

June 6, 2023

Tracy Stone-Manning
Director
Bureau of Land Management
1849 C Street NW
Washington, D.C. 20240

Dear Director Stone Manning:

On April 3, 2023, the Bureau of Land Management (BLM) published the proposed rule on “Conservation and Landscape Health.” The rule, which amends a longstanding interpretation of the Federal Land Policy and Management Act (FLPMA), has raised significant concern among the grazing community.

The undersigned organizations represent cattle and sheep producers who have, for generations, been partners with the BLM in managing the 245 million acres of federal land in the West as well as hundreds of millions of acres of private land nationwide. These producers are the original conservationists of these landscapes, having managed lands, waters, wildlife, and adverse conditions to ensure the resources remain healthy and resilient to provide for the diverse needs of people, animals, and the environment. These producers have always been the BLM’s primary partner in fulfilling your mission of managing landscapes for multiple use and sustained yield. Yet, in the promulgation of the proposed rule, the BLM neglected to engage with these partners.

The proposed rule was developed without any stakeholder discussion or advanced notice. Despite the ongoing discussions about sage grouse plan revisions, mitigation, conservation practices, grazing regulations revisions, and resource resilience, the BLM did not provide any indication they were promulgating this proposal. Individually, each of the components of the proposed rule would have warranted substantive and detailed discussion. Together, they demand the BLM do the necessary work of engaging with stakeholders to avoid conflict and develop durable outcomes. This discussion certainly should be longer than 75 days during one of the busiest times of year for federal grazing permittees.

The five public information sessions have done little to compensate for the agency’s lack of advanced discussion. Instead of holding dialogues in places where federal grazing permittees and other multiple use stakeholder groups operate, the agency elected to host briefings in urban centers. Each of these sessions has featured a briefing, after which BLM staff have been unable to answer questions about future implementation of the proposed rule, instead urging attendees to answer those questions in the public comments. The format of these events, the expectation that permittees from twelve western states would drive to just three urban centers, and the lack of meaningful dialogue with stakeholders at the briefings has left the grazing community with the conclusion that the BLM is not committed to open dialogue on this proposal.

To create a “durable mechanism” to improve landscape health, these concepts would have been more appropriately explored in one of the agency’s more appropriate tools like a Request for Information, an Advanced Notice of Proposed Rulemaking, or – most appropriately, a scoping period attached to a programmatic Environmental Impact Statement. Instead, the agency moved straight to a proposed rule, inappropriately bypassing key stakeholder discussions and regulatory processes that would have informed a more durable process. For this reason, the undersigned organizations request BLM withdraw the proposed rule and begin again, engaging with stakeholders in a forum that would promote open dialogue and address fatal flaws in the existing proposal.

If the BLM instead forges ahead with the proposed rule, the undersigned organizations request a 105-day extension to the public comment period, to allow for a full 180 days. The undersigned organizations are actively engaging with other multiple use groups across the West, doing the hard work that should underpin federal lands management. Additionally, we request the agency hold public meetings and forums for discussion in each of the states where user groups were previously omitted: Washington, Oregon, California, Idaho, Utah, Arizona, Montana, Wyoming, North Dakota, South Dakota, and Nebraska. While we appreciate the agency’s recognition that some groups may prefer virtual meetings, virtual meetings should not replace in-person engagement in states where broadband access often precludes robust participation.

Over the last several generations, ranchers have been at the front of the line helping the BLM conserve wildlife habitat, reduce wildfire risk, support balanced multiple use, reduce on-range conflicts, and identify areas of greatest need. We urge the BLM not to compromise that relationship by forging ahead with a rule that will undoubtedly result in ranchers and other multiple use groups being forced from the landscape over time. We support durable conservation, we support creative partnerships, and we have always been willing to do the hard work that partnership requires. We urge you to seriously consider our request and be willing to engage with this community into the future.

Sincerely,

Public Lands Council
National Cattlemen’s Beef Association
American Sheep Industry Association
American Farm Bureau Federation
American Quarter Horse Association
American National Cattle Women
National Lamb Feeders Association
Arizona Cattle Growers Association
Arizona Farm Bureau Federation
Arkansas Cattlemen’s Association
California Cattlemen’s Association
California Farm Bureau
California Public Lands Council
California Wool Growers Association

Colorado Cattlemen's Association
Colorado Farm Bureau
Colorado Public Lands Council
Colorado Wool Growers Association
Florida Cattlemen's Association
Idaho Cattle Association
Idaho Farm Bureau Federation
Idaho Public Lands Council
Idaho Wool Growers Association
Indiana Sheep Association
Kansas Farm Bureau
Minnesota Lamb & Wool Producers Association
Montana Association of State Grazing Districts
Montana Farm Bureau Federation
Montana Public Lands Council
Montana Stockgrowers Association
Montana Wool Growers Association
Nebraska Cattlemen
Nevada Cattlemen's Association
Nevada Farm Bureau Federation
Nevada State Grazing Board Central Committee
Nevada Wool Growers Association
New Mexico Cattle Growers Association
New Mexico Farm and Livestock Bureau
New Mexico Wool Growers Association
North Dakota Farm Bureau
North Dakota Stockmen's Association
Oklahoma Cattlemen's Association
Oregon Cattlemen's Association
Oregon Farm Bureau
Oregon Public Lands Council
Southern Arizona Cattlemen's Protective Association
South Dakota Cattlemen's Association
South Dakota Public Lands Council
Tennessee Cattlemen's Association
Utah Cattlemen's Association
Utah Farm Bureau Federation
Utah Wool Growers Association
Washington Cattlemen's Association
Washington Farm Bureau
Washington State Sheep Producers
Wyoming Farm Bureau Federation
Wyoming Stock Growers Association
Wyoming State Grazing Board
Wyoming Wool Growers Association