



November 30, 2023

The Honorable Tracy Stone-Manning
Director
Bureau of Land Management
1849 C Street N.W.
Washington, D.C. 20515

Dear Director Stone-Manning:

We write today to express our collective disappointment and concern over the process the United States Bureau of Land Management (BLM) has attempted to implement in changing its grazing regulations and internal policies and procedures.

First, our state agencies, county commissioners, and other eligible entities have committed significant time, attention, and resources as cooperating agencies in the BLM's grazing regulation review. In spite of those efforts, the Administration opted to route the rule to the Office of Management and Budget's Office of Information and Regulatory Affairs (OIRA) without sharing the full draft Environmental Impact Statement (DEIS) with cooperators. Cooperators only received, and were expected to comment on, Chapters 1 and 2 of the DEIS. BLM withheld Chapters 3 and 4, and all appendices, from cooperators, leaving them unable to engage meaningfully. This decision to disengage from cooperators, mid-stream, was communicated surprisingly after no communication for months.

The impacted cooperators received word from your staff that the rulemaking was "paused," and forthcoming efforts would be announced regarding the development of internal policies. While we appreciate the "pause" in the development of new formal grazing regulations, we learned of several profoundly concerning items during a webinar with cooperators and your staff on October 11:

- 1) New and revised grazing policies will not be offered or available for review and comment from cooperators, or the public, prior to implementation.
- 2) Despite having absolutely no role in the drafting or review of these proposed internal policy revisions, the BLM asked cooperators to help communicate changes to stakeholders and "support" the agency during the rollout and implementation.
- 3) BLM staff were unwilling to share a list of which policies are going to be created or revised.

- 4) The grazing rule will be reopened after policy changes are implemented in the spring/summer of 2024, making it appear that the ball will already be rolling on newly implemented policies before we have a chance to meaningfully critique them.

It is disappointing and frustrating to exclude cooperators from regulatory and policy discussions, and then request that they spread the good word about BLM's changes. We share in the frustration of our fellow cooperators who have been anxious to offer feedback, particularly given that these policy changes have potential to impact the livelihoods of our farmers, ranchers, and others who rely on federal lands for their way of life. From our perspective, these critical stakeholders have been unnecessarily excluded from the process. We do not mince words when we say that the actions of your agency have eroded the public's trust.

The solicitation of additional feedback during the webinar on November 15 is appreciated, but it does not equal a change in approach. There is still no guarantee that any feedback offered by cooperators will be incorporated by the BLM. As a result, it is imperative that all grazing policy changes, including formal regulations, instructional memoranda, and informational bulletins, are put on hold until a truly transparent and collaborative process is developed.

A frustrating pattern is emerging at the BLM. Meaningful coordination on important decisions within the agency, from rulemakings to land use plans, is treated as an afterthought or disregarded entirely, especially for our states. We urge the BLM to pause both the formal regulations and any policy or guidance changes immediately. Listening to the expertise and on-the-ground knowledge of our agencies and other cooperators is essential.

During this pause, we request that the BLM send all internal documents related to the current grazing policy guidelines, to the impacted stakeholders and cooperators. This will help instill trust in the process as we seek to better understand what guidelines are being considered, and what policies our constituents will have to live under.

Without the critical and valuable perspective of cooperators, the current process will not yield the results necessary to give certainty to impacted farmers and ranchers in the west.

Sincerely,



Greg Gianforte
Governor of Montana



Brad Little
Governor of Idaho



Joe Lombardo
Governor of Nevada



Spencer Cox
Governor of Utah



Mark Gordon
Governor of Wyoming

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CC: Secretary Deb Haaland
Chairman Joe Manchin
Vice Chairman John Barrasso
Chairman Bruce Westerman
Ranking Member Raúl Grijalva