

Sierra Club Grazing Team Statement Concerning Sierra Club Position on the Malheur Community Empowerment for the Owyhee Act (MCEOA) - December 9, 2019

Recommendation

The Sierra Club Grazing Team (SCGT) recommends that the Sierra Club oppose the Malheur Community Empowerment for the Owyhee Act (MCEOA) as currently worded. All SCGT members who have commented on the MCEOA have expressed either deep concern about or outright opposition to this bill. (This document incorporates extensive comments concerning this matter from SCGT members who have reviewed the MCEOA and provided written feedback.) Presented below is the rationale for this SCGT recommendation.

The MCEOA and Livestock Grazing Primacy

The MCEOA bill includes numerous provisions that appear to establish a primacy in promoting livestock grazing under local rancher control in Malheur County. Given the provisions and structure of the MCEOA, the SCGT believes that it is likely that the MCEOA would short-change other objectives that are important to the Sierra Club (such as promoting properly-functioning ecological conditions on federal public lands in Malheur County that have been adversely affected by past and relatively recent livestock grazing.) The SCGT believes that the most likely outcome of the MCEOA would be the expansion of livestock production on federal land in Malheur County at the expense of native wildlife and the health of native wildlife habitat.

Numerous examples reveal the intent of the MCEOA to assert the primacy of livestock grazing on federal public land in Malheur County. The SCGT believes that these numerous examples are inconsistent with the purpose stated in Sec. 3(a) "... to promote the long-term ecological health of the Federal land to support communities and natural resources." The bill states in Sec. 3(b)(1)(B) that the objective is "to protect ... western traditions for which the Federal land is known;" and in Sec. 3(b)(1)(C) that the objective is "to maintain grazing on the Federal land ...". The bill also creates the Malheur CEO Advisory Group and a subservient Malheur CEO Advisory Committee (see page 5). (The composition of the CEO Group is described on page 19. The CEO group would consist of 13 people – 6 ranchers, 1 Burns Paiute representative, and 6 from other interests [including 2 who must reside in Malheur County.]) It is highly likely that federal public lands ranchers would control this CEO Advisory Group. The CEO Group will also initially appoint themselves to the Advisory Committee. (The structure of the Advisory Committee is defined on page 26.) Moreover, the Malheur CEO Group and Advisory Committee will be specifically exempted from the Federal Advisory Committee Act [FACA]. (See page 28.) This exemption dramatically alters the process of appointing the CEO Group and Advisory Committee members and the composition of the Advisory Committee.

The SCGT's leading expert concerning livestock grazing on federal lands in southeastern Oregon argues forcefully that the whole CEO group and apparatus set up by the MCEOA will likely render the BLM largely irrelevant concerning critical livestock grazing management activities on federal public lands in Malheur County. She notes that "the whole CEO group and apparatus set up by the Bill makes the BLM largely irrelevant. Yeah, it refers to 'the Secretary' doing this and that but the power of 'the Secretary' on the ground will have been pretty much handed over to the CEO group." While a strong Vale BLM District manager might be able to challenge the power of a rancher-dominated MCEOA-related CEO Group, the SCGT remains skeptical that such BLM independence in defense of threatened native flora and fauna would be a likely outcome, especially given the current composition of BLM and Department of Interior leadership at the national level.

Funding authorizations specified in the MCEOA would further reinforce livestock grazing-related primacy over BLM land in southeastern Oregon. One of the \$10,000,000 spending authorizations would go to the Animal and Plant Health Inspection Service (APHIS) for research on reducing invasive species, even though livestock grazing and associated activities are likely the most significant vectors concerning the spread of cheatgrass – perhaps the most problematic invasive species in the Western United States! (Scientists have concluded that invasive species such as cheatgrass (*Bromus tectorum*) are invasive when there is soil disturbance. Intact soils and biological soil crusts prevent invasion. Such activities as commercial livestock grazing, road building, and motorized trails are major sources of soil disturbance.)

