



Secretary Deb Haaland
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

September 20, 2021

Dear Secretary Haaland:

I am writing you on behalf of Public Employees for Environmental Responsibility (PEER) to follow up on my July 21, 2021, letter to you concerning our review of U.S. Bureau of Land Management (BLM) records. Our review shows that a minimum of 40 million acres of federal rangeland (an area the size of Washington State) fail the BLM's minimum standards for quality of water, vegetation, and soils, as well as the ability to support wildlife, due to overgrazing.¹ Today I am writing to you about a related topic: the failure of BLM to apply available data about the growing adverse environmental impacts of the vast public land livestock program to land management decision-making.

We strongly support your efforts to apply sound science to advance the Department of the Interior's mission to protect our lands and waters. Unfortunately, however, BLM's handling of information about unsustainable livestock practices has been the antithesis of sound science.

BLM has consistently excluded consideration of livestock grazing as a possible factor in changing landscapes across six ecoregions covering the West—including the agency's Rapid Ecoregional Assessments (REAs), which were supposed to examine the state of current data. BLM management claims it has taken this posture for "technical reasons," claiming a lack of "seamless data."² In fact, the decision to exclude consideration of livestock grazing impacts was political, with BLM managers quoted as saying that they needed to get direction from the Washington Office on how to proceed due to anxiety from "stakeholders" and fear of litigation.³

Vast amounts of data concerning the ecological impacts of grazing exist in the form of datasets containing BLM's Land Health Standards evaluations (LHS) for grazing allotments. From these datasets, PEER conducted its own analysis that shows the widespread failure of landscape functionality due to overgrazing. We have been able to find no evidence that BLM has conducted any such analysis of its own, however, or even reviewed the data, or, most importantly, used it to guide land management decision-making.

In the years since the Ecoregional Assessments were conducted, little has changed. For example, in August, a highly-publicized U.S. Geological Survey study found that wild horses are adversely affecting sage grouse habitat.⁴ That study is being used as part of the rationale for

¹ <https://www.peer.org/decades-of-overgrazing-compromise-30-x-30-goal/>

² <https://www.peer.org/blm-says-it-cannot-track-cattle-on-its-lands/>

³ <https://www.peer.org/grazing-punted-from-federal-study-of-land-changes-in-west/>

⁴ https://www.usgs.gov/news/when-unchecked-free-roaming-horse-populations-threaten-greater-sage-grouse?qt-news_science_products=1#qt-news_science_products

removing thousands of free-ranging horses from sage grouse habitat.

Yet PEER's analysis shows that in Nevada, one of the states in which the Bureau of Land Management has begun "emergency" wild horse roundups, 88% of allotment acreage in which wild horses have been identified as a cause of land degradation also list livestock grazing as a cause. The USGS has these data and has, in fact, used them to map livestock impacts as long ago as 2011, despite their claim in the study that "Our analysis did not explicitly model livestock (e.g., cattle) ... primarily because of challenges associated with compiling quality spatial data."

The Department of the Interior (DOI) has a vast wealth of data at its disposal, which the BLM has gathered from 21,000 grazing allotments across 150 million acres of public lands since 1997. These data show that more than 15 million acres of priority sage grouse habitat fail to meet BLM's own minimum standards for quality of water, vegetation, and soils, as well as the ability to support wildlife, due to overgrazing. An equal amount of priority sage grouse habitat lies within grazing allotments that remain to be evaluated, but patterns suggest this habitat will also exhibit high degrees of degradation.⁵

While wild horses certainly impact sage grouse habitat, to focus conservation efforts for this habitat on addressing impacts made by thousands of wild horses, while ignoring troves of data on the impacts from millions of cattle, undermines your efforts to create a culture of scientific integrity at DOI.

I am urging you to end DOI's treatment of the livestock grazing program as a political "sacred cow" and instead begin to rigorously apply basic principles of sound science to this long-neglected area.

We would be happy to supply you with additional information and to meet with technical experts within BLM or DOI to discuss how best to make use of BLM's data to guide management of the livestock grazing program and of wild horse and burro populations, and to restore sage grouse and other priority habitat across the interior West.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Whitehouse", with a stylized, flowing script.

Tim Whitehouse
Executive Director

⁵ https://www.peer.org/wp-content/uploads/attachments/11_10_14_FWS_letter_on_sage_grouse_impacts.pdf