

September 12, 2025

The Hon. John Thune
Majority Leader
U.S. Senate
Washington, DC 20515

The Hon. Charles Schumer
Democratic Leader
U.S. Senate
Washington, DC 20515

Dear Leader Thune, Leader Schumer, and Senators:

We are former Senior Executive officials with the Department of the Interior, each with decades of experience in both land use planning and decision making for land use authorizations. We have each spent years on the Executive Leadership Team for the Bureau of Land Management (BLM) and served under multiple administrations. In short, we are well-versed in the planning and decision-making processes for federal lands and resources with well over 120 years of collective experience.

We are writing because the U.S. House of Representatives has recently passed three resolutions under the Congressional Review Act (CRA) to disapprove BLM land use plans for the Central Yukon, North Dakota, and Miles City Field Offices. In our opinion, should these joint resolutions pass into law, this unprecedented step will have disastrous consequences not only for the affected planning areas, but for federal lands across the country. It could inhibit federal agencies – particularly, the Bureau of Land Management (BLM) and U.S. Forest Service (Forest Service) – from fulfilling their most basic functions, including administering and approving permits, leases, and other approvals for energy development and transmission, recreation, grazing, wildlife conservation, and logging.

Federal agencies manage close to a third of our nation's land mass – roughly 640 million acres. BLM and the Forest Service oversee many of these lands and, as required by federal law, prepare and periodically revise management plans that designate lands for various commercial and conservation uses. These plans reflect the most current information when the plans are written and integrate years of interaction with states, counties, Tribes, local communities, stakeholders, and the public. Plans that emerge from these multi-year, legally required processes, along with the factual record that is created, are the foundation of public lands management.

Using the CRA to disapprove a federal land use plan would irreparably impair the reliability of authorizations based on a land use plan, undermine the basis for authorizations, and result in significant legal uncertainty, risk, and additional costs for public lands users, including for energy developers, ranchers, and recreation permittees who operate under land use plan authorizations. More litigation over management plans and authorizations throughout the country would be likely, diverting federal agencies' capacity, and delaying or stopping approval or implementation of new land use authorizations.

More broadly, it could thrust Congress into a role that, with all due respect, it is not equipped to fill: the day-to-day management of vast tracts of federal lands, many of which are located thousands of miles from Washington, D.C.

To the best of our knowledge, the CRA has never been applied to cancel a BLM or USFS land use plan. The bureaus utilize a well-established and defensible process steeped in law and precedent to update or modify land use plans. We encourage the Senate to reject these resolutions to maintain this existing process and seriously consider the disruption and unintended consequences that we believe will result from the application of the CRA to federal land planning decisions.

Thank you for taking our concerns into account.

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Retired BLM Director

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