



November 18, 2024

The Honorable Tom Tiffany  
Chair  
Subcom. on Federal Lands  
Committee on Natural Resources  
1324 Longworth House Office Building  
Washington, D.C. 20510

The Honorable Joe Neguse  
Ranking Member  
Subcom. on Federal Lands  
Committee on Natural Resources  
1324 Longworth House Office Building  
Washington, D.C. 20510

Chairman Tiffany and Ranking Member Neguse:

We write to express our strong support for H.R.6441, the “*Ranching Without Red Tape Act of 2023*” and urge the Committee’s swift consideration of the bill. Introduced by Representatives Gabe Vasquez (D-NM) and John Curtis (R-UT), this bill represents a commonsense improvement to administration of grazing permits that allows cattle and sheep producers to be responsive to on-the-ground conditions without unnecessary bureaucratic delays. This bill, together with its Senate companion (S.3322) introduced by Senator John Barrasso (R-WY), is both good governance and responsible land management policy.

The Public Lands Council (PLC) is the national association dedicated to representing the unique rights and interests of cattle and sheep producers who hold approximately 22,000 federal grazing permits on public lands across the West. Together with our state and national affiliates, including the National Cattlemen’s Beef Association (NCBA) and the American Sheep Industry Association (ASI), we engage in a wide variety of policy discussions that seek to ensure grazing activities are not only maintained on public lands, but used to support and create positive land management outcomes. NCBA is the nation’s oldest and largest trade association representing American cattle producers, representing nearly 150,000 cattle producer-members through both direct membership and 44 state affiliate associations is dedicated to supporting the needs and rights of ranchers across the country. ASI represents more than 100,000 sheep ranchers across the United States who produce lamb and wool.

Across the country, livestock producers are engaged in careful stewardship of natural resources, not only because their businesses depend upon it, but also because today’s work is a continuation of a generations of responsible, proactive conservation. In the West, this ethos extends to ranchers’ management of public grazing lands, encompassing millions of acres that thrive under the watchful eye of experienced ranchers.

The current regulatory framework imposes significant requirements on grazing permittees, and these management requirements are often hampered by inefficient agency processes. As partners to federal land management agencies like the Bureau of Land Management (BLM) and U.S. Forest Service (USFS), grazing permittees need to be able to take immediate action to address challenges as they arise, rather than waiting for an often lengthy approval process. This is especially true when it comes to making necessary range improvements. These improvements, such as fixing fences, maintaining wells, and upgrading water pipelines, are incorporated as

permittees' responsibilities as part of their grazing permit. All too often, however, approval of that basic work is delayed by agency process.

H.R.6441 addresses this issue by allowing permit holders to make minor range improvements without the need for renegotiation of their underlying permit, provided they notify the appropriate USFS or BLM official. If the appropriate official does not respond within 30 days, the permittee can move forward with the necessary work. Additionally, the bill requires the Secretary of Agriculture and the Secretary of the Interior to respond to larger improvement requests within a similarly expedited timeframe, utilizing all available administrative tools to facilitate the necessary work.

By setting expectations for timely response to permittees, this bill supports permittees' role as stewards of these Western landscapes and ensures the agencies don't stand in the way of important range management. We urge the Committee to move swiftly to consider and pass H.R.6441.

Thank you for your attention to this critical matter. We appreciate your support for America's grazing permittees and their generational investments in our nation's public lands.

Sincerely,

Public Lands Council  
National Cattlemen's Beef Association  
American Sheep Industry Association



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Chairman Tiffany and Ranking Member Neguse:

We write to express our full support for Representative LaMalfa's bill, H.R.7666, that would emphasize the use of livestock grazing to reduce the significant risk of catastrophic wildfire. As we reach the end of another significant fire year, now is the time to provide meaningful direction to federal agencies to utilize all tools and partnerships to mitigate the damage that wildfire imposes on the landscape.

The Public Lands Council (PLC) represents cattle and sheep producers across the West who hold approximately 22,000 grazing permits on federal lands. Together with our 14 state affiliates and three national affiliates, PLC is dedicated to the historically-proven application of grazing as a land management and wildfire mitigation tool. The National Cattlemen's Beef Association (NCBA) represents nearly 26,000 direct members and 44 state cattle associations, totaling about 178,000 collective members across the country. Together, we urge the Committee's support of the bill and swift action to address the ever-looming threat of next year's fire season.

