

January 3, 2022

Bureau of Land Management  
Burns District Office  
28910 Highway 20 West  
Hines, Oregon 97738

**SUBMITTED VIA EMAIL**

*Re: Bridge Creek Area Allotment Management Plan Environmental Impact  
Statement Comments (DOI-BLM-ORWA-B060-2021-0004-EIS)*

Mr. Rotell:

We are writing to express our continuing disappointment with the BLM's failures surrounding the reinstatement of the Bridge Creek Area Allotments to Hammond Ranches, Inc. (HRI). As you are aware, our organizations have been engaged with the future of these allotments since the permit was first denied renewal in 2014. We have engaged in the administrative proceedings following that decision, and in each comment opportunity that has followed with one goal – to see the permit reinstated on fair terms and conditions to HRI. The Hammonds have managed the permit for the past 51 years, they have intermingled private lands with these permitted public lands, who has water rights, and who has maintained and invested in range improvements within the allotment. We continue to assert that the February 26, 2021 Secretarial Order rescinding the final permit issuance for the Bridge Creek Area Allotment Management Plan was improper, and that the January 29, 2021 Secretarial Decision was sound and otherwise lawful.

This letter marks the seventh time our organizations have written over the last year to your office, urging the timely reinstatement by BLM of the grazing permit previously held by for 51 years by HRI. Each engagement with your office, has caused us more concern about the BLM's approach to this permit. Furthermore, we are gravely concerned that BLM's continued actions regarding this permit and the associated delay will have lasting negative consequences for rangeland health, the local economy, and one of Harney County's longest standing ranch families.

Since BLM first declined to renew the permit in 2014, our organizations have engaged to help ensure that the permit is restored to HRI. While reinstatement of the permit should have occurred shortly after the original Secretarial Order in January 2019, BLM

delayed for more than a year prior to initiating the NEPA process to move the permit forward. In our first letter to you in April 2020, we urged BLM to timely initiate a clear and transparent process to restore the permit to HRI, and to ensure that turnout could proceed in the spring of 2021. We are now less than two months from 2022 turnout. BLM's actions appear to all but ensure that turnout will not occur this season, increasing the fire risk on the allotment, and resulting in harm to the local ranching economy.

As we have stated several times in the past, the extended period of non-use due to the failure to renew HRI's permit has created a significant fuel load that presents a risk to BLM managed public lands, neighboring rancher land, and the natural habitat for numerous wildlife species found on the allotments. It is critical for the economic vitality of Harney County and the ecological health of the region that grazing be restored to these allotments immediately.

Hammond Ranches has a long history of stewardship on this allotment. The February 26<sup>th</sup> rescission of HRI's permit sets a very dangerous precedent for the hundreds of public lands ranchers across Oregon and the nation. Without the permit, HRI will be unable to continue to operate their ranch and range improvements, manage its interspersed private land, and move forward with rebuilding the ranch. Rescission of the permit also risks neighboring ranches due to the building fuel load on private and public lands associated with the allotment due to lack of grazing.

We are very frustrated that despite all applicable factors supporting restoration of the permits to their family, and despite strong support from the community and a strong ecological need to restore grazing this season, BLM continues to take actions that risk the future viability of this ranch. HRI has worked diligently since 2014 to restore its permit, and it has met all applicable criteria in the code of federal regulations. All local ecological and environmental factors favor returning HRI's cattle to the allotment this grazing season. Continued BLM action of this sort is damaging the Harney County community, Harney County ecosystems, and a long-standing Harney County family. BLM can and must do better.

We do not understand why BLM appears to be beginning the NEPA process again, when the February 26<sup>th</sup> order simply required reinstatement of the protest period from the already completed NEPA process. Beginning the NEPA process again wastes federal resources, the local community's time, and subjects HRI to once again participate in a NEPA process that has been more than properly concluded, and which has already been completed at least twice. BLM is using its administrative processes to intentionally obstruct and delay restoration of the permits to HRI. This also has the effect of demonstrating to the local ranching community the power BLM has to impact their lives. To say this process has and continues to be frustrating is an understatement – in our decades of public policy advocacy with federal agencies, we have never seen an agency drag out a NEPA process to forestall a result that they apparently do not wish to see – restoration of grazing use within a duly established Grazing District under

the Taylor Grazing Act, restoration of grazing use as allocated and directed by the applicable land use plans, and restoration the permit to HRI.

Further, we agree with the December 27<sup>th</sup> comments of HRI that BLM has intentionally narrowed the project objectives on which it seeks comment. BLM has omitted the factors that would weigh in favor of HRI, including the recognition of the allotments as part of a grazing district, the consideration of the intermingled private lands owned by HRI, and to consider a land exchange that would benefit both the BLM allotments and HRI land management. We also echo HRI's request for clarification on the timeline for the decision to be made, and the need to restore grazing to HRI while the NEPA process concludes.

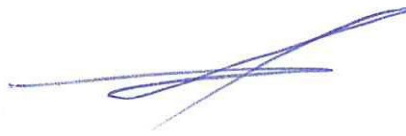
We have attached our prior comments to this letter. We strongly object to this new proposed NEPA process, and urge the Burns District BLM to restore the Hammonds permit immediately to allow turnout this grazing season.

Thank you for your consideration and please do not hesitate to contact us if you have any questions.

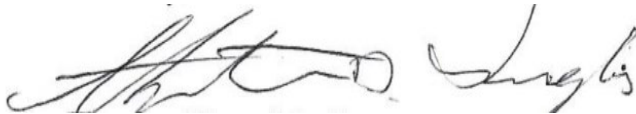
Sincerely,



Mary Anne Cooper  
Vice President of Public Policy  
Oregon Farm Bureau



Todd Nash, President  
Oregon Cattlemen's Association



Thurston "Rusty" Inglis, President  
Harney County Farm Bureau



Mark Owens, Representative District 60  
Oregon State Legislature