



## SAN JUAN COUNTY COMMISSION

Lori Maughan      Chair  
Jamie Harvey      Vice-Chair  
Silvia Stubbs      Commissioner

July 7, 2026

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: Proposed Revision of Grazing Regulations

Dear Sir:

We support most of the proposed changes to the grazing regulations with the intent to modernize and increase efficiency in the administration of livestock grazing operations. Some of the proposed revisions we support include the following:

- Clarification that cooperation (Section 4120.5-2) does include cooperation with state and county governments as well as their corresponding agencies in the administration of livestock grazing
- Recognition that all users and activities on public lands, not just livestock grazing, will be accountable to Rangeland Health standards
- Provision to include specific flexibility limits in grazing permit terms and conditions that will help livestock operators make timely adjustments to grazing operations in response to changing resource conditions
- Changing base property requirements to only require that the property serve as a base of livestock operations

We disagree with the proposed change that would make a stay of a decision automatic with the filing of an appeal. Many appeals that are filed are frivolous with the intent to slow or ultimately prevent the decision from being implemented. Other appeals may only object to a certain aspect of a decision with multiple parts. If an appeal would automatically stay a decision as stated in the proposed changes, this would unnecessarily delay decision implementation oftentimes based on a frivolous rationale or disagreement to only part of a multi-faceted decision.

We recommend that the current regulation on stays remain unchanged so that a request for stay is a separate action which must be filed with adequate rationale. In this way, an administrative law judge would determine whether to grant or deny a request for stay based on the stated rationale rather than a stay of the decision being an automatic process as proposed in the changes.

We appreciate this effort to revise the grazing regulations and for this opportunity to comment.

Sincerely,

Lori Maughan  
Commission Chair