



ENVIRONMENTAL RESPONSIBILITY

842-4718

PUBLIC TRUST BETRAYED:

***Employee Critique of Bureau of Land Management
Rangeland Management***



What is PEER?

Public Employees for Environmental Responsibility (PEER) is a new association of government resource managers, scientists, biologists, and others committed to upholding the public trust through responsible management of the nation's environment and natural resources. It addresses the essential need for a well-spring of integrity and ideas for reform from within government.

With PEER, there is a tremendous opportunity to transform government's role in environmental preservation in the 1990s. The American people have voted for "change" in leadership from the White House to Congress to state houses across the country. It is a change born both of hope that democracy can work to improve our collective well-being and anger that government has become a tool to benefit special interests at the expense of the whole of our society and the health of the planet.

Environmental issues are at the heart of this tension. Government agencies charged with natural resource management and environmental protection embody the democratic mandate to safeguard the quality of life for all and future generations. At the same time, many of these federal departments and agencies—such as Interior, Agriculture, EPA, and Energy—serve as commodity brokers of the same resources they are intended to protect. Pervasive special interests are historically inbred in the relationship between government, industry, and the environment.

The structural conflicts of interest and values are represented within agency personnel. Some enlisted to serve the public as agents of environmental protection. Others serve the cause of commodity extraction. The record of the past twelve years is clear: management authority is vested in those who favor industry. Agency decisions have been driven more by the short-term economics than by sound environmental science.

The new Administration's commitment to conservation and environmental innovation offers a rare historic moment for a realignment of priorities within natural resource and environmental protection agencies. But change at the top of government is not enough. Without information and diligence from government employees on the front lines of defense against environmental denigration there is little likelihood that agencies will change. Meaningful reforms will all too easily fall prey to the many layers of institutionalized corruption and ineptness within these agencies.

President Bill Clinton will face continuing pressure to sacrifice long-term environmental concerns to short-term economic development. Just as PEER can be an invaluable ally to a new administration committed to ecologically sound policy, so will PEER provide a credible voice of conscience for holding the Clinton administration accountable to the promise of effective government action on the environment.

PEER's objectives for the coming year are to:

- Organize a broad base of support among employees within federal and state environmental agencies;
- Inform the new Administration, Congress, state officials, the media, and the public about the substantive issues of concern to PEER associates;
- Defend and strengthen the legal rights of public employees to speak out about environmental violations.
- Monitor and watch-dog public land management and environmental protection agencies.

The formation of PEER represents an important step toward recognizing the valuable role that government employees can and must play as defenders of our environment and stewards of our natural resources.



About This Report

This document was painstakingly prepared by over a dozen current Bureau of Land Management employees in the inter-mountain west. They are district managers, fisheries and wildlife biologists, and range conservationists who passionately care about the ecological health of the public lands they administer. Their report has also been peer reviewed by over thirty other grazing specialists and scientists in other federal and state land management agencies, academia, and other knowledgeable people in the private sector.

The authors of this white paper merely want to communicate that the BLM's oft-repeated claim that public rangelands are in better condition now than they have ever been is a myth, and that decisive action must be taken immediately in order to end the deterioration of these lands.

They have had to stay anonymous, in order to avoid the inevitable retaliation that would be taken against them by their supervisors in the Bureau, local grazing permittees, and state and local legislators. In the BLM and in the west, the status quo is still to "kill the messenger" who tries to speak to the continued overgrazing crises and the need to drastically reduce the stocking levels and change the grazing management practices on public rangelands.

Public Employees for Environmental Responsibility (PEER) is proud to be able to serve the brave few in the BLM who produced this report by being the intermediary in its distribution.

— Jeff DeBonis, Executive Director, PEER

GRAZING WHITE PAPER SUMMARY

The Department of Interior's Bureau of Land Management (BLM) is one of America's best kept secrets: BLM manages one-eighth of the total U.S. land area, more than the U.S. Forest Service, Park Service and Fish & Wildlife Service combined, yet receives little scrutiny.

In this White Paper, BLM's own scientists charge the agency with gross mismanagement leading to the destruction of millions of acres of publicly-owned rangeland, threatened extinction of wildlife, and the suppression of even the most basic rangeland management tools.

BLM REFUSES TO RECOGNIZE THAT OVERGRAZING CONSTITUTES A PROBLEM — OR THAT IT EVEN EXISTS

BLM is committed to maximizing livestock use levels regardless of the consequences. In some Western States, BLM permits grazing on 100-percent of available land, even fragile or unsuitable areas where erosion is the predictable result. When a given range is recognized to be deteriorating, BLM will propose a number of piecemeal solutions, but it will never, ever consider a reduction in grazing allotments. In this White Paper, BLM scientists conclude that the long-term interests of these rangelands—both environmentally, and as an economic resource—would best be served by a reduction in BLM-issued grazing permits.

INDUSTRY DOMINATION OF BLM HAS LED TO DISASTROUS RESULTS

During the severe six-year drought in the West, BLM actually allowed grazing to increase. Meanwhile, BLM has fostered the destruction of thousands of natural springs and wetlands by encouraging grazers to construct troughs, pipelines and reservoirs as "range improvement facilities." Overgrazing has also led to the systematic extermination of wildlife, like the bighorn sheep, that compete with livestock for scarce resources on the range.

BLM'S GRAZING FEE INCENTIVE PROPOSAL IS A SHELL GAME

BLM's proposal to reward good rangeland practices with reductions of up to seventy-five percent in grazing fees would, under current agency practices, actually be counter-productive:

- BLM has no ability to even monitor range practices. For example, the agency cannot detect livestock trespass, which is common on public land. Few, if any, trespass cases have been filed on many of BLM's grazing intensive districts in recent years.
- BLM lacks reliable rangeland condition data needed to measure range deterioration or improvement. The past administration made it impossible for the BLM to collect stocking rate and carrying capacity data. BLM now artificially defines poor rangeland as healthy through the use of an arbitrarily chosen "desired plant community."

-
- Incentives proposed by BLM encourage permittees to construct “rangeland improvement” facilities, thereby creating an equity interest on public lands and fueling the political and legal attempts of ranchers to secure private property rights in order to redeem their economic investment.

The above-mentioned issues have not been the subject of balanced debate. The previous administration stacked the decks at BLM in favor of the livestock industry. Individuals sympathetic to short-term industry interests were promoted while environmentally responsible employees were shut out of the management loop. The powerful livestock industry lobbying machine is well prepared to fight off any perceived threat to their interests. Many Western universities with range conservation programs have a pro-industry bias due to their primary concern with placing graduates in industry jobs and securing research subsidies.

GRAZING WHITE PAPER RECOMMENDATIONS

OVERGRAZING AND DETERIORATING RESOURCE CONDITIONS

Perform Emergency Triage — Some rangelands are in such poor shape that they will never recover. Much of the rest is rapidly deteriorating. The few good or excellent condition rangelands that are the key areas still contributing to biodiversity deserve the highest priority protection. A reduction in livestock grazing will be required.

Restore Sanity to Rangeland Resource Management — BLM should immediately initiate a survey of carrying capacity of all grazed range. Carrying capacity should be determined on the basis of the most sensitive areas and plant needs to ensure that vegetative resources on which all livestock and wildlife rely is maintained. Livestock use allotments should be based upon the land's carrying capacity. The "desired plant community" concept used by BLM to justify any ecological condition it wants should be abandoned.

Reverse Riparian Wetland/Stream Deterioration — A moratorium should be imposed on all spring developments and reservoirs constructed for livestock watering. Resources should instead be committed to rehabilitating degraded springs and riparian areas. Give riparian areas and floodplains a chance to recover at the end of each grazing season. In those critical riparian areas, grazing preferences should receive automatic allotment reductions when grazing livestock do not leave at least six inches of herbaceous vegetation stubble.

Assess and Address Rangeland Restoration Needs — BLM should publicly admit that it has an overgrazing problem and take steps to correct grazing problems on deteriorated ranges. On lands that still have the opportunity to recover to a productive status without rangeland restoration methods, BLM must establish stocking levels below carrying capacity so that native plant communities can return over time. Research on methods of rangeland restoration should be increased. Millions of acres are now so depleted by abusive grazing that even removing livestock entirely will not result in improvement. Our knowledge of how to restore diverse rangeland communities is in its infancy.

