



BLM Land Health Status

REPORT

BLM Identifies Millions of Acres of Failing Lands

The Bureau of Land Management (BLM) is responsible for 245 million acres of public lands in 13 western states. The agency manages more public land than any other land management agency.

This report makes available to the public BLM data depicting rangeland health conditions of the 155,000,000 acres of leased livestock allotments under its administration. The data reveal that BLM most frequently cites livestock grazing, far and away, as the most significant cause of the failure of the allotment to meet Rangeland Land Health Standards (LHS). This is the same across most of the grazing lands in every state under the agency's administration. We see that BLM has yet to assess millions of acres of land that is currently being leased. The data show that many of the BLM lands in sage grouse habitat are failing. Though BLM identifies many reasons for an allotment to be classified as failing, including livestock, invasive species, weeds, drought, fire, off highway vehicles and wild horses, horses are cited very few times. The data calls into question BLM's policy decision to prioritize the removal of wild horses instead of making management decisions to directly address the cited reasons for failure.

PEER, through the Freedom of Information Act (FOIA), received grazing allotment LHS records for BLM assessments conducted between 1997 and 2019 for 21,000 livestock allotments. Each of the BLM datasets contained problems with accuracy, resolution, completeness, timeliness, omissions, and inconsistencies, and it was clear that the agency had not subjected them to its rigorous data quality standards.

PEER compared these datasets to identify and correct these data quality problems to the best of our abilities, but ultimately, they reflect the condition of the data as received from BLM. The data quality issues were reconciled where possible and were converted into geospatial format to provide the public with an opportunity to examine the significance of livestock grazing as a factor impacting rangeland health as reflected in the BLM's Land Health Standards evaluation data.

Recommendations for BLM

- Create a central BLM geodatabase containing rangeland health evaluation records. Combine and coordinate all the agency databases so that it puts all the data to work.
- Complete and update Land Health Standards evaluations. Many allotments have not been evaluated and many of the evaluations were completed ten years ago.
- Commit to utilizing the data to make land use decisions. If grazing has been determined to be a cause for failure, BLM can reduce livestock numbers or change the season of use. If the cause of failure is off-road vehicles, the agency can limit permitting. The data are not political.
- Use the data to look at broader regional trends and to identify field office outliers within those regions. For instance, there are field offices with usually low failure levels relative to others within an ecoregion. A notable example is the Utah's Fillmore Field Office, located in the Central Basin and Range ecoregion, has a much lower livestock failure rate than the rest of the ecoregion. It is revealed as a square block of green (meeting all standards) in a sea of red (failing to meet standards).
- Prioritize biodiversity, including the dwindling greater sage-grouse population. The agency should consider expediting data collection and compliance efforts for the allotments in sage grouse habitat.
- Reconsider the wild horse and burro program. Use the agency data to evaluate the impacts of horses on failing lands in comparison to livestock.

I. The Data

What Are They and Why Are They Important?

BLM is required to ensure that rangeland health is not compromised within the context of its multiple-use mission as defined in the Federal Lands Policy Management Act (FLPMA). The agency has been pivoting from management of land health at the local pasture and allotment scale to considering land health at the landscape and regional scales. It has conducted important assessments to identify significant factors that impact rangeland health conditions but has not factored in the effects of the most ubiquitous disturbance factor on grazing lands under their administration – livestock grazing. Despite the centrality of ensuring that livestock grazing does not compromise rangeland health, the agency has never maintained formal records with which the significance of livestock grazing impacts could be investigated. The lack of these important data precluded the inclusion of livestock grazing in these regional assessments.

In order to explore the broadscale significance of livestock grazing on rangeland health, PEER undertook this project, that is to compile records gleaned from field offices of land health assessments for all of the designated grazing allotments, clean them up, and convert them to geospatial format. BLM does not maintain these data in electronic form.

Many factors impact rangeland health, from off-highway vehicles to drought, the spread of invasive species, and fire, but there are limited factors under the agency's complete control including regulating grazing management practices. The agency data compiled by PEER represent the most complete picture of the influence of land health and livestock grazing at landscape and regional scales. The data have been compiled to help track, map, and examine achievements and non-achievements of allotment rangeland health, and importantly, to help the public explore and assess the accuracy and timeliness of the agency's data themselves.

It is notable that BLM does not track the number of acres that is failing LHS. For example, BLM Range Staff may classify an entire allotment, which can be tens of thousands of acres, as failing, despite only analyzing the allotment in a limited number of places. The agency will analyze the allotment where they judge that the level or ecological importance of the impacts is significant enough for them to make a determination. PEER is only sharing the data in the same way that the agency maintains it.

II. Rangeland Health Standards

How does BLM Assess Grazing Allotments?



Land health stewardship has been a longstanding challenge for the agency. In 1995, BLM developed formal regulations (43 C.F.R. §§4180.1, 4180.2) to define the minimum rangeland health management requirements and set standards and guidelines for administration of livestock grazing. The intent of the regulation was to clarify that maintaining rangeland health must take precedence over land use. The regulations were enacted specifically to address the impacts of ongoing management practices that contributed to rangeland health degradation.

The regulations require livestock grazing practices to ensure that:

- a) Watersheds are in, or are making significant progress toward, properly functioning physical condition, including their upland, riparian-wetland, and aquatic components; soil and plant conditions support infiltration, soil moisture storage, and the release of water that are in balance with climate and landform and maintain or improve water quality, water quantity, and timing and duration of flow.
- b) Ecological processes, including the hydrologic cycle, nutrient cycle, and energy flow, are maintained, or there is significant progress toward their attainment, in order to support healthy biotic populations and communities.
- c) Water quality complies with State water quality standards and achieves, or is making significant progress toward achieving, established BLM management objectives such as meeting wildlife needs.
- d) Habitats are, or are making significant progress toward being, restored or maintained for Federal threatened and endangered species, Federal proposed or candidate threatened and endangered species, and other special status species.

