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July 13, 2026

Steve Pearce
U.S. Department of the Interior
Director (630)
Bureau of Land Management
1849 C St. NW, Room 5646
Washington, DC 20240

Re: BLM2026-0001 - Revision of Regulations for Grazing Administration, Exclusive of Alaska

Dear Director Pearce:

The California Farm Bureau appreciates the opportunity to comment on the Bureau of Land Management's (BLM) proposal to update regulations for grazing administration and land health standards.

California Farm Bureau is California's largest farm organization, comprised of 54 county Farm Bureaus currently representing approximately 23,000 agricultural, associate, and collegiate members in 57 counties. As an organization, we strive to improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable food and fiber supply through responsible stewardship of California's resources. California Farm Bureau's members include ranchers who are BLM grazing permittees/lessees that will be directly impacted by the proposed revisions.

Livestock grazing plays a key role in many rural communities in California. Per BLM estimates, there are 553 grazing permittees/lessees in the State of California totaling 6.1 million acres. We are appreciative of the collaboration between Department of Interior and the U.S. Department of Agriculture on the Grazing Action Plan and Memorandum of Understanding "Advancing Grazing on Forest Service and BLM lands." This proposal will update decades-old regulations that will support the domestic cattle herd, meet the needs of modern grazing practices, and recognize the value of land health evaluations across multiple use types. For these reasons, California Farm Bureau supports the proposal with minor modifications. We offer the following specific comments for BLM's consideration:

Subpart 4100 – Grazing Administration – Exclusive of Alaska; General

Section 4100.0–5 Definitions

We support the modernization of many existing definitions and introducing new definitions to improve clarity and consistency throughout the regulations. We offer the following specific comments relative to definitions:

Active Use – California Farm Bureau supports removal of “conservation use” as we believe this will help to clarify what specifically BLM permits are able to be used for. This clarification also follows the intention of the Taylor Grazing Act which preserves these permits for grazing livestock.

Animal Unit Month (AUM) – Permittees often use a variety of tools to protect animals on the range including guardian dogs and donkeys. In California, this is increasingly the case where many of our livestock producers must grapple with the gray wolf attacking their herds. We urge BLM to consider adding livestock guardian animals in this definition or including them in another appropriate place within the regulation.

Beginning rancher (mentee) - We appreciate the attention the proposal gives to beginning farmers and ranchers. With the increased aging trend of farmers and ranchers, succession planning within families has never been more critical. The proposal includes updates that will provide great flexibility in how BLM works with existing permittees to meet estate transfer requirements. This will help greatly with generational transitions.

Grazing permit – The high quantity of vacant allotments is a commonly voiced concern in California. For this reason, we urge BLM to consider adding language to this definition that is inclusive of total AUMs, both active and suspended. We believe this will help prevent potential recordkeeping failures and keep a more accurate account of available grazing permits.

Interested Public – The added language in this definition, which requires a party to have a specific interest in the allotment, will help limit unnecessary participation by individuals or organizations not directly affected. This change will also help ensure that participation is focused on those with a direct interest in the outcome. It will also promote more timely and efficient decision making. The interested public would still retain the right to engage in a National Environmental Policy Act public process.

Permitted Use – Similar to our comments on the “grazing permit” definition above, we urge BLM to consider the inclusion of language in this definition that considers total AUMs, both active and suspended.

Prescribed Grazing – California Farm Bureau supports the addition of this definition as it necessarily broadens the term “targeted grazing” to allow for more opportunities to use livestock for objectives other than fire mitigation. Adding in categories such as ecological, economic, and management objectives provides flexibility to implement livestock as a land management tool.

Production-oriented livestock – California Farm Bureau supports the addition of this definition given the Taylor Grazing Act’s intent to focus on public land grazing of livestock for commodity-producing purposes.

Supplemental feed – We urge BLM to add “nutritional supplement” within the definition to reflect current approaches to animal feeding.

Targeted grazing – California Farm Bureau supports the addition of this definition as it will further facilitate grazing as a land management tool that reduces fuel loads that contribute to catastrophic wildfire and reduces invasives.

Subpart 4110 – Qualifications and Preference

Section 4110.2-3 - Transfer of grazing preference

We support the updates to this section as they will provide clarity and efficiency to the transfer process. Specifically, we support the requirement that transfers must include written consent of the owners of the base property as well as the flexibility provided to the authorizing officer to change the name on the authorization, leaving it in place for the duration of the permit.