Over the last several years, the United States has experienced several of the most severe wildfire seasons on record. Year after year, the West sees fires burn hotter, longer, and more intensely as a result of repeated misuse of available tools and poor prioritization of strategic assets. While the U.S. Forest Service (USFS) manages most of the acres most affected by the worst fires, the agency has repeatedly failed to meaningfully incorporate strategic grazing to improve fuel breaks, reduce fine fuels at scale, and target some of the most at-risk ecosystems. Even in USFS's most recent Wildfire Crisis Strategy from 2022, the agency makes no mention of the role grazing can – and should – play in the larger effort to restore a more reasonable fire matrix on federal lands.

The 2020 North Complex fire in California devastated more than 300,000 acres and produced more pollutants than all of the vehicles in California would produce in a full year. In 2021, the Dixie Fire burned a million acres in California. In 2022, an ill-fated prescribed burn in New Mexico triggered a nationwide reevaluation on the use of prescribed fire because more often than not, USFS lands are so densely vegetated that the risk of using good fire to prevent bad fire is unpredictable, at best.

In 2023, the country got a bit of a reprieve from fire as a result of favorable weather conditions, but states across the West fared poorly in 2024. More than 782,000 acres burned in Wyoming, 1.9 million acres burned in Oregon, and nearly a million acres burned in California. To date, more than 8 million acres have burned across the West and even in early November, more than 480,000 acres are currently on fire.

This ongoing trend underscores the need to do things differently. Currently, USFS considers use of grazing as a fuels management tool only if rangeland and grazing program staff suggest grazing on a pilot basis. By contrast, the agency regularly considers mowing, prescribed burns, and other mechanical treatments as “first line” tools to reduce the risk from fuels. This disconnect means the agency is missing out on the opportunity to remove billions of pounds of fine fuels that put these landscapes into the high-risk category.

A [2022 study from the University of California – Davis](#) confirmed the scope of the positive impacts grazing can have: grazing – regardless of livestock species (cattle, sheep, goats), is an effective tool to reduce the grasses that dry and become wildlife fuel. Because of the way livestock graze, they also provide a variable pattern of fuels densities. This creates a natural fire break that changes fire behavior and makes fires less intense and the resulting damage less severe. Cattle grazing has the unique additional advantage of slowing woody shrub and tree encroachment into grassland ecosystems, which has a host of benefits not only for mitigating future fire risk posed by dense shrub stands.

H.R.7666 also addresses the benefits of applying grazing to the landscape after fire burns. Generally, USFS and the Bureau of Land Management are reluctant to resume grazing activities or use grazing as a management tool after fire, because they take a hands-off approach in most fire scenarios. All uses are precluded from the burned area with the goal of allowing the land time to recover, but unfortunately this approach has contributed to the widespread establishment of invasive annual grasses and lost opportunity to turn over topsoil and incorporate important organic matter. The bulk of scientific literature demonstrates that recovery of burned rangeland is not adversely affected by grazing. Likewise for grasslands, deferment of grazing for one or two years was not supported by science, as the [grassland recovery occurred at the same rate](#) through managed grazing and careful monitoring of timing.

Over the last 50 years, the number of livestock authorized to graze on federal lands has been significantly diminished, while the size, intensity, and frequency of fires has continued to increase. Ensuring that land management agencies and local communities have all available tools at their disposal – particularly tools that are proven to be successful – is key if we are ever going to truly stem the tide of fire devastation.

Just last year, Dr. Dave Daley, a respected leader within the California Cattlemen’s Association, Public Lands Council, and National Cattlemen’s Beef Association, emphasized the critical role of grazing in bolstering wildfire resilience during his testimony before your committee. His plea highlights the urgent need for comprehensive land management approaches, prioritizing post-fire operations, fuel breaks, and rectifying past mismanagement. As Dr. Daley aptly stated:

*“...wildfire resilience practices such as livestock grazing work, and confronted with the very real threat of worsening wildfire conditions, there ought to be bipartisan consensus endorsing these effective tools.”*

We wholeheartedly support this bill and urge its swift passage. Thank you for your attention to this matter, and we look forward to seeing progress on this important issue.