60 FR 9969, Feb. 22, 1995, as amended at 71 FR 39508, July 12, 2006.

BLM working documents rely on "standards and guidelines" to assess allotments. The standards and guidelines for grazing administration required authorized officers to ensure that:

- i. Management practices maintain or promote adequate amounts of ground cover to support infiltration, maintain soil moisture storage, and stabilize soils;

- ii. Management practices maintain or promote soil conditions that support permeability rates that are appropriate to climate and soils;
- iii. Management practices maintain or promote sufficient residual vegetation to maintain, improve or restore riparian-wetland functions of energy dissipation, sediment capture, groundwater recharge and stream bank stability;
- iv. Management practices maintain or promote stream channel morphology (e.g., gradient, width/depth ratio, channel roughness and sinuosity) and functions that are appropriate to climate and landform;
- v. Management practices maintain or promote the appropriate kinds and amounts of soil organisms, plants and animals to support the hydrologic cycle, nutrient cycle, and energy flow;
- vi. Management practices maintain or promote the physical and biological conditions necessary to sustain native populations and communities;
- vii. Desired species are being allowed to complete seed dissemination in 1 out of every 3 years (Management actions will promote the opportunity for seedling establishment when climatic conditions and space allow.);
- viii. Conservation of Federal threatened or endangered, proposed, candidate, and other special status species is promoted by the restoration and maintenance of their habitats;
- ix. Native species are emphasized in the support of ecological function;
- x. Non-native plant species are used only in those situations in which native species are not readily available in sufficient quantities or are incapable of maintaining or achieving properly functioning conditions and biological health;
- xi. Periods of rest from disturbance or livestock use during times of critical plant growth or regrowth are provided when needed to achieve healthy, properly functioning conditions (The timing and duration of use periods shall be determined by the authorized officer.);
- xii. Continuous, season-long livestock use is allowed to occur only when it has been demonstrated to be consistent with achieving healthy, properly functioning ecosystems;
- xiii. Facilities are located away from riparian-wetland areas wherever they conflict with achieving or maintaining riparian-wetland function;
- xiv. The development of springs and seeps or other projects affecting water and associated resources shall be designed to protect the ecological functions and processes of those sites; and
- xv. Grazing on designated ephemeral (annual and perennial) rangeland is allowed to occur only if reliable estimates of production have been made, an identified level of annual growth or

residue to remain on site at the end of the grazing season has been established, and adverse effects on perennial species are avoided.

60 FR 9969, Feb. 22, 1995, as amended at 61 FR 59835, Nov. 25, 1996; 71 FR 39508, July 12, 2006.

The regulations require the agency to make management adjustments to ensure range health. To achieve these objectives, BLM field offices are required to conduct periodic Rangeland Health Standards assessments of allotments to determine whether these basic requirements are met. If the agency finds that one or more Rangeland Health Standards are not achieved, the regulations require that BLM identify the significant factors contributing to the failure.

[If] the authorized officer determines through standards assessment and monitoring that existing grazing management practices or levels of grazing use on public lands are significant factors in failing to achieve the standards and conform with the guidelines that are made effective under this section, the authorized officer will, in compliance with applicable laws and with the consultation requirements of this part, formulate, propose, and analyze appropriate action to address the failure to meet standards or to conform to the guidelines. (Emphasis added)

60 FR 9969, Feb. 22, 1995, as amended at 61 FR 59835, Nov. 25, 1996; 71 FR 39508, July 12, 2006.

The language requires the agency to assess the land according to specified standards, and if the land does not meet the specified conditions, the agency must identify the cause. Then, importantly, the regulations require that BLM take action to protect your public lands.

Assessing the Data

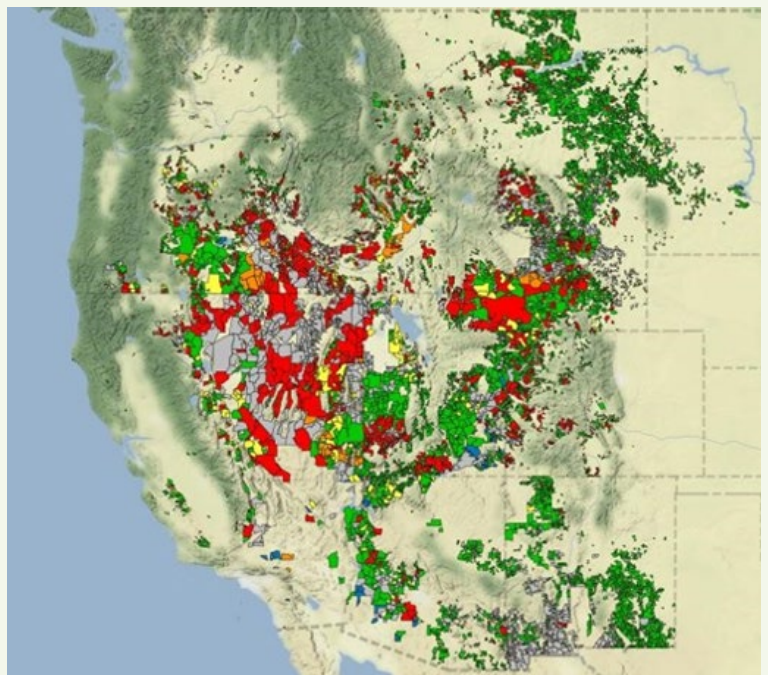
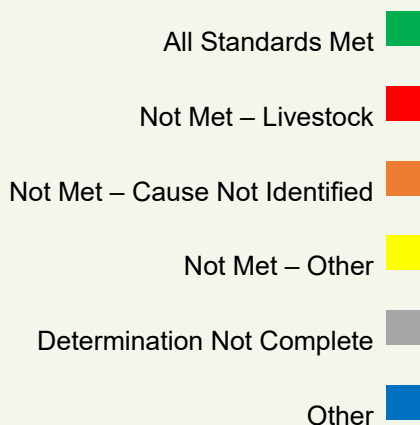
Three separate datasets were obtained from BLM through FOIA requests since 2008. The data were provided in spreadsheet format but were not examined by the agency to determine whether they met agency data quality standards. Once compiled, many records of the same evaluations were available for comparison, helping to reconcile errors, omissions, and inconsistencies. Every effort was made to correct these data quality problems to produce a single merged dataset containing the most current LHS evaluation records. The data were joined with the BLM National Grazing Allotment polygon file for spatial exploration.