Redirect Rancher Subsidies - To cushion any financial hardships on grazing permittees as a result of stocking rate reductions, range improvement funds ("8100 monies" and grazing advisory board budgets) should be redirected to buy hay from private pastures to feed stock displaced from BLM lands and to employ ranch hands on aggressive rangeland rehabilitation projects.

MANAGE FOR THE FUTURE

End the Grazing Entitlement Syndrome — Allotment of grazing permits is a privilege, not a God-given right. Abuse of the privilege should result in its loss. Permit conditions should actually be enforced. The common practice of BLM allowing ranchers to routinely exceed the established preference or grazing use dates should end.

Allow Voluntary Retirement of a Grazing Permit — Conservation organizations and state wildlife agencies which purchase crucial wildlife areas are finding that on BLM lands, if a permit is not used for livestock grazing within two years it becomes available to any other qualified applicant. This “use it or lose it” policy should end.

Reduce Permit Preferences Where the Range is in Poor Condition — Adoption of this recommendation would be a first step for the BLM to begin phasing in ecosystem management on a broad scale.

Develop Criteria For Approval of “Range Improvement Projects” — BLM’s current attitude is that any construction project on rangeland is an “improvement.” Projects such as fencing, seeding, and water developments should be strictly scrutinized to ensure that other resource values, such as wildlife, are not needlessly sacrificed in the name of “improved livestock distribution.”

MAKE BLM ACCOUNTABLE TO THE PUBLIC

Collect and Disseminate Accurate Range Condition Information — Honesty is a novelty at BLM. Valid rangeland data should be gathered, maintained, and made freely available so that the public will, for the first time, have the tools to evaluate BLM performance.

Put BLM Personnel in the Field — An ethic of physically monitoring the range should be established at BLM.

Abolish Grazing and Multiple Use Advisory Boards — These advisory boards are structured to be dominated by livestock interests. If there is a need for formal public input to BLM, citizen advisory committees should be given balanced memberships and be provided with accurate information on resource conditions and resource trade-offs.

End Retaliation Against BLM’s Own Resource Specialists — BLM is one of the most repressive agencies within federal service. BLM will never reform until it abandons its “kill the messenger” approach to the public servants charged with delivering the facts on rangeland conditions.

EMPLOYEE CRITIQUE OF BLM RANGELAND MANAGEMENT

PURPOSE

In this document, we highlight many current problems facing the Bureau of Land Management (BLM) in rangeland management. We hope to convey a sense of the extreme urgency needed to redirect management emphasis and to correct past errors. The first important step in solving problems is recognizing that problems do indeed exist. For decades, many rangeland management issues have either gone unrecognized as significant problems, or have been purposely avoided. As a result of this neglect, the health of our public rangelands has continued to deteriorate. Only through immediate and effective action can we hope to halt the continued severe and irreversible degradation of publicly owned rangeland ecosystems.

INTRODUCTION

As the nation's single largest manager of public lands, the BLM may be the best kept secret in the United States. The BLM manages one-eighth of all land in the U.S., more public land than the combined area of all the states on the Eastern seaboard. It administers more land than the U.S. Forest Service, the National Park Service, and the U.S. Fish and Wildlife Service combined. This vast land area is a major part of the heritage of all Americans, yet many Americans have little or no knowledge of the BLM.

The BLM was given a multiple-use mandate with passage of the 1976 Federal Land Policy and Management Act (FLPMA). In 1978, Congress passed the Public Rangelands Improvement Act. With the goal of improving declining range conditions, this Act directed the BLM to inventory range conditions and to document range condition trends. In addition, the Act instructed the BLM to develop and periodically review allotment management plans. The BLM has been unable and, in some cases, unwilling to meet the Congressional mandates of these Acts. Many, if not most, allotments are not managed under an allotment management plan.

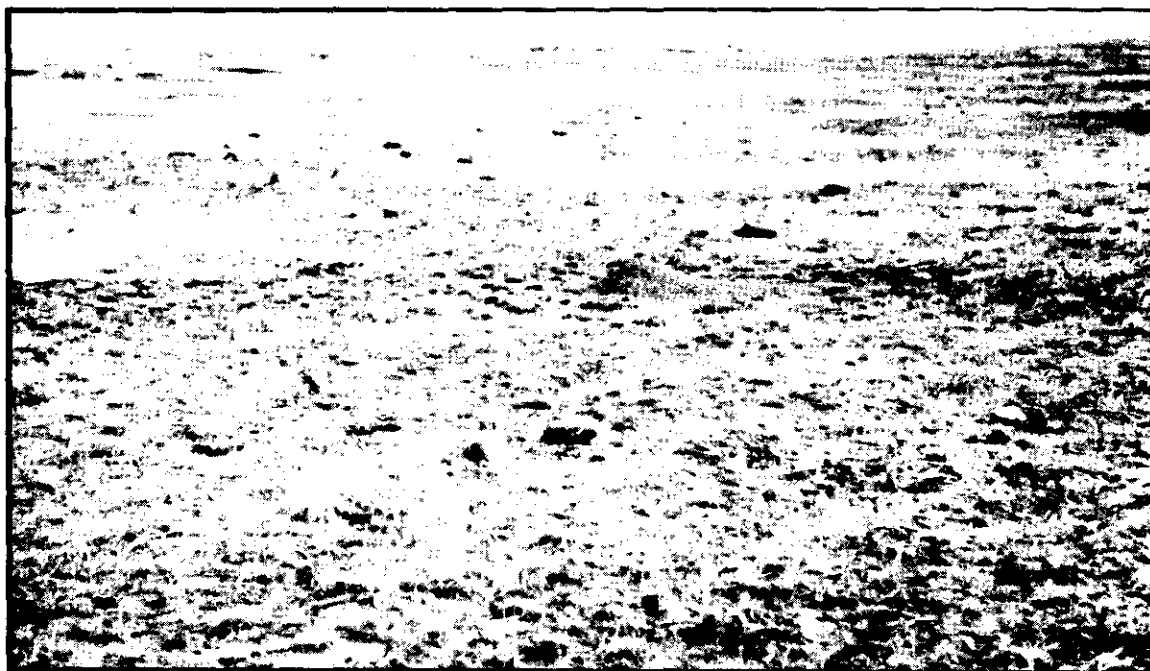
People are generally unaware of the state of the rangelands on public lands managed by BLM. While the difference between an old growth forest and a clearcut is immediately obvious, the differences between rangelands in good and poor ecological condition are more subtle. Ecological decline from overgrazing is a gradual, long-term process.

Overgrazing slowly causes a decline in the diversity and abundance of native plant species. As native plants die off, they are usually replaced by exotic plants that are significantly less productive in terms of forage,

watershed protection, and wildlife habitat. Many people can not tell the difference; most have never seen rangelands in good condition to use as a comparison.



Good condition rangelands inside a fenced cemetery where grazing is not allowed. South Central Idaho, 1993.



Poor condition rangelands on Critical Deer Winter Range, South Central Idaho, 1993

The BLM continues to claim that public rangelands are in better condition now than they have ever been. However, little, if any, range condition data has been collected on BLM-administered public lands to back up these assertions. The BLM is not, and never has been, able to adequately administer an intensive livestock management program. The agency simply doesn't have the capability in terms of staff and budget. In any given year, many range conservationists will see less than half of the grazing allotments they are responsible for.



Looking from grazed BLM Lands to ungrazed Buenos Aires NWR in Arizona. Note absence of grass. 1991.

PHOTO BY GEORGE WUERTHNER

BLM MANAGEMENT: A BRIEF SUMMARY

The problems in BLM can best be described by looking at individual programs. Activities described here are not exhaustive but these items are most significant for their effect on ecological health of BLM rangelands.

Political Pressures and Professionalism

The western livestock industry has tremendous political power and influence. These forces are routinely used at even the slightest perception of a threat to the livestock industry. Backed by the industry, livestock permittees usually have the best lawyers money can buy. Livestock industry allies are found in many university range staffs and range extension personnel. These entities generally function as strong advocates for the industry. In many cases when the BLM has taken legal action to correct rangeland livestock abuse, university range professors have testified on behalf of the livestock operator. Interestingly enough, when an environmental group appeals a BLM rangeland decision, these very livestock permittees and their university allies often intervene on the BLM's behalf.