Section 4110.2-4 Allotments

California Farm Bureau generally agrees that limiting mandatory consultation, cooperation and coordination to those most directly affected will encourage efficiency and timely decision making. However, we also urge BLM to clarify that any impacted holder or applicant for a grazing authorization, as well as adjacent landowners, adjacent grazing authorization holders, and adjacent grazing authorization applicants be provided consultation, cooperation and coordination opportunity. Ranchers seeking grazing authorization and applicants are deeply knowledgeable about the condition and availability of forage, the water required to maintain livestock, and proper use conditions to sustain resources. Additionally, while we understand it is BLM’s intention to include affected county governments in its planning provisions, we strongly encourage BLM to make this clear in its final rule. This will help ensure the final rule is meaningful, productive, and effective for local, rural economies.

Section 4110.3-1 Increasing active use

As mentioned above, a high quantity of vacant allotments is a commonly voiced concern in California. For this reason, we support an increase in active use for permittees including reinstatement of suspended AUMs where appropriate for range conditions. We also urge BLM to consider the inclusion of additional temporary forage in areas that have been subject to disasters such as wildfire or drought.

Section 4110.3-3 – Implementing changes in active use

We urge BLM to clarify this section to acknowledge that emergency scenarios may result in temporary changes to active use.

Subpart 4120 – Grazing Management

Section 4120.3-1 Conditions for range improvements

California Farm Bureau supports the proposed changes to this section as they would align with new NEPA implementation guidance. We also support including routine maintenance as a function of continued use under a permit. No as no additional authorization or new NEPA analysis and decision should be required.

Section 4120.3-3 Range improvement permits

We support the proposed language that would be added to (c) allowing for temporary nonrenewable permits on existing but unused forage. We also support the requirement of consultation, cooperation, and coordination with the current permittee. There should not be one without the other. Additionally, any range improvements paid for by the permittee should become property of the permittee.

Section 4120.3-9 Water rights for the purpose of livestock grazing on public land

California Farm Bureau appreciates the language BLM is seeking to add to (b). This will provide increased certainty for water rights holders.

Section 4120.5-2 Cooperation with state, county, Tribal and Federal agencies and governments

We appreciate the retention of these important coordination provisions, especially as it is related to county governments. This will help ensure the final rule is meaningful, productive, and effective for the federal government, permittees and rural economies.

Subpart 4230 – Authorizing Grazing Use

Section 4130.2 Grazing permits

As noted above, California Farm Bureau supports removal of “conservation use” as this will clarify what BLM permits are able to be used for. We also support the updates that seek to clarify permits for “production-oriented livestock”. These clarifications follow the intention of the Taylor Grazing Act. Section 4130.2(d)(4) which allows for short-term grazing permits to be authorized to reduce vegetation is also important given grazing activities are essential to reducing catastrophic wildfire risk.

Section 4130.3-2 Other terms and conditions

We support the inclusion of nutritional supplements in (c). We are also supportive of the provisions added to (h) as these provisions will allow for reasonable amounts of flexibility for permittees without having to seek new approvals. We believe this will allow for more responsive decisions relative to landscape management.

Section 4130.3-3 Modification of permits

We urge BLM to clarify the interaction between the provisions included in this section and the new Section 1700. Should any issues arise under Section 1700 related to standards, BLM should

work to ensure that any modifications to permits or changes to current practices are not reactionary and occur only after a thorough review process.

Section 4130.4 - Authorization of temporary changes in grazing use within the terms and conditions of permits and leases, including temporary nonuse

California Farm Bureau supports the additional flexibility offered by these proposed changes. Allowance for adaptive use 21 days before or after dates in the permit will allow permittees to select the timing that is most appropriate for both their operations and resource conditions.

Section 4130.6-3 – Trailing permits

California Farm Bureau supports the new provisions added to (b) which allows the authorized officer to make immediate decisions on trailing permits. This will allow for faster decision making and reduced administrative burden for both BLM and the permittee.

Section 4130.7 - Ownership and identification of livestock

As mentioned above, California Farm Bureau appreciates the attention the proposal gives to beginning farmers and ranchers. Additionally, with the increased aging trend of farmers and ranchers, succession planning within families has never been more critical. For these reasons, California Farm Bureau is supportive of the addition of grandchildren and beginning ranchers to this section. We also support the removal of the less than 50% requirement to help aid with succession planning.