Other language in the bill appears intended to justify (and legally enhance) the promotion of further livestock grazing primacy on federal public lands in Malheur County. The bill asserts that grazing is a significant portion of the economic well-being of Malheur County, though the total economic contribution of livestock, even in rural Malheur County, is relatively insignificant. (Farm income makes up only 3.5% of the total income in Malheur County, and only about 40% of the farms have any connection with the livestock industry. [Source: Western Watersheds Project, <https://www.westernwatersheds.org/2019/11/proposed-malheur-legislation-sacrifices-land-health-elevates-livestock-above-other-land-uses/>].) The bill also asserts that grazing is "a tool to improve the ecological health of the Federal land ..." when commercial livestock grazing has, in fact, been the single-most documented source of historic and current ecological degradation on federal public lands in Malheur County. (See below.)

The MCEOA would generate very real harm to National Environmental Policy Act (NEPA) processes concerning livestock grazing management on federal public lands in Malheur County. Sec.4(a)(2)(C) lists three pages of exemptions concerning performance of site-specific environmental analyses based on a Programmatic Environmental Impact Statement (PEIS).

One crucial element of high-quality environmental analysis includes conducting comprehensive assessments of cumulative impacts of known and foreseeable actions. The SCGT believes that it would be extremely difficult for the BLM to generate a high-quality PEIS cumulative impacts analysis that would adequately assess the huge range of potential actions for this area – an area where previous planning and management have largely failed to rehabilitate ecologically-degraded landscapes due to previous livestock grazing. (The SCGT notes that the Vale Rangeland Rehabilitation Program and subsequent BLM management failed to establish, implement, and enforce effective grazing management systems that remedied earlier livestock-grazing-related ecological damage in southeastern Oregon. See below.)

The MCEOA in relation to the Sierra Club Grazing Policy

The SCGT believes that the livestock grazing-related features associated with the MCEOA appear to be largely inconsistent with (and in conflict with) the Sierra Club Grazing Policy. The SCGT believes that these features will likely result in intensified commercial livestock grazing and associated activities on already-ecologically-impaired arid lands that constitute crucial habitat for a number of threatened native animal species.

The Sierra Club Policy on Grazing on Public Lands states, "... the Sierra Club will work toward ending commercial grazing on federal public lands where one or more of the following circumstances exists:

"Lands that receive an average annual precipitation of 12 inches or less or areas with cryic soils.

"Associated activities (e.g., water developments, predator control, vegetation manipulation) are occurring in such a manner that native plant and animal species are significantly impacted.

"Grazing is causing degradation of habitat necessary for threatened, endangered or sensitive native plant and animal species.

"Grazing is causing significant degradation of water quality.

"The public land management agencies have insufficient funding, staff, and determination to create and administer monitoring systems that will provide reasonable assurance that adverse impacts will be minimized and opportunities for restoration taken advantage of."

Arguably, the Sierra Club Grazing Policy applies to all grazed BLM lands in Malheur County concerning all of these criteria to some degree. We address the application of these criteria to the MCEOA below.

MCEOA, Malheur County, and Annual Precipitation

Malheur County receives about 10 inches of precipitation annually. The precipitation criteria of the Sierra Club Grazing Policy clearly apply to Malheur County.

MCEOA and Threatened Wildlife

Sierra Club Grazing Policy concerning native plants, animal species, and threatened, endangered or sensitive native plant and animal species also clearly applies to the livestock grazing and associated activities that have occurred within Malheur County, both historically and currently. For the sake of brevity, this document will focus on two species that have been adversely impacted by livestock grazing and associated activities in the past and are likely to be adversely impacted by livestock grazing and associated activities in the future if the MCEOA as currently worded becomes law: Sage Grouse and Pygmy Rabbits.

MCEOA and Sage Grouse

Malheur County contains extremely important sage grouse habitat. The relatively recent BLM Louse Canyon Geographic Management Area Assessment [LCGMA] and Standards of Rangeland Health Evaluation (Spring 2018) for the Campbell, Louse Canyon, and Star Valley allotments in southeast Malheur County (nearly 500,000 acres collectively) documented the ecologically-impaired status of sage grouse and sage grouse habitat on these grazing allotments -- a status due primarily to adverse impacts generated by livestock grazing and associated activities over time. Relevant excerpts from this LCGMA-SRHE analysis are provided below:

