



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Washington, D.C. 20240  
<http://www.blm.gov>



In Reply Refer To:  
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**FEB 12 2016**

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 is in response to your May 27, 2015, appeal for correction of information under the Information Quality Act (IQA). The Bureau of Land Management (BLM) brought together a panel to consider this appeal. The team consisted of program staff, records management, and senior executives. In your initial challenge on December 22, 2014, and then restated in your appeal, you provided the following recommendation for correction:

That BLM amend the current online version of the 2013 RIME report by retaining the current Table 7, which provides information on the success or failure of actual acres sampled in meeting the individual Fundamentals of Land Health, and adding the Table 7 that appeared in earlier RIME reports. This Table 7 lists, for the current year (Part A) and cumulatively (Part B), the number of allotments and the number of acres within them in which “Rangelands [are] meeting all standards or making significant progress toward meeting the standards,” are “not meeting all standards or making significant progress toward meeting the standards, but appropriate action has been taken to ensure significant progress toward meeting the standards (livestock is a significant factor),” are “not meeting all standards or making significant progress toward meeting the standards, and no appropriate action has been taken to ensure significant progress toward meeting the standards (livestock is a significant factor),” and are “not meeting all standards or making significant progress s toward meeting the standards due to causes other than livestock grazing.”

On April 16, 2015, BLM responded to the December 22, 2014, challenge acknowledging the change in reporting and provided an explanation:

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.

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.

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.

## DECISION

The panel agrees that the "utility" or "usefulness" of the 2013 RIME report was diminished by omitting the causal factors—the result of an unfortunate disabling of the mapping application that was to display the locations of the findings reported in the revised Table 7. While BLM continues implementing the 2012 data standards, reporting instructions, and mapping application, the BLM will augment the FY13 and future Table 7 section of the RIME Report with the previous format until the mapping application is functional. This will entail a manual data collection and compilation activity that will require several months based on agency priorities and available staff. The interim Table 7 section of the RIME Report will include a footnote to explain the

inaccuracy of reporting as specified in the initial decision. Once the 2012 data standards, new reporting, and mapping application are fully implemented, this temporary reversion will cease. The BLM Records Officer, Corey Wells will keep you apprised of correction status. Should you have any questions, you may reach Mr. Wells, at (202) 912-7561 or at [cjwells@blm.gov](mailto:cjwells@blm.gov).

Sincerely,



Janine Velasco  
Assistant Director  
Business, Fiscal and Information  
Resources Management