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RANGELAND  
MANAGEMENT

Results of Recent Work  
Addressing the Performance  
of Land Management  
Agencies

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Mr. Chairman and Members of the Subcommittee:

I am pleased to be here today to discuss our most recent work addressing the management of the nation's public rangeland. As you requested, my remarks today focus primarily on three recently issued GAO products--(1) our May 4, 1992, response to you and 16 Senators assessing a January 1992 critique of three GAO reports on rangeland management by a Nevada consulting firm,<sup>1</sup> (2) our February 1992 report on rangeland monitoring by the Interior Department's Bureau of Land Management (BLM),<sup>2</sup> and (3) our November 1991 report on BLM's management of livestock grazing activity in the so-called "hot deserts" of the American Southwest.<sup>3</sup> Before describing the findings contained in these reports, however, I believe it would be useful to provide some perspective on the ongoing rangeland management debate and the role of our work in that debate.

BACKGROUND ON THE PUBLIC RANGELAND  
MANAGEMENT DEBATE

Although the impact of livestock grazing on the nation's nearly 270 million acres of public rangeland has been debated for decades, the controversy has intensified in recent years and months. On the one hand, conservationists have increasingly emphasized the adverse effects of livestock grazing on the land's condition as well as on its productivity for other uses and its preservation for future generations. On the other hand, livestock interests have strengthened their position in defense of long-standing claims to the control and use of the land. Some have taken the position that grazing on federal land is not a privilege but rather a property right comparable to water rights and mineral rights.

In administering grazing activity on public rangeland, the two land management agencies--BLM and the Agriculture Department's Forest Service--are charged with steering a course of **balanced** stewardship in accordance with the principles of multiple use and sustained yield set forth in the Federal Land Policy and Management Act of 1976 and the National Forest Management Act of 1976, and reaffirmed by the Public Rangelands Improvement Act of 1978. Over the years, we have issued a number of reports and testimonies where we expressed the view that the agencies' performance can be improved. (See app. I for a list of Related GAO Products.) In

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<sup>1</sup>Rangeland Management: Assessment of Nevada Consulting Firm's Critique of Three GAO Reports (GAO/RCED-92-178R, May 4, 1992).

<sup>2</sup>Rangeland Management: Interior's Monitoring Has Fallen Short of Agency Requirements (GAO/RCED-92-51, Feb. 24, 1992).

<sup>3</sup>Rangeland Management: BLM's Hot Desert Grazing Program Merits Reconsideration (GAO/RCED-92-12, Nov. 26, 1991).

particular, we have expressed the need for (1) more aggressive enforcement of livestock trespass regulations, (2) more comprehensive data on land conditions and trends, (3) improved performance in fulfilling resource management planning mandates, and (4) greater progress in restoring damaged riparian areas. In each of these reports, however, we have also recognized that resource constraints have substantially hampered the agencies' ability to carry out their responsibilities.

While the land management agencies have, on the whole, reacted favorably to our reports, various interest groups have criticized our work. According to certain livestock interests, our findings have "played into the hands" of those interested in discrediting livestock grazing on the public land. At the same time, others have claimed that our work has not gone far enough in exposing the damage caused by grazing. This criticism from both sides tends to provide support to the independence of our work and the value of our reports in providing decisionmakers with objective information based on sound analyses.

#### RESPONSE TO NEVADA CONSULTING FIRM'S CRITIQUE

The most visible criticism of our public rangeland work to date is a January 1992 report A Technical Review of U.S. General Accounting Office Rangeland Management and Public Rangelands Reports 1988-1990 by a Nevada consulting firm critiquing three GAO rangeland management reports issued between June 1988 and August 1990.<sup>4</sup> As we demonstrate in our overall and point-by-point responses to the consulting firm's report, the consulting firm's critique is not valid. After careful review, we are confident that our work was performed with due professional care consistent with generally accepted government auditing standards and that our findings are well supported, our conclusions flow logically from the facts, and our recommendations offer reasonable suggestions for addressing the problems we identified.

In its critique, the consulting firm made a number of specific charges with respect to each of the three GAO reports. Our written response thoroughly addresses each of these charges. In addition, the consulting firm highlighted several criticisms for special emphasis.

