

March 21, 2024

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

Pat Deibert  
National Sage-Grouse Conservation Coordinator  
Bureau of Land Management  
5353 Yellowstone Road  
Cheyenne, W.Y. 82009

Re: “Notice of Availability of the Draft Resource Management Plan Amendment and Environmental Impact Statement for Greater Sage-Grouse Rangewide Planning.” Federal Register 3/15/2024.

Director Stone-Manning and Ms. Deibert,

The undersigned organizations represent a diverse cross-section of agricultural producers in the West. As public lands grazing permittees and private landowners operating adjacent to federally owned landscapes, this group of producers constitutes a sizeable portion of the local stakeholders that the Bureau of Land Management has historically, currently, and will continue to depend on to achieve durable conservation results for the greater sage grouse.

Our organizations have waited with keen interest for the BLM’s draft Resource Management Plan Amendment (RMPA) and Environmental Impact Statement (EIS) on sage grouse since the proposal was noticed in November 2021. Western farmers and ranchers share your commitment to ensuring that the sage grouse and the sagebrush steppe ecosystem are beloved features of the American West for generations to come. We also depend on the agency to uphold its multiple use mission, which is critical to the economic and social sustainability of thousands of rural communities. In light of that shared commitment to multiple use and the conservation of this species, we request that the comment period on both the RMPA/EIS and the associated Area(s) of Critical Environmental Concern (ACECs) be extended to September 11, 2024 — a total of 180 days.

The scope of this proposal is enormous, with 10 states, 77 land use plans, and millions of acres impacted. The BLM has constructed an umbrella that shadows an incredible diversity of different landscapes, dominant land uses, predator concerns, wild horse and burro numbers, habitat health conditions, fire risks, and more. It will be nigh impossible for stakeholders to provide the local, landscape-level attention that this plan requires in just 90 — or 60, for ACECs — days. With more than 600 pages of analysis and information to chew through, many of the entities that are closest to the land and best qualified to provide input, including farmers, ranchers, and county government officials, will be hard pressed to meet the BLM’s initial deadline. Additionally, providing such a short window will neuter the efficacy of the planned in-person meetings, since

there will be very little time to thoughtfully digest and incorporate the discussion into comments. The length of the scoping comment period for this proposal was 75 days. Given how much material has been generated during the rulemaking process, the undersigned organizations believe that doubling that 75-day benchmark should be a minimum number, not a maximum.

Land management rulemakings should always be guided by the best available science. In the years since the sage grouse plans were last overhauled in 2015 and 2019, new studies have been completed on this topic. Allowing more time in the comment period will give all stakeholders the time they need to assess new information that could impact their comments, including a significant study recently completed by Dr. Karen Launchbaugh at the University of Idaho, which is currently being peer reviewed ahead of publication.

Spring is one of the busiest times of year for many of the Westerners who will be the most impacted by changes to sage grouse habitat management. There are new calves and lambs to care for, fields to plow, crops to plant, and livestock to trail to federal grazing allotments. These are not stakeholders who are sitting in an office, paid by the hour to engage in regulatory processes and lawsuits — these are men and women who are busy putting food on the American table. Pushing the comment deadline for the RMPA, EIS, and ACECs to September 11, 2024 will help ensure that this process remains equitable for all communities invested in the success of the sage grouse.

Sincerely,

National Cattlemen's Beef Association  
American Farm Bureau Federation  
Public Lands Council  
American Sheep Industry Association  
Association of National Grasslands  
Colorado Cattlemen's Association  
Colorado Public Lands Council  
Colorado Wool Growers Association  
Idaho Cattle Association  
Montana Stockgrowers Association  
Montana Public Lands Council  
Montana Association of State Grazing Districts  
Nevada Cattlemen's Association  
North Dakota Stockmen's Association  
Utah Cattlemen's Association  
Utah Wool Growers Association  
Wyoming Wool Growers Association