The previous administration promoted individuals sympathetic to the livestock industry. The upper echelon of the BLM has many livestock industry proponents. Fear of professional reprisal has kept many environmentally responsible employees silent on important resource issues. In many small towns in the West, the livestock permittees are neighbors. Most of them are well-meaning people who have a vested interest in the number of livestock they are permitted to stock on public lands. Reducing livestock numbers for someone who is well-liked or very influential in a community can be socially unpleasant and, in extreme cases, can lead to intimidation and threats. BLM managers, although schooled in resource management, often do not have the psychological fortitude to handle these difficult situations and, in the absence of upper management support, succumb to intense permittee pressure.

Many livestockmen/women sincerely believe they are not damaging the range, but seldom think in terms other than livestock feed. They measure the health of range in terms of livestock weight gains. They further assume that if livestock are making good gains on their range that wildlife must be benefiting as well. What they fail to understand is that livestock are ecological generalists and many species of wildlife have much narrower food and cover requirements. Wildlife, however, is often narrowly defined as animals that are hunted. The diversity of species supported by public lands is often overlooked.

Although livestock permittees are often skilled in the ways of animal husbandry and livestock management, they may have little or no knowledge of vegetative management or long-term vision of the future. It's a familiar story of men and women who are hastening the demise of the only life they know.

Range conservationists are trained in vegetation management and their jobs are supposed to include ecological trend and utilization monitoring, prescribing livestock use levels, initiating trespass actions, and developing and implementing grazing systems and range improvements. Inevitably, some parts of a range conservationist's job are not popular with permittees. Because they work directly with livestock permittees, who may also be neighbors and friends, range conservationists often experience social intimidation. Under the current BLM organization it is often impossible for range conservationists to do their job.

Range conservationists are typically graduates of western universities. Many range professors at these universities bias their perception of the profession towards protecting rancher's "rights" rather than proper management of rangeland resources. Only those range conservationists with a deep personal commitment and interest in natural resources can avoid the many pitfalls that the BLM and universities provide. Remarkably, some do have the intense commitment necessary to do their job well. Others could more appropriately be referred to as rancher conservationists rather than range conservationists.

There are many true professionals in the BLM who, despite intimidation and frustration, have maintained high ethical standards and quality of work. To a discouraging degree, many BLM managers have redefined the term professional to mean an individual who 1) does not make waves, 2) gives any decision by management blind support, 3) is willing to put the right "spin" on the facts, and 4) accommodates the wishes of the commodity user. Truth, integrity, and ethics are all too frequent casualties - denial and public deception are often the victors.

Drought Management

The extreme drought occurring in the Intermountain West over the last six years exemplifies BLM's mismanagement of the public lands. Vegetative production estimates toward the drought's end dropped to as low as thirty-five percent of normal for the six states most directly impacted (Oregon, Idaho, Nevada, Utah, Wyoming and Montana). In spite of this, actual grazing use was seven percent higher after five years of drought than it was in 1980 (Public Land Statistics). In 1991, after five years of drought, livestock use was only two percent less than in 1983, when precipitation levels in the West

were well above average. Stocking levels during this drought resulted in the overgrazing of much of this region at rates two to three times over what the vegetation production could support. Rather than take closure actions to protect public resources during this historic drought, the BLM merely asked livestock permittees to voluntarily cut back grazing use. Sadly, upland, riparian and aquatic habitats were severely abused except in the few isolated instances where livestock permittees took the management initiative on their own. In many cases, this has caused permanent damage.



Cattle "bombed" BLM lands in Utah near the Paria River, 1991.

PHOTO BY GEORGE WUERTHNER

Carrying Capacity and Stocking Rates

Based on an inventory by established methodology BLM has measured the forage produced on most BLM lands. This occurred mostly in the late seventies. This measured forage quantity can be allocated to different uses: a certain percentage to plant health and maintenance, a certain percentage to use by wildlife and a certain percentage for use by domestic livestock (Holecheck, et al. 1989). This allocational process identifies the carrying capacity of the vegetational resource for grazing animals. In most cases these inventories demonstrated that reductions in livestock were necessary to bring the stocking rate in line with the carrying capacity. These reductions are documented in many grazing Environmental Impact Statements prepared in the last 15 years. In response, the administration in 1986 issued policy direction that no reductions in livestock were to be made based on inventory. BLM instead had to demonstrate an unsatisfactory trend through monitoring over time before reductions could be implemented. This monitoring requirement is extremely expensive and difficult to meet. BLM's efforts at good land management were further limited by concurrent reductions in budget, effectively eliminating any potential for reductions in livestock use in overgrazed allotments.

The Burden of Proof in Livestock Management

In the rural West, the local ranching public supports an active advocacy group for livestock grazing on public lands. Conversely, the general public — those Americans

concerned generally about the health of rangelands — lack both local knowledge and local avenues for their views to be heard. Because of this, managers assess the risk of offending local commodity interests as much higher than the risk of offending people supportive of ecological health. As one manager put it, when confronted with the fact that he had not considered the impacts of an action on archaeological resources and sensitive species: “I’m managing risk. Who’s going to catch me and sue me?”

Because of this assessment of risk, the burden of proof is on the non-range specialist to show why a proposed grazing action is damaging to ecological health. The same level of proof is not demanded of the specialists proposing a pro-grazing action to demonstrate the action will benefit the resource. This “burden of proof” reality permeates all aspects of BLM culture and activity.

Trespass

Although trespass grazing is common on public land, many BLM Districts have processed few, if any, trespass cases in years. Trespass use is generally “resolved” by requesting permittees to remove livestock. When BLM does process a trespass case, the low trespass penalty provides little incentive for the permittee to avoid future trespass.

Demonstration Areas

The BLM has widely publicized its “success stories”. The public would be wise to be suspicious of the claimed improvement in these demonstration areas. While some improvements are genuine, many are simply a vegetative expression that results from a brief rest from grazing. This is not true recovery since the area will revert to its original state with the next grazing event.

Grazing Fees, the Fee Incentive Program, and Grazing Privileges

The grazing fee is currently the most publicized issue of public rangeland management. The grazing fee controversy is a symptom of the much larger problem of deteriorating resource conditions. There are several weaknesses with the grazing fee incentive program recently proposed by BLM. Under this proposal, the grazing fee could be discounted up to 75 percent, based on a permittee’s “improvements” on public lands within an allotment. If man-made range improvement facilities count as “improvements”, permittees could possibly claim a controllable interest in public lands based on an established equity without effecting any change in rangeland condition.

Although the federal government does not recognize any property value associated with federal grazing permits, financial institutions do recognize them as property. Ranch property values are usually based on the livestock carrying capacity of the private lands and allowable livestock use levels associated with federal grazing permits. Although grazing permits are currently defined in the Taylor Grazing Act and federal regulations as a privilege, the western livestock industry continues to lobby Congress to recognize grazing permits as a property right. The incentive fee proposal could result in what the Sagebrush Rebellion had previously failed to accomplish by establishing a private property right on public lands through economic investment.

Land management agencies must be able to fulfill their Congressional mandates without interference or disruption from user groups claiming a property right on public lands through economic investment. This includes not only livestock permittees but also recreationists, miners, rights-of-way holders and other user groups.

BLM's current grazing fee proposal would also require setting desired resource objectives without knowing current rangeland conditions. Setting resource objectives and monitoring are supposed to be done now but, in reality, have occurred on a very small percentage of grazing allotments. In the usual absence of data, the BLM would make decisions on grazing fee discounts based on "professional judgement." If history is any indication, the discount assessment will more depend on political influence rather than any scientific evaluation of resource conditions. Without increases in budgets, personnel, and particularly a commitment to scientific integrity, this program is destined to be rife with fraud and to fail the resource.

Desired Plant Communities - Bureaucratic Deception

During the past administration, the BLM was committed to making deteriorated range conditions sound good by using deceptive terminology. One administrative initiative was a concept called Desired Plant Community (DPC). Using this concept, the BLM, with input from user groups (e.g. livestock permittees), can decide what plant community to manage for in order to "obtain the optimal balance of resource uses." The definition of DPC thus becomes a political decision rather than a resource based decision. A "desired plant community" can be achieved even though the rangelands are in fair or poor condition!

Overstocked Rangelands

The BLM has never officially admitted that overstocked rangelands are a problem (GAO, 1988). Poor range conditions are regularly attributed to poor livestock distribution. BLM policy is to address these "distribution problems" with water developments, grazing systems and other range "improvements." This results in the movement of livestock into areas previously lightly or un-used, usually resulting in their degradation with no improvement in the previously degraded areas. The BLM and universities have always searched for a panacea to prevent reductions in livestock numbers.