“The Campbell Allotment is not meeting Standard 5 for sage-grouse as indicated by the high amount of marginal and unsuitable ratings for breeding, brood-rearing, and winter habitats. Only 29% of breeding (nesting/early brood rearing) habitat, 23% of summer (upland) habitat, and 25% of winter habitat rated suitable. The northern portion of the allotment has unsuitable sagebrush cover and has an increase in abundance of annual invasive grasses. The southern portion has marginal sagebrush cover and has a low abundance and diversity of perennial grasses and forbs. Riparian summer sites across the allotment were predominately rated marginal or unsuitable due to lack of preferred forb availability and FAR riparian stability. Additionally, Standards 1, 2, and 3 are not being met in this allotment as indicated by an abundance of annual invasive grasses, lack of sagebrush cover, and lack of stabilizing riparian vegetation. The lack of sagebrush cover, low grass/forb heights and lack of perennial forb cover and availability does not provide the suitable food and structure for nesting, foraging and escape cover for sage-grouse and other sagebrush dependent wildlife species. Sage-grouse habitat suitability was based on a combination of indicators, and no single indicator was used by itself to determine site-scale suitability of sage-

grouse habitat.” [allotment size: approx 162K acres, see page 185] ... “The Louse Canyon Allotment is not meeting Standard 5 for sage-grouse as indicated by the high amount (89%, unweighted) of marginal and unsuitable ratings for riparian summer habitat. Additionally, Standard 2 is not being met because several streams lack attributes to dissipate stream energy, reduce erosion, capture sediment, and stabilize streambanks. Limited forbs and lack of riparian stability are conditions noted throughout the allotment and therefore it does not provide suitable late brood-rearing habitat for sage-grouse.” [allotment size: approx 132K acres, see pages 302-303] ... “The Star Valley Allotment is not meeting Standard 5 for sage-grouse as indicated by the high amount (100%) of marginal ratings for riparian summer habitat. Additionally, Standard 2 is not being met because riparian areas in the South Tent Creek pasture lack attributes to dissipate energy associated with high water flows, reduce erosion, capture sediment, and stabilize streambanks. Limited forbs and lack of riparian stability are conditions noted throughout the South Tent Creek Pasture and therefore it does not provide suitable late brood-rearing habitat for sage-grouse.” [allotment size: approx 188K acres, see pages 368-369] ... [Source: Louse Canyon Geographic Management Area Assessment and Standards of Rangeland Health Evaluation, Spring 2018, Bureau of Land Management, Vale District Office, Malheur Field Office 100 Oregon Street Vale, Oregon 97918] https://eplanning.blm.gov/epl-front-office/projects/nepa/106452/148121/181986/DOI-BLM-ORWA-V000-2018-0025_LCGMA_AssessEval.pdf]

The SCGT believes that implementation of MCEOA will likely result in more fence construction, spring development, pipeline and water trough development, vegetation treatment to remove sagebrush and juniper in order to facilitate the planting of more non-native plant forage species, and increased number of Animal Unit Months allocated to public lands ranchers in this area. With expanded range infrastructure development and increased allowable livestock stocking density rates, substantial livestock grazing-related adverse impacts to sage grouse are likely to follow.

Such likely future adverse impacts and likely future consequences for sage grouse in this area were expertly presented in a October 12, 2010 Declaration of David Dobkin [1] concerning the southeastern area of Malheur County that would be affected by the MCEOA:

“In my professional judgment, it is a scientific certainty that significant adverse effects on sage-grouse population persistence will result from the proposed management actions (fence construction, spring developments, pipelines, water troughs, vegetation treatments that remove sagebrush or plant non-native species, number of AUMs, timing of grazing, and the locations and timing of stock movements). To assert that the consequences of these actions can be anything but negative over the foreseeable future for sage-grouse nesting success, chick survival, population recruitment, and population growth on the LCGMA is both unrealistic and scientifically indefensible. As shown by the population viability analyses of Garton et al. (2009), the long-term outlook for this population is bleak in the absence of markedly improved habitat conditions and effective maintenance of current high-quality habitat against further deterioration. In my opinion, the concluding warning of Connelly et al. (2009b) is likely to apply to the sage-grouse population on the LCGMA under the proposed grazing plan: 'Failure to protect what [suitable habitat] is left and fix what is broken will likely result in extirpation of many, if not most, populations of Greater Sage-Grouse.'”