Section 4130. 8 – Payment of fees

California Farm Bureau supports single billing and the streamlining of payment fees. These changes are common sense and will help reduce the administrative burden on both BLM staff and permittees. We are also supportive of BLM not requiring a surcharge of those impacted by hardship due to drought, wildfire, etc.

Subpart 4150 - Unauthorized Grazing Use

Section 4150.1 Violations

While we support the updates to the documentation and notification process, we urge BLM to clarify that unintentional, resolved events do not remain as recorded violations in a permittee grazing file.

Subpart 4160 – Administrative Remedies

Section 4160.1 - Proposed Decisions

We are supportive of the proposed revisions as they will greatly modernize the process for issuing proposed decisions. These changes will also reduce cost and administrative burden. We support the posting of proposed decisions to the BLM website.

Section 4160.2 Protests/ 4160.3 Final Decisions

California Farm Bureau supports the proposed changes to these sections. We specifically support BLM's proposal to simplify protests with a single deadline allowing protests to be registered within 20 days. Additionally, we support the provisions included in new paragraph (c) as they will have the effect of suspending a decision until the appeal is resolved. Suspension of the decision will allow for minimal harm to a permit holder while they are going through the adjudication process.

Subpart 4170 - Penalties

Section 4170.1-2 Failure to use

California Farm Bureau supports these proposed changes as they will help clarify that approved temporary nonuse will not be held against a permittee when BLM makes an evaluation whether that permittee has been making substantial use of their authorization to graze.

Subpart 4190 – Effect of Wildfire Management Decisions

Section 4190.1 - Effect of wildfire management decisions

We strongly support adding targeted grazing to the list of examples of appropriate fuel reduction and fuel treatment activities.

Part 1700 – Fundamentals of Land Health and Standards for Program Administration

BLM managed lands may be impacted by wildfire, drought, wild horses and burros, invasive species and several multiple uses. For this reason, the California Farm Bureau supports BLM's proposal to provide a land health framework across all multiple use types on BLM land. This will eliminate the grazing-only focus on land health and instead take a more holistic approach consistent with the Federal Land Policy and Management Act of 1976 (FLPMA).

Section 1700.1 - Fundamentals of land health

We urge BLM to remove references to special status species in (c) given there is no uniform definition of such species at this time.

Section 1700.2 - Standards

We support updating the delegation of authority for standard-setting to the BLM Director. This will reduce delays and help foster uniformity across BLM.

Section 1700.3 - Rapid landscape-scale condition assessment/Section 1700.4 Land health evaluation and causal factor determination

We support the changes in these sections that would modernize initial rapid landscape-scale condition assessments. However, we also encourage BLM to ensure that any remote data utilized is somehow verified for accuracy on-the-ground. We also support evaluating land health standards scientifically first, then applying causal factor analyses only if an area's "resource conditions are

not achieving or making significant progress toward achieving land health standards” as this will help identify any factors impacting landscape health.

We additionally appreciate the addition of timelines as these will provide certainty for all stakeholders participating in multiple use activities on the landscape. Last, we appreciate BLM’s recognition of causal factors beyond BLM’s jurisdiction that may still impact BLM lands. Examples of this include natural disasters such as drought and catastrophic wildfire.

Part 4 – Department Hearing and Appeals Procedures

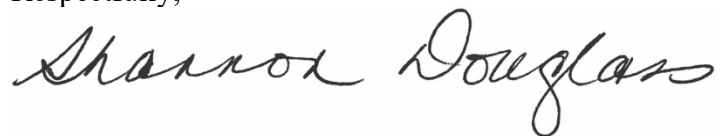
As discussed above, California Farm Bureau supports the proposed changes to section 4160.3. We are additionally supportive of the changes to the Office of Hearings and Appeals (OHA) process given the changes are consistent.

Conclusion

Public lands grazing permittees play an important role in supporting the nation's food and fiber production. As such, California Farm Bureau appreciates the Department of Interior’s prioritization of modernizing livestock grazing administration on Bureau of Land Management lands. The proposed revisions will benefit current permit holders as well as future generations by providing greater certainty and stability. They will also offer increased clarity and flexibility, allowing land managers and permittees to work collaboratively to manage public lands in a manner that best meets resource objectives and operational needs.

We appreciate your careful consideration of these comments and urge BLM to finalize the regulations with the minimal amendments we have suggested above. If questions, please contact Erin Huston (ehuston@cbbf.com).

Respectfully,

A handwritten signature in black ink that reads "Shannon Douglas". The signature is written in a cursive, flowing style.

SHANNON DOUGLASS
President