



National Association of State Departments of Agriculture

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July 13, 2026

U.S. Department of the Interior
Director Steve Pearce
Bureau of Land Management
1849 C Street, N.W.
Washington, DC 20240

Submitted via Regulations.gov

Re: Request for Comments on Revision of Regulations for Grazing Administration, Exclusive of Alaska; BLM-2026-0001

Dear Director Pearce:

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to provide comments on the Bureau of Land Management's (BLM) proposed revision to its grazing regulations, published in the Federal Register on May 12, 2026.

NASDA represents the commissioners, secretaries, and directors of the state departments of agriculture in all fifty states and four U.S. territories. State departments of agriculture administer a wide range of programs related to agricultural production, natural resource conservation, environmental protection, and rural economic development. Our members both regulate and promote livestock and natural resources industries within their states and play a significant role in protecting the land and water resources upon which production agriculture depends.

NASDA supports the multiple-use management of federal lands, including livestock grazing, and appreciates BLM's continued recognition that grazing remains a vital and appropriate use of the public rangelands it administers. Public lands grazing supports thousands of ranching operations across the U.S. and continued access to public grazing lands is essential to the long-term viability of these operations and the rural communities they support.

When properly managed, livestock grazing is compatible with other authorized uses of public lands, including wildlife habitat, recreation, watershed protection, and conservation. In many areas, grazing also serves as an important land management tool by reducing available wildfire fuels, managing invasive species, and supporting healthy, resilient rangeland ecosystems. NASDA encourages BLM to continue to support the multiple-use mission established by Congress by implementing grazing policies that recognize the compatibility of livestock production with broader land management objectives.

NASDA appreciates BLM's recognition that the health of public rangelands can be influenced by a wide range of authorized uses, natural events, and environmental conditions. Effective land management should consider all significant factors contributing to resource conditions and ensure management actions are appropriately tailored to their underlying causes. Evaluating land health

through a comprehensive, multiple-use framework will support more effective stewardship practices while recognizing the important role of livestock grazing on public lands.

NASDA strongly supports BLM's continued emphasis on coordination and collaboration with state partners throughout the implementation of these regulations. State departments of agriculture possess extensive expertise in livestock production, rangeland management, conservation, and natural resource stewardship, while balancing support for agricultural productivity with enforcement of environmental protections. Early and meaningful engagement with state agencies will improve the effectiveness of grazing management decisions by incorporating local knowledge and by building on our members' established relationships with producers and other key stakeholders.

NASDA also encourages BLM to continue to recognize states' cooperative roles in managing water resources. State authority over water rights remains essential to effective coordination between federal land managers, state agencies, and agricultural producers and BLM should ensure implementation of these regulations respect established state water allocation systems.

NASDA supports BLM's continued commitment to science-based land management and encourages the agency to ensure that grazing management decisions are grounded in objective monitoring, transparent methodologies, and the best available scientific information. Public land management decisions have significant impacts on agricultural producers, natural resources, and rural communities. As such, management actions should clearly identify the factors contributing to natural resource concerns and be supported by sound data that accurately reflect on-the-ground conditions.

To support that effort, NASDA encourages BLM to maintain regular consultation with state departments of agriculture and other appropriate state agencies when developing land health standards, conducting landscape assessments, and implementing grazing management decisions. This collaborative approach is consistent with longstanding principles of cooperative federalism and will help ensure management decisions are science-based, practical, and responsive to the diverse ecological and agricultural conditions across the landscapes managed by BLM.

NASDA also supports the use of standardized monitoring and adaptive management practices to evaluate rangeland conditions over time. While landscape-scale assessments can provide valuable information, they should be complemented by site-specific monitoring and local expertise. This ensures that management decisions appropriately reflect evolving environmental conditions and ecological differences across regions. Incorporating state agencies and permittees into monitoring efforts can improve the quality of available data while fostering more collaborative, outcome-based management of public lands.

NASDA also appreciates BLM's recognition of the role that livestock grazing can play in reducing wildfire risk and maintaining healthy rangelands. Properly managed livestock grazing is a cost-effective natural resource management tool that can reduce available fuels, slow the spread of invasive annual grasses, and complement other vegetation management practices. As wildfire frequency and severity continue to increase across the West, livestock grazing should remain an important component of broader fuel reduction and landscape resilience strategies.

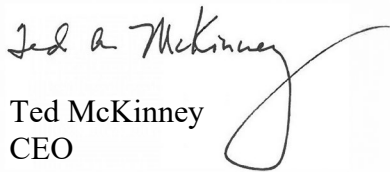
NASDA encourages BLM to continue integrating livestock grazing into wildfire mitigation, hazardous fuels reduction, and post-fire recovery efforts where appropriate. Grazing management should remain one of the tools available to land managers to reduce fuel loads, support rangeland restoration, and improve ecosystem resilience. Continued coordination with states, permittees, and local land managers

will help ensure grazing is implemented strategically to achieve both land health and wildfire management objectives.

NASDA supports BLM's efforts to improve the efficiency, consistency, and predictability of the federal grazing permitting process. Timely permit renewals, clear administrative procedures, and efficient implementation of National Environmental Policy Act (NEPA) requirements provide greater certainty for producers while allowing BLM to effectively carry out its stewardship responsibilities. NASDA encourages BLM to continue identifying opportunities to streamline grazing administration, reduce unnecessary administrative delays, and ensure permittees receive timely decisions while maintaining transparent, science-based resource management regulations. NASDA also encourages BLM to implement these regulations consistently across field offices in order to provide permittees with greater predictability, transparency, and equitable administration.

NASDA appreciates the Bureau of Land Management's efforts to modernize its grazing regulations and encourages the Bureau to maintain a framework that recognizes that livestock grazing on federal rangelands, when properly managed, contributes to the long-term vitality of agricultural operations and rural communities. By emphasizing multiple-use management, science-based decision making, coordination with states, wildfire resilience, and efficient grazing administration, BLM can strengthen its partnership with producers and state agencies while advancing sound stewardship of the nation's public lands. NASDA looks forward to continued collaboration with the Bureau as these regulations are finalized and implemented. If you have any questions, please contact Logan Moss, Associate Director of Public Policy (logan.moss@nasda.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Ted McKinney", with a large, stylized flourish extending from the end of the signature.

Ted McKinney
CEO
NASDA