III. Land Health Standards Assessment Records (1997-2019)

Notable Findings in the Land Health Data

- Of the total acres assessed, BLM reports that 50% fail to meet Land Health Standards. This is a total of 54 million acres (approximately the area of Washington state).
- Of the lands that failed to meet LHS, BLM reported that in 72% of cases, “a significant cause” was livestock grazing. That is approximately 40 million acres that are failing due to overgrazing.
- BLM has assessed Land Health Standards for approximately 108 million acres of grazed public lands. The agency has yet to assess nearly 41 million acres.
- A portion of the assessed lands that are classified as “meeting” standards are actually only “making significant progress” toward meeting the standards, not actually meeting them.
- There are massive allotments that need agency attention. In Wyoming, for example, there is an allotment of over 950,000 public acres that is identified as failing Land Health Standards. BLM attributes “livestock grazing” as a significant cause. There is a 1.4-million-acre allotment in Nevada that has yet to be assessed.

Figure 1. Land Health of Total 151,000,000 BLM Managed Grazing Allotments



BLM National Data

Figure 2. Current Rangeland Health Standards Status as described in BLM allotment Land Health Assessment records, 1997 - 2019

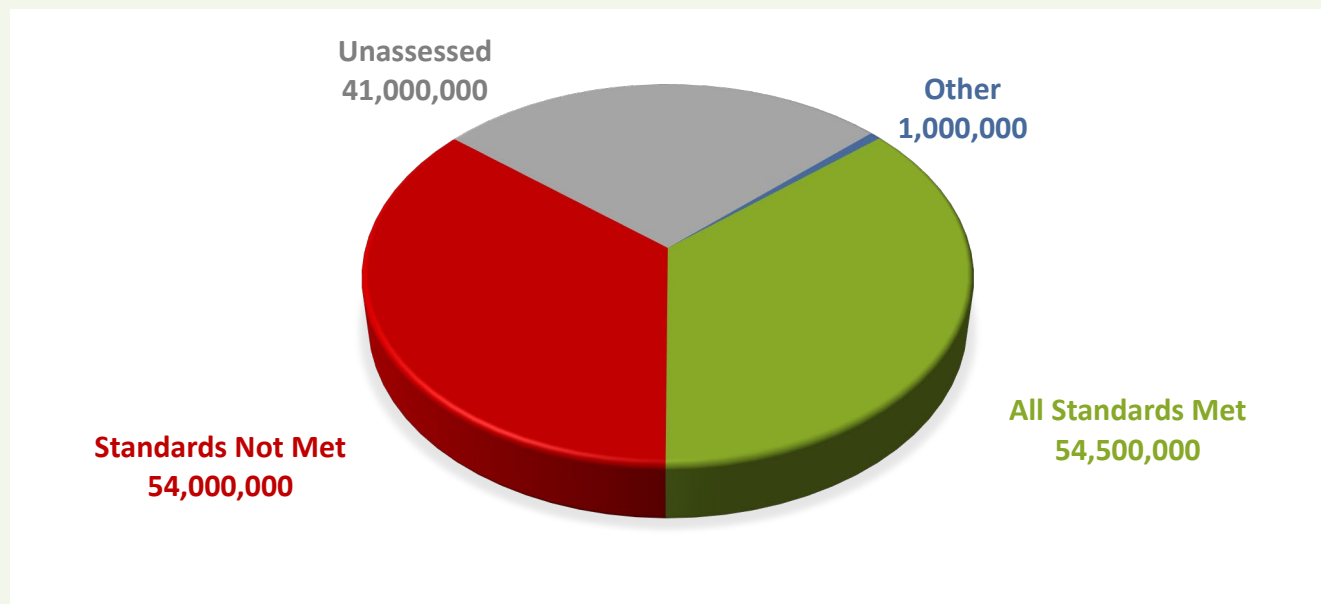


Table 1. BLM Allotment Land Health Status Determinations 1997 - 2019

Status	Percentage of Public Land Acres			
	Public land acres (from FOIA dataset)	Percent of all allotments	Percent of all assessed allotments	Percent of allotments failing LHS standards
All Standards Met	54,553,776	36%	50%	
Not Met - Livestock	39,059,868	26%	36%	72%
Not Met – Cause not identified	4,509,463	3%	4%	8%
Not Met - Other	10,601,121	7%	10%	20%
Determination Not Complete	40,751,988	27%		
Other	1,435,245	1%		
Total with Areas & Allotment Number (Public Acres)	150,911,461	100%		
Total Assessed (public acres)	108,724,228		100%	
Total Failed (public acres)	54,170,452			100%

Figure 3. The relative significance of livestock and horses as causes of failure to achieve allotment land health standards,

The Advanced Search Tool of the PEER interactive map was used to generate these displays.

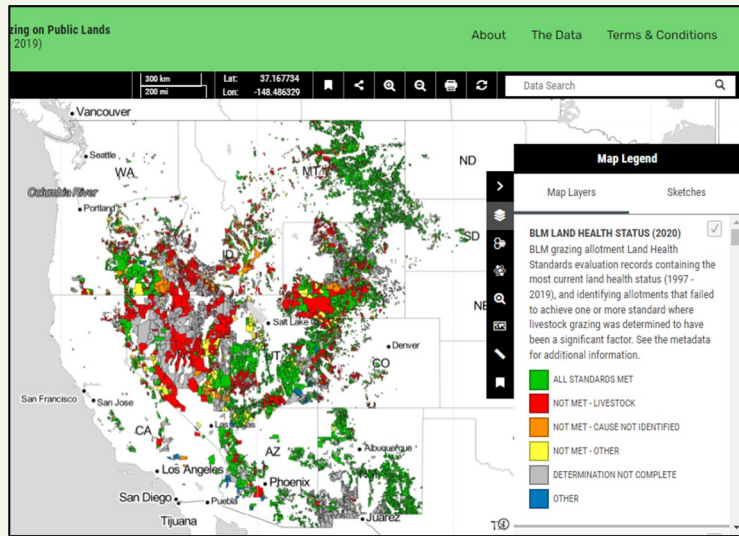


Figure 3a. In this query, all allotments land health standards are selected. This is the default map.

