



PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY

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March 7, 2022

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Comments: America the Beautiful – Docket Number: DOI-2021-0016

These comments are submitted on behalf of Public Employees for Environmental Responsibility (PEER) in response for a call for public input in developing an “Atlas” to track a clear baseline of information on lands and waters that are conserved or restored for purposes of the administration’s America the Beautiful initiative to have at least 30% of our lands and waters protected by 2030 (also known as “30x30”). The Department of Interior is required to develop guidelines for lands to qualify for 30x30, as well as mechanisms to continuously monitor progress towards the 30x30 goal.¹

The below comments reflect PEER’s suggestions on some of the attributes of what should be considered conserved lands, as well as data sources, stewardship actions, and ecological outcomes such an Atlas should encompass. PEER has already submitted separate comments on assessing conserved waters.

I. Use GAP Criteria

U.S. Geological Survey (USGS) Gap Analysis Program (GAP) 1 and 2 criteria should be the focus of meeting 30x30 goals. The Atlas should identify areas that meet USGS GAP 1 and 2 criteria and use science-based criteria to identify lands that are a priority for increasing protections to meet GAP 1 and 2. These criteria should include lands with high potential biodiversity values, lands that act to connect wildlife habitats, and lands with an ability to act as productive carbon sinks. GAP Status 1 lands have protections to keep

¹ Executive Order 14008, § 216, 86 FED. REG. 7619, 7627 (Feb. 1, 2021), <https://www.energy.gov/sites/default/files/2021/02/f83/eo-14008-tackling-climate-crisis-home-abroad.pdf>.

them permanently in their natural state.² GAP Status 2 lands are kept primarily natural, but natural disturbances, like wildfires or floods, may be suppressed in Status 2 lands.³

The Atlas should also identify lands that don't meet GAP 1 and 2 criteria but that may contribute to conservation in other ways, such as those used primarily for recreation, those in a temporary conservation status, and those that are used for other purposes such as ranching and logging. In most instances, these lands shouldn't be counted as contributing to 30x30, but the Atlas should identify their actual and potential conservation values. Lands thus identified could be added to the Atlas's conservation total if they received durable and comprehensive protections up to the standards set by GAP 1 and 2 criteria.

II. Focus on Federal Public Lands

The Atlas should inventory the conservation values of federal public lands. This is especially important because many of our federal public lands are in a degraded condition or are burdened with extractive uses and are under the jurisdiction of the Department of the Interior, which also is managing the development of the Atlas.

Our comments in this section focus on mapping the impacts of grazing, mining and fossil fuel extraction, and logging in the Atlas and whether they should count toward the conserved or restored totals for purposes of the America the Beautiful initiative.

a. Livestock programs on lands managed by the Bureau of Land Management (BLM)

Landscapes that fail to meet BLM's own minimum standards for ecological health cannot be considered conserved and should not be counted toward attainment of the new 30x30 conservation goals, but should be included in the Atlas for further analysis of mechanisms to prevent degradation. In addition, lands where BLM has not conducted a land health assessment should also be included in the Atlas for further study but cannot be counted toward 30x30 goals because the ecological health of this land are not known.

The Atlas needs to include BLM data on Rangeland Health Standards for the 155 million acres of land managed for livestock grazing. BLM's Standards for Rangeland Health set indicators of healthy lands. The indicators prescribe the minimum quality of water,

² U.S. Environmental Protection Agency (EPA), EnviroAtlas Terms and Definitions, <https://enviroatlas.epa.gov/EnviroAtlas/glossary/glossary.html#gap1> (last visited Mar. 7, 2022).

³ EPA, EnviroAtlas Terms and Definitions, <https://enviroatlas.epa.gov/EnviroAtlas/glossary/glossary.html#gap2> (last visited Mar. 7, 2022).

vegetation, and soils, as well as the ability to support wildlife—metrics required by the agency for permitting livestock grazing. All lands are required to be assessed, if the assessment reveals that the land is not meeting the Rangeland Health Standards BLM is required to take actions to meet the Standards. Actions can include reducing the season of use, reducing the number of livestock permitted, and even resting the allotment.

