



7/13/2026

Docket Number: OMB-2026-0034

Re: SRM Comment on Proposed OMB Federal Financial Assistance

The Society for Range Management (SRM) appreciates the opportunity to submit comments on the Office of Management and Budget's (OMB) proposed rule, "Regulation for Federal Financial Assistance," published in the Federal Register on May 29, 2026.

As the leading professional scientific society and conservation organization dedicated to the study, management, and sustainable use of rangelands, SRM represents a diverse coalition of rangeland scientists, land managers, educators, students, and agricultural producers. A significant portion of our membership includes federal employees from agencies such as the Bureau of Land Management (BLM), the USDA Forest Service (USFS), and the Natural Resources Conservation Service (NRCS), alongside academic researchers working under federal cooperative agreements and grants.

While SRM supports the overarching goals of modernizing data delivery and reducing administrative redundancies, we have deep concerns regarding several provisions that would inadvertently disrupt rangeland conservation, create funding instability, and isolate university efforts and research that may undermine active on-the-ground resource stewardship.

1. Restrictions on Conference Costs, Subscriptions, and Professional Activity (§ 200.432 & § 200.454)

The proposed revisions making conference attendance allowable only when explicitly approved at the time of the award, and presumptively disallowing professional periodical subscriptions, will severely isolate conservation professionals.

Rangeland management is an adaptive science. For instance, an emergency breakthrough in a specific wildfire mitigation strategy or an unpredicted invasive species outbreak requires rapid information sharing. Requiring researchers to anticipate and hard-code specific conference attendance years in advance adds immense administrative friction.

SRM recommends OMB should maintain the flexibility of the current framework, allowing routine technical training, workshop attendance, and professional society participation to remain standard allowable costs without requiring case-by-case agency pre-approval.

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2. Preservation of Scientific Dissemination and Journal Accessibility (§ 200.461)

The proposed rule moves to make journal publication costs—including article processing charges—unallowable by default absent statutory mandates or case-by-case approvals. SRM's peer-reviewed publication, *Rangeland Ecology & Management*, serves as the bedrock guiding academia, students, and practitioners in their field work. Taxpayer-funded research on soil health, grazing systems, and carbon sequestration loses its public return on investment if the findings cannot be published and accessible.

SRM requests that OMB excludes scientific, peer-reviewed journal publication fees from this restriction to ensure that federally funded conservation data continues to reach the land managers who require it.

3. Discrepancy, Uncertainty, and Implementation Timeline

The sweeping scale of converting portions of the Uniform Guidance into directly binding regulation across dozens of distinct federal grant-making offices creates severe interpretation risk. Individual program officers at different regional offices are highly likely to interpret these rigid mandates inconsistently. This uncertainty creates a chilling effect, making small entities and non-profit conservation partners hesitant to apply for critical landscape-scale projects.

Recommendation: If finalized, OMB must provide a robust, multi-agency training period and a phased implementation timeline, ensuring that "binding regulation" does not eliminate the collaborative spirit inherent to successful public-private conservation agreements.

4. Protection Against Funding Instability and Volatility (§ 200.205 & § 200.340)

SRM is deeply concerned by provisions expanding senior political appointee review over discretionary merit awards (§ 200.205) and widening an agency's authority to terminate active awards mid-project based on shifting "national interests" or "agency priorities" (§ 200.340).

Natural resource research—such as tracking sage-grouse habitat resilience, regional rangeland carbon dynamics, or multi-year invasive weed treatments—requires longitudinal stability. If active, long-term monitoring grants become political targets or are terminated mid-award due to a change in administration, years of taxpayer-funded data and baseline progress will be completely wasted. It is imperative that we maintain the historical integrity of the career-

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scientist peer-review process. Mid-project award terminations should remain strictly tied to documented non-compliance or fraud, shielding critical conservation science from political cycles.

Sustaining healthy, working rangelands requires a seamless connection between federal land management agencies, non-profit technical partners, and the academic community. By restricting professional collaboration and introducing funding instability, the proposed rule threatens the continuity of vital conservation initiatives. We urge OMB to reconsider these restrictive cost and administrative provisions to protect the integrity of federal financial assistance programs.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Walker". The signature is fluid and cursive, with the first name "John" and last name "Walker" clearly distinguishable.

John Walker, Ph.D.
President, Society for Range Management

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