In the last 20 years, one highly acclaimed "management tool" was the rest rotation grazing system, which involves alternating cattle use through different pastures. This approach assumes that one season of rest will allow for recovery from any levels of previous grazing use. This assumption has been proven false. Prescribed seasons of use, duration, and stocking rates in most pastures are usually counterproductive in improving riparian areas or meeting the physiological needs of native range plants (Cook and Child 1971; Trlica et al. 1977; Hughes 1986; Eckert and Spencer 1987; Holecheck et al. 1989). Holistic resource management, the newest system, is similar to rest rotation except that the pastures are smaller, used for shorter durations, and grazed with higher numbers of livestock. Both systems fail to achieve improved conditions without incorporating major changes in stocking rates and seasons of use.

The BLM has ignored the fact that a tremendous amount of public land is unsuitable for livestock grazing. Steep slopes and areas that are far from water are generally recognized as

unsuitable, yet they are typically allocated to livestock. Livestock will concentrate where there is water (e.g. riparian areas and springs) and where there is easy access to forage. Stocking rates were set assuming livestock would use entire allotments, despite the significant areas of unsuitable range. One of the main reasons that so many allotments are overstocked is because these unsuitable lands are included in the livestock stocking base. Following are percentages of BLM administered public lands currently being managed for livestock grazing (Public Land Statistics):

- ☐ Arizona — 98.6%
- ☐ California — 45%
- ☐ Colorado — 93.3%
- ☐ Idaho — 107%
- ☐ Montana — 100.2%
- ☐ Nevada — 104.7%
- ☐ New Mexico - 100.1%
- ☐ Oregon — 82%
- ☐ South Dakota — 97%
- ☐ Utah — 106.3%
- ☐ Wyoming — 96.2%

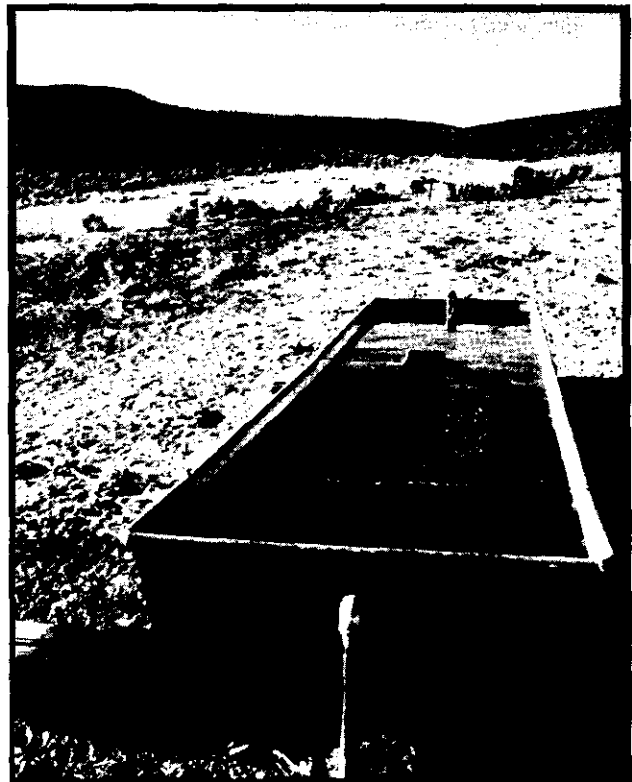
The BLM land base in California and Oregon reflects lower percentages than other states because it is managed for timber harvest. The reason for BLM land being grazed at more than one hundred percent reflects both poor record keeping on the BLM's part and lands BLM administers but doesn't own.

"Range Improvements" — an Oxymoron

"Range improvement" projects are a major BLM management emphasis. These projects would be more accurately termed as livestock management facilities. One of the most common range improvement projects is to run water through a pipe from a natural spring to a watering trough. In Idaho and Montana alone, the BLM and livestock permittees have developed over 3500 springs on public lands. Some BLM Districts have developed all known springs. Yet in desert ecosystems, natural springs are critical areas for maintaining biological diversity.

The BLM often states that the purpose of these spring developments is to improve riparian area condition. Yet the BLM does not monitor the effectiveness of these projects for riparian improvements.

PHOTO BY GEORGE WUERTHNER



Water stock pond has removed water from stream.
Trampled wet meadow. Sheldon NWR, Nevada, 1990.

Diverting spring water to a trough results in a dewatered wetland or spring riparian area, and a net loss of wetlands acreage. This effect is not only inconsistent with the Bureau's publicized goals for wetland/riparian improvement, but is inconsistent with the national policy of no net loss of wetlands.

Wetland areas are also lost by the construction of reservoirs. In Montana, the BLM has developed 6,900 livestock watering reservoirs. Reservoirs are usually constructed in natural depressions or wetlands along water-courses. This new water source increases livestock use around the reservoir and in adjacent riparian areas, thus impacting water quality. These range "improvement" projects also stop water that otherwise would flow to riparian habitats downstream. Over time, downstream riparian habitat is reduced.



Use of car bodies to stop loss of front slope due to wave action. Montana.

"Range improvements" also involve large scale vegetation changes on uplands. Range surveys conducted in the Vale, Oregon District during the 1950s showed that the range was overstocked to the point that proper use would require 50 percent cuts in permitted livestock use (Heady, 1977). The Vale Project in eastern Oregon set out to improve the rangelands so that no reduction in livestock use would be required. Thousands of range improvement projects were developed to accommodate overstocking of the rangelands.

An economic analysis of the Vale Project revealed that it cost the American taxpayers approximately \$10 million over an 11-year period between 1963 and 1974. The money was used to remove the shrub component from the natural vegetation on 506,000 acres, plant exotic grasses on 267,000 acres, build over 2,000 miles of fence, construct 1,600 water developments and 463 miles of pipelines (Heady, 1977). Project costs exceeded benefits by \$5 million.

Now, 20 years since project completion, native shrub seedlings have increased, crowding out exotic grasses, and water developments have fallen apart. Today, permitted livestock numbers are based on the optimal livestock forage conditions that were artificially created 20 years ago. The result: overstocking, and overgrazing. Similar situations occur on a smaller scale on BLM lands nationwide. Livestock stocking rates are increased based on construction of "range improvements" and then are maintained at that level even though the project may no longer be functional. Tremendous pressure exists to have the BLM maintain these exotic grass seedlings by eliminating shrubs with fire or chemicals and rebuilding the water systems. The livestock permittees cannot afford to do it.

In the late 1970s, under court order, the BLM completed a land management plan for the Challis Resource Area of the Salmon District in Idaho. The plan outlined livestock use reductions, new grazing systems and livestock management improvements. The BLM subsequently constructed approximately \$583,400 dollars worth of "range improvement" projects (ESP 1990) but never made the livestock use reductions. Rangeland and riparian habitat conditions continue to deteriorate as a result of the agency's failure to reduce livestock numbers. This same situation has occurred in many other areas in the BLM.

Wildfire Impacts Over the Last 20 Years

Wildfire has changed millions of acres of shrub steppe habitat to rangelands dominated by exotic weeds (Mack, 1981; Rosentretter, 1992). Most exotic plant species have relatively no value for wildlife and greatly reduced value for livestock. Plant communities dominated by exotic weeds represent low-quality watersheds with increased susceptibility to soil erosion and are prone to desertification (Buckhouse, 1985). Once these exotic species dominate the landscape, fire frequency increases and biodiversity is further reduced (Young and Tipton, 1989).

Current grazing levels in many desert ecosystems have reduced the vigor of native plants. The additional stress of wildfire has further reduced the ability of native plants to compete with exotic weedy species and annual grasses. On the other hand, areas where native vegetation is in good health normally recover from wildfire without assistance.

Due to increased fire frequency and the invasion of exotic plants, rangelands in the Great Basin region may actually be in worse condition than at any time in history.

PHOTO BY GEORGE WUERTHNER



Desert Bighorn Sheep

Although historical livestock use levels were higher, the grazing impacts created weren't permanent. Even poor condition rangelands may actually be getting worse because overgrazing is allowing plants with little value to be replaced with plants with no value. Research has shown that is difficult and expensive to restore native vegetation to these exotic plant dominated rangelands.

Livestock Grazing and Wildlife Management

BLM managers often choose livestock grazing over wildlife protection when livestock interests conflict with wildlife needs. BLM has been concerned with satisfying the needs of livestock grazing interests "to the detriment of other land uses and the overall health of the land itself" (GAO, 1991).

