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July 13, 2026

VIA ELECTRONIC SUBMISSION: www.regulations.gov

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

Re: RIN 1004–AE82; Docket No. BLM–2026–0001 — Comments on Proposed Rule, “Revision of Regulations for Grazing Administration, Exclusive of Alaska”

Dear Director Pearce:

The Wild Sheep Foundation (WSF) welcomes and suggests three improvements to the Bureau of Land Management’s (BLM) proposed revisions to grazing regulations. We credit the proposal for modernizing and streamlining BLM’s grazing program both in terms of business arrangements and updated ecological concepts such as the proposed definition of carrying capacity.

As a hunter-conservation organization in the tradition of sustainable, science-based wildlife management, we promote multiple use and active management and have invested more than \$145 million toward these ends since our founding. This commitment has made us proud partners with BLM, grazing permittees, and the state wildlife agencies responsible for wildlife on BLM lands.

1. Preserve a meaningful role for parties with demonstrated, on-the-ground investment in land condition.

The proposed rule would narrow consultation, cooperation, and coordination (CCC) to the affected permittee and the state or states containing the allotment, removing the “interested public” (§§ 4110.2–4 re: allotment combination and division; 4110.3–1 and 4110.3–3 re: changes in active use; 4120.2 re: allotment management plans; 4130.2(b) re: permit issuance and renewal; 4130.3–3 re: permit modification; and 4130.6–2 re: nonrenewable permits).

Understanding that an undefined universe of CCC parties could – and perhaps has – slowed decision-making without adding value, we ask BLM to consider a meaningful adjustment of the exclusive option presented.

Obviously, permittees and states have direct interests in CCC discussions – and so do other partners in the multiple-use mission who commit financially to conditions on the ground at the allotment scale.

WSF, for example, funds habitat improvement projects, including prescribed burns, brush management and water developments, and operational improvements executed in direct partnership with the grazing permittee on the allotment; and we fund wild sheep population management projects, including translocations, in direct partnership with state wildlife agencies that themselves hold statutory management authority over the resource. We have funded major redesigns of operations on allotments, including conversions of livestock type, rerouting and timing of trailing, deployment of water sources, and long-term nonuse where the personal objectives of the permittee and the wildlife objectives of state agencies align with ours concerning wild sheep.

We suggest defining a class of “qualified interested parties” in §4100.0-5 as entities with demonstrated financial and operational commitment to range conditions – and including this class in CCC discussions alongside BLM, permittees, and states.

2. Strengthen § 4130.4 with clarity on “conservation” and explicit return-to-use objectives.

We support the intent of proposed § 4130.4 authorizing temporary changes and suggest two improvements: clearer resolution of the lingering, misapplied concept of “conservation use”, and adoption of explicit objectives for nonuse.

Conservation was misconstrued in previous policy – and often is in everyday speech – as something different than grazing. Grazing, in fact, is a component of conservation alongside hunting, forestry, farming, and interventions such as prescribed burning and wildlife translocations. Protections are also components of conservation, whether short-term for plant growth or bird nesting, or perpetual for scenic beauty. As such, BLM’s entire mission is conservation, and is therefore the purpose of all its regulations, which, including §4130.4, merely specify the components of conservation employed.

We particularly support §4130.4(f) because (f)(1) is one way we work with permittees to achieve management objectives and (f)(2) guards against the needless loss of a long-term partnership with a permittee who is managing temporary circumstances.

We suggest that (f)(1) could read as simply as “enhancement or protection to achieve specified resource condition objectives”. To use “conservation” here at all would perpetuate the misunderstanding of the word. By specifying the objectives for (f)(1) nonuse, the rule would align with the purposes of causal factor determinations as proposed in §§ 1700.3 and 1700.4. Resource objectives defined from the outset would become indicators for when (and why) active grazing will resume. The specificity would also identify ways WSF could assist through our Grant-In-Aid program and through direct arrangements with individual permittees. We are a ready partner of permittees whose objectives in taking the (f)(1) option align with our objectives for wild sheep.

3. Address the practical capacity gap behind Part 1700’s assessment and evaluation timelines.

We suggest more fundamental changes to improve the timeliness of assessments and evaluations – and to make these studies more informative.

Proposed §§ 1700.3 and 1700.4 would require BLM to complete rapid landscape-scale condition assessments and, where warranted, land health evaluations and causal factor determinations, within fixed windows — six months and ninety days, respectively.

Limiting the time allowed does not address the fundamental problem of the affordability of assessments and evaluations. Since at least 2015, the burdens of required analyses made their timely completion impossible. Congress authorized permit extensions to proceed before analyses were complete. This did not solve the underlying problem either, leading to a growing backlog of unexamined allotments and permits locked into the same terms and conditions as initially issued. As a result, the condition of many allotments is unknown, and permit terms are frozen.

BLM has recently begun to find a more affordable and informative approach and we suggest expanding upon that as one fundamental change.

The February 2026 memorandum of understanding between BLM and the Public Lands Council formally recognizes permittees as data and monitoring partners specifically because of their direct interest in allotment condition and financial operational commitments. This implicitly acknowledges that BLM has not – and does not now – have sufficient staff to collect data itself. It also implies that more external partners with interests and commitments could increase the workforce for data collection.

BLM could also improve – also with the help of permittees and other interested parties – the design of its data collection and analyses. The Assessment, Inventory, and Monitoring (AIM) program is designed for broad, coarse-scale information instead of the targeted, fine-scale information needed for allotments. With currently evolving techniques, AIM data, satellite imagery, permittee and partner data could be ground-truthed at the allotment level. Low-

elevation drone imagery and modeling is now capable of identifying individual plants, making possible the sampling of conditions on allotments.

In these directions, we suggest timely and more informative data and analyses may be obtained through cooperative agreements and service contracts.

Conclusion

We value the opportunity to comment and work with BLM, permittees, and other partners.

Sincerely,

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Gray N. Thornton
President & CEO

A handwritten signature in black ink, appearing to read 'Corey Mason', with a long horizontal flourish extending to the right.

Corey Mason
COO & Exec. VP of Conservation