

October 5, 2021

The Honorable Debra Haaland
Secretary of Interior
U.S. Department of Interior
1849 C Street NW,
Washington, DC 20240

Dear Secretary Haaland:

A 20-year mega-drought is gripping much of the western United States.¹ The undersigned organizations and our millions of members and supporters are writing to request that the U.S. Department of Interior (USDO I) issue an emergency directive requiring all Bureau of Land Management (Bureau) Districts that are experiencing multi-year, extreme or exceptional drought to substantially reduce or curtail stocking of livestock to relieve pressure on native biodiversity and natural resources. We request that the Bureau defer future livestock grazing on allotments experiencing extreme or exceptional drought until vegetation is determined to have recovered to pre-drought conditions. We also request that the USDO I continue the process of developing comprehensive regulations for the Bureau's grazing program that address the climate crisis, and conserve, protect and restore public lands, biodiversity, and natural resources. Regulations, subsequent policy, and management directives must include mandatory provisions to reduce grazing during periods of extended drought and accountability measures to ensure compliance.

Regulatory and policy reforms for the Bureau's grazing program are necessary to ensure the consistent application of strategies to deal with current and future environmental conditions. However, absent a dedicated strategy to reform the culture of the Bureau, these changes will not have the desired effect. In fact, the Bureau already has the necessary authority and direction to address this current crisis through IM-2013-094, the underlying authorities of the Taylor Grazing Act, and the Federal Public Lands Management Act which all require the agency to prevent overgrazing and ensure that public lands are managed in a manner that prevents undue and unnecessary degradation. Despite the current regulatory, legislative and legally binding direction under which the Bureau operates, action at the field office and state office level is either non-existent, inconsistent, or insufficient to address the current situation. Fundamental changes to the management structure at the Bureau are required, including accountability for Bureau employees that fail to protect drought-stressed public lands by turning a blind eye to the ecological destruction caused by permitted grazing.

On April 16, 2021, you signed Secretarial Orders 3398 and 3399 for the purposes of creating a "Department-Wide Approach to the Climate Crisis and Restoring Transparency and Integrity to the Decision-Making Process" and to emphasize that the "Department's commitment to honor the Nation's trust responsibilities and conserve and manage the Nation's natural resources and cultural heritage must be guided by the best science and be protected by processes that ensure the

¹ ". . . [T]he 2000–2018 [Southwestern North American] drought was the second driest 19-year period since 800 CE, exceeded only by a late-1500s megadrought." Williams, AP, ER Cook, JE Smerdon, BI Cook, JT Abatzoglou, K Bolles, SH Baek, AM Badger, and B Livneh. 2020. Large contribution from anthropogenic warming to an emerging North American megadrought. *Science* 368:314-318.

integrity of Federal decision making. It is Department policy to listen to the science; to address societal inequities and create opportunities for the American people; to conserve and restore our land, water, and wildlife.”

According to the U.S. Drought Monitor,² over 98% of the western region is experiencing some level of drought and over 80% is rated as severe, extreme or exceptional. Many areas are also experiencing long-term drought conditions that have persisted for at least a decade in what some researchers have called the “megadrought.”³ However, even this characterization may not accurately depict what is occurring in much of the West which is more akin to “aridification” or a permanent “transition to an increasingly water scarce environment.”⁴

Despite this shift to a “new normal” of a more arid West, the Bureau does not have livestock drought management strategies that include conservation and protection of public lands, biodiversity, imperiled species, and other natural resources. In many cases, Resource Management Plans are decades old with insufficient standards, and capability and suitability analysis that do not reflect current conditions. This problem is compounded by the fact that the vast majority of grazing allotments are operating under outdated authorizations that enshrine stocking rates developed over half a century ago based on dubious forage production studies and livestock that weigh nearly a third less than today’s animals. The backlog of permits requiring assessments and analysis under the National Environmental Policy Act is growing each year leaving even fewer tools available to address the current crisis. Even when new decisions are made, this often occurs in isolation from other resource specialists and does not address the impacts to other public land resources including native plants and wildlife.