Bighorn sheep (*Ovis canadensis*) exemplify the management conflicts between livestock and native wildlife on public lands. Prior to the appearance of domestic sheep, bighorn sheep were one of the most abundant wild herbivores in the Intermountain West. Sportsmen/

women and other wildlife groups have spent millions of dollars transplanting bighorn sheep to reestablish native populations, only to experience population crashes when newly established populations come in contact with domestic sheep. The demise of bighorn sheep populations after exposure to domestic sheep is well documented (Table 1).

TABLE 1

Major all-age die-offs of bighorn sheep due to pasteurella caused pneumonias following contact with domestic sheep (Foreyt and Jessup, 1982; Onderka and Wishart, 1984; Coggins, 1986; Jessup, 1981).

Population	Year
Lava Beds, Calif.	1980
Methow Game Range, Wash.	1980
Moormon Mountain, Nev.	1980
Rock Mountains, Alberta	1981-82
Lostine Mountains, Ore.	1986-87

Although the cause has not yet been conclusively determined, one of the largest Rocky Mountain bighorn sheep populations, the Salmon River herd in Idaho, has experienced a similar population crash.

Wool growers have been quick to dismiss the blame for bighorn sheep population losses. They assert that there is not enough research to conclusively prove that contact with domestic sheep is fatal. Yet the literature clearly indicates that contact with domestic sheep transmits diseases that are fatal to bighorn sheep (Foreyt and Jessup 1982, Onderka and Wishart 1988).

Winter mortality of elk (Cervus elaphus) and mule deer (Odocoileus hemionus) is another example of conflicts between livestock and native wildlife on public land. Elk and mule deer winter kill is often blamed on the weather. Although a certain percentage of elk and deer can be expected to die naturally every winter, many die from compounding factors associated with overstocked rangelands. Current death rates exceed natural mortality for two primary reasons:

1. Deer and other wild ruminants require nitrogen to break down plant materials into digestible components. Nitrogen is readily available in succulent green grass and forbs, but not in dried forage. In the arid West, most forage dries up early each summer in upland areas. Green plants in riparian areas and springs are the only



Yearling mule deer winter kill. South Central Idaho, 1993.

Yearling mule deer winter kill, South Central Idaho, 1993



*Yearling mule deer winter kill, fair condition range-lands. South Central Idaho, 1993
[Note lack of any vegetation except sagebrush]*

nitrogen-rich forage remaining later in the year. Livestock eat almost all available forage in these areas. Therefore, many elk and deer go into the winter in poor condition. This forage utilization conflict is most severe during droughts.

2. Many elk and deer move onto low elevation ranges in the winter. Heavy forage utilization by livestock on critical big game winter ranges leads to winter starvation and/or problems with big game depredation on adjacent private lands. Millions of sportsmen's and sportswomen's dollars are spent each year to compensate private landowners for depredation. Many of these landowners also have federal grazing permits that allows them to overstock winter ranges and contribute to the problem for which they are compensated by sportsmen and sportswomen.

Mule deer forced onto private lands in winter because of poor condition BLM rangelands. South Central Idaho, 1993



Elk populations have increased in many western states. This fact has been used as an argument that range condition has improved and that current livestock use levels and big game management are compatible. State Fish and Game data has shown, however, that elk population increases are primarily a reflection of intensive management by fish and game agencies. Shortened hunting seasons, controlled hunt areas and bull only elk hunting seasons have brought elk populations back. Elk also have the ability to use rangelands that livestock rarely, if ever, use. Although these rangelands are allocated for livestock use, distance from water and steepness of slope prevent them from using these areas.

Deer and elk are very adaptable in terms of both food and cover requirements. Many species of birds have narrower habitat requirements and are therefore better indicators of habitat changes than deer or elk. Ground nesting birds are particularly sensitive to impacts by livestock on rangeland vegetation. For example, the masked bobwhite (*Colinus virginianus ridgwayi*) was extirpated from the southwest around the turn of the century due directly to livestock overgrazing (Brown, 1989). A very expensive and tenuous effort is currently underway to restore habitat and reestablish this species.

Mearns quail (*Cyrtonyx montezumae*), another southwestern species, although still common enough to support recreational hunting, has been eliminated from extensive areas of its former habitat largely due to livestock (Johnsgard, 1973). Lesser prairie chickens (*Tympanuchus pallidicinctus*) in the Southwest and Columbian sharp-tailed grouse (*Tympanuchus phasianellus columbianus*) in the northern intermountain region occupy less than 10% of their former habitat (Taylor and Guthery, 1980 and Johnsgard, 1973). Although habitat conversion from rangeland to agriculture is responsible for much of the lost habitat, these two bird species have been eliminated from or severely reduced in most remaining rangeland habitat as well. Losses on rangeland are directly attributable to the changes in plant communities brought about by livestock grazing.



Sage grouse, Rawlis, WY

The western race of sage grouse (Centrocercus urophasianus phaios) has declined so significantly in eastern Oregon and Washington that it is listed as a federal Candidate Species. Even the range of the widespread and common eastern race (C.u. urophasianus) has disappeared from parts of its range. Over most remaining areas, populations are much reduced from former levels due to degraded shrub and meadow plant communities (Johnsgard, 1973).

Riparian areas are the lush green areas of vegetation next to stream, lakes, springs, and ponds. They are critical for wildlife and fish in arid rangeland ecosystems. The health of these areas is the best indicator of whether the BLM is managing in accordance with the multiple use mandate required by FLPMA. No other area better exemplifies the wide range of resource uses and values that the BLM manages. Western riparian areas are in the worst condition in recorded history and have made almost no improvement despite seven years of increasing funding and attention.

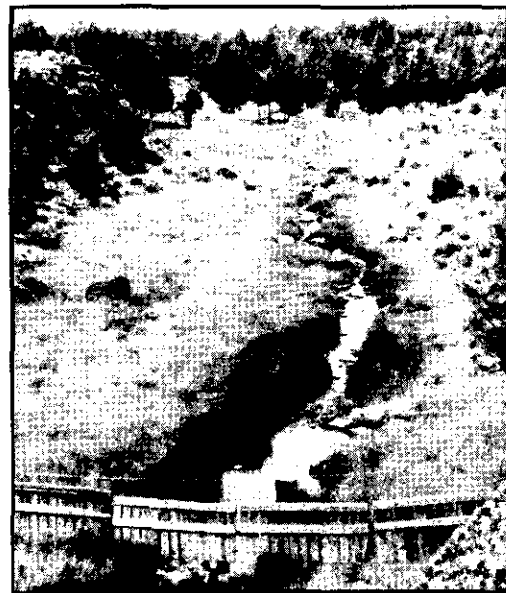
Riparian management efforts initiated by BLM staff specialists are often undercut by BLM headquarters and local managers responding to rancher objections (GAO, 1988). In a 1989 statement made in a congressional hearing, a GAO official stated that, "Thousands of miles of streams are in a degraded condition largely because of poorly managed livestock grazing."

Degraded riparian habitats have had a significant impact on riparian associated wildlife. Many western riparian associated nongame bird species have been on long term declines. Several species, including the western race of the Yellow-billed Cuckoo (Coccyzus americanus occidentalis), southwest Willow Flycatcher (Empidonax traillii brewsten), and Least Bell's Vireo (Vireo bellii pusilla) have experienced dramatic population declines due largely to livestock. Some argue that these species have declined because of habitat deterioration on wintering areas outside the United States. However, the response of neotropical migrants to retirement of grazing from the San Pedro National Conservation Area, AZ, has been tremendous, especially for species using understory vegetation (Krueper, in press). Even resident species such as mountain quail (Oreortyx pictus), now classified as a federal Candidate Species, have disappeared from most of the riparian habitats of the northern Great Basin and the Columbia Plateau.

Fish, especially cold-water species inhabiting rangeland environments, are very good ecosystem health indicators. In Nevada, the Lahontan cutthroat trout has been listed as an endangered species. The Bonneville cutthroat trout, redband trout, and bull trout are all Candidate species for possible listing as threatened or endangered. These fish are in trouble due partially to habitat loss and degradation associated with livestock grazing. Endangered and threatened Pacific salmon populations are at all time low levels. A myriad of problems, especially dams, are impediments to recovery. Abusive livestock grazing on many streams where spawning occurs will retard or prevent recovery even if other problems are rectified. The American public will ultimately be responsible for funding fish and wildlife recovery programs to avoid species extinction.



