

July 13, 2026

Steve Pearce, BLM Director
Bureau of Land Management
1849 C St. NW, Room 5686
Washington, DC 20240

Submitted via <https://www.regulations.gov/document/BLM-2026-0001-0001>

Re: Revision of Regulations for Grazing Administration, Exclusive of Alaska, BLM-2026-0001

Dear Director Pearce,

Thank you for the opportunity to comment on the proposed revisions to the Bureau of Land Management's (BLM) livestock grazing regulations.¹ The undersigned organizations have thousands of staff, volunteers, and members who live, work, and recreate in the western United States and have a strong interest in how BLM administers the nation's public lands and monitors land health. The proposed revisions to BLM's livestock grazing regulations warrant careful consideration because they affect management decisions across our public lands with important implications for land health, wildlife conservation, and the public's use and enjoyment of these shared resources.

As BLM considers revisions to these regulations, it must ensure that the final framework upholds the agency's statutory obligations, including under the Federal Land Policy and Management Act (FLPMA).² This includes providing for robust public involvement and managing public lands for multiple use and sustained yield.³ The term "multiple use and sustained yield," as defined by Congress, makes clear that public lands must be managed to meet present and future needs through a balanced combination of uses — including not only grazing, timber and minerals, but also watersheds, wildlife and fish, scenic, scientific, and historic values.⁴ This requires maintaining healthy, resilient ecosystems that can support a wide range of values and uses.⁵

¹ 91 Fed. Reg. 26,852 (Tuesday, May 12, 2026).

² See, e.g., *The Federal Land Policy and Management Act*, 43 U.S.C. §1701 et. seq.; *The Public Rangelands Improvement Act of 1978 (PRIA)*, 43 U.S.C. § 1901 et seq. (Congress declared that "vast segments of the public rangelands are producing less than their potential for livestock, wildlife habitat, recreation, forage, and water and soil conservation, and for that reason are in an unsatisfactory condition," PRIA therefore established and reaffirmed the national policy that the rangelands be managed, maintained, and improved to "become as productive as feasible for *all* rangeland values. . ." (emphasis added)).

³ 43 U.S.C. § 1712; 43 U.S.C. § 1702.

⁴ 43 U.S.C. § 1702(c).

⁵ *Id.*; 43 U.S.C. § 1732(a).

Based on BLM's own data, BLM is currently failing to meet this statutory obligation. Existing BLM information documents widespread failures to meet land health standards across BLM-managed grazing lands, along with significant gaps in lands assessed.⁶ Approximately 75 percent of livestock grazing allotments are either failing to meet land health standards or have not been assessed since BLM adopted land health standards and evaluations in 1995.⁷ Of the allotments that have been assessed, approximately 50 percent, representing nearly 57 million acres, fail to meet minimum land health standards, while an additional 24 percent, representing 36.5 million acres, have never been assessed.⁸

The final regulations must provide effective mechanisms for addressing existing land health failures and preventing future ones. Below, we offer two broad recommendations for strengthening the proposed rule that will help BLM better achieve its obligations.

Land Health and Adaptive Management Framework

Integral to managing for multiple use and sustained yield is a strong framework for monitoring land and resource conditions and adaptive management. Such a framework is necessary for informing public land decision-making and program administration. A successful framework must establish regular monitoring of land conditions using science-based indicators and standards at scales appropriate to inform decision-making, and rapid implementation of adaptive management actions where land health is found to be compromised. Also integral to success is inclusion of indigenous voices and the public (e.g., non-governmental organizations, scientists, community members, recreationists) who can bring considerable expertise to the process, and transparency.

The proposed rule maintains the existing land health and adaptive management construct but moves it from the grazing regulations to a new standalone regulatory section under proposed Part 1700 and applies it to all lands and program areas. While we support this broader application, we are concerned that the framework in the proposed rule fails to meet the above criteria. Specifically, it does not require BLM to conduct land health evaluations on a regular schedule, among other things, and does not provide for public notification or involvement in the development of standards and indicators, landscape-scale condition assessments, land health evaluations and causal factor determinations.

⁶ *Evaluating Trends in Rangeland Health on Bureau of Land Management Lands*, Public Employees for Environmental Responsibility (PEER), (May 2024), https://peer.org/wp-content/uploads/2024/05/Evaluating-Trends-Rangeland-Health-BLM-Lands-5_5_24-FINAL.pdf.

⁷ *Id.*

⁸ *Id.*

One of the main reasons why the current framework is not functioning to its potential is the absence of required timelines for evaluations.⁹

We therefore recommend that BLM ensure that the final rule include these critically-important provisions.

Public Involvement

Meaningful public engagement is essential to accountable decision-making and helps ensure that the diverse interests and values associated with public lands are adequately considered and that the vast expertise of the public is incorporated into decision-making.

As currently proposed, the regulations would significantly narrow opportunities for public involvement in livestock grazing administration decisions. Collectively, the changes to how the “interested public” may participate and receive notice of decisions would substantially reduce transparency and limit engagement opportunities for scientists, conservation organizations, local communities, Tribes, and other stakeholders with an interest in how our public lands are managed.

These changes are particularly concerning when considered alongside recent revisions to the Department of the Interior’s National Environmental Policy Act implementing regulations.¹⁰ Together, these regulatory changes would make it significantly more difficult for the public to remain informed about or participate in grazing management decisions affecting public lands. Such an approach undermines transparency and is inconsistent with BLM’s statutory obligations.

We recommend that BLM preserve and strengthen existing opportunities for public notice, participation, and involvement throughout grazing administration and land health evaluation processes.

Thank you for considering our comments.

Sincerely,

Maddy Munson
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Defenders of Wildlife

⁹ See, e.g., BLM’s Conservation and Landscape Health Rule, previously found at 43 C.F.R. Parts 1600 and 6100, contemplated that BLM would complete land health evaluations at least every ten years and BLM would determine the priority landscape and appropriate scale for completing land health evaluations based on resource concerns. 43 C.F.R. § 6103.1.2 (a), (b) (repealed 2026).

¹⁰ 91 Fed. Reg. 8738 (Feb. 24, 2026).

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