A few examples include the following:

- The Ironwood Forest National Monument in the Tucson Field Office of Arizona was designated June 9, 2000, five years into Arizona's 26-year long-term drought, to protect natural and cultural resources, which include more than 200 sites from the prehistoric Hohokam period (Proclamation at p.1). The Monument is also home to the long-lived ironwood tree, saguaro cactus, and what is possibly the last viable population of desert bighorn sheep indigenous to the Tucson basin (Proclamation at p.1), the Sonoran desert tortoise, and the Sonoran talussnail, both of which are currently being considered for listing under the Endangered Species Act. The 1998 Coordinated Resource Management Plan for the area states that "drought and heavy livestock use reduce annuals and threaten tortoise reproduction



² <https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?West>

³ <https://www.science.org/doi/abs/10.1126/science.aaz9600>

⁴ https://www.usu.edu/colorado-river-research-group/files/crrg_aridity_report.pdf

success." And yet the Bureau has authorized 527 AUMs for the Cocaroque allotment since the 1990s despite long-term, ongoing drought and failed to adequately address livestock grazing impacts in light of drought in the 2013 Resource Management planning process. The Cocaroque allotment is grazed year-round and was fully authorized for grazing in 2021 despite extreme drought conditions.

- Within the Richfield Field Office in south central Utah only two years of normal precipitation have occurred since 2000. Much of the state has been within the severe, extreme and exceptional drought categories during the other 19 years. Based on Bureau data, there is little to no indication of reduction of livestock use based on drought. For instance, in the nearly quarter of a million-acre Robber's Roost allotment, east of Hanksville, UT, permitted livestock use has only varied by 5% over the last 11 years. In 2020, when the allotment was in extreme and exceptional drought, non-use was even less than the average at only 3.5% reduction. Vegetative conditions are poor within the allotment, with a near complete loss of preferred forage species. With the loss of most forage species, the livestock are so desperate that they are depending on non-forage species such as Mormon Tea. The result is that even this non-preferred species is being grazed so heavily it is forming mats, low to the ground, instead of its usual upright shrub form.



- The Alvord Desert near Steens Mountain in Oregon has historically been a dry place but the current drought (one of the most severe in recorded history) has pushed the local ecosystem and native species to the brink. According to the latest summary report by the U.S Drought Monitor, 87% of Oregon's rangeland was rated as being "poor" or "very poor."⁵ A new allotment management plan is in progress by the Burns District Office for the Alvord Allotment which proposes the reinstatement of 1,670 Suspended AUMs, bringing the stocking rate up to full authorization. The proposed alternative also calls for the construction of seven new wells to enhance "livestock distribution". The Andrews RMP, which guides the development of management plans on the Alvord Allotment, calls for "sustainable livestock grazing that meets allotment management (natural resource) objectives" and goes on to say "revision of AMPs are based on evaluations and rangeland health assessments, which determine allowable Animal Unit Months (AUMs) and plant community management... Interim and long-term grazing management and stocking levels are adjusted in accordance with results of monitoring studies, allotment evaluations, and rangeland health assessments." During this unprecedented drought, the Bureau should be considering the reduction of AUMs not increasing them. Clearly, the

⁵ <https://droughtmonitor.unl.edu/Summary.aspx>

Bureau is not following its own directives and is disregarding the parched reality on the ground.

- In 2015, the Bureau finalized 98 Resource Management Plan Amendments for the purpose of greater sage-grouse conservation. Within the Records of Decisions that implemented the plan amendments, the Bureau included specific language related to drought and responses to drought conditions. On June 28, 2021, letters were sent to the State Directors for each of the applicable seven states. Five of the seven State Directors have since responded with nearly identical letters that indicate the Bureau has imposed no mandatory reductions of livestock grazing, and that the states are all relying on “stock and monitor” policies to preserve sage-grouse habitat.⁶ However, the vast majority of grazing allotments in sage-grouse habitat have not had recent land health evaluations and most have not even implemented the 2015 plan amendments pertaining to livestock grazing because site-specific analysis has never been conducted.