PHOTOS COURTESY OF
OREGON TROUT



*Willow Creek, on the Crooked River
National Grassland in Oregon. Picture on
the left shows condition during active cattle
grazing, 1988. Picture on the right shows
condition after two years of excluding
cattle, 1990.*

CONCLUSION

When speaking in such broad generalities about extremely diverse landscapes as managed by the BLM, there will always be exceptions. That is the point; they are exceptions. There are a few examples of good land management in the BLM, but when taken in the overall context of the total amount of public land being managed, they are insignificant.

BLM resource specialists and managers routinely make decisions for the benefit of individuals in the livestock industry and to the detriment of both overall ecosystem health and future generations of Americans. The federal budget deficit parallels the natural resources deficit created during the last two decades by utilizing natural resources at unsustainable levels.

REFERENCES

- Buckhouse, J.C. 1985. Effects of fire on rangeland watersheds. In: Sanders, K.; Durham, J., eds. Proceedings of a symposium: rangeland fire effects. Boise, ID:U.S. Department of Interior, Bureau of Land Management: 58-60.
- Brown, D.E. 1989. Arizona game birds. Univ. of Arizona Press, Tucson. 307 p.
- Coggins, V.L. 1988. The Lostine Rocky Mountain Bighorn Sheep die-off and domestic

sheep. Proceedings of Bienn. Symp. North. Wild Sheep and Goat Counc.

Cook, C. and R. Child. 1971. Recovery of desert plants in various states of vigor. J. Range Manage. 24: 339-343.

Eckert, R. and J. Spencer. 1987. Growth and reproduction of grasses heavily grazed under rest-rotation management. J. Range Manage. 40: 156-159.

ESP. 1990. Tenth year report. Experimental Stewardship Program. Bureau of Land Management, Salmon District.

Foreyt, W.J., and D.A. Jessup. 1982. Fatal pneumonia of bighorn sheep following association with domestic sheep. J. Wildl. Dis. 18:163-168.

GAO. 1988. Public rangelands - Some riparian areas restored but widespread improvement will be slow. GAO-RCED-88-105. 85p.

GAO. 1988. Rangeland management - More emphasis needed on declining and overstocked allotments. GAO-RCED-88-80. 71p.

GAO. 1991. Public land management - Attention to wildlife is limited. GAO-RCED-91-64. 52p.

Heady, Harold F., and James Bartolme. The Vale rangeland rehabilitation program: The desert repaired in Southeastern Oregon. USDA For. Serv. Resour. Bull. PNW-70, 139 p., illus. Pacific Northwest Forest and Range Experiment Station, Portland, Oregon.

Holecheck, J., R. Pieper and C. Herbel. 1989. Range Management Principles and Practices, Prentice Hall, Englewood Cliffs, New Jersey, 501 p..

Hughes, L. 1986. Grazing systems on the Arizona Strip, p. 239-240. In: Rangelands: A Resource Under Siege. Cambridge Univ. Press, Sydney, Australia.

Jessup, D.A. 1981. Pneumonia in bighorn sheep: Effects on populations. Cal-Neva Wildlife Trans. 72-78.

Johnsgard, P.A. 1973. Grouse and quails of North America. Univ. of Nebraska Press, Lincoln. 553 p.

Krueper, D.J. in press. Effects of land-use practices on western riparian ecosystems. Proceedings of the National Workshop on Status and Management of Neotropical Migratory Birds. Estes Park, CO.

Mack, R.M. 1981. Invasion of Bromus tectorum L. into western North America: an ecological chronicle. Agroecosystems 7: 145-165.

Onderka, D.K., and W.D. Wishart. 1984. A major bighorn sheep die-off from pneumonia in Southern Alberta. Proceedings North. Wild Sheep and Goat Conference. 4:356-363.

Onderka, D.K., and W.D. Wishart. 1988. Experimental contact transmission of Pasteurella haemolytica from clinically normal domestic sheep causing pneumonia in rocky mountain bighorn sheep. J. Wildl. Dis. 24(4):663-667.

Rosentretter, R. 1992. Displacement of rare plants by exotic grasses. Paper presented at the Symposium on Ecology, Management, and Restoration of Intermountain Annual Grasslands, Boise, ID, May 18-22, 1992.

-
- Taylor, M.A. and F.S. Guthery. 1980. Status, ecology and management of the lesser prairie chicken. U.S.D.A. Forest Service, Genl. Tech. Rpt. RM-77. Fort Collins, CO. 15 p.
- Trlica, M., M. Buwai, and J. Menke. 1977. Effects of rest following defoliations on the recovery of several range species. *J. Range Manage.* 30: 21-27.
- Young, J.A. and F. Tipton. 1990. Invasion of cheatgrass into arid environments of the Lahontan basin. pages 37-40 in Durant et al, Proceedings: Symposium on Cheatgrass Invasions, Shrub Dieoff, and Other Aspects of Shrub Biology and Management. April 5-7, 1989; Las Vegas, NV. General technical report INT276; Ogden, Utah.

RECOMMENDATIONS TO FACILITATE RANGELAND IMPROVEMENT

OVERGRAZED RANGELANDS

Grazing use levels on most of the Federal rangelands in the west must be reduced to manage for healthy ecosystems and allow for a long-term sustainable livestock industry. Heavy livestock grazing, particularly in areas that evolved without or with few large herbivore species (e.g. American bison) has been a formula for ecosystem collapse. Livestock reductions will be required to improve the millions of public land acres that are currently in poor or fair condition. Management of desert ecosystems that do not acknowledge this serious livestock management problem are no more than rhetoric; ecosystem management goals for such programs will never be realized. In the short-term, the western livestock industry will suffer financially without some kind of assistance. However, the industry would benefit in the long-term by the stability associated with realistic stocking rates prescribed on what the land can sustainably support.

FEDERAL ASSISTANCE PROGRAMS

Federal assistance programs must be implemented to reduce the financial hardships that stocking rate adjustments would have on affected grazing permittees. Suggestions to consider include the following:

1. Grazing advisory board and 8100 monies now being used to build "range improvements" can be used to buy hay for a period of time (five years) in decreasing increments each year (100% of the total grazing reduction the first year, 80% the second year, etc.) for those permittees receiving grazing reductions. Additional appropriations may be necessary over and above advisory board and 8100 monies.
2. People incurring grazing reductions should be given priority in hiring necessary manpower for aggressive rangeland rehabilitation programs.
3. Low cost or even free job training programs should be made available to enable displaced livestock operators an opportunity to retrain in other fields.
4. Some operators have had success increasing the productivity of private hay ground and pasture through intensive management. Training and financial incentives could be provided.

ACCOUNTABILITY

This issue is the most difficult to address, but is the most important in terms of improving rangeland conditions. The only environmental law where accountability is required for resource conditions is the Endangered Species Act. There are many laws, regulations,

and policies in existence that, if followed, would preclude the Endangered Species Act. The problem is there is no accountability associated with all other environmental laws and regulations and so they are routinely ignored. The Endangered Species Act has become the “bad guy” when a lack of accountability for compliance with other laws and regulations is the real culprit.

Those people who ignored natural resource conditions and concentrated on peripheral issues have largely experienced successful, upwardly mobile careers. The amount of money, time, and manpower spent on computer programs, GIS systems, the creation of automated data bases, administration, record keeping, affirmative action, media blitzes, resource management plans, planning for resource management plans, coordinating with “user groups,” consulting with “user groups” and a myriad of other superfluous activities is incredible. It’s not that these activities don’t have their place, but the BLM has long since lost sight of its job of natural resource management. Other activities are now our primary responsibility, with resource management being something done if and when everything else is accomplished.

Focusing the BLM back on responsibility for which the agency was named (e.g. land management), would streamline the agency, improve its management, and make the BLM more fiscally and environmentally accountable to the taxpaying public.

In the past 13 years, the only risk for a resource manager or specialist has been in doing his or her job. In many cases, it would be difficult to determine from reading performance evaluation criteria for BLM managers and even some specialists that they are in any way associated with a resource management agency. Risk should be created for those resource managers and specialists who do not manage natural resources in a sustainable fashion. Making resource managers accountable for resource conditions is the first step towards making the BLM a better land management agency.

“Inspector General-type inspectors” who are knowledgeable about natural resources could analyze and evaluate data collected and reports documenting resource conditions, and compare them against actual resource conditions. Several inspectors should be located in each state and remain autonomous to all but the BLM Director. The results of these evaluations should result in accountability for resource conditions by those responsible. Accountability should take the form of disciplinary actions or rewards depending on resource condition successes or failures.

