



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Washington, D.C. 20240
<http://www.blm.gov>



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In Reply Refer To:
1020 (22)

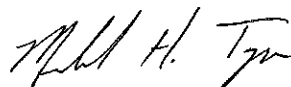
Ms. Kirsten Stade
Advocacy Director
Public Employees for Environmental Responsibility (PEER)
2000 P Street, NW Suite 240
Washington, DC 20036

Dear Ms Stade:

This letter responds to your Information Quality Act (IQA) Information Correction Request (ICR) dated December 22, 2014, regarding the *Fiscal Year (FY) 2013 Rangeland Inventory, Monitoring, and Evaluation*¹ and Bureau of Land Management (BLM) response to *PEER Press Release of May 14, 2012*². Your correspondence requests the BLM rescind and republish (with the corrected information) the two aforementioned records, "because the identified information does not comply with BLM, DOI, or OMB Information Quality Guidelines.

The attached document address the three primary recommendations and the related nine sub points included in your IQA ICR. In summary, the BLM will remove the BLM response to *PEER Press Release of May 14, 2012* as it is now outdated and the BLM will no longer report on land health using the old Table 7 format.

Pursuant to the BLM Information Quality Guidelines³, you have the right to appeal. Any appeal must be received within 45 days of this decision using the physical mail and electronic mail addresses provided in the guidelines.


MICHAEL H. TUPPER

FOR Edwin Roberson
Assistant Director, Resources
And Planning

¹ Available at: http://www.blm.gov/wo/st/en/prog/more/rangeland_management/rangeland_inventory.html

² Available at: <http://www.blm.gov/wo/st/en/prog/grazing.print.html>

³ Available at: http://www.blm.gov/style/medialib/blm/national/national_page.Par.7549.File.dat/guidelines.pdf

ATTACHMENT

A. Request Topic: Description of challenged “Information” that BLM “Disseminates” to the Public

1. The 2013 Rangeland Inventory, Monitoring and Evaluation (RIME) report differs substantially from previous RIME reports, primarily in Table 7, which reports a summary of land health findings completed at the field offices. The change is made to address a number of shortcomings in previous versions of Table 7. The revised version of Table 7 relates the land health findings to the Fundamentals of Land Health, which are applicable to all states, rather than to each state’s individualized land health standards. Table 7 information is not required by law, regulation or policy to be presented as a national level report.
2. As described by PEER, the national level Table 7 in the RIME report no longer contains the information on an allotment basis. After the new data standards were implemented in 2012, the report was changed to more accurately reflect conditions on the ground. The report was intended to accompany a map display on Geocommunicator, but the Geocommunicator maps were inactivated and a new mapping display system is under development.

B. Request Topic: The challenged information does not comply with the BLM Information Quality Guidelines

1. Despite not having a legal mandate to report on Land Health, or internal policy to provide a national summary report on Land Health, BLM chose to report on Rangeland Health beginning in Fiscal Year 1998, soon after implementation of the 1995 Fundamentals of Rangeland Health. Beginning in Fiscal Year 1998 and continuing through Fiscal Year 2012, BLM’s Rangeland Inventory, Monitoring, and Evaluation (RIME) reports included a report on Rangeland Health in Table 7. For each Rangeland Health category in Table 7, the number of grazing allotments and the entire BLM acreage within those allotments was reported. For example, in Table 7, for Arizona, it is showing that 669 grazing allotments were meeting all standards or making significant progress toward meeting the standards. The 669 allotments contain 8,327,843 acres of public land. For each allotment, in most instances, BLM was finding some BLM acreage within the allotment was meeting land health standards, some acres were found to be “meeting all standards or making significant progress toward meeting the standards”, and some BLM acreage within the allotment may have been found to not be “meeting all standards or making significant progress toward meeting the standards.” It was not an accurate portrayal of the BLM acreage that fit within each category, to say that the entire BLM acreage of an allotment fit within the category. BLM decided to address and try to remedy this inaccuracy of reporting, resulting in a new, revised way of reporting Land Health that is reflected in the format and information seen in the Fiscal Year 2013 RIME report.

C. Request Topic: BLM Response to PEER Press Release of May 14, 2012

1. BLM did not misquote PEER because neither the press release <http://www.peer.org/news/news-releases/2012/05/14/livestock's-heavy-hooves-impair-one-third-of-blm-rangelands/> nor the BLM response at <http://www.blm.gov/wo/st/en/prog/grazing.html> used the phrase '*strictly due to livestock*' as stated in the complaint. PEER stated in their press release that 40 % of allotments surveyed failed to meet standards and that in allotments totaling more than 33 million acres; the impairment is attributed to livestock grazing. In fact, the 2012 RIME report Table 7 shows that 78% of surveyed allotments are meeting standards. BLM attempted to clarify that the 40% figure was incorrect based on what was an apparent misinterpretation of the data.
2. Since 2008, BLM has recognized short-comings in the Table 7 report and has been developing a method for reporting the acres not meeting standards rather than reporting all the acres in allotments that were determined not to meet standards. To point out that these shortcomings resulted in an inaccurate portrayal of conditions and the extent of the effects of livestock is not biased or lacking in objectivity. In 2012, BLM issued data standards and instructions for reporting land health to more accurately portray land health status. This resulted in a change in the 2013 Table 7.

D. Request Topic: Recommendations for Correction

BLM reviewed the requested PEER changes provided in their original request, and the projected BLM actions are provided below.

1. The BLM will remove the "BLM Response to PEER Press Release of May 14, 2012," as the response is outdated.
2. For reasons cited herein, the BLM does not find violations of the Data Quality Act.
3. BLM will no longer use the pre-2013 Table 7 report format and will continue to develop the mapping format using the anticipated replacement for Geocommunicator.