Sincerely,

Public Lands Council  
National Cattlemen’s Beef Association  
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Chairman Tiffany and Ranking Member Neguse:

We write to express our full support for Representative Curtis's bill, the *Operational Flexibility Grazing Management Program Act* (H.R.9062). Livestock grazing permittees are the lynchpin of public land management and play a pivotal role in the stability of rural economies. Public lands grazing permittees pay careful attention to the ecosystem health and needs of the resources when they manage their cattle and sheep, and apply the same attention and care to management of their public lands grazing allotments. The Public Lands Council<sup>1</sup> (PLC) is the national association dedicated to representing these permittees, dedicated to promoting the unique rights and interests of cattle and sheep producers who hold the approximately 22,000 federal grazing permits on public lands across the West.

Together with the Bureau of Land Management (BLM) and the U.S. Forest Service (USFS), cattle and sheep permittees manage more than 200 million acres across the West. Their presence on the landscape and attentive management has created grazing lands that are resilient to drought, wildfire, pests, and able to withstand increasing demands from varied multiple uses. In some cases, however, this attentive management is inappropriately constrained by a long list of federal requirements that while originally well-intentioned, have become barriers to good management practices.

Livestock grazing on federal land is highly regulated under the National Environmental Policy Act (NEPA), Federal Land Policy and Management Act (FLPMA), Endangered Species Act, Clean Water Act, and many other regulations and guidance documents that together form the litany of regulatory requirements to which livestock producers must adhere. Permittees' management is evaluated on an annual basis as part of complying with the terms of their grazing

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<sup>1</sup> PLC has state affiliates in California (California Cattlemen's Association, California Wool Growers Association), Colorado (Colorado Cattlemen's Association, Colorado Livestock Association, Colorado Wool Growers Association), Idaho (Idaho Cattle Association, Idaho Wool Growers Association), Montana (Montana Stockgrowers Association, Montana Wool Growers Association), Nevada (Nevada Cattlemen's Association, Nevada Wool Growers Association, Nevada Rangeland Resources Commission), New Mexico (New Mexico Cattle Growers Association), Oregon (Oregon Cattlemen's Association, Oregon Sheep Growers Association), North Dakota (North Dakota Stockmen's Association, North Dakota Lamb & Wool Producers Association), South Dakota (South Dakota Cattlemen's Association, South Dakota Sheep Growers Association), Utah (Utah Cattlemen's Association, Utah Wool Growers Association) and Wyoming (Wyoming Stock Growers Association, Wyoming Wool Growers Association), as well as three national affiliates: the National Cattlemen's Beef Association, the American Sheep Industry Association, and the Association of National Grasslands.

permits and often, management adjustments are made to ensure that grazing activities support healthy rangelands and ecological conditions.

Unfortunately, sometimes permittees' ability to make these adjustments swiftly, or at all, is limited by the permits themselves. In some cases, permits have been drafted to include overly prescriptive language about on/off dates to allotments, timing and utilization of pasture and forage resources, and other details that should be addressed in the annual use planning discussions that occur between the permittee and their agency partner. Making adjustments to any of these factors currently requires incredibly onerous NEPA, changes to grazing permits that often require lengthy FLPMA processes, and result in permits that are equally restrictive to a new set of stringent management requirements.

This bill would provide a facility for permittees and their agency partners to act much more quickly when the need to make changes inevitably arises. This bill will allow for permittees to adjust grazing rotations across pastures that may have received differing levels of precipitation. Language in this bill would provide for an extension – or reduction – in the number of days grazed on an allotment if there was too much or not enough forage. Permittees need the flexibility to make prompt management decisions to mitigate conflicts with recreation, fire, drought, and all kinds of factors. H.R.9062 will provide them that flexibility and enshrines in law the need for adaptive management to be viewed favorably by the law.

Permittees should be encouraged to be proactive in making management changes for the benefit of the resource and overall land management – and supported by their federal agency partners in doing so. Federal requirements should not be a barrier to making the best of their management goals. Equally, Federal agencies have been plagued by regulatory barriers to updating their own regulations to provide this flexibility, so we thank Congressman John Curtis for introducing this bill and emphasizing permittees' ability to be leaders in land health. Permittees are dedicated to the landscapes they manage this bill gives the agencies the ability to be better partners to ranchers to allow both parts of the partnership to work toward the same goal: optimized landscape health and resiliency.

Representative Curtis and other grazing stakeholders see the incredible opportunity to provide the kind of long-term flexibility and adaptive management that so often is constrained by unnecessary bureaucratic process. We thank Representative Curtis for his support and urge swift passage of H.R.9062.

Sincerely,

Public Lands Council  
National Cattlemen's Beef Association  
American Sheep Industry Association