



The **Western Landowners Alliance** advances policies and practices that sustain working lands, connected landscapes and native species.

December 12, 2025

The Honorable Brooke Rollins
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Re: Comment on USDA's Plan to Fortify the American Beef Industry

Dear Secretary Rollins and Secretary Burgum:

The Western Landowners Alliance (WLA) is a landowner-led, nonpartisan organization whose members steward millions of deeded and leased public acres across eleven western states. We work to advance the policies and practices that sustain working lands, connected landscapes, and native species. Our members depend on United States Department of Agriculture (USDA) programs and expertise: the Natural Resources Conservation Service (NRCS) and the Farm Service Agency (FSA) to keep operations economically viable while advancing conservation; the U.S. Forest Service (USFS) to administer grazing permits; USDA-Animal Health and Plant Inspection Service (APHIS) for disease management and animal damage control; Agricultural Research Service science for innovation; and Forest Service firefighters to protect the forest–ranch interface. The USDA is a key partner in keeping working lands working and producing food for this nation, which in turn supports the rural economies of the West.

First, we want to thank USDA for bringing forth this initiative to support ranchers and cattle producers in America. We offer the following comments for your consideration. The three coordinated priorities of PROTECTING AND IMPROVING THE BUSINESS OF RANCHING; EXPANDING PROCESSING, CONSUMER TRANSPARENCY, AND MARKET ACCESS; BUILDING DEMAND ALONGSIDE DOMESTIC SUPPLY; and PROTECTING AND IMPROVING THE BUSINESS OF RANCHING are admirable objectives.

To maintain and grow the cow herd we must ensure the economic viability of ranching. The U.S. is losing ranch and farmland to other uses at an incredible rate. The USDA's NRCS reported that between 1983 and 2017, roughly 14 million acres of rangeland were lost to development¹. From 1992 to 2012, 31

¹ U.S. Department of Agriculture, Natural Resources Conservation Service. (2020). *Summary report: 2017 National Resources Inventory* (USDA Miscellaneous Publication No. 338720).
https://www.nrcs.usda.gov/sites/default/files/2022-10/2017NRI_Summary_Final.pdf

million acres of agricultural land nationwide were converted to non-agricultural uses². A large part of that is happening in states like Wyoming, Montana, and New Mexico. Overall, the US is losing about 2,000 acres of farmland daily, or roughly 730,000 acres per year, to non-agricultural uses³. The erosion of agricultural land to other uses threatens not only the US cowherd, but it threatens rural communities and the wildlife species that exist on these ranches.

These comments will be by section:

PROTECTING AND IMPROVING THE BUSINESS OF RANCHING:

Strengthen U.S. cattle production through endangered species reforms, enhanced disaster relief, increased grazing access, increased access to capital, and affordable risk management tools.

A. USDA–DOI GRAZING ACTION PLAN

Landowners and land managers in the checkerboarded West work across intermingled land ownerships. If landowners are to remain economically viable, we must manage our operations holistically across multiple ownerships, sustaining and improving animal husbandry, land health, water supply, and wildlife habitat. Across the West, the BLM and USFS is an integral partner in achieving operational, land health and conservation goals on lands they administer. This revision is an opportunity for these agencies to incorporate needed management flexibility, which is the number one issue for permittees and conservation partners. WLA believes that flexibility to improve land health and productivity through adaptively managed grazing will reduce or eliminate the erosion of active Animal Unit Months (AUMs) on BLM lands in the West. Erosion of AUMs is another top concern of livestock permittees. WLA has submitted comments to DOI on proposed changes to the BLM grazing regulations, [view here](#).

ELEVATING RURAL AMERICANS: Giving Ranchers a Voice

USDA and DOI Action: Strengthen engagement and mutual understanding between federal agencies and grazing communities through structured listening, learning, and on-the-ground collaboration. ii. Implementation: Host regional meetings to identify producer priorities and locally led rangeland health solutions.