With respect to our report on declining and overstocked grazing allotments, the consulting firm claimed that we created an

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<sup>4</sup>See Rangeland Management: More Emphasis Needed on Declining and Overstocked Grazing Allotments (GAO/RCED-88-80, June 10, 1988), Public Rangelands: Some Riparian Areas Restored but Widespread Improvement Will Be Slow (GAO/RCED-88-105, June 30, 1988), and Rangeland Management: Improvements Needed in Federal Wild Horse Program (GAO/RCED-90-110, Aug. 20, 1990).

unduly negative picture of rangeland conditions and placed undue emphasis on livestock overgrazing as a cause of declining conditions. We disagree. Our report fully disclosed the amount of land in each land condition category and the amount of land that was declining, stable, or improving. Our report then focused on the grazing allotments that were declining and/or overgrazed because (1) our analysis of range managers' responses demonstrated that overgrazing was the most prevalent cause of declining rangeland conditions; (2) overgrazing can seriously, even permanently, damage the land; and (3) overgrazing is a problem that the agencies can address.

Regarding our report on riparian area restoration, the consulting firm asserted that we prepared our report on the basis of selective, unverified anecdotal information that led us to overstate the magnitude of riparian area restoration needs. This assertion is inconsistent with the facts. Our review included field visits and analysis of a large portion of the riparian restoration projects that had been undertaken at that time. Furthermore, we did not limit our review to an examination of individual projects. To verify that our findings were representative of conditions on public land throughout the West, we examined available agency riparian condition inventory data and interviewed agency experts. This work showed that tens of thousands of miles of riparian areas on public rangeland in the West are in need of restoration.

Regarding our report on the federal wild horse program, the consulting firm asserted that we did not bring to light inadequacies in program management because we focused on problems relating to livestock grazing. We disagree with this assertion. Our report included a substantial discussion of management problems associated with program elements that have no relationship to livestock grazing, including the wild horse adoption program, wild horse sanctuary operations, and the prison halter training program. We devoted substantially more discussion to these issues than to the comparative effects of wild horses and domestic livestock on range conditions. We discussed livestock grazing in our report because during our work it became clear that unsatisfactory range conditions cannot be widely improved by concentrating on wild horse management alone.

While we believe our reports stand on their own merits, it is important to note that a number of others have issued reports or reached conclusions similar to those we presented. These include those by or for Interior's Inspector General, Board of Land Appeals, Wild Horse and Burro Advisory Board, Fish and Wildlife Service, and National Fish and Wildlife Foundation; the Environmental Protection Agency; the President's Council on Environmental Quality; and the Bonneville Power Administration. The State of Nevada's Department of Wildlife has also commented favorably on the quality of our work.

Likewise, both BLM and the Forest Service have recognized the need to address the issues raised in our reports and are taking actions to implement many of our recommendations. For example, in following up on our report on declining and overstocked allotments, the Forest Service has found that nearly one out of every four grazing allotments in its six western regions is considered to be in a declining condition and/or overstocked--a level that is consistent with the data cited in our report--and has developed a detailed action plan for addressing the problem allotments. Similarly, in a December 11, 1991, letter to GAO, the Director of BLM characterized our report on riparian area management as "one of GAO's more comprehensive and expert studies of a very relevant issue."

In contrast to our reports, the consulting firm's critique contains little factual data to substantiate its assertions. Instead, the critique misrepresents our reports' findings to support its positions and challenges the manner in which we presented the facts and the implications we drew from them.

#### REPORT ON BLM'S RANGELAND MONITORING

Our February 1992 report followed up on the recommendations in our June 1988 report on declining and overstocked grazing allotments. Both reports pointed out that monitoring of allotment conditions is a key component of BLM's grazing management responsibilities. Monitoring on a continuous basis is needed to ensure that existing grazing levels and practices are consistent with the land's ability to sustain the activity. If monitoring indicates that overgrazing is occurring, BLM managers are responsible for reducing authorized grazing to a sustainable level. Under current BLM policy, all grazing level adjustments are required to be based on monitoring data accumulated over several years. In accordance with this policy, BLM established a 5-year time frame--beginning with the issuance of the relevant grazing environmental impact statement--to conduct the necessary monitoring and implement a grazing decision establishing an appropriate grazing level for each allotment. At the time of our review, this deadline had passed on about 14,500 of BLM's 22,500 allotments.

Our review of BLM's performance showed that BLM had completed the required monitoring and issued a decision on appropriate grazing levels for only about 20 percent of the 14,500 allotments covered by environmental impact statements issued more than 5 years ago. It had not monitored about 7,200 allotments at all. For the allotments that it had monitored, it had generally not analyzed the data and decided on the appropriate grazing levels.

Our May 1991 report on the Forest Service's monitoring performance presented strikingly similar findings.<sup>5</sup> Our findings in these two reports as well as those in a number of other GAO reports on both BLM's and the Forest Service's range management programs are linked by a common thread: the performance weaknesses we have observed are in large measure a result of resource constraints; the agencies do not have sufficient staffing and funding to perform all the management tasks necessary to effectively administer the current level of grazing activity. If the agencies' performance is to be demonstrably improved, our reports concluded that a better balance between the level of grazing activity and the resources available to administer it is needed.

