



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

July 13th, 2026

Brenda Younkin
DOI Deputy Assistant Secretary, Lands and Minerals
Washington Office
1849 C St, NW Room 5646
Washington, DC 20240

Re: Comment on Proposed BLM Grazing Rule (RIN 1004-AE82; 2026-09387)

Dear Ms. Younkin,

The Western Landowners Alliance (WLA) is a landowner-led, nonpartisan organization whose members steward millions of acres of private and leased public lands across the West. We work to advance policies and practices that sustain working lands, connected landscapes, and native species. Public lands managed by the BLM are integral to many western ranching operations, the enjoyment of Americans, and vibrant rural communities. Our members share the BLM's commitment to maintaining and improving land health while supporting productive and resilient working lands.

We appreciate the considerable time and effort the BLM has invested in revising the grazing regulations. We also appreciate the BLM's willingness to engage with stakeholders throughout the process, including participating in our public webinar. While we offer several recommendations to strengthen the proposed rule below, the rule includes several key changes that we believe better support both livestock production and land health outcomes.

WLA applauds expanding the application of the Fundamentals of Land Health and Standards to all uses of BLM lands. This fundamental change establishes land health as the foundation not just for livestock production but for management decisions across the entire agency. It is equally important that the BLM have the ability to adjust the management of other programs and uses to address non-grazing factors that affect land health. The care of public lands and natural resources must be a shared responsibility. To do this well, changes to management must be accompanied by robust monitoring data.

Rangeland scientists, livestock producers and many conservation organizations have embraced the importance of monitoring and adaptive management to land health. The condition assessment and land health evaluation framework proposed by the BLM is an important step toward ensuring that management actions are adjusted within the appropriate program when that program is identified as impacting land health. Managing land and livestock within a dynamic, living system is a complex and challenging endeavor, and we appreciate the added flexibility in temporary changes in grazing use, including nonuse, to account for real-world conditions and to better meet natural resource objectives.

At the same time, we also believe this rule will have greater durability and better serve the goals of the Taylor Grazing Act (TGA) and the Federal Land Policy and Management Act (FLPMA) with stronger emphasis on the long-term production capability of the land and the principle of sustained yield. For example, a “no net loss” policy of allowable AUMs ensures the long-term availability of the resource base for livestock production. However, managing every allotment to maximize AUMs may increase livestock numbers at the expense of future productivity and resilience of the resource. As discussed above, producers need the flexibility to adjust to real world conditions and to meet land health standards. However, this also requires current, adequate, and defensible monitoring data.

We offer the following comments and recommendations for your consideration on the following sections of the rule:

I. Part 4 Subpart C: §§ 4.170 – 4.175-Specific Rules Applicable to Grazing Proceedings (Inside and Outside of Grazing Districts)

a. Recommendation: The DOI should provide permittees notice of an appeal within 30 days of it being filed in the Departmental Cases Hearings Division.

Permittees need to be aware of appeals for decisions that are occurring on their allotments. Ranchers lack adequate notice of appeals regarding their federal permit, jeopardizing their operations and long-term investments. There are instances where permittees can intervene in the case and provide valuable information, like monitoring data, that support the BLM’s decision.

b. Recommendation: Expedite Grazing Appeals

WLA is concerned that appeals simply last for too long, delaying the implementation of updated grazing decisions for months or even years. During that time, permittees, the BLM, and public land resources are left in a state of uncertainty, while outdated authorizations may continue to govern management. WLA recommends that the BLM establish expedited timelines for resolving appeals involving grazing authorizations and prioritize them for timely resolution.

II. §§ 1700.1 & 1700.2 Fundamentals of Land Health and Standards

Recommendation: Clarify how BLM lands will be managed and monitored to meet air and water quality standards in compliance with state and EPA regulations.

WLA recognizes the need to reduce unnecessary and duplicative regulations. At the same time, we believe that the FLPMA makes clear that the BLM has an independent responsibility to manage public lands for these values as part of its multiple-use and sustained-yield mandate. This can be accomplished by ensuring public lands management complies with state and federal air and water quality standards. While the Environmental Protection Agency and state agencies play essential regulatory roles, their authorities do not replace the BLM's obligation to consider and manage water quality.