WLA fully supports “structured listening, learning, and on-the-ground collaboration on federal grazing allotments and on conservation programs for private lands. USDA agricultural conservation programs like Environmental Quality Incentives Program (EQIP), Regional Conservation Partnership Program (RCPP), Conservation Reserve Enhancement Program (CREP), Grassland Conservation Reserve Program (CRP), and Agricultural Conservation Enhancement Program (ACEP) are key programs that will help make ranching more economically viable in the long term. Local listening sessions and collaboration will make these programs more effective and easier to use for ranchers and their conservation partners. We would like to see USDA shine more light on these valuable programs in this Action Plan, including suggestions on a process to make these programs more workable for producers.

MAXIMIZING FLEXIBILITIES: Keeping Working Lands Working

² Freedgood, J., M. Hunter, J. Dempsey, A. Sorensen. (2020). *Farms Under Threat: The State of the States*. Washington, DC: American Farmland Trust.

https://www.farmlandinfo.org/wp-content/uploads/sites/2/2020/05/AFT_FUT_SAF_2020final.pdf

³ Hunter, M., Sorensen, A., Nogeire-McRae, T., Beck, S., Shutts, S., & Murphy, R. (2022). *Farms Under Threat 2040: Choosing an abundant future*. American Farmland Trust.

https://farmlandinfo.org/wp-content/uploads/sites/2/2022/08/AFT_FUT_Abundant-Future-7_29_22-WEB.pdf

USDA and DOI Action: Promote innovative grazing management tools and outcome-based practices to sustain ecological health while reducing costs for ranchers. ii. Implementation: Expand targeted grazing as a vegetation management tool to control invasive species and reduce wildfire risk. Allow outcome-based grazing agreements to tailor stocking rates and timing to local conditions. Pilot and scale virtual fencing and other precision-management technologies to lower labor costs and improve herd distribution.

Public land managers and livestock grazing permittees should work together to develop flexible plans that can be rapidly modified to account for unpredictable changes in conditions or monitoring results. Cross jurisdictional alignment for permittees that move between BLM and Forest Service land is something WLA has also advocated for. WLA believes you can “Promote innovative grazing management tools and outcome-based practices to sustain ecological health” on private lands, by using existing and creating new incentive based agricultural conservation programs.

B. PREDATOR MANAGEMENT AND ESA REFORM

USDA and DOI Action: DOI will collaborate with USDA to develop new standards of evidence for compensating ranchers for predations by wolves, bears, coyotes, and other species that prey on livestock in Arizona, New Mexico, and other states. ii. Implementation: USDA APHIS and DOI FWS will collaborate and work with relevant state agencies to develop new standards of evidence for predations of livestock.

Depredation compensation is essential to maintaining the economic viability of livestock operations impacted by chronic predator conflicts. WLA is excited to hear that “DOI will collaborate with USDA to develop new standards of evidence for compensating ranchers for predations”. Clear and well-informed standards of evidence are essential to support trustworthy investigations. When developing standards, WLA recommends that USDA and DOI meaningfully consult and incorporate feedback from stakeholders including livestock producers, producer groups and state wildlife management agencies to ensure depredation standards reflect on-the ground experience from multiple perspectives. Specifically, while pre-mortem hemorrhaging is the “gold standard” for depredation confirmations, we recommend that this should not be the sole requirement for confirmation. A preponderance of evidence including tracks, bite scrapes, locations of bite marks, and other information should be sufficient to confirm a depredation. A “probable” determination should be based on less evidence.

WLA believes that ESA reform is warranted, but supports the intent of the ESA to protect and recover imperiled species and the ecosystems on which they depend. The law and its implementation can inadvertently discourage and penalize landowners for supporting conservation and recovery efforts. In a classic case of “No deed goes unpunished,” those with the best habitat and last remaining species should be rewarded and supported but instead are often exposed to the greatest regulatory risk and cost. Well-managed livestock grazing is not only compatible with wildlife conservation, it is one of the few economic means of maintaining the West’s open lands and habitats. WLA supports reform efforts that reward rather than penalize producers for voluntary habitat conservation on both public and private lands. This includes better access to ESA regulatory assurances and USDA agricultural conservation programs.