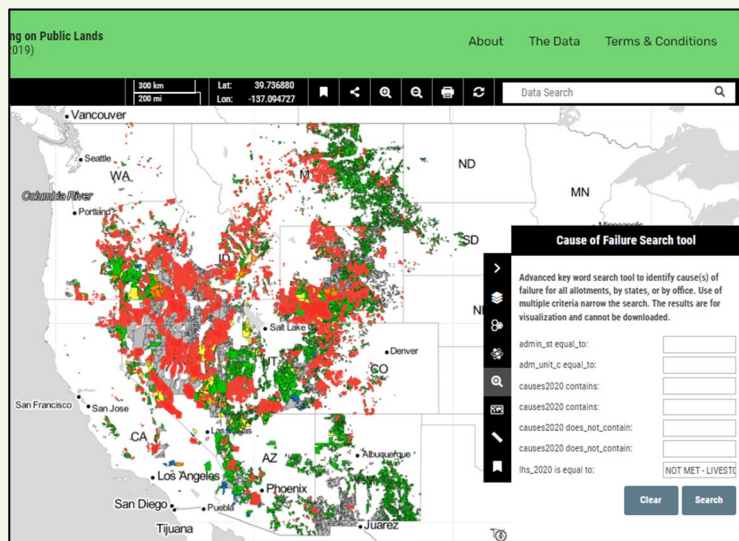


Figure 3b. In this query, we have selected to show only BLM's most recent assessment.

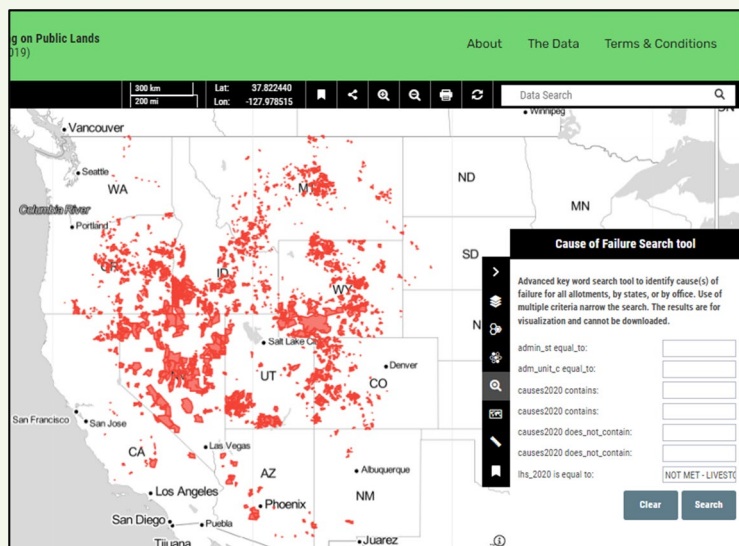


Figure 3c. Again, we selected only BLM's most recent assessment, but show only allotments that BLM identified as failing due to livestock grazing.

BLM State Data

State	All Standards Met	Not Met - Livestock	Not Met – Cause Not Identified	Not Met - Other	Determination not Complete	Other	Total
Arizona	6,287,896	947,668	37,748	892,958	2,500,347	608,611	11,275,228
California	2,394,302	1,876,089	157,325	392,976	1,036,514	91,193	5,948,399
Colorado	3,757,463	2,569,740	42,687	696,317	622,475	18,184	7,706,866
Idaho	1,751,144	4,379,267	758,449	992,699	3,049,838	10,052	10,941,449
Montana	6,477,045	1,088,482	176,556	251,258	57,843	11,544	8,062,728
New Mexico	6,849,768	136,328	1,561	28,852	4,908,867	-	11,925,376
Nevada	4,106,110	15,420,561	1,375,722	3,572,141	18,272,383	66,726	42,813,643
Oregon	5,451,116	3,077,349	1,457,228	1,076,194	2,390,450	10,569	13,462,906
Utah	11,605,449	3,371,843	-	1,332,871	4,624,164	618,268	21,552,595
Wyoming	5,873,483	6,192,541	502,187	1,364,855	3,289,107	98	17,222,271
TOTAL	54,553,776	39,059,868	4,509,463	10,601,121	40,751,988	1,435,245	150,911,461

State	All Standards Met	Not Met - Livestock	Not Met – Cause Not Identified	Not Met - Other	Determination not Complete	Other	Total
Arizona	56%	8%	0%	8%	22%	5%	100%
California	40%	32%	3%	7%	17%	2%	100%
Colorado	49%	33%	1%	9%	8%	0%	100%
Idaho	16%	40%	7%	9%	28%	0%	100%
Montana	80%	14%	2%	3%	1%	0%	100%
New Mexico	57%	1%	0%	0%	41%	0%	100%
Nevada	10%	36%	3%	8%	43%	0%	100%
Oregon	40%	23%	11%	8%	18%	0%	100%
Utah	54%	16%	0%	6%	21%	3%	100%
Wyoming	34%	36%	3%	8%	19%	0%	100%
TOTAL	36%	26%	3%	7%	27%	1%	100%

Table 4. Current Rangeland Health Standards Status for All Assessed BLM Allotments 1997-2019 (acres)

State	All Standards Met	Not Met - Livestock	Not Met – Cause Not Identified	Not Met - Other	Total Assessed	Not Met - Total
Arizona	6,287,896	947,668	37,748	892,958	8,166,270	1,878,374
California	2,394,302	1,876,089	57,325	392,976	4,820,692	2,426,390
Colorado	3,757,463	2,569,740	42,687	696,317	7,066,207	3,308,744
Idaho	1,751,144	4,379,267	758,449	992,699	7,881,559	6,130,415
Montana	6,477,045	1,088,482	176,556	251,258	7,993,341	1,516,296
New Mexico	6,849,768	136,328	1,561	28,852	7,016,509	166,741
Nevada	4,106,110	15,420,561	1,375,722	3,572,141	24,474,534	20,368,424
Oregon	5,451,116	3,077,349	1,457,228	1,076,194	11,061,887	5,610,771
Utah	11,605,449	3,371,843	-	1,332,871	16,310,163	4,704,714
Wyoming	5,873,483	6,192,541	502,187	1,364,855	13,933,066	8,059,583
TOTAL	54,553,776	39,059,868	4,509,463	10,601,121	108,724,228	54,170,452

Table 5. Current Rangeland Health Standards Status for All Assessed BLM Allotments 1997-2019 (%)

State	All Standards Met	Not Met - Livestock	Not Met – Cause Not Identified	Not Met - Other	Not Met - Total	Livestock of Not Met
Arizona	77%	12%	0%	11%	23%	50%
California	50%	39%	3%	8%	50%	77%
Colorado	53%	36%	1%	10%	47%	78%
Idaho	22%	56%	10%	13%	78%	71%
Montana	81%	14%	2%	3%	19%	72%
New Mexico	98%	2%	0%	0%	2%	82%
Nevada	17%	63%	6%	15%	83%	76%
Oregon	49%	28%	13%	10%	51%	55%
Utah	71%	21%	0%	8%	29%	72%
Wyoming	42%	44%	4%	10%	58%	77%
TOTAL	50%	36%	4%	10%	50%	72%

IV. Impacts of Livestock Grazing on Key Wildlife Species

Greater Sage-grouse

Much of the Greater Sage-Grouse Priority and General Habitat Management Area lies within BLM allotments in ecoregions where more than 40% of livestock allotments assessed fail to achieve Land Health Standards. BLM often attributes the reason for failing standards to livestock grazing.