Using BLM’s land health records, PEER created a comprehensive digital map on the assessments of rangeland health on BLM lands.⁴ The map of the most current BLM data will be released publicly on PEER’s website in early March 2022. Please see the PEER map [here](#). The Atlas should incorporate this data as soon as it becomes available.

PEER’s map, using BLM’s own data, identifies huge swaths failing fundamental Landscape Health Standards, with livestock grazing identified as a significant leading cause of failure. Of the total acres assessed, 50% fail to meet BLM Standards for Rangeland Health, totaling nearly 54 million acres. Among the lands is has assessed, where lands are failing BLM identifies grazing as a cause for failing lands 72% of the time. Many other factors impact rangeland health—off highway vehicles, drought, the spread of invasive species, and fire. Shockingly, nearly 27% of public rangelands administered by BLM—nearly 41 million acres—have never been assessed. Lands that are unassessed or failing Land Health Standards should not be considered “conserved” for purposes of 30x30. Rather these lands should be the focus of new efforts to properly build up these areas so that they can one day qualify to be conservation lands.

By incorporating land health data, the Atlas can help steer BLM toward better conservation practices by accurately portraying the conservation values of the land they manage. With much of the West entering drought conditions, significant progress towards attainment is increasingly unrealistic, and the amount of livestock-induced landscape damage could significantly increase unless BLM dramatically improves the quality of its range management.

b. Extractive use of federal lands

The Atlas should also contain information on mining and oil and gas drilling on public lands, including leases and information on abandoned oil and gas wells and mines on public lands. Lands designated for extractive use should not be counted toward 30x30 conservation goals, regardless of whether they are currently being mined or exploited.

Oil and gas production and coal mining from public lands are a significant contributor to climate change and the biodiversity crisis. USGS estimated in 2018 that nearly a fourth of the country’s 2014 emissions came from public lands, and oil, gas, and mining are a huge

⁴ PEER, Mapping Rangeland Health, <https://peer.org/areas-of-work/public-lands/grazing-reform/mapping-rangeland-health/>.

part of these emissions—coal mining representing 60% of the overall total public land emissions.⁵ Mineral and oil and gas leasing destroys and fragments western ecosystems, putting threatened and endangered species on the path to extinction.

BLM manages 37,496 Federal oil and gas leases covering 26.6 million acres with nearly 96,100 wells.⁶ In January of 2022 the U.S. Interior Department revealed that there are over 130,000 abandoned oil and gas wells in the U.S.⁷ Twenty-six states have applied for federal money to deal with the abandoned wells within their borders.⁸ The Atlas should map these wells and infrastructure to help determine the extent of damage and need for remediation of large areas of public lands. Until all public lands are assessed for this kind of damage, they should not be included in 30x30, an overall presumption that lands are only conserved when there is data to support it will make America the Beautiful a far more credible program.

In the western United States, large areas of public lands are opened to oil and gas leasing in Resource Management Plans (RMPs) prepared by BLM. An analysis by the Center for Western Priorities finds that wilderness-quality lands are nearly *three times* less likely to be managed to protect those characteristics if they are overlapped by oil and gas leases—even if those leases are purely speculative and are not being drilled. Lands that are opened to oil and gas leasing in RMPs, even if there is no drilling occurring, should be included in and the Atlas and not be counted toward 30x30 conservation goals.

c. Old growth forests

The Atlas should map intact public forests under threat from logging and identify the important conservation values of these forests as both carbon sinks and for the biodiversity they support. The Atlas should also identify the mature and old-growth forests remaining across the nation. Due to their extreme scarcity and the complexity and the biodiversity they host, mature and old-growth forests are a key issue in conservation policies and provide important carbon sinks.

