

January 18, 2011
The Honorable Ken Salazar
Secretary of Interior
1849 C Street NW
Washington, DC 20240

RE: Secretarial Order No. 3310, “Protecting Wilderness Characteristics on Lands Managed by the Bureau of Land Management”

Dear Secretary Salazar:

The undersigned livestock groups write regarding your December 23rd, 2010 Secretarial Order No. 3310, “Protecting Wilderness Characteristics on Lands Managed by the Bureau of Land Management” (“Order”). Our organizations represent ranchers and an industry which accounts for some 18,000 grazing permits on 157 million acres of Bureau of Land Management (BLM) land, and whose presence is an important part of the western economy, landscape, and culture. We are concerned this Order could be a threat to ranchers and their communities, as it may jeopardize livestock grazing and other multiple uses on BLM lands. We question whether this Order goes against Congress’ prerogative to declare Wilderness Areas and Wilderness Study Areas (WSAs).

The BLM, by placing higher emphasis on managing for wilderness characteristics than on managing for other uses, will be diverging significantly from its mandated mission. Congress has determined that BLM lands will be managed for multiple uses. This Order appears to violate that mandate.

By shifting its mission from multiple-use management to one of wilderness preservation, the BLM is threatening ranchers’ continued existence on federal lands. Roads, water systems, and other range improvements will be made impossible or extremely difficult to maintain. This will inevitably lead to either ranchers’ inability to continue grazing livestock on those lands, or, at the very least, the impairment of their ability to manage grazing for optimum range health. The loss of federal grazing allotments will have multiple negative effects. Ranchers, the on-the-ground stewards of the land, will no longer be present to control noxious weeds, wildfire risks, and vandalism. Furthermore, their loss of ability to graze on federal lands will likely result in the failure of their ranching operations. Rural economies will suffer greatly, and base properties will risk being subdivided and developed, resulting in the loss of wildlife habitat and open spaces across the west.

The undersigned associations have strong reservations about the Order and question its validity. We continue to support management of public lands for multiple uses and will continue working to ensure protection of our members and industry under current law.

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
Montana Stockgrowers Association
New Mexico Cattle Growers' Association
New Mexico Wool Growers, Inc.
Nevada Cattlemen's Association
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