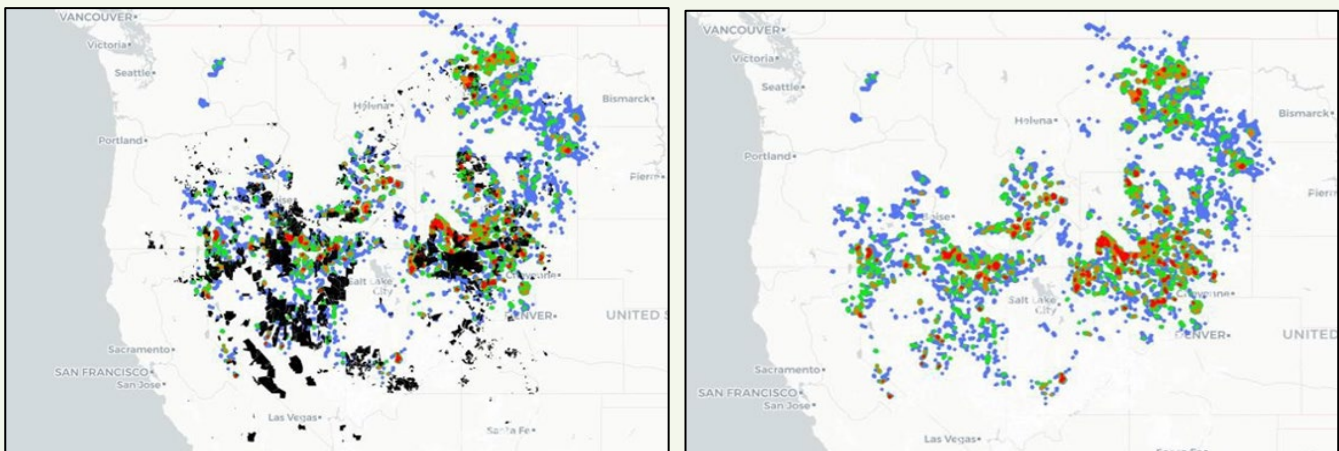
The Greater Sage-Grouse (GRSG) are in decline. Still legally hunted in many states, the birds have reached record low numbers. Their habitat is slowly being chipped away by oil and gas development, abusive livestock grazing, fire, and drought. A 2021 USGS study found an 80% range-wide decline in their population since 1965 and a nearly 40% decline since 2002. Government scientists predict that 78% of leks have a more than 50% chance of disappearing over the next six decades.



BLM oversees more sage grouse habitat than any other federal land management agency. Nevertheless, estimates suggest that core GRSG habitat is disappearing at a rate of about 1.3 million

Figure 5. (Left) Greater Sage-Grouse Breeding Bird Densities (25% red, 50% - orange, 75% - green, 100% - blue). Chick survival rate is declining in Wyoming at an alarming rate (High Country News, Wyoming Sage-Grouse numbers 'alarming', [Angus M. Thuermer Jr.](#) Jan. 11, 2022), and is expected to hit a low in 2022, heading back to 1990's levels.

(Right) Greater Sage-Grouse Breeding Bird Density showing allotments failing due to livestock circa 2020.



acres a year from a national base of 26 million acres. The data that PEER compiled reveals that livestock grazing is degrading public and presumably private lands and some of these lands appear to be in the bird's habitat.

Much of the bird's habitat is within the Wyoming Basin Ecoregion. BLM data reveals that the livestock grazing failure level of this ecoregion exceeds 40% of the assessed area. Consider the data on the GRSB breeding bird densities displayed on the map in Figure 5. The red and orange points are home to 50% of the breeding bird population range wide.

We have overlapped the data layer of allotments that BLM has identified as failing over the bird breeding areas to show the impact of grazing on GRSB habitat. The black areas represent the livestock allotments that the agency has identified as "failing to meet rangeland health standards."

Oil & Gas Development Prioritized Over Sage Grouse



BLM Biologists and internal documents reveal how BLM is managing lands for Greater Sage-Grouse. In addition to the fact that BLM continues to permit grazing on lands that they have determined are failing land health standards and that are within the sage grouse habitat, BLM is issuing exemptions to industry to work in sage grouse habitat.

Even as sage grouse numbers plummet, BLM continues to waive Greater Sage-Grouse habitat protections so that oil and gas operations can work without hindrance. According to BLM records in six field offices, nearly 100 such exemptions were issued in the last four years. The exemptions and timing stipulations allow mainly oil and gas activity in areas

set aside to protect sage grouse and various migratory raptors.

The agency has not been transparent with the public. Four of the BLM Wyoming Field Offices within the bird's habitat have yet to provide any documents, so we have yet to learn how many exemptions have been granted and what the cumulative impacts will be to the bird.

Most recently, on June 20, 2022, PEER filed a complaint with the Office of Inspector General requesting an investigation into the issue. PEER also requested that BLM Director Stone-Manning address the issue.

What's Next? Will the Sage Grouse be Classified as Endangered?

The Greater Sage-Grouse population now is less than a quarter of what it was more than 50 years ago. The birds were originally proposed for listing as threatened in 2013, but the Fish and Wildlife Service (FWS) abandoned the proposal in 2015. In 2018, a federal court found that the Service had wrongly denied Endangered Species Act protection and required the agency to re-evaluate the bird's situation. The FWS again proposed the bird for protection, but in March 2020 the Trump

administration withdrew the proposal for the bi-state sage grouse and required the agency to re-evaluate the bird's situation. The FWS again proposed the bird for protection, but in March 2020 the Trump administration withdrew the proposal.

