



RE: Comments Regarding Proposed BLM Grazing Rule Change

Date: July 4, 2023

To: US Bureau of Land Management

The Yakima County Farm Bureau (YCFB) submits comments regarding the Bureau of Land Management (BLM) proposed rule change affecting grazing allotments to be bid on and “managed” by preservation groups.

The YCFB is aware of comments submitted by the North Yakima Conservation District (NYCD), the Washington State Farm Bureau and the American Farm Bureau Federation. The YCFB fully supports those comments.

With respect to the NYCD comments, the YCFB notes that the current rules were last substantively changed in 1983. The BLMs own reporting noted improved ecological health post-change. It is important to note that the rule prior to 1983 allowed some bidding by preservation groups. The YCFB believes that it makes no sense to return to the process prior to 1983, thus reducing ecological function and worse, to broaden the scope of its negative effects by managing more or all of its lands in this poor manner.

The BLMs own science report that found the biological conditions improved by grazing is in fact a compelling argument to retain the activity upon the landscape. Because the agency is ignoring its own work and choosing to revert to the failed past, leads the YCFB to believe that the BLM is now making a political calculation.

The YCFB notes that the BLM attempted to pass this rule change through Congress in 2017 (Planning rule 2.0) and it failed overwhelmingly. Since Federal law bars the resubmission of the same proposal without congressional authority, this renewed attempt by the BLM is illegal. Further, basing this proposal now on Executive order (14008) even ignores a recent land mark Supreme Court ruling (Sacket vs. EPA, May 2023) and is there for, unconstitutional.

Quoting the BLM mission statement:

“The Bureau of Land Management’s multiple-use mission is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on public lands.”

Comparing the proposed BLM rule to its mission statement, it is obvious to the YCFB and any reasonable person, that the agency is ignoring its own mission statement to entertain this proposal. Descriptive terms such as multiple use, livestock grazing and mineral development do not fit with a preservation scheme. Simply put, the YCFB believes that the BLM is out of bounds by considering this rule change.

As a representative of our member farmers and ranchers, the YCFB believes in conserving farm and ranch operations for future generations. The rule the BLM is considering imperils ranching because it will eliminate grazing on an immense geographical and economic scale.

In maintaining a grazing allotment, both a preservation group and a rancher would have to pay the “grazing fee”. The preservation group would have no other expense but a rancher would continue to have the added costs of the grazing activity. The allotment fees on federal lands are lower because grazing those lands is very management intense compared to other grazing options. Since a preservation group would not incur any other cost in securing the allotment than the fee, they would be provided an overwhelming advantage to out-bid any rancher.

This proposed rule threatens the sustainability of thousands of ranching operations since it would destabilize their grazing resource base. The scope of this impact can’t be overstated since the BLM administers nearly 18,000 allotments. With the loss of their grazing allotments, many ranchers would be forced out of business. Countless western communities owe their very existence to the economic activity related to agriculture and without that activity they will wither and cease to exist. The YCFB believes this would create staggering consequences.

The occurrence of wild land fires has been increasing due to increased fuel loads and the YCFB believes elimination of managed grazing will encourage that disastrous trend. The YCFB recently had a conversation with the local regional director for the Washington Department of Fish and Wildlife who is also one of their biologists whose expertise is in upland wildlife ecosystems. When asked to identify the number one threat to Sage Grouse, he listed wild fire. Sage Grouse are imperiled and the number one issue is fire and yet, the BLM would consider an already failed path that increases wild fire activity as noted by its very own report.

The YCFB also believes that the American consumer achieved a new realization during the COVID-19 pandemic that their food supply is not immune to disruption and shortage. Much of the factors creating those shortages were a direct result from much of our necessities being produced and processed in other countries. The YCFB believes that this BLM proposal would greatly add to more of our food production being relocated outside of the United States and that will **NOT** be viewed enthusiastically by the consumer as it raises questions of both food security and food safety.

The YCFB urges the BLM to not change its current grazing rules which would return our federal lands to a poorer state of ecological health and increase wild fire occurrence, negatively impact or eliminate huge swaths of small communities, force ranchers to sell out and thus relocate more of our precious food production outside the United States. Furthermore, the BLM should adhere to its mission statement, that of managing for “multiple use”. Finally, the YCFB requests the BLM follow the Law as well as its own true science it has recognized since 1983, AND abide by the United States Constitution.

Sincerely,

Mark Herke

President, Yakima County Farm Bureau