The SCGT notes that the most recent and best available scientific information concerning sage grouse population status in Malheur County is discouraging:

“The estimated spring sage-grouse population in the Vale District was 5,906 individuals (95% CI; 5,623 – 6,189 individuals), a -17.1% decline from 7,126 individuals in 2018. This was the second consecutive year of population decline in the district. During 2019 observed male attendance at complexes also counted during 2018 decreased -16.3% from 1,567 to 1,312 individuals. Five-year average population trend in the District was 2.8% between 2014 and 2019. However observed male attendance remains -49.7% below the 2003 baseline level (n2003 = 473, n2019 = 238), at complexes counted during both 2003 and 2019 (Figure 13). Data collected since the 2011 conservation assessment a stable trend in average complex size since 1993 (Multiple R² = 0.003, p-value = 0.80; Figure 13).” [Oregon Greater Sage-Grouse Population Monitoring: 2019 Annual Report, page 19, September 2019 Oregon Department of Fish and Wildlife, Lee Foster, P.O. Box 8, Hines, OR 97738]

The SCGT believes that any further intensification of livestock grazing and associated activities will likely only aggravate these recent downward population trends for sage grouse populations in Malheur County.

MCEOA and Pygmy Rabbits

The SCGT also notes that vulnerable Pygmy Rabbit populations also utilize the Owyhee region as crucial habitat. Pygmy rabbits require habitats with dense shrub cover and deep, non-compacted soils. They are listed as endangered in Washington State. The IUCN published this information concerning occupied Pygmy Rabbit habitat in southeastern Oregon:

"Oregon: In 2000, a survey was conducted at 17 historical sites active in 1995 in southeast Oregon and only three sites contained evidence of current use by *B. idahoensis*. A 2001-2002 survey of 38 historical sites found evidence of recent use at only one location. However, recent surveys at new sites with habitat attributes preferred by *B. idahoensis* found evidence of rabbit use. On the Burns BLM district, 54 sites were surveyed and 12 sites showed signs of occupied rabbit use and undetermined use at eight sites (Carey et al. 2004)."

The SCGT believes that implementation of MCEOA will likely generate significant adverse livestock grazing-related impacts to pygmy rabbit populations and pygmy rabbit habitat in Malheur County in the future.

MCEOA and Water Quality Degradation

Has livestock grazing on federal public lands in southeastern Oregon caused significant impairment of watershed function and water quality degradation? Here is what the Vale BLM specialists wrote about the 162,000 acre Campbell Allotment [Vale BLM District] in 2018 concerning watershed function and water quality:

Upland Watershed Function-Standard 1: “Upon review of the upland watershed function assessment, Campbell Allotment is not meeting Standard 1 due to findings in the Peacock, Twin Springs, Sacramento Hill, and Lucky Seven FFR Pastures. Current conditions in these pastures are impacting the ability of the watershed to effectively capture, store, and safely release moisture associated with normal precipitation events in relation to the local soil, climate, and landform.” [page 178] ... *Riparian/Wetland Watershed Function-Standard 2:* “Upon review of the riparian and wetland function assessment, Campbell Allotment is not meeting Standard 2 due to findings in the Sacramento Hill, Horse Hill, and Starvation Brush Control Pastures. Current conditions in these pastures limit the ability of both lotic and lentic systems to dissipate energy associated with high water flow, reduce erosion, capture sediment, and improve floodwater retention and ground water recharge. Although re-vegetation of bare ground and areas of willow recruitment were

noted, it is not adequate to make significant progress toward meeting the standard.” [page 179]... *Ecological Processes-Standard 3*: “Upon review of the ecological processes assessment, the Campbell Allotment is not meeting Standard 3 due to findings in the Peacock, Twin Springs, Sacramento Hill, Starvation Brush Control, Starvation Seeding, and Lucky Seven FFR Pastures. Ecological processes in these pastures do not maintain the ability to incorporate carbon storage, nutrient cycling and water movement through soil macropores to deeper regions of the soil profile and minimize abundance of shallow rooted grasses and invasive annual grasses.” [page 181] ... *Water Quality-Standard 4*: “Upon review of the water quality assessment Campbell Allotment is not meeting Standard 4 due to findings in the Twin Springs, Sacramento Hill, Horse Hill, Starvation Brush Control, Starvation Seeding, and Larribeau Pastures. Spring sources, wet areas, and riparian vegetation in these pastures lack the proper characteristics to function and aid in the maintenance for water quality.” [page 183]... [Source: Louse Canyon Geographic Management Area Assessment and Standards of Rangeland Health Evaluation, Spring 2018, Bureau of Land Management, Vale District Office, Malheur Field Office 100 Oregon Street Vale, Oregon 97918] ... https://eplanning.blm.gov/epl-front-office/projects/nepa/106452/148121/181986/DOI-BLM-ORWA-V000-2018-0025_LCGMA_AssessEval.pdf