On May 17, 2022, a federal court ruled that the U.S. Fish and Wildlife Service illegally withdrew its proposal to list the Bi-State sage-grouse as threatened under the Endangered Species Act.

Continuing sage grouse declines will likely result in imposition of Endangered Species Act protections that will be far stricter than current safeguards.

Wyoming Habitat is Pivotal to Greater Sage-Grouse Recovery



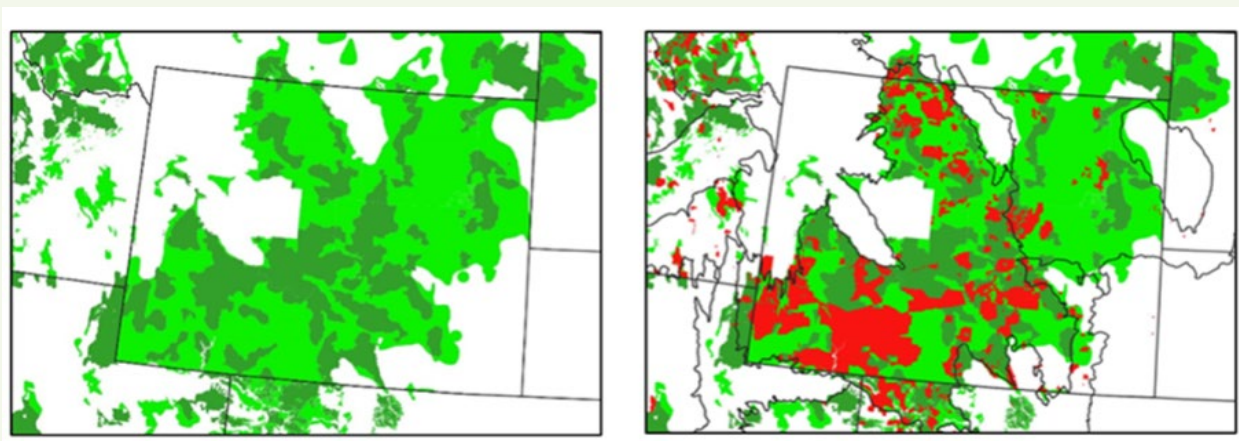
The state of Wyoming is home to a third of the remaining Greater Sage-Grouse habitat. The habitat spans across public and private land. To recover the species, we urge BLM to critically examine the management of livestock on public lands within the bird's habitat

Of the approximately 17,222,271 acres that BLM manages in Wyoming (Figure 6), the agency has determined that 8,059,583 acres are failing to meet the agency land health standards. In 44% of public allotments in the state that the agency

has assessed, BLM has identified livestock as a significant cause for failing land health. Note that the agency uses different criteria for assessing sage grouse habitat than those used to assess landscape health.

Since private lands are not included in the BLM assessment and because we have not identified public lands that are failing Land Health Standards for other reasons, such as drought or fire, the red area is certainly underrepresenting the extent of the marginal lands.

Figure 6. The dark green areas in the map represent the Priority Habitat Management Areas for the Greater Sage-Grouse in Wyoming. The light green represents the General Habitat Management Areas. Areas that BLM has identified as "failing Land Health Standards due to livestock" are overlayed in red.



Wild Horses and Burros

BLM Data Calls into Question Agency Policy Decisions on Wild Horses



BLM has a robust wild horse and burro control policy that is designed to maintain healthy lands. The agency regularly reduces the total number of horses on public lands to maintain the Appropriate Management Level (AML) in Herd Management Areas (HMA).

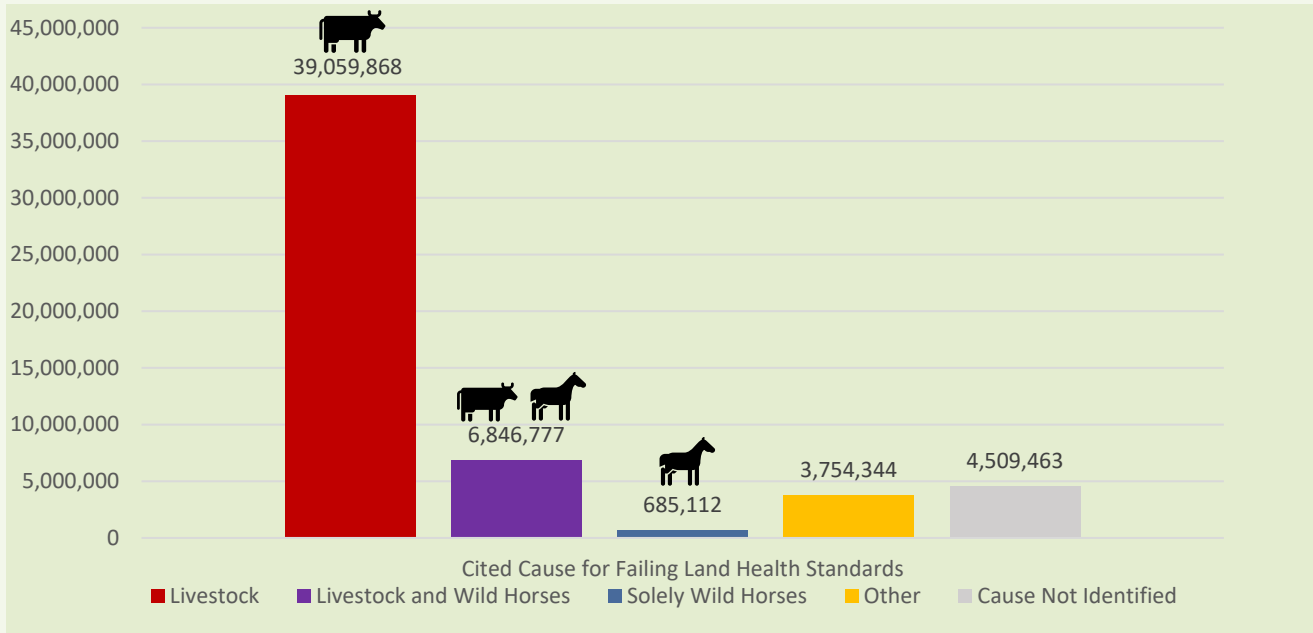
In early October 2022, BLM stated in a National Wild Horse and Burro Advisory Board meeting that it rounded up a total of 20,851 wild horses and burros and permanently removed 19,011 animals from federal rangelands in fiscal 2022. This record number exceeds by far the previous

record of 13,666 animals, which was set in 2021.