⁵ See USGS, Merrill, M.D., Sleeter, B.M., Freeman, P.A., Liu, J., Warwick, P.D., and Reed, B.C., 2018, Federal lands greenhouse emissions and sequestration in the United States—Estimates for 2005–14: U.S. Geological Survey Scientific Investigations Report 2018–5131, 31 p., <https://doi.org/10.3133/sir20185131>, available at <https://pubs.er.usgs.gov/publication/sir20185131>.

⁶ U.S. Department of Interior, Oil and Gas Leasing Program, <https://www.doi.gov/ocl/oil-and-gas-leasing-program> (last visited Mar. 7, 2022).

⁷ Zack Budryk, *Interior: US has twice as many abandoned oil and gas wells as previously thought*, THE HILL, Jan. 5, 2022, <https://thehill.com/policy/energy-environment/588398-interior-us-has-twice-as-many-abandoned-oil-and-gas-wells-as?rl=1>.

⁸ *Id.*

The Atlas should also identify how conservation goals for areas could be strengthened to help forests qualify as protected. For instance, many forests on public lands, including old growth forests, are managed under plans that support logging instead of emphasizing the protection biodiversity and climate values. These lands should be identified in the Atlas, and they should be evaluated with the goal of providing permanent protections so that they will contribute to goals of 30x30.

III. Avoid Greenwashing

The Atlas must exclude all plastic turf and similar impermeable or toxic surfaces from any consideration as conserved lands. This normally would go without saying, but Department of the Interior officials have been quoted as claiming that America the Beautiful embraces everything “from synthetic turf to new wilderness lands.”

There are an estimated 13,000 syn-turf fields in the U.S. Most utilize infill composed of thousands of shredded tires layered atop a plastic carpet. These artificial turf fields expose children and athletes to intimate contact with an array of toxic chemicals, such as lead, arsenic, and cadmium. In recent years, PEER led a successful campaign to induce federal agencies, such as the U.S. Environmental Protection Agency (EPA), to drop their endorsements of shredded tire infill for precisely that reason. PEER has also shown that the artificial turf blades themselves contain toxic PFAS, the “forever chemicals” that can leach into adjacent soil and waters. Despite turf manufacturer claims, turf cannot be recycled as there are no facilities accepting this product. This poses another unknown and largely uncontrolled public health concern about artificial turf fields.

Any version of 30x30 that includes synthetic turf, paved surfaces, or other toxic or unnatural habitats will not meet the standards set by Executive Order 14008, which stated: “America’s farmers, ranchers, and forest landowners have an important role to play in combating the climate crisis and reducing greenhouse gas emissions, by sequestering carbon in soils, grasses, trees, and other vegetation and sourcing sustainable bioproducts and fuels.”⁹

While increasing access to outdoor spaces is a laudable goal, exposing children and athletes to toxic substances that also prevent carbon sequestration and harm wildlife would be entirely contrary to the stated policy of 30x30. The America the Beautiful

⁹ Executive Order 14008, § 214, 86 FED. REG. at 7626, <https://www.energy.gov/sites/default/files/2021/02/f83/eo-14008-tackling-climate-crisis-home-abroad.pdf> (stating the policy justification for 30x30, which is mandated in § 216).

program has to hold itself to a higher standard, not only bringing urban parks and facilities to a larger portion of the population, but assuring that those facilities aren't promoting technologies that harm human health and the environment as a cost-cutting measure that greenwashes environmental injustice.

IV. Conclusion

We recognize that the America the Beautiful initiative will bring together locally-led campaigns, private conservation efforts, and cooperation from all levels of government, including Tribal Nations. PEER applauds these efforts and recognizes that these groups and efforts need to play an important role in helping reach the 30x30 conservation goals. We have focused our comments on the areas of our work we are most familiar with and encourage the Department to uplift the perspectives of environmental justice communities and fully consult with historically marginalized groups as it finalizes guidance and mechanisms for continuous improvement within the Atlas.

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