Would further intensification of livestock grazing and associated activities on the Campbell allotment likely aggravate already-impaired watershed function and degraded water quality? The SCGT believes that the answer to this question would most likely be yes. Would the MCEOA as currently worded likely promote further intensification of livestock grazing and associated activities on the Campbell Allotment? The SCGT believes that the answer to this question would also most likely be yes. Given such a likelihood, the SCGT believes that endorsement of the MCEOA as currently worded would be inconsistent with the fourth provision of the Sierra Club Grazing Policy cited above. (Additional water quality concerns in Malheur County water bodies that could be aggravated by passage and implementation of MCEOA are noted in footnote [2] below.)

MCEOA and Monitoring of Adverse Grazing-Related Impacts

The fifth provision from the the Sierra Club Grazing Policy cited concerns regarding “insufficient funding, staff, and determination to create and administer monitoring systems that will provide reasonable assurance that adverse impacts will be minimized and opportunities for restoration taken advantage of.” Would passage of the MCEOA promote conditions to minimize adverse grazing-related impacts and promote ecological restoration?

The SCGT's leading expert concerning livestock grazing on federal lands in southeastern Oregon, in reviewing what the Vale BLM has done concerning monitoring and rangeland health assessments in the past, notes:

“RE: Malheur Vale BLM lands as a whole and the FRH [Fundamentals of Rangeland Health]. Keep in mind BLM has NEVER done FRH assessments over vast areas - including - wild guess – over half of Vale BLM Lands ... In the north, they mainly did Bully Creek ... Then BLM also started circa 2006 in the Trout Creek Mtns [near the] NV border, west of Highway 95 from the Louse Canyon county ... Never went anywhere. STALLED because conditions are bad and the abusive permittees push back hard and BLM does nothing.”

(The SCGT notes that SCGT member requests made last week and today concerning the existence of other relatively recent Vale BLM District FRH assessments have yielded no substantive replies from Vale BLM District officials. Evaluation of the status of listed grazing permits for the Malheur RA [part of Vale BLM District] at the BLM Rangeland Administration website appears to indicate that virtually all grazing permits in the Malheur RA have been processed (or are being processed) according to FLPMA 402(C)(2)/Appropriations Act specification. This designation typically indicates that commercial livestock grazing permits have been renewed (or will be renewed) without FRH

determinations having been issued by the BLM. See [https://reports.blm.gov/report/RAS/5/Permits-Schedule.\[3\]](https://reports.blm.gov/report/RAS/5/Permits-Schedule.[3]) In addition, the most recent comprehensive BLM Rangelands Health Standards Summary for grazed BLM lands in southeastern Oregon appears to date back to September 2012, based on data gathered between 1998 and 2012. (See Rangeland Health Standards by Grazing Allotment, PPH/PGH, District, Planning Area, and BLM Ownership, Jeanne DeBenedetti Keyes, 09/12/2012.)

SCGT member (and former Sierra Club Board Member) Jim Catlin, in reviewing the MCEOA, wrote this concerning the adaptive management and monitoring aspects of the bill:

“The direction BLM will take is ... 'adaptive management'. I have not examined each detail but I believe that adaptive management is left undefined in this law [sic]. It is an agency term used to describe changing management based on social, political, economic, and, sometimes, ecological needs. It is management without a guiding ecological basis ... The bill does not seek as a goal management and land use that leads to the land reaching its natural ecological potential expected for each ecological site. Projects for improvement don't have a clear ecological goal. Monitoring also is not well defined and it is unclear on its link to ecological conditions. Grazing use in terms of permitted numbers and period of grazing [would not be] reviewed and changed in order to meet ecological goals. This is the most important and damaging use of the area, yet it is absent from this legislation. It may exempt BLM from having to enforce its rangeland health standards and guidelines.”