In contrast, BLM does not have a similar national strategy to analyze the impacts of the massive livestock grazing program even though its data indicates that livestock is a problem for land health. BLM data reveal that most of the allotments within HMAs that fail its standards for rangeland health – approximately 11.5 million acres of the 21.5 million acres of allotments within HMAs assessed by BLM to date – identify livestock as a significant cause of that failure. Overall, in allotments including those within HMAs, BLM cites livestock as the number one cause of allotments failing LHS, not horses.

Table 6. Acreage breakout of land health standards status associated with wild horses and livestock as recorded by BLM field office	
Description of breakout	Public Land (acres)
Total allotments meeting land health standards	54,517,295
Total allotments failing land health standards	54,170,452
Failing due to livestock	39,059,868
Failing due to causes other than livestock	10,601,121
Failing due to livestock in conjunction with wild horses	6,846,777
Failing solely due to wild horses (no reference to livestock)	685,112
Failing due to causes other than livestock or wild horses	3,754,344
Failing but cause not identified	4,509,463

Figure 7. BLM Land Health Standards data reveal that livestock are by far the most frequently cited as the cause of failure to meet standards, for quality of water, vegetation, and soils, as well as the ability to support wildlife nationwide, including allotments within HMAs.



When you look at sheer numbers of animals, the data does not justify the agencies focus on reducing the wild horse and burro population without a similar focus on the grazing numbers. Cows outnumber wild horses on BLM lands by a ratio of more than 30 to 1. It is noteworthy that unlike horses, cattle are not on the land for 12 months of the year. However, BLM considers horses and cows roughly equivalent in terms of how much forage they consume. The 2021 federal grazing fee states that the animal unit month (AUM) for cattle is equivalent to the per head month (HM) fee for horses. This contrasts with fees for goats and sheep. Goats and sheep are calculated as five per month compared to cows and horses.

Looking at the data on all allotments (Table 7), not just those within Wild Horse Management areas, wild horses are cited as “a significant disturbance factor” 65 times, but most frequently, 86% of the time, in conjunction with livestock.

Table 7. Horses and livestock as the sole causal factor for failing allotments

Failing Due to Livestock and Horses	Allotments (n)	Allotments (%)	Public Lands (acres)	Public Lands (%)
Not Met due to Livestock & Horses	56	86%	6,161,665	90%
Not Met due solely to Horses	9	14%	685,112	10%
Totals	65	100%	6,846,777	100%

Consider Colorado, where BLM states that the drought has left too little water and too little vegetation for food to sustain the wild horse herds of the state. As of today, the agency has yet to issue a state-wide drought call, that is mandatory reductions in livestock grazing.

A BLM roundup resulted in the death of 142 horses when a contagious virus spread through the holding facility. In May 2022 in Colorado, Governor Polis requested that BLM stop rounding up wild horses in Colorado. BLM responded to the governor that it would be proceeding. The governor's office stated that it was disappointed by the BLM's decision to move ahead with a "costly and wasteful roundup of our wild horses" and that "the agency truly doesn't care to first listen to stakeholders before moving forward."

In October 2022, BLM reported that it is holding nearly 64,000 wild horses and burros in off-range holding corrals and pastures and it is responsible for caring for all the animals it cannot adopt over the course of their lifetimes. The large number is close to the maximum number of roughly 78,000 total animals that BLM has space to hold.

While wild horses do have impacts on the land, coherent landscape and recovery planning require a hard look at the policy of continuing to permit millions of cows to forage on increasingly stressed rangelands.

Table 8. Wild horses are identified as a cause of failure to achieve land health standards in 65 allotments containing roughly 7 million acres of public lands. Most lands failing standards that identify wild horses and burro as a cause are on Nevada.

State	Acres identified as failing due to horses, or horses and livestock	Public Lands (% of total)
California	546,456	8%
Colorado	32,905	0%
Idaho	93,367	1%
Montana	38,313	1%
Nevada	5,653,590	83%
Oregon	81,499	1%
Utah	371,792	5%
Wyoming	28,855	0%
TOTAL	6,846,777	100%

Figure 8. The Relative Significance of Horses and Livestock as Causes of Failure to Achieve Allotment Land Health

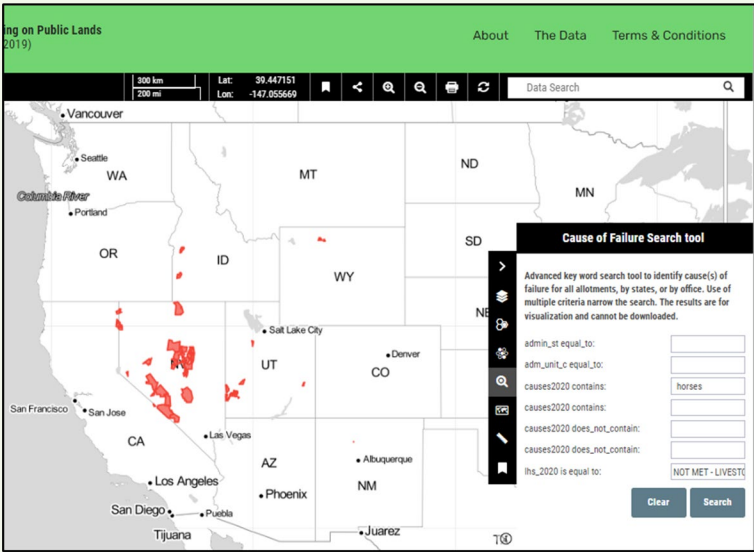


Figure 8a. Allotments that failed land health standards where BLM identified horses & livestock as the cause.