Moreover, many permittees across the West have emphasized the importance of legally defensible monitoring data to support adaptive management decisions and withstand legal challenges. If water quality is no longer explicitly addressed within the Fundamentals of Land Health, it raises questions about whether water-related monitoring will continue to occur.

This concern is particularly important because many existing BLM land health standards—including maintaining soil conditions that support appropriate infiltration and permeability, restoring riparian-wetland function, improving groundwater recharge, capturing sediment, and maintaining streambank stability—are inherently tied to water resources. Likewise, other BLM programs, including minerals, energy, transportation, and land use authorizations, can have direct or indirect effects on air quality. Removing explicit references to air and water quality risks creating the perception that these resources are outside the BLM's land health responsibilities, despite their clear connection to healthy, functioning landscapes and the agency's statutory obligations under FLPMA.

We encourage the BLM to clarify that this proposed revision is not intended to diminish the agency's responsibility to manage these values as part of achieving and maintaining land health across all BLM programs.

III. § 1700.3 Rapid landscape-scale condition assessment

a. Recommendation: The new rule should emphasize that landscape assessments include periodic site-specific trend data.

WLA appreciates the BLM defining a framework for assessing BLM lands as monitoring is core to maintaining public trust responsibilities and achieving long-term ecological health and productivity of public lands. Collecting the necessary data through landscape-scale assessments using advanced technologies, *together with* site-specific trend data, is key to achieving adaptive

management and long-term ecological health. WLA endorses the concept of providing “flexibility with accountability” to respond appropriately to those documented changes, but the BLM cannot provide flexibility or accountability without having clear, defensible metrics that allow for direct comparison over time and that directly inform progress toward rangeland health goals for individual allotments.

Landscape-scale condition assessments can be useful in identifying driving factors and trends across regions, but those factors will not affect all allotments or portions of allotments in the same way, due to variability on the landscape, historic use, recent management, edaphic factors, weather patterns, etc. New tools and technologies, such as remote sensing and other advanced technologies, should be incorporated in the framework, but it should not replace the timely, periodic rangeland health monitoring by range staff for the purposes of tracking conditions and trends of individual allotments or key portions of allotments. We fear that broad-brush management prescriptions, such as AUM reductions or increases for entire regions, based on landscape-scale assessments, have a high probability of being inaccurate if not grounded in field-based data and could compromise land health. With a landscape level approach, a permittee could be punished, or their permit changed, due to conditions on a neighboring permit. Decisions at the permit level must be based on current, site-specific trend monitoring.

b. Recommendation: Enable and support the use of third-party monitoring.

The BLM routinely lacks the resources and staff capacity necessary to conduct the monitoring needed to ensure that the Fundamentals of Land Health and Standards are being met. In the past, outdated and incomplete assessments have remained on record as failing to meet land health standards, regardless of actual on-the-ground conditions. These outdated records have contributed to increased litigation by groups relying on stale data to challenge the BLM's decisions.

Now that the Fundamentals of Land Health and Standards apply across all BLM programs, it is even more important that monitoring be completed in a timely and consistent manner. To accomplish this, WLA recommends that the use of third-party cooperative monitoring be explicitly defined and incorporated into the rule¹.

¹ WLA recognizes that the BLM already has the authority to engage in cooperative monitoring efforts and work with external partners to collect and evaluate resource data. However, explicitly defining and incorporating third-party cooperative monitoring into the rule would provide better consistency across all BLM programs and field offices.

IV. § 1700.4 Land health evaluation and causal factor determination

- a. Recommendation: Incorporate site-specific trend data into part (2) as to read: “Rely on information from rapid landscape-scale condition assessment and site-specific trend data (1700.3).”**

WLA appreciates the establishment of clear guidelines, including specified timeframes, for evaluating land health and determining when management changes are needed. We also recognize that identifying the causes of declining land health is complex and difficult with limited lines of evidence.

