Exclusive of Alaska [Docket No. BLM–2026–0001; A2407–014–004–065516, #O2509–014–004–125222; LLHQ220000]

Dear Director Pearce:

The Nevada Association of Counties (NACO) appreciates the opportunity to provide input on the U.S. Department of the Interior (DOI) and Bureau of Land Management (BLM) proposed Revision of Regulations for Grazing Administration, Exclusive of Alaska, collectively referred to as "Grazing Regulations". NACO's membership includes all seventeen counties in Nevada. NACO works with counties to adopt and maintain local, regional, state, and national cooperation that results in a positive influence on public policy and optimize the management of county resources. NACO also supports comments submitted by the various Nevada counties that have Public Lands Policy Plans that are more specific to their individual circumstances. In the spirit of coordination and alignment with locally adopted plans and policies, NACO requests close consideration of their comments by DOI and BLM.

Public lands grazing is a critical multiple use across much of Nevada and contributes to the customs, cultures and economies of nearly every Nevada county. Counties provide and maintain services and infrastructure pertinent to grazing and healthy public lands. These include, but are not limited to: land use planning, emergency management including wildland fire fighting, fuels management, infrastructure and utilities, roads, stormwater systems, and flood control facilities. These aspects of county-provided services have some nexus with grazing on BLM managed public lands, as well as resilient and resistant rangelands that support both grazing and county services and values. As such, NACO provides this high-level comment

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after reviewing the proposed regulations. Generally, NACO supports the DOI and BLM stated purpose to increase flexibility of and to streamline grazing administration on public lands.

As relates to the definitions in **§ 4100.0-5,** NACO supports the inclusion and expansion of prescribed and targeted grazing as well as expanded use of temporary non-renewable (TNR) permits for grazing when excess feed (and fuel) is available. Use of TNR permits needs to be implemented in a manner that does not conflict with existing permit holders. TNR permitting also needs to be streamlined given the time-sensitive nature of such permits. NACO suggests the BLM issue Final Decisions as relates to these permits and eliminate the step of issuing "proposed decisions". In Nevada, wildfire is the most imminent threat from public lands to loss of life and property, potential loss of county infrastructure, impacts associated with subsequent flooding and loss of watershed function, increased presence and density of annual invasive species, and loss of wildlife habitat. Grazing is the only widely available management tool that can be implemented at significant scale to manage and manipulate fine fuels that pose such a major threat to these county assets and values. As relates to the definitions, NACO wants to ensure that the definition and application of "Annual rangeland" does not limit the ability for annual forage to be calculated for long-term allocations of Animal Unit Months. From a fire and fuels management standpoint, these are the exact rangelands that need regular grazing with permit flexibility, and not annual allocations based on annual temporary non-renewable permits. The definition and concept of "carrying capacity" needs to be rethought and perhaps eliminated. It is extremely difficult to establish "carrying capacity" in most of Nevada given climatic variability. Further, NACO does not want grazing to be limited due to mismanagement of other species such as wild horses (BLM) or wildlife (State) which the permittee has no control over.

Generally, NACO understands and supports the change from Fundamentals of Rangeland Health / Standards to Fundamentals of Land Health / Standards that apply to ALL approved BLM land authorizations, **§ 4180 → §1700**. NACO believes land health assessment at a watershed scale makes a lot of sense and has seen this successfully applied in the BLM's Ely District for years as relates to restoration planning. NACO has several hesitations with this change and proposal:

NACO does not want to encourage the curtailment of authorized lands uses or access to public lands as relates to critical County functions or existing multiple uses. As such, NACO encourages coordination with both state and COUNTY governments in completing rapid landscape-scale condition assessments as well as causal factor analysis.

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NACO does not want to see these requirements, and particularly the time limits, result in increased litigation that further undermines and delays necessary actions to improve and conserve public lands. Considering current BLM staffing levels, NACO suggests removing time limits on assessments and causal factor analysis.

Use of remote sensing in Rapid Land Health Assessments needs to be balanced with adequate ground truthing and traditional monitoring methods.

NACO appreciates **§4120.5–2 Cooperation with state, county, Tribal and Federal agencies and governments.** NACO encourages additional coordination with local governments on fuel reduction and wildfire management. This is extremely important to rural communities and counties, particularly in but not exclusive to: urban-wildland interface areas. To that end, NACO requests that this be added in a subsection (c). Finally, NACO requests coordination with local government and consistency with locally adopted policies "…to the maximum extent…" per **§202.c.9** of the Federal Land Management Act when considering administration of grazing. Furthermore, "appropriate County government(s)" should be added as relates to a term used throughout the proposed regulations, "consultation, cooperation and coordination…" with the affected grazing permittee and State. This will ensure proper consistency with locally adopted policies.

As relates to **§4110.3–2 Decreasing active use.** NACO understands that from time to time grazing may need to be decreased, and NACO appreciates doing so through suspension rather than cancelation of AUMs. However, decreasing active use should be a last option after all other adaptive management options are exhausted (change in season of use, herding, new range improvements, etc.). As such, the BLM must do so after consultation, cooperation, and coordination with permittees, the same as required when increasing active use.

As relates to **§ 1700.2 Standards (11)** and incorporating the use of non-native plant species**.** Use of desirable non-native plant species should be encouraged in more cases than those currently defined in the section. Often in Nevada, native species are cost prohibitive and do not compete with undesirable non-native plant species such as cheatgrass. It is imperative that desirable non-native plant species be applied anytime they fill or provide an ecological niche similar to native species and/or if native species are cost prohibitive in rehabilitating areas at a scale of sufficient size.

As relates to **§4120.3–2 Cooperative range improvement agreements**. NACO does not support that portion of section (b) that is suggest permanent range improvements "…where

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authorization is granted after August 21, 1995 shall be in the name of the United States". NACO would propose leaving this subsection the same as before where ownership is proportionate to the development and construction costs. The proposed approach will create significant issues in Nevada where water rights for stock use are to be held by the stock owner. If said stock owner can't own the infrastructure associated with their water right because of this section, then there will be a significant inconsistency between State and Federal Law. This section should as be clear that it only applies to "stock" water rights.

As relates to **§4120.3–9 Water rights for the purpose of livestock grazing on public lands.** NACO does not support the use of the term "adjudicated" in subsection (a). This is a term of water law that does not include applications, rights and certificates that aren't approved through an "adjudication" process. As such, the term needs to be stricken for consistency with State Law. Further, NACO is very reluctant to support changes to the process for administration of stock water rights in Nevada where stock water applications and permits are issued in the name of the "United States" with a "joint ownership agreement" with the permittee. This has been very problematic with the Forest Service and could upset the current administration of stock water rights (applications, permits, certificates, and claims) on public lands where the custom has been to issue stock water rights to the owner of the livestock. NACO strongly urges deletion of this proposed sentence: *To the extent allowed by the law of the state within which the land is located, any such water right shall be acquired, perfected, maintained, and administered in the name of the United States, including, as necessary, through the use of a joint ownership arrangement, principal/agent relationship, or any other legal arrangement allowed or recognized under state law and in coordination, consultation and cooperation with impacted permittees.*

Thank you for your attention and consideration of these comments. If you have any questions, please do not hesitate to contact me at ahs@nvnaco.org or by phone at (775) 883-7863, or our Public Lands and Natural Resources consultant Jeremey Drew at jeremy@rci-nv.com or by phone at 775-883-1600.

Respectfully,

Amy Hyne-Sutherland, Ph.D.

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Interim Chief Executive Officer

Cc: Governor Joe Lombardo
Nevada's Congressional Delegation
Justin Abernathy, Acting BLM Nevada State Director