Additionally, the MCEOA, as currently written, would limit monitoring to that defined by a Monitoring Network established by the Act. The SCGT believes that this would result in data that only the CEO Group wants collected; data collected using methodologies specified only by the CEO Group; and data collected by people that only the CEO Group specifies. No other independent monitoring data or citizen science would likely be considered by the CEO-dominated Monitoring Network. The SCGT believes that these limitations would constitute a recipe for generating severely-biased field monitoring data. Important ecological condition indicator data would be unlikely to be collected, and key applicable data sets would be unlikely to be considered for comparative purposes.

Based on these comments from our expert SCGT members concerning this matter, the SCGT does not have confidence that MCEOA, as currently written, would result in funding, staff, determination, and monitoring systems that would lead to the minimization of adverse grazing-related impacts and active pursuit of ecological restoration opportunities on federal public lands in Malheur County. Therefore, the SCGT believes that a Sierra Club endorsement of the MCEOA as currently written is inconsistent with the fifth provision of the Sierra Club Grazing Policy cited above.

Conclusion and Recommendation

In conclusion, the SCGT asserts emphatically that a Sierra Club endorsement of the MCEOA as currently worded would constitute a severe violation of the spirit, if not the letter, of the Sierra Club Grazing Policy concerning Federal Public Lands. As such the SCGT recommends that the Sierra Club publicly oppose the MCEOA as currently worded.

The SCGT, instead, recommends that the Sierra Club propose a straightforward Owyhee Canyonlands wilderness bill that includes voluntary grazing permit retirement language that would apply to all BLM grazing allotments within Malheur County that would be affected by any new wilderness designation. The SCGT also recommends that a site-specific NEPA requirement be included concerning any range infrastructure

development proposed for current and future designated BLM Wilderness, Wilderness Study Area, and Wild and Scenic River lands in Malheur County. The SCGT also recommends language be included that would prohibit an expansion of allowable livestock grazing in current and future designated BLM Wilderness, Wilderness Study Area, and Wild and Scenic River lands in Malheur County.

Sincerely,

Todd Shuman, Chair, Sierra Club Grazing Team, on behalf of the Sierra Club Grazing Team (national level),
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Footnotes

[1] Declaration of David S. Dobkin, Ph.D., concerning OREGON NATURAL DESERT ASS'N and WESTERN WATERSHEDS PROJECT, Plaintiffs, v. CAROLYN FREEBORN, Field Manager, Jordan Resource Area, BLM, *et al.*, Case No. 06-1311-MO IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON PORTLAND DIVISION. David Dobkin is a professional ecologist with a Ph.D. in zoology and ecology from the University of California, Berkeley, an M.S. in zoology and entomology from Colorado State University, and a B.A. in biology from George Washington University. He was the Executive Director of the High Desert Ecological Research Institute, conducting scientific ecological research in collaboration with colleagues from universities and federal research labs throughout the Intermountain West and Southwest at the time he provided this declaration. He was Senior Ecologist in the Center for Conservation Biology at Stanford University (1983-86), a zoology professor at Rutgers University (1986-92). Since 1997 he has been adjunct professor in graduate programs for Lewis & Clark College.

[2] Other water quality issues in Malheur County water bodies could easily be aggravated by passage and implementation of the MCEOA. Livestock grazing and livestock production in Malheur County was likely a vector for bacterial contamination and water quality degradation in a number of water bodies in Malheur County, including Antelope Reservoir, Upper Cow Creek Lake, Owyhee Reservoir, and Warm Springs Reservoir, as documented by the State of Oregon in 2011. See pages B-15 and B-16 of *Oregon DEQ Harmful Algal Bloom (HAB) Strategy* Appendix B June 2011, prepared by: Andy Schaedel Oregon Department of Environmental Quality, <https://www.oregon.gov/deq/FilterDocs/habsAppendixB.pdf>

[3] Process Note: Once BLM issues a Rangeland Assessment, the BLM Field Manager (FM) must then make a Determination. (This is where and when the BLM FM officially attributes causes concerning any resource degradation that has been documented). Often the term "Assessment" is used to refer to both the Assessment and the Cause Attribution by the BLM FM. In the next step after the Determination, BLM is supposed to make changes to correct the problem before the start of the next grazing year. Typically, NEPA is conducted to implement the full array of grazing changes necessary to ensure compliance with the FRH. As data on a PEER website shows, this next step often does not occur. See Public Employees for Environmental Responsibility, <https://mangomap.com/pdl/maps/24736/blm-rangeland-health-standards-evaluation-data-2012-#>