RIPARIAN/WETLAND MANAGEMENT

The stage has been set for serious future management problems with native species that rely on riparian/wetland habitats to survive. Along most streams in the west the BLM is ignoring all other riparian and aquatic resource values and is allowing these areas to be used exclusively for livestock forage. The BLM should comply with the Clean Water Act, FLPMA, and other federal policy statements concerning riparian/wetland habitats by implementing the following action items:

Grazing allotments would receive an automatic 25 percent reduction in preference each year when there isn’t a minimum of 6" of grazeable herbaceous vegetation stubble in riparian areas at the end of each grazing season. In addition, livestock management

would have to be conducted in such a manner as to ensure that upland range conditions do not deteriorate. This stubble height criterion for livestock management in riparian areas is supported by scientific research in the Intermountain West (Clary and Webster, 1989). Stocking rates that ensure that these ecologically sensitive areas are lightly grazed will be necessary to meet any reasonable riparian management goals.

Riparian habitats in the western United States are so diverse that this recommendation may need regional adjustments. More restrictive standards relating to additional types of vegetation may be necessary in some areas. This criteria is, however, an important first step since currently in the Intermountain West livestock severely overgraze vegetation in riparian areas leaving eroded banks, silted streams and no forage for wildlife. This concept is simple enough to allow the BLM to expeditiously monitor many more areas than they could under more complex evaluation criteria. This directly monitors where cattle use is concentrated. This would also provide an impetus for livestock permittees to salt and herd livestock away from these ecologically sensitive areas.

Grazing regulations should be amended so that beginning in 1994 the amount of grazing use allowed is estimated and licensed based on the best available data. Grazing use allocations should be determined based on the capacity of the most sensitive areas and on the basis of plant needs to ensure the sustainability of the vegetative resource, on which all livestock and wildlife rely. Estimates of allowable grazing use and subsequent licensing should be repeated every five years.

WATER DEVELOPMENTS

Institute a moratorium on all spring developments and reservoirs constructed for livestock watering. In addition, commit money and manpower into mitigating and/or rehabilitating those springs or reservoirs sites already developed. Development of these ecologically sensitive areas would violate any policy of no net loss of wetlands. Mitigation of impacts caused by these developments would be a good faith effort at improving current resource conditions. Continued development of springs and reservoirs is drawing livestock into what are, in many cases, the only good condition rangelands remaining. This is having disastrous effects on biodiversity and ecosystem management.

ALLOTMENT MANAGEMENT PLANS

Allotment management plans should state why a particular grazing treatment (system) is chosen and provide a literature review that fully justifies the use of that grazing system. Most allotment management plans presently written in the BLM are "range improvement" justification statements. Grazing systems are often chosen because the livestock operator wants to try it or it simply legitimizes what is already occurring. Grazing systems as proposed in most allotment management plans often have a harmful impact on the vegetation and other resources.

GOOD/EXCELLENT CONDITION RANGELANDS

Give the highest priority to identifying good or excellent condition rangelands that remain and preventing them from deteriorating. These are the key areas still contributing to

biodiversity. Deterioration of these areas will result in the inability to restore similar rangelands and could result in many plant and animal species being listed as endangered.

DETERIORATED RANGELANDS

Identify and restore deteriorated rangelands. Unlike depleted ranges which lack the ability to recover from past abusive grazing, these ranges still have the ability to recover to a productive status without the intervention of rangeland restoration methods. These lands should be managed to prevent them from becoming depleted and no longer having the ability to recover. The best and probably only solution is to stock these areas substantially below their carrying capacity to enable recovery of the plant community over time.

RANGELAND RESTORATION

Increase the level of rangeland restoration research. Millions of acres are now depleted due to continuous abusive grazing. Desirable native species have been almost or entirely killed out or severely suppressed by undesirable species. Removing or reducing grazing pressure by itself will not result in improvement. Our knowledge of how to restore diverse rangeland communities in areas that are depleted of native vegetation is in its infancy.

GRAZING PERMIT RETIREMENT

Change the grazing regulations to allow voluntary retirement of all or a portion of the grazing permit by the owner of the base property to which a grazing permit is attached. Conservation organizations and state wildlife agencies purchase crucial wildlife areas from willing sellers. The price they pay for these ranches that have both private lands and an attached BLM grazing permit includes the value of the private ranch and the grazing permit. Frequently, these organizations want to eliminate or reduce the livestock grazing pressure on these lands. Technically, if the permit is not used for livestock grazing within two years it is available to other qualified applicants.

Conservation organizations and state wildlife management agencies do not qualify to hold grazing permits.

UNAUTHORIZED GRAZING USE

Increase enforcement activities and penalties for livestock trespass violations. This is necessary to deter future trespass activity.

GRAZING APPEALS

Revise appeal regulations to provide that grazing decisions will not be stayed until the appeal process has been completed. Changes in current land management practices based on data or other pertinent information should not be delayed for what is often extended periods of time.

SUPPLEMENTAL LIVESTOCK USE

All livestock use on public lands over and above the established preference or grazing use dates would not be allowed. Overstocked rangelands are so common that allowing use over and above established preference anywhere is a luxury western ecosystems cannot afford.

“RANGE IMPROVEMENTS”

Develop much stricter project criteria to ensure “range improvements” such as fencing, seedlings, and water developments enhance other resource values. Alternatives that better address a wider range of resource values are often conveniently overlooked in favor of more range improvement projects. Most of these projects are done on a whim with virtually no real justification other than the standard “improve livestock distribution.”

DESIRED PLANT COMMUNITY

Eliminate this concept from all planning and management efforts. The desired plant community concept can be easily distorted to the over-riding benefit of a single resource user group. Desired plant community is deceptive in that it allows land management agencies to portray degraded resource conditions as a desirable condition to be managed for, while effectively skirting the issue of the ecological condition of the rangelands. The BLM should communicate in terms the general public understands. They may not be able to relate with ecological range sites, but they know and understand terms such as excellent, good, fair, and poor. Changes in terminology that are deceptive (desired plant community) or meaningless (seral stages) to the general public further creates a misinformed, uninformed, and distrustful public.

INTERNAL EDUCATION

Resource managers must learn the role and value of the “general public.” There needs to be a much greater emphasis placed on the management of public lands for the public and not local communities or a segment of local communities.

PUBLIC EDUCATION

Disseminate accurate information about resource conditions, resource values, and resource trade-offs on BLM lands to the American public including that segment of the public not geographically associated with BLM lands. The BLM is one of the best kept secrets in the United States. The vast majority of the public not only does not know the resource conditions or values prevalent on BLM lands, but have never even heard of the BLM. Widespread public knowledge will most likely be the impetus for the BLM to change from managing public lands for the benefit of several thousand livestock permittees to managing those same lands for several hundred million Americans. These are resources that can be enjoyed and valued by many.

GRAZING ADVISORY BOARDS

Issue an executive order to eliminate grazing advisory boards. It is difficult for the BLM to be a multiple use agency while being held accountable to a specific use group, namely livestock permittees. This advisory board frequently undermines even weak attempts by the BLM at multiple use management. Grazing advisory board members often receive preferential treatment not only over other resource users, but many times over other livestock permittees. These individuals are often perceived by the BLM as so powerful that they are given free rein to do whatever they please on public land with little or no regard for regulations or the environment.

MULTIPLE USE ADVISORY COUNCILS

Issue an executive order that will eliminate multiple-use advisory councils or drastically restructure these councils so that they reflect sustainable resource use and ecosystem management and not extractive use. The makeup of these groups are often so similar to advisory boards that for all practical purposes they are one and the same. The only difference is a "token" environmentalist or two is added to the group. These environmentalists are easily outvoted on any issue of significance.

EXPERIMENTAL STEWARDSHIP PROGRAMS

Pass legislation to eliminate experimental stewardship programs. This program typifies past Bureau efforts of disguising business as usual as experimental and the cutting edge of resource management. There is no data that substantiates the success of this program and a good case can be made for deteriorating rangeland conditions in areas currently in experimental stewardship programs.

MULTIPLE USE

Multiple use is a concept that has outlived its usefulness. It is impossible to be all things to all people on every acre of land. Deteriorating resource conditions are prima facie evidence of this being the case. Manage areas where best resource use of an area is recognized. Some areas may be conducive to intensive livestock management. Other areas may be best managed with no livestock. This concept would apply to all resource uses.