In this context, our February 1992 report asked the Congress to consider (1) reducing the scope of the existing grazing program or (2) funding an increase in BLM's range management resources. Among the options for offsetting the additional required appropriations would be to increase federal grazing fees.

#### GRAZING ON BLM LAND IN THE HOT DESERTS

In our November 1991 report on grazing activity on the public land in the hot deserts of the Southwest, we reached a similar conclusion.<sup>6</sup> Livestock grazing occurs on almost 20 million acres of BLM land in America's hot deserts--some of the most unproductive, yet environmentally fragile, land in the country. We found that current livestock grazing activity risks long-term environmental damage while generating minimal economic benefits and grazing fee revenues that are not sufficient to provide for adequate management. We found evidence of damage caused by livestock grazing on BLM land as well as evidence of livestock grazing's adverse impacts on several wildlife species. Some damaged land may take decades to recover if it recovers at all.

We also found that BLM lacks the staff resources needed to collect and evaluate data measuring the impact of livestock grazing on many desert allotments. Without these data, BLM is not in a position to assess livestock usage of desert allotments and change usage as needed. Overall, because livestock grazing on BLM's hot desert land poses a high risk to the environment and costs more to manage than it returns to the federal government, we questioned the merits of the activity as it is currently conducted. Our report offered several options for the Congress to consider if it chooses

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<sup>5</sup>See Rangeland Management: Forest Service Not Performing Needed Monitoring of Grazing Allotments (GAO/RCED-91-148, May 16, 1991).

<sup>6</sup>The "hot deserts" encompass the Mojave, Sonoran, and Chihuahuan deserts. BLM manages land in these deserts in portions of California, Nevada, Utah, Arizona, and New Mexico.

to alter the program. Consistent with our more recent report on rangeland monitoring, these options included providing BLM with more resources or reducing the scope of desert grazing activity.

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Mr. Chairman, this concludes my prepared statement. At this time, I would like to submit for the record a copy of our response to the Nevada consulting firm's critique as well as our reports on BLM allotment monitoring and management of hot desert grazing activity. I would also be pleased to respond to any questions you or members of the Subcommittee may have.

RELATED GAO PRODUCTS

Rangeland Management: BLM's Hot Desert Grazing Program Merits Reconsideration (GAO/RCED-92-12, Nov. 26, 1991).

Rangeland Management: Comparison of Rangeland Condition Reports (GAO/RCED-91-191, July 18, 1991).

Rangeland Management: Current Formula Keeps Grazing Fees Low (GAO/RCED-91-185BR, June 11, 1991).

Public Land Management: Attention to Wildlife is Limited (GAO/RCED-91-64, Mar. 7, 1991).

Rangeland Management: BLM Efforts to Prevent Unauthorized Livestock Grazing Need Strengthening (GAO/RCED-91-17, Dec. 7, 1990).

Public Lands: Limited Progress in Resource Management Planning (GAO/RCED-90-225, Sept. 27, 1990).

Rangeland Management: Improvements Needed in Federal Wild Horse Program (GAO/RCED-90-110, Aug. 20, 1990).

California Desert: Planned Wildlife Protection and Enhancement Objectives Not Achieved (GAO/RCED-89-171, June 23, 1989).

Public Rangelands: Some Riparian Areas Restored but Widespread Improvement Will Be Slow (GAO/RCED-88-105, June 30, 1988).

Rangeland Management: More Emphasis Needed on Declining and Overstocked Grazing Allotments (GAO/RCED-88-80, June 10, 1988).

Rangeland Management: Grazing Lease Arrangements of Bureau of Land Management Permittees (GAO/RCED-86-168BR, May 30, 1986).

Public Land Management: Issues Related to the Reauthorization of the Bureau of Land Management (GAO/T-RCED-91-20, Mar. 12, 1991).

Management of the Public Lands by the Bureau of Land Management and the U.S. Forest Service (GAO/T-RCED-90-24, Feb. 6, 1990).

Shortfalls in BLM's Management of Wildlife Habitat in the California Desert Conservation Area (GAO/T-RCED-90-1, Oct. 2, 1989).



Change in Approach Needed to Improve the Bureau of Land Management's Oversight of Public Lands (GAO/T-RCED-89-23, Apr. 11, 1989).

Management of Public Rangelands by the Bureau of Land Management (GAO/T-RCED-88-58, Aug. 2, 1988).

Restoring Degraded Riparian Areas on Western Rangelands (GAO/T-RCED-88-20, Mar. 1, 1988).