



Ms. Alexa Sandoval  
Chair, WAFWA LPCIC  
Director, New Mexico Department of Game & Fish  
One Wildlife Way  
Santa Fe, NM 87507

September 12, 2016

Re: Opposition of WAFWA acquisition of private lands

Madam Chair,

The National Cattlemen's Beef Association (NCBA) is the beef industry's largest and oldest national marketing and trade association, representing American cattlemen and women who provide much of the nation's supply of food and own or manage a large portion of America's private property.

The Colorado Cattlemen's Association (CCA) exclusively represents the state's more than 12,000 beef producers, CCA serves members by speaking out on behalf of Colorado's beef producers to ensure their business and property interests are honored and respected.

The Kansas Livestock Association (KLA), established in 1894, represents nearly 5,300 members involved in many aspects of the livestock industry, including private landowners involved in beef and dairy production and diversified farming operations.

The New Mexico Cattle Growers' Association (NMCGA) was founded in 1914. It is a membership-based trade organization that represents members from all 33 of New Mexico's counties as well as 19 other states. The purposes for which NMCGA was organized are to advance and protect the cattle industry; work toward solutions to industry problems; promote the well-being of ranching and ranching families; provide an official and united voice on issues important to ranching and feeding the nation; and, to create and maintain an economic climate that will provide its' members the opportunity to obtain optimum returns on their investments within the free enterprise system. NMCGA participates in regulatory processes and litigation on behalf of all its members.

The Texas and Southwestern Cattle Raisers Association (TSCRA) is a 139-year-old trade association and is the largest and oldest livestock organization based in Texas. TSCRA has more than 17,000 beef cattle operations, ranching families and businesses as members. These members represent approximately 50,000 individuals directly involved in ranching and beef production who manage 4 million head of cattle on 76 million acres of range and pasture land primarily in Texas and Oklahoma, but throughout the Southwest. A significant portion of our members own and operate private ranching enterprises in the range of the lesser prairie chicken.

The Oklahoma Cattlemen's Association (OCA) is the trusted voice of the Oklahoma beef cattle industry. OCA Leadership serves, strengthens and advocates for the Oklahoma beef cattle farmers and ranchers.

We write today in order to express our concern regarding the private ranch acquisitions WAFWA has made through the Lesser Prairie Chicken Range-Wide Plan (RWP). We understand that these acquisitions, one in Texas last year and another in Kansas more recently, were completed in order to satisfy the 25% permanent conservation requirement of the RWP. Further, we understand that it is WAFWA's intent to continue grazing as the primary form of conservation on these ranches – a decision we applaud.

Beyond that wise land use decision, however, the livestock industry in the five-state RWP area would like to note our serious objection to WAFWA's choice of private land acquisition as the first option to satisfy the 25% permanent conservation requirement. The RWP outlines multiple options to meet that obligation including permanent easements secured through land trusts throughout the five state range.

Our organizations exist to protect and advance the cattle industry and private property rights in our respective states and across the country. As such, we feel very strongly that private lands should stay in private hands, and that conservation efforts on those lands should be both voluntary and in keeping with the ongoing operation of a profitable working ranch. Consequently, while WAFWA may not be a formal Federal or State Entity, it is run and controlled by multiple state wildlife agencies across the western U.S. and Canada. The Range-Wide Plan was endorsed by the U.S. Fish & Wildlife Service so in our view, WAFWA is effectively operating this program through delegated Federal authority.

The livestock industry is opposed to the past and any future acquisitions of private property in our states by WAFWA before all non-acquisition options have been exhausted. The livestock industry remains committed to the successful conservation of the Lesser Prairie Chicken and understands the valuable role we play in aiding the bird's recovery. We also understand that only through direct engagement with our members will the Range-wide plan be successful. For these reasons, we would appreciate the opportunity for representatives of our state livestock associations to meet with you and your colleagues in order to cooperatively and collaboratively develop the most efficient method available to satisfy the 25% conservation requirement in a way that best protects the bird and private property rights alike.

We look forward to your response and commitment that this behavior will cease immediately and we stand ready to assist WAFWA in meeting the requirements of the RWP in a way that benefits everyone involved.

Regards,



Tracy Brunner  
President, NCBA



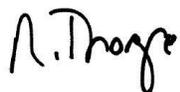
Tim Lehmann  
President, CCA



Matt Teagarden  
CEO, KLA



Pat Boone  
President, NMCGA



Richard Thorpe  
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Charlie Swanson  
President, OCA