FUNDING

Additional funding is necessary to accomplish many of the recommendations identified. Money should be made available only after a system is in place that provides for natural resource condition accountability for land managers and specialists. In those instances where additional funding has become available, the result has been money wasted because of a lack of commitment to resource improvements by land managers. This is unfair to the American taxpayer. They deserve more for their money than rhetoric and deception.

NATIONAL ENVIRONMENTAL PROTECTION ACT

Require all NEPA documents to include a no grazing alternative to be used as a baseline. This would require consideration of all the ecological costs associated with grazing and encourage the design of alternatives that minimize the negative impacts of grazing.

REFERENCE

Clary W.P. and B.F. Webster. 1989. Managing grazing of riparian areas in the intermountain region. USDA Forest Service; Intermountain Research Station; General Technical Report IMT-263. 11p.

"Public Trust Betrayed: Employee Critique of Bureau of Land Management Rangeland Management" is an example of how employees can initiate meaningful change and remain anonymous, while exercising their right to ethical dissent. It is exciting to note that Jim Baca, Director of the Bureau of Land Management, in response to the report commented that "changes will be made in the BLM". Official responses from BLM channels to PEER, called the report and the employees' concerns "legitimate". Director Baca hopes that one of the characteristics of his tenure will be the free and open expression of concerns by employees about the environmental consequences of how we manage public lands. Baca has also worked with PEER to protect a BLM employee on an issue of scientific integrity. In this instance, Baca intervened to stop a forced transfer motivated by pressure on the BLM by local development interests.

If you would like to take action to correct these abuses of the public trust at BLM, please do the following:

1) Write Interior Secretary Bruce Babbitt and tell him you have read Public Trust Betrayed: Employee Critique of BLM Rangeland Management and request he take immediate action to correct the problems detailed in the report by:

A) Ensuring that the professional atmosphere at BLM encourages sound science and does not allow powerful livestock and political interests to intimidate BLM employees from exercising their right to ethical dissent to correct problems they witness.

B) Altering the current grazing policy and begin implementing the white paper recommendations. Restrict or eliminate grazing in sensitive areas and protect "at risk" plants and wildlife.

Ask Secretary Babbitt to respond to your letter and inform you of his plan of action to correct these problems.

Mr. Bruce Babbitt
Secretary of the Interior
U.S. Department of the Interior
18th & C Street, NW
Washington, DC 20240

Send a copy of your letter to Jim Baca, Director of the Bureau of Land Management.

Jim Baca
Director of the Bureau of Land Management
U.S. Department of the Interior
18th & C Street, Room 5660
Washington, DC 20240

2) Send copies of the letter you sent to Secretary Babbitt to your Senators and Representatives in Congress and ask them to contact Secretary Babbitt and BLM Director Jim Baca about the problems at the Bureau of Land Management.

United States Senate
Washington, DC 20510

U.S. House of Representatives
Washington, DC 20515

3) Write a letter (or get a friend to write) to the editor of your local newspaper that summarizes the problems detailed in the white paper. Ask people who are interested in this problem to contact PEER.

4) Share this action alert and the white paper with friends and ask them to also write letter. If you would like additional copies of the white paper, please contact the PEER office.

5) *Join PEER!* Help support environmentally concerned public employees.

P.E.E.R.
810 First Street, NE, Suite 680
Washington, DC 20002
Telephone: 202-408-0041, FAX 202-842-4716

What You Can Do

"Public Trust Betrayed: Employee Critique of Bureau of Land Management Rangeland Management" is an example of how employees can initiate meaningful change and remain anonymous, while exercising their right to ethical dissent. It is exciting to note that Jim Baca, Director of the Bureau of Land Management, in response to the report commented that "changes will be made in the BLM". Official responses from BLM channels to PEER, called the report and the employees' concerns "legitimate". Director Baca hopes that one of the characteristics of his tenure will be the free and open expression of concerns by employees about the environmental consequences of how we manage public lands. Baca has also worked with PEER to protect a BLM employee on an issue of scientific integrity. In this instance, Baca intervened to stop a forced transfer motivated by pressure on the BLM by local development interests.

If you would like to take action to correct these abuses of the public trust at BLM, please do the following:

1) Write Interior Secretary Bruce Babbitt and tell him you have read Public Trust Betrayed: Employee Critique of BLM Rangeland Management and request he take immediate action to correct the problems detailed in the report by:

A) Ensuring that the professional atmosphere at BLM encourages sound science and does not allow powerful livestock and political interests to intimidate BLM employees from exercising their right to ethical dissent to correct problems they witness.

B) Altering the current grazing policy and begin implementing the white paper recommendations. Restrict or eliminate grazing in sensitive areas and protect "at risk" plants and wildlife.

Ask Secretary Babbitt to respond to your letter and inform you of his plan of action to correct these problems.

Mr. Bruce Babbitt
Secretary of the Interior
U.S. Department of the Interior
18th & C Street, NW
Washington, DC 20240

Send a copy of your letter to Jim Baca, Director of the Bureau of Land Management.

Jim Baca
Director of the Bureau of Land Management
U.S. Department of the Interior
18th & C Street, Room 5660
Washington, DC 20240

2) Send copies of the letter you sent to Secretary Babbitt to your Senators and Representatives in Congress and ask them to contact Secretary Babbitt and BLM Director Jim Baca about the problems at the Bureau of Land Management.

United States Senate
Washington, DC 20510

U.S. House of Representatives
Washington, DC 20515

-
- 3) Write a letter (or get a friend to write) to the editor of your local newspaper that summarizes the problems detailed in the white paper. Ask people who are interested in this problem to contact PEER.
 - 4) Share this action alert and the white paper with friends and ask them to also write letter. If you would like additional copies of the white paper, please contact the PEER office.
 - 5) *Join PEER!* Help support environmentally concerned public employees.

**P.E.E.R.
810 First Street, NE, Suite 680
Washington, DC 20002
Telephone: 202-408-0041, FAX 202-842-4716**

PLEASE... INCLUDE ME ON PEER'S SUBSCRIPTION LIST!

- ☐ **Member:** current, former or retired public employee
☐ **Supporter:** citizen, activist, environmentalist, etc.

PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY

810 First Street, NE, Suite 680 • Washington, DC 20002
TEL 202-408-0041 • FAX 202-842-4716

NAME _____
ADDRESS _____
CITY _____ STATE _____ ZIP _____
PHONE (Work) () _____ (Home) () _____
Organization (FS, BLM, NPS, EPA, State FW & G, etc.) _____
Organizational Unit/Office: _____
Job Title: _____ Resource Specialty (s) _____
Other Skills _____

- ☐ **Regular**\$30.00
☐ **Sustaining**\$50.00
☐ **Advocate**\$100.00
☐ **Patron**\$500.00
☐ **Foreign**US \$40.00
☐ **Other** \$_____

☆ Please send information to these friends:

NOTE: PEER never shares its mailing list with other organizations

• Contributions are tax deductible •

NAME _____
ADDRESS _____
CITY _____ STATE _____ ZIP _____

NAME _____
ADDRESS _____
CITY _____ STATE _____ ZIP _____

ALSO: Please send me _____ additional copies of the BLM Report @ \$5.00 each. Enclosed is \$_____.

PLEASE... INCLUDE ME ON PEER'S SUBSCRIPTION LIST!

- ☐ **Member:** current, former or retired public employee
☐ **Supporter:** citizen, activist, environmentalist, etc.

PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY

810 First Street, NE, Suite 680 • Washington, DC 20002
TEL 202-408-0041 • FAX 202-842-4716

NAME _____
ADDRESS _____
CITY _____ STATE _____ ZIP _____
PHONE (Work) () _____ (Home) () _____
Organization (FS, BLM, NPS, EPA, State FW & G, etc.) _____
Organizational Unit/Office: _____
Job Title: _____ Resource Specialty (s) _____
Other Skills _____

- ☐ **Regular**\$30.00
☐ **Sustaining**\$50.00
☐ **Advocate**\$100.00
☐ **Patron**\$500.00
☐ **Foreign**US \$40.00
☐ **Other** \$_____

☆ Please send information to these friends:

NOTE: PEER never shares its mailing list with other organizations

• Contributions are tax deductible •

NAME _____
ADDRESS _____
CITY _____ STATE _____ ZIP _____

NAME _____
ADDRESS _____
CITY _____ STATE _____ ZIP _____

ALSO: Please send me _____ additional copies of the BLM Report @ \$5.00 each. Enclosed is \$_____.

