



July 13, 2026

Doug Burgum
Secretary
Department of Interior
1849 C Street NW
Washington, DC 20240

RE: Docket No. BLM–2026–0001, Revision of Regulations for Grazing Administration,
Exclusive of Alaska

Dear Secretary Burgum:

The REALTORS® Land Institute (RLI) appreciates the opportunity to provide comments on the Bureau of Land Management's (BLM) proposed rule to modernize grazing administration. RLI strongly supports this effort to update regulations that have remained largely unchanged for more than 35 years and believes the proposed revisions will improve the Bureau's ability to effectively manage public lands while supporting responsible livestock grazing as an important component of the agency's multiple-use mission.

Members of RLI specialize in land brokerage related to all types of land, including farms, ranches, timberland, undeveloped tracts of land, transitional and development land, subdivision and lot wholesaling, assemblage of land parcels, auctions and farm and land management.

America's public lands support thousands of livestock producers who provide food and fiber, sustain rural economies, conserve open space, and actively steward more than 240 million acres of federal lands across the West. Effective grazing management requires regulations that are responsive to today's environmental conditions, operational realities, and resource management objectives. The proposed rule represents a thoughtful modernization that provides greater administrative flexibility while maintaining accountability and responsible stewardship.

Modernizing Grazing Administration

The proposed rule appropriately focuses on four guiding principles—flexibility, clarity, efficiency, and compliance—that will improve both agency administration and on-the-ground resource management.

Current regulations often require lengthy administrative processes before routine grazing management adjustments can be implemented. As weather conditions, drought, wildfire risk, and forage availability become increasingly dynamic, permittees and local land managers need the ability to make timely management decisions that



reflect actual field conditions rather than rigid regulatory processes and bureaucratic red tape.

Providing greater flexibility for grazing management decisions allows permittees and Bureau personnel to implement adaptive management practices that protect rangeland health, improve grazing distribution, respond to drought, reduce wildfire fuels, and achieve better long-term resource outcomes. These changes recognize that successful land management depends upon collaboration between local managers and permittees who possess extensive knowledge of the landscapes they steward.

These proposed changes should also recognize that the grazing permits and associated grazing allotments are part of a livestock operation that creates a holistic economic unit and encourages that unit to be kept in place and operational.

RLI urges the BLM to clarify that the grazing permitted on public lands is for domestic, production-oriented livestock as indicated in the Taylor Grazing Act and other legislation that impacts grazing on the public lands. RLI also supports changes that make it easier to put rangeland improvements in on public lands so that the resource can be used more effectively and proper grazing improved.

RLI also supports proposals that streamline the transfer of a grazing permit when a ranch is sold. The permits on federal grazing lands have historically been part of the operation and make the ranch a working unit whose value has been integrated into the purchase and sale process.

Improving Administrative Efficiency

The proposed rule also reduces unnecessary administrative burdens that consume agency resources without improving environmental outcomes. Streamlining permit administration, clarifying regulatory requirements, and providing greater consistency in implementation will enable Bureau staff to focus more time on resource management and less time navigating procedural requirements. RLI believes the people closest to the ground—the local Bureau of Land Management (BLM) personnel and the permittees who know that country—are usually in the best position to make good management decisions.

Greater administrative efficiency benefits both permittees and the agency while reducing complexity and improving transparency and regulatory certainty. Predictable and consistent permit administration provides stability not only for ranching families but also for the long-term value of working ranches.

Supporting the Next Generation of Producers

The proposed rule also takes important steps to improve opportunities for beginning ranchers and agricultural producers. Entry into livestock agriculture continues to present



significant financial and regulatory challenges, especially on operations that depend on federal grazing permits.

Providing clearer guidance regarding permit administration, transfers, and management will reduce barriers to entry and help ensure continuity of family ranching operations. Supporting the next generation of producers strengthens rural communities, enhances domestic food security, and preserves the long-term stewardship of working landscapes.

Advancing the Multiple-Use Mission

The proposed rule appropriately reinforces the Bureau's statutory multiple-use mission. Livestock grazing is one of the longstanding and productive uses of public lands and contributes significantly to rural economies, wildlife habitat management, invasive species control, wildfire risk reduction, watershed protection, and the conservation of open space.

By providing greater operational flexibility while maintaining responsible oversight, the Bureau can better balance multiple resource values and improve the resilience of public lands under changing environmental conditions. Well-managed livestock grazing is often one of the best stewardship tools for the landscape.

The proposed rule also compliments recent efforts to restore greater emphasis on multiple-use management following the rescission of the Public Lands Rule. Together, these actions reaffirm that conservation and responsible productive use are complementary objectives that can be successfully achieved through collaborative land management.

Conclusion

The proposed modernization represents a practical and balanced update to regulations that have not kept pace with modern rangeland management practices. By increasing flexibility, improving administrative efficiency, reducing unnecessary regulatory burdens, and supporting adaptive management, the Bureau will strengthen both public land stewardship and the long-term viability of livestock grazing on federal lands.

RLI thanks you for your consideration of these comments.

A handwritten signature in black ink, appearing to read "Geoff Hurdle". The signature is fluid and cursive, with a long, sweeping underline.

Geoff Hurdle, 2026 RLI President