C. ENHANCED DISASTER AND PREDATION SUPPORT

USDA Action: FSA is enacting OBBBA provisions that better protect ranchers from the devastating economic impacts of natural disasters and protected species predation.

WLA strongly supports enhanced disaster prevention and relief for producers and communities impacted by natural disasters. Increasing frequency and severity of wildfires, floods and severe drought are jeopardizing working lands across the West even as insurance companies are withdrawing coverage from communities most at risk. In most cases, disaster prevention is less costly than disaster recovery and investments are needed to restore watershed and forest health across the West's intermingled public and private lands. Investments in both disaster prevention and relief should include strengthening local knowledge, capacity and resources. Federal disaster recovery aid also needs to be expedited. For example, producers need to be able to quickly contain livestock when fencing is damaged by flood or fire.

In rangelands occupied by large carnivores, including gray wolves and grizzly bears, persistent conflicts can negatively impact range utilization and threaten rancher's bottom line. Range riding applies human presence to reduce costly conflicts between livestock and large carnivores on open rangelands. Riders provide adaptability to help producers make decisions in direct response to the behaviors of predators and livestock regarding if, when, and how to manage livestock, deter predators, and monitor the activity of both. A range rider may also monitor site conditions like forage availability and impacts from conflicts to work with the producer and collectively make decisions on herd movements and management in response to conflicts. Two NRCS RCPP projects are currently delivering support (\$22 million over four years) for range riding across Arizona, Colorado, Montana, New Mexico, and Oregon. Demand for this tool is high: in Montana and Colorado alone, 175 producers requested over \$28 million—more than triple the \$8.5 million available in those states. Furthering good grazing practices, adaptability and reduced wildlife-livestock conflicts, USDA NRCS should establish west-wide availability of the range riding program through the Environmental Quality Incentives Program.

WLA would like to see the Livestock Indemnity Program (LIP) increased to 100% reimbursement for predation losses to protected endangered species. Endangered species are of national importance, and consequently the federal government should lead on compensation for predation by ESA protected large carnivores. USDA should look to states like Wyoming for a model on how to provide fair and adequate compensation to livestock producers.

EXPANDING PROCESSING, CONSUMER TRANSPARENCY, AND MARKETS FOR RANCHERS:

These investments will put American beef producers and processors first, expand marketing choices for ranchers, and ensure clear, truthful labeling for consumers."

WLA supports the concepts behind these initiatives to *PROTECT AND PROMOTE AMERICAN BEEF THROUGH TRANSPARENT LABELING; PROMOTE FAIR AND TRANSPARENT BEEF MARKETS; ENHANCE LOCAL PROCESSING, INCREASING MARKETING OPTIONS FOR RANCHERS AND CONSUMERS;* and other efforts to expand market choices for ranchers and provide more opportunities for consumers to buy locally raised beef. WLA is skeptical that tariffs and flooding the market with Brazilian and Argentinian beef are good for American agriculture, working lands, and the conservation benefits produced on these lands.

WLA firmly believes that USDA agricultural conservation programs offer incentive-based conservation that is good for ranchers, good for the resource base and good for wildlife. The money delivered to ranchers through these conservation programs keeps families ranching, which helps stop the sale of ranchland and helps stabilize the US beef herd. Grassland CRP is a great example of a conservation program that pays ranchers to ranch, while providing ecological benefit. The ACEP has been used by many ranchers to help them transition their ranches to the next generation or a new generation, while protecting important habitat for the Nation's wildlife. WLA believes USDA should lean in on what has been working for producers and reshape what has not been working.

Ranchers and landowners in the West are central to the long-term strength of the American beef industry. Thoughtful improvements to grazing management, disaster assistance, predator compensation, and better access to ESA regulatory assurances and incentive-based conservation programs will help keep operations viable. WLA stands ready to work with USDA and DOI to ensure these policies achieve their intended outcomes on the ground.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lesli Allison', with a stylized, cursive script.

Lesli Allison
Chief Executive Officer
Western Landowners Alliance