

December 16, 2010

The Honorable Ken Salazar  
Secretary of Interior  
1849 C Street NW  
Washington, DC 20240

**Re: National Landscape Conservation System Secretarial Order**

Dear Secretary Salazar:

The undersigned livestock groups write in response to your recent signing of the Secretarial Order (Order) elevating the National Landscape Conservation System (NLCS) and Community Partnerships to the level of directorate within the Bureau of Land Management (BLM). According to the BLM's website, the NLCS is intended to "conserve the essential fabric of the West" and consist of areas that are "part of an active, vibrant landscape where people live, work and play." We are not confident that language within your Order is in keeping with this working-landscape philosophy, not to mention existing land management statutes or the BLM's multiple-use mission statement. We seek assurance that livestock grazing will continue as an uncompromised use on NLCS lands, and that federal lands ranchers will remain participants in an NLCS working landscape.

We appreciate your assertions, notably in your remarks at the NLCS Summit, that you intend to implement NLCS with a "multiple-use strategy," maintaining "a variety of economically productive uses, such as...livestock grazing." However, experience teaches us that restrictive designations on federal grazing lands typically result in pressure to reduce or eliminate grazing—not necessarily by the BLM or other land management agencies, but by litigious environmental groups uninterested in compromise or the carefully crafted laws that allow for multiple uses to continue harmoniously on public lands. While your spoken words are heartening, your Order leaves too much room for doubt.

We submit that the Order, at the very least, fails to include livestock grazing as an integral part of NLCS land management—and at the very worst, invites attacks on grazing. Section 4 (a) of the Order states that multiple uses "in conflict" with the "values for which [the lands] were designated" will be prohibited. "In conflict" is an ambiguous term that leaves room for litigious opponents of grazing to claim that it conflicts with values and uses with which grazing is actually compatible or even complementary. Section 4 (a) continues: "If consistent with such protection, appropriate multiple uses *may* be allowed, consistent with the applicable law and the relevant designations under which the components were established" (emphasis added). Federal land ranchers would have far more assurance if "may" were replaced with "shall."

This Order's language not only undermines the concept of working landscapes by taking away the assurance federal land ranchers need in order to run viable operations—it may also be in conflict with existing land use statutes. Certain protections for grazing have been provided by congressional acts in many NLCS components, and the BLM's mandated mission revolves around the concept of "multiple use and sustained yield" of resources. In contrast, the Order's narrower preservation mission makes grazing optional and discretionary. We believe that existing laws and real multiple use management should ensure that grazing is an integral part of conservation.

From your NLCS Summit remarks that the NLCS serves as the "successful model for our nation," we gather that the intention is to add more lands to the NLCS portfolio. As more NLCS lands are added, the BLM's mission will necessarily begin to shift away from one of multiple use management, toward one that focuses on preservation. Nearly 18,000 federal land ranchers count on the wise use of BLM lands for their livelihoods. Should the restrictive language in the Order be applied to more BLM lands, the potential loss of grazing permits would have a devastating impact on rural economies and landscapes across the west.

In spite of our concerns, we agree with many of the Order's aims. We appreciate the goal to "offer visitors the adventure of experiencing natural, cultural and historic landscapes." Ranching is a longstanding western tradition, and very much part of the cultural and historic landscape. We also believe that grazing can and should be part of the effort to "conserve the open spaces that are...part of America's heritage." No other industry's welfare is so directly linked to a healthy, vibrant range. Well-managed grazing has been documented to improve wildlife habitat, reduce fine fuels that feed wildfires, and provide new growth and forage, to the benefit of wildlife. Furthermore, federal lands ranchers provide services such as water improvements and weed and fire control, reducing costs to the land management agencies and taxpayers. Their continued presence on federal land ensures that their privately owned ranches remain intact and America's rural landscapes stay free of urban development, preserving vast open spaces for the benefit of ecosystems and wildlife.

As a result of implementing conscientious grazing regimes, federal lands ranchers benefit from the healthier, more productive land—as do other members of the public, who enjoy clean water and air, open space, and abundant wildlife. Indeed, tourism and recreation on public lands are growing industries across the west. Federal lands grazing can not only coincide with, but actually *enhance* those industries by contributing to conservation, yet this can only be accomplished if federal land ranchers have assurance of their continued presence on the range.

Thank you for considering our position on the Order. We look forward to continuing our industry's longstanding contribution to the worthy goal of preserving open space and the beautiful landscapes for generations to come.

Sincerely,

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

Arizona Cattle Growers' Association  
California Cattlemen's Association  
Colorado Cattlemen's Association  
Colorado Public Lands Council  
Colorado Wool Growers Association  
Idaho Cattle Association  
Idaho Wool Growers Association  
Montana Association of State Grazing Districts  
Montana Public Lands Council  
Nevada Cattlemen's Association  
New Mexico Cattle Growers' Association  
New Mexico Wool Growers, Inc.  
North Dakota Stockmen's Association  
Oregon Cattlemen's Association  
South Dakota Cattlemen's Association  
Utah Cattlemen's Association  
Utah Wool Growers Association  
Washington Cattlemen's Association  
Wyoming Stock Growers Association