

October 3, 2017

Michael Nedd Acting Director Bureau of Land Management 1849 C. Street NW Washington, DC 20240

Dear Mr. Nedd:

The Western Landowners Alliance (WLA) has recently become aware that the Bureau of Land Management (BLM) will be permitting a number of "outcome-based grazing authorizations", pursuant to IB 2017-051, for inclusion in a demonstration program. Our organization represents approximately 14 million acres of western rangelands and forests. As conservation-minded producers and private landowners with decades of experience partnering with the BLM and other government agencies on important land and water issues, we believe the concept and philosophy behind outcome-based grazing holds tremendous potential for generating operational flexibility, promoting economic stability, and establishing an innovative precedent for a broad variety of resource conservation goals throughout the West.

We respectfully request that the deadline for submitting projects to the BLM for consideration be extended from October 27, 2017 to January 12, 2018. Many WLA members are interested in this demonstration program but have not yet had an opportunity to consult with their local BLM field offices. We believe that such an extension would also support the implementation efforts of BLM field offices as they work closely with producers to put forth sound proposals consistent with the agency's dual purpose of enhancing management flexibility while also meeting important habitat and vegetation goals. This outcomes-based approach to public lands grazing will be watched closely and may face legal challenges, further underscoring the importance of deliberative, thoughtful planning on both sides to achieving permitted pilots that will withstand scrutiny.

Thank you for your consideration of this request. Please do not hesitate to reach out if you need any additional information, as WLA stands ready to work with you on this promising new initiative.

Lesli Allison

Executive Director

Western Landowners Alliance