We reiterate that landscape-scale condition assessments alone should not be the primary basis for determining whether an allotment is meeting land health standards or for identifying the causal factors contributing to those conditions. Incorporating site-specific trend monitoring data into the evaluation process will improve the accuracy of causal factor determinations and support more informed management changes.

- b. Recommendation: The BLM should monitor annually when a factor has been identified as the cause for an allotment or area not meeting land health standards.**

If a particular factor is preventing an allotment or area from meeting land health standards, the monitoring schedule (part 1 of this section) rule should explicitly require annual monitoring to evaluate whether any management changes are producing the intended outcomes.

V. § 4100.0-5 Definitions

- a. Recommendation: Define adaptive management in the rule.**

Throughout the preamble and the justification for the proposed rule, the BLM emphasizes the importance of adjusting management actions across programs in response to land health evaluations and condition assessments. However, the proposed rule does not define "adaptive management," despite relying on the concept as a central component of achieving the Fundamentals of Land Health and Standards.

While adaptive management is a familiar concept within rangeland management, establishing a regulatory definition would provide consistency and clarity across all BLM programs. WLA recommends defining adaptive management and incorporating the term more broadly throughout the rule to ensure a standardized approach to achieving and maintaining the Fundamentals of Land Health and Standards. Adaptive management is the process of adjusting management actions based on monitoring results, changing environmental conditions, and other relevant factors in order to achieve land health standards. The Department of the Interior’s *Adaptive*

Management Technical Guide defines adaptive management as a decision process that promotes flexible decision-making that can be adjusted as uncertainties are reduced through monitoring and improved understanding of management outcomes².

b. Recommendation: The BLM should consider including a broader definition for livestock to reflect the diversity of western livestock operations.

The new “production-oriented” livestock definition is a key provision in the new rule which merits further consideration and clarification. The Taylor Grazing Act was specifically designed for the purpose of managing livestock on public lands. The original act reads, “Sec. 3. That the Secretary of the Interior is hereby authorized to issue or cause to be issued permits to graze livestock on such grazing districts to such bona fide settlers, residents, and other stock owners...” It is therefore appropriate under statute that grazing permits apply specifically to livestock grazing. However, livestock serves a wide range of purposes, including food and fiber production, fuel reduction, invasive plant control, soil and rangeland health improvements, cultural uses, and outfitting, among others. This range of uses is valuable to the BLM, to livestock producers, to local communities and to the public, and should not be foreclosed by an overly narrow definition of qualifying livestock. We ask that the BLM adopt terminology that more accurately reflects the diversity of western livestock operations and desired outcomes on public lands.

c. § 4120.2 Allotment Management Plans

Recommendation: Clarify that range improvements identified in an allotment management plan should be implemented as part of the approved plan.

To expedite actions that benefit the resource, range improvements that are specifically identified in, and necessary to implement, an approved allotment management plan should be considered implementation of that approved plan rather than separate discretionary management actions.

VI. Conclusion

WLA appreciates the opportunity to provide comments on this proposed rule and recognizes the significant effort the BLM has invested in modernizing its grazing regulations. We support the agency's goal of improving land health across all BLM programs while providing permittees with greater management flexibility and accountability. Our recommendations are intended to strengthen the rule by promoting the long-term health and productivity of public lands. We encourage the BLM to continue refining the rule to emphasize sustained yield, adaptive

² Williams, B. K., Szaro, R. C., & Shapiro, C. D. (2009). *Adaptive management: The U.S. Department of the Interior technical guide*. U.S. Department of the Interior, Adaptive Management Working Group.

management, and meaningful collaboration with permittees and partner organizations. By doing so, the final rule will ensure that public lands remain healthy, productive, and resilient for generations to come.

Thank you for your consideration of these comments and for your continued engagement with landowners, livestock producers, and partners who steward America's public rangelands.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lesli Allison', with a stylized flourish at the end.

Lesli Allison

WLA CEO