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

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-C020-2014-0011-DNA
Project Name: Fish Springs Wild Horse PZP Pilot Project
Applicant Name: BLM
Project Location: Douglas County, Nevada
T14 N R20E, Sections 24, 25, 36, T14N 21E Sections 13-36, T 14N 22E Sections 18-19, 30-31, T13N 21E, Sections 1-36, T13N 22E, Sections 4-6, 7-9, 15-22, 27-30, 31-33, T12N 21E, Sections 1-5, 9-12, and T 12N 22E, Sections 4-9, 17-18.

A. Description of the Proposed Action and any applicable mitigation measures:
The Return to Freedom American Wild Horse Preservation Campaign (RTF) has proposed to the Bureau of Land Management (BLM), Sierra Front Field Office, to conduct a one-year pilot project to administer liquid porcine zona pellucide (PZP) to all mares one-year of age and older residing in the Fish Springs area. Fish Springs is located in the wildland urban interface east of Minden/Gardnerville, Douglas County, Nevada (Figure 1). The BLM would enter into a Memorandum of Understanding with RTF if this project were to be extended beyond the first year.

Approximately 30 to 40 wild horses frequent the Fish Springs residential community. To deter residents from placing water troughs for the wild horses on their private property, in December 2013 the BLM authorized the placement of a water trough on public land (DOI-BLM-NV-C020-2014-0005-DNA).

The project area is located approximately 10 miles south of the Pine Nut Mountain Herd Management Area (HMA), although it is within the Herd Area (HA) (Figure 1). The project area is the vicinity of the water trough where these 30 to 40 wild horses are most likely to be found (Figure 2). The area is approximately 69,000 acres of public and private lands (Figure 2).

The objective of this action is to achieve zero population growth, and over time, through natural attrition, reduce the number of wild horses residing outside the HMA. If successful, this pilot project may be expanded to other areas within or adjacent to the HMA. The most recent census of wild horses residing in the HMA in May of 2012 was 293 animals. The Appropriate Management Level (AML) for the HMA is 119-179 animals.

The BLM is considering this pilot project as an alternative to periodic gathers to reduce or remove wild horses. The most recent gather occurred in 2010, when the BLM removed 43 wild horses residing outside the HMA in the Buckskin Range and 22 mