

**Worksheet**  
**Determination of NEPA Adequacy (DNA)**  
**U.S. Department of the Interior**  
**Bureau of Land Management**

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**Project Lead:** John Axtell  
**Field Office:** Sierra Front Field Office  
**Lead Office:** Sierra Front Field Office  
**Case File/Project Number:** N/A  
**NEPA NUMBER:** DOI-BLM-NV-C020-2013-0012-DNA  
**Project Name:** Carson City Urban Interface Nuisance Horse Removal  
**Applicant Name:** Bureau of Land Management  
**Project Location:** Carson City, Nevada

**A. Description of the Proposed Action and any applicable mitigation measures:**

The Proposed Action is to remove approximately 10 wild horses that have established their home range in the extreme western edge of the Pine Nut Mountains Herd Management Area (HMA), privately-owned lands and Carson City parklands. These horses continually present public safety concerns ranging from aggressive encounters between the wild horses and domestic horses, sometimes resulting in damage to private corrals and injuries to the domestic horses, to aggressive encounters including one a woman that was forced to seek refuge in a tree to avoid a stallion in the city park. Additionally, this office is aware of four vehicles collisions involving wild horses along Deer Run Road; this number could be greater as we are not always notified of vehicle collisions.

**B. Land Use Plan (LUP) Conformance**

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:

Carson City Field Office Consolidated Resource Management Plan (May 2001):

1. WHB-2, decision 2 – “Maintain sound thriving populations of wild horses within HMAs.”
2. WDL-3, decision 4 – “Maintain and improve wildlife habitat, and reduce habitat conflicts while providing for other appropriate resource uses.”
3. WDL-2, decision 6 – “Maintain or improve the condition of the public rangelands so as to enhance productivity for all rangeland values (including wildlife).”

**Name of Plan:** NV – Carson City RMP

**C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.**

Clan Alpine, Pilot Mountain and Pine Nut Herd Management Areas Gather Plan October 20, 2010 (Gather Plan) (DOI-BLM-NV-C010-2010-0019-EA).

#### **D. NEPA Adequacy Criteria**

**1. Is the new Proposed Action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

This action is essentially similar to the Gather Plan Proposed Action, the main difference is that the wild horses will be lured into a temporary corral using bait rather than run into a temporary corral by a helicopter. Though helicopter herding does not excessively stress horses, bait trapping is even less stressful since the horses willingly enter the corral. In many instances bait trapping is not feasible due to numbers of horses to be gathered, access or reasonable time frames, however, in this instance bait trapping is feasible. Once inside the temporary corral all further handling will be identical to what was analyzed in the Gather Plan Proposed Action. The project area was included in the analysis within the Gather Plan.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new Proposed Action, given current environmental concerns, interests, and resource values?**

The existing Gather Plan analyzed removing all wild horses outside of the HMA which included the Carson City area/urban interface horses and capturing 80 percent of the horses inside the HMA, treating the mares with a contraceptive and releasing the horses captured inside the HMA back into the HMA. The Gather Plan also analyzed recapturing and re-treating the horses every 2 – 3 years. However, due to budget constraints the horses have not been recaptured. At the time the Gather Plan was written there were 148 wild horses within the HMA and 67 wild horses outside of the HMA, the May 2012 estimate is 293 wild horses inside and outside of the HMA. The Animal Management Level (AML) for this HMA is 119 – 179 wild horses. Since the existing Gather Plan was written, this area has been experiencing an extended drought which has stressed resources inside and outside of the HMA. Combining the recent drought conditions and above AML population estimates, the HMA cannot support these numbers of wild horses.

**3. Is the existing analysis valid in light of any new information or circumstances (such as, range- land health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new Proposed Action?**

The existing Gather Plan is still valid as removing the nuisance excess wild horses in the Carson City area/urban interface area would contribute toward an increase in range health and move the population of wild horses toward the AML.

**4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

Both direct, indirect, and cumulative effects of this proposal would be similar if not identical to those analyzed in the existing Gather Plan.

**5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current Proposed Action?**

The existing Gather Plan was made available for public review and comment on August 23, 2010. Letters were sent to individuals, organizations and agencies listed on the Carson City District Office (CCDO) Wild Horse and Burro program mailing list. The comment period closed on September 23, 2010. The Gather Plan is located at the following hyperlink: [http://www.blm.gov/nv/st/en/fo/carson\\_city\\_field/blm\\_information/nepa/nepa\\_archives.html](http://www.blm.gov/nv/st/en/fo/carson_city_field/blm_information/nepa/nepa_archives.html).

Comment letters from the public, organizations and agencies were received by email, fax, and mail delivery. All comments were reviewed, considered and then categorized. Comment letters were broken down into categories. A summary of the public comments were included in Appendix G of the Final EA of the Gather Plan. For this action the BLM has provided public notification by publication of a news release.

**E. Persons/Agencies/BLM Staff Consulted**

<u>Name</u>	<u>Title</u>	<u>Agency Represented</u>
Rachel Crews	Archaeologist	BLM

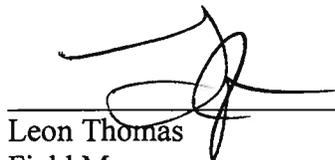
The bait/trap site is previously disturbed and does not require a cultural resources survey or monitoring.

  
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Signature of Project Lead

  
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Signature of NEPA Coordinator

**F. Decision**

It is my Decision to remove approximately 10 wild horses in the Carson City urban interface. I have reviewed this LUP conformance and NEPA compliance record and have determined that the gather is in conformance with the CRMP and that no further NEPA analysis is required. This Decision is in full force and effective upon its issuance in accordance with 43 CFR 4770.3(c) because removal of the wild horses is necessary to protect public safety, and under 43 CFR 4710.4 because bait trapping is the minimum level necessary to reduce the size of the wild horse herd associated with the Pine Nut Herd Management Area.

  
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Leon Thomas  
Field Manager  
Sierra Front Field Office

Date 1-22-13