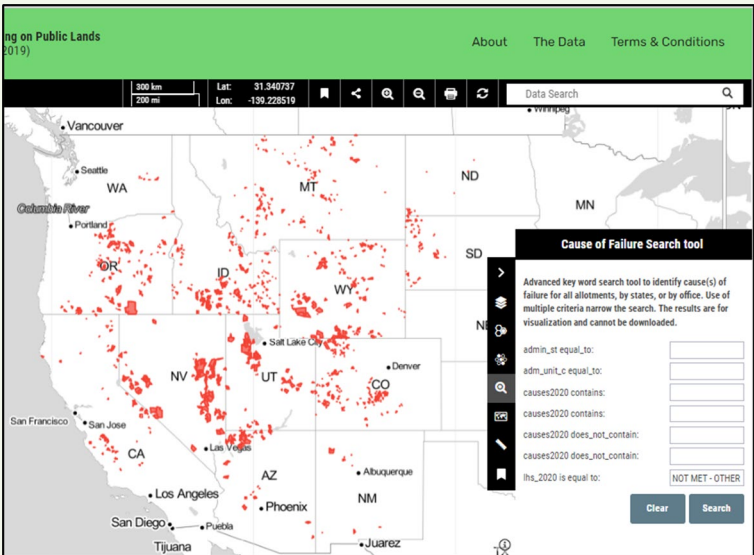


Figure 8b. Allotments that failed land health standards where BLM did not identify livestock as the cause. (OTHER, e.g., OHV, oil and gas, invasive species, horses)

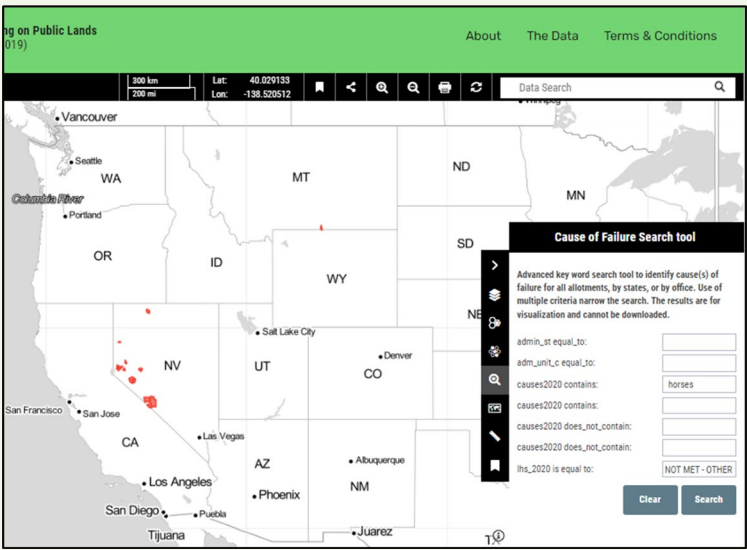


Figure 8c. Allotments that failed land health standards where BLM identified horses as a cause but livestock not livestock.

Wild Horses in Nevada

In Nevada, 5,653,590 acres of public lands have been determined to be failing due to wild horses, though some of those allotments also have livestock as contributing factors. While this number is very high, it's actually an outlier in the country as Nevada has more herd management areas (HMAs) than any other state.

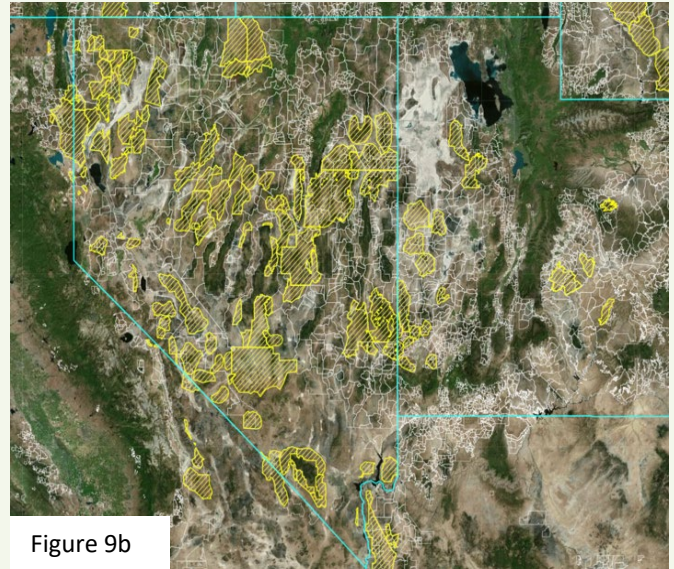
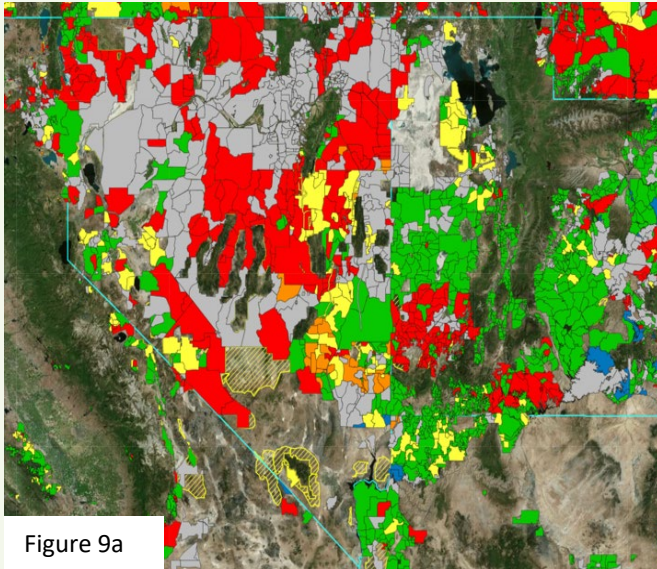


Figure 9. In the above map images of Nevada, taken from PEER's Interactive BLM Rangeland Health Geospatial Data Portal, the red sections of the map to the left (Figure 9a) indicate areas that are failing health standards lands. In the map to the right (Figure 9b) you can see the HMAs. When exploring the Land Health Map, you can easily see how these areas overlay.

V. Resources

All resources available at www.peer.org/mapping-the-range/

[Mapping the Range: BLM Rangeland Health Geospatial Data Portal \(Arc GIS Map\)»](#)

[Impacts of Grazing \(Arc GIS Story Map\)»](#)

[Rangeland Health Fact Sheet»](#)

[The Biden Administration's Bureau of Land Management \(Report\)»](#)

For questions contact Chandra Rosenthal, Rocky Mountain PEER Director croenthal@peer.org