



PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY

962 Wayne Ave • Suite 610 • Silver Spring, MD 20910

July 21, 2021

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

Dear Secretary Haaland:

I am writing to you on behalf of Public Employees for Environmental Responsibility (PEER) to address President Biden's January 27, 2021 Executive Order committing his administration "to achieve the goal of conserving at least 30 percent of our lands and waters by 2030." These targets are an essential part of any plan to address the climate crisis, create healthy communities, and protect wildlife.

I am writing to ask you to commit to a major improvement to rangeland health as part of the administration's commitment to meeting its 30 percent land conservation goal by 2030. For this to occur, the U.S. Bureau of Land Management (BLM) must address livestock overgrazing on federal lands.

By far, the biggest human impact on public lands managed by the BLM is its livestock grazing program, which affects some 155 million acres across ten states.

A new analysis by PEER has found that a minimum of 40 million acres of federal rangeland, an area the size of Washington State, fail the BLM's own minimum standards for quality of water, vegetation, and soils, as well as the ability to support wildlife due to overgrazing. The PEER analysis looked at 21,427 BLM grazing allotments using the agency's data and found:

- Approximately 40 million acres, or 36% of all acres assessed, failed BLM land health standards and identified livestock as a cause. Almost 55 million acres, around half of the total allotment area assessed (an area larger than Utah), failed these landscape viability standards due to livestock overgrazing, as well as other factors;
- Livestock grazing is the most frequently cited significant cause of failure to meet land health standards across the West.
- Five states have livestock failures of 40% of the assessed area or more, with two (Nevada and Idaho) exceeding 50% failure.

Moreover, these livestock failure figures likely significantly underestimate the damage since a

substantial proportion of allotments yet to be assessed are in regions where livestock failure rates are remarkably high, such as in Nevada. In addition, in allotments that BLM counts as meeting all rangeland health standards, high-resolution imagery reveal very large areas that clearly would fail to meet range health standards due to excessive livestock grazing.

The main finding of this analysis is that landscapes that fail to meet the agency's own minimum standards for ecological health as a result of overgrazing cannot be considered to be conserved, and should not be counted toward attainment of the new "30 x 30" conservation goals. With much of the West entering drought conditions, significant progress towards attainment is unrealistic and the amount of livestock-induced landscape damage could significantly increase unless BLM dramatically improves the quality of its range management.

In the coming weeks, PEER will be submitting policy, recordkeeping, and management suggestions to you and to the new BLM leadership on how best to ensure that BLM-managed rangelands can meet and sustain the agency's own standards of ecological health for watersheds, soils, riparian areas, and wildlife. We look forward to engaging with you and your staff on how improvements in range conditions can best be accomplished to return these landscapes to functioning ecosystems.

Sincerely,

A handwritten signature in black ink that reads "Tim Whitehouse". The signature is fluid and cursive, with a long horizontal stroke at the end.

Tim Whitehouse
Executive Director