Without sufficient management response mechanisms, public lands continue to endure heavy livestock utilization of drought-depleted vegetation. The Bureau is authorizing unsustainable numbers of livestock through permits that were developed decades ago without consideration of contemporary drought, heat, or aridification. Many grazing allotments are already failing to meet land health standards and a larger percentage have never even been assessed.⁷ Even though the Bureau’s own regulations require regular assessments and responsive actions when allotments fail to meet standards, rarely are the regulations enforced or complied with by local Bureau managers. This reality of both an agency culture that is resistant to following and enforcing the rules and a lack of accountability resulting from insufficient regulatory mechanisms or direction from the national leadership requires immediate attention at the highest levels of the Department of the Interior.

We propose two actions to help conserve and protect biodiversity and natural resources on Bureau-managed lands:

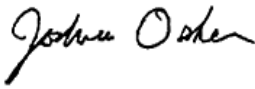
1. Issue an emergency directive requiring all Bureau of Land Management districts that are experiencing multi-year, extreme or exceptional drought to sufficiently reduce or curtail stocking of livestock to protect the public lands’ native species and natural resources, and to defer future grazing authorizations until vegetation is determined to have recovered to pre-drought conditions. This directive should include required reporting by all affected Bureau offices with specific deadlines. The reports should provide detailed factual information on all actions taken under the directive. The directive should indicate that audits may be done to verify the accuracy of the information provided in these reports.
2. Continue the formal rulemaking process to develop comprehensive regulations for the Bureau’s grazing program and ensure that the new regulations, including mandatory actions and agency accountability measures, combat the climate crisis and conserve and protect public lands, biodiversity, and natural resources.

⁶ https://drive.google.com/drive/folders/1EFK1xowglcXb3g4GiE-_u4DoJl-fsVnl?usp=sharing

⁷ <https://www.peer.org/areas-of-work/public-lands/grazing-reform/>

We hope to hear your thoughts on this climate-based concern and our proposed actions.

Sincerely,



Joshua Osher
Public Policy Director
Western Watersheds Project

And on behalf of:

American Horse Protection Society
American Wild Horse Campaign
Animal Wellness Action
Animal Wellness Foundation
Arizona Grazing Clearinghouse
Blue Mountains Biodiversity Project
Center for a Humane Economy
Center for Biological Diversity
Conserve Southwest Utah
Endangered Species Coalition
Environmental Protection Information
Center
Friends of the Sonoran Desert
Gallatin Wildlife Association
Grand Canyon Trust
Grazing Reform Project
Great Old Broads for Wilderness
Greater Hells Canyon Council

Los Padres ForestWatch
Lower San Pedro Watershed Alliance
Natural Resources Defense Council
Oceanic Preservation Society
Oregon Natural Desert Association
Project Eleven Hundred
San Luis Valley Ecosystem Council
Sequoia ForestKeeper®
Sierra Club
Southern Utah Wilderness Alliance
Utah Native Plant Society
Western Environmental Law Center
Western Watersheds Project
White Mountain Conservation League
WildEarth Guardians
Wilderness Watch
WildLands Defense

Cc:

Director Bureau of Land Management, Tracy Stone-Manning
Deputy Director for Policy and Programs BLM, Nada Culver
Principal Deputy Assistant Secretary - Land and Mineral Management, Laura Daniel-Davis
Council on Environmental Quality, Chair, Brenda Mallory
House Committee On Natural Resources, Chairman, Rep. Raul Grijalva
Senate Committee on Energy and Natural Resources, Chairman, Sen. Joe Manchin