



EXPLORE, ENJOY, AND PROTECT THE PLANET.

September 9, 2021

The Honorable Debra Haaland  
Secretary of the Interior  
1849 C Street Northwest  
Washington, DC 20240

Dear Secretary Haaland,

As you may know, the Sierra Club advocates an elimination of livestock grazing on BLM Herd Management Areas (HMAs) in order to promote rapid progress toward Thriving Natural Ecological Balance (TNEB) (where it does not exist) and to facilitate maintenance of TNEB (where it already exists).

The Sierra Club believes that current livestock AUM allocations are severely biased against horse populations and other wildlife on horse-occupied Bureau of Land Management (BLM) HMAs. We also believe that this bias has generated a severe excess in adverse livestock-grazing-associated impact within BLM HMAs that is inconsistent with both the letter and spirit of the 1971 Wild and Free Roaming Horse and Burro Act.

Specifically, the Sierra Club advocates:

- An immediate initiation of the processes necessary to end all cattle/sheep grazing on all horse-occupied BLM Herd Management Area (HMA) lands.
- Management of horses on all BLM HMAs to retain horse population sizes that will maintain TNEB (where TNEB already exists) or promote rapid progress toward TNEB (where TNEB does not currently exist).
- Management should prioritize keeping horses on designated HMA lands, within ecological parameters that maintain or promote continued progress toward TNEB.
- Immediate commencement of NEPA-conforming BLM Resource Management Plan (RMP) Amendment processes for all BLM Districts that currently contain legally-demarcated horse-related BLM HMAs (pursuant to the 1971 Wild and Free-Roaming Horses and Burros Act) to bring about the TNEB-associated outcomes articulated above.
- Preparation of a robust, broad-based scientific assessment of the baseline ecological conditions that have been adversely impacted by livestock grazing (and associated infrastructure) to serve as the basis for determination of sustainable wild horse numbers and use, and for determining HMA restoration/recovery/sustainability actions.

Addressing livestock-induced-ecological problems within BLM Herd Management Areas would potentially restore the ability of these lands to sequester carbon, help climate stabilization efforts, improve riparian conditions and water quality, and also address biodiversity issues. If successfully implemented (and augmented further through permanent protection), such an initiative may qualify wild horse HMAs for inclusion in the 30x30 effort.

Thank you for your leadership in protecting our public lands. The Sierra Club would welcome further discussion of these ideas with you and/or members of your team at Interior. Thank you for your consideration.

Respectfully yours,

Athan Manuel  
Director, Lands Protection Program