



September 8, 2022

VIA EMAIL

The Honorable Debra A. Haaland
Secretary of the Interior
Debra.Haaland@doi.gov

Re: Petition for Rulemaking – Wilderness Inventory and Management
in the Greater Steens Mountain Area, Southeastern Oregon

Dear Madam Secretary:

The Oregon Natural Desert Association (“ONDA”) respectfully submits the attached petition asking you to direct and support the Bureau of Land Management in updating its wilderness inventory and management direction for public lands in the greater Steens Mountain area, managed by the agency’s Burns District office in southeastern Oregon. This is necessary to bring that district’s wilderness inventory and management direction into alignment with neighboring districts, comply with statutory and other legal obligations, and preserve ecological integrity and climate resiliency on one of the West’s most iconic sagebrush landscapes.

ONDA is a 501(c)(3) non-profit, public interest, conservation organization whose members use and enjoy the public lands throughout southeastern Oregon, including throughout the greater Steens Mountain area. ONDA’s mission is to protect, defend, and restore forever the health of Oregon’s native deserts.

For decades, ONDA has engaged extensively in public processes for planning and management of the federally administered public lands in Oregon’s high desert. As you know, Congress in 1976 directed

the Bureau to identify roadless areas with wilderness values across the Western public lands. By 1987, the Bureau had identified about 2.7 million acres of such lands in Oregon's outback. However, the Secretary of the Interior recommended less than half those lands for permanent preservation, in 1991.

The desert advocates who founded ONDA knew that the Bureau had significantly undercounted Oregon's desert wilderness lands, and so they prepared their own inventory and wilderness preservation proposal. The Bureau was unmoved by this effort and, by the time George W. Bush took office, decided to altogether abandon inventorying wilderness lands.

So ONDA continued to systematically inventory seven million acres of public lands in Oregon's high desert—and identified more than 4.5 million acres of wilderness never before recognized by the Bureau. The Bush administration declined to consider ONDA's reports but, in 2008, a landmark court decision established that the Secretary and Bureau have not just the authority, but an obligation, to identify and manage wilderness values on public lands. After all, wrote the court, Congress had identified the conservation of wilderness lands as a “national priority” in the 1964 Wilderness Act.

As a result, the Bureau in 2012 reinstated its previously abandoned wilderness policy manuals. Over the next decade, the Bureau updated its wilderness surveys across eastern Oregon. More often than not, the Bureau agreed with ONDA's findings—which continue to be some of the most comprehensive, accurate, and up-to-date information on record concerning wilderness values in southeastern Oregon. But there is one glaring exception: in the greater Steens Mountain area, the Bureau has never revisited its Bush-era decision to almost wholly reject these important public inventory findings.

It is time to fix this. These spectacular wildlands provide critical fish and wildlife habitat. They increase resiliency against wildfire and other threats stemming from earth's changing climate. And they preserve millennia-old cultural values. This is why ONDA is asking you

to exercise your authority to direct the Bureau to update its wilderness inventory using current guidance, evaluate new and more accurate publicly generated information, and update its land use plan direction for these important public lands and wilderness resources. We stand ready to support this effort however we can, and we look forward to your timely response to our petition.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Houston". The signature is fluid and cursive, with a large initial "R" and a stylized "H".

Ryan Houston, Executive Director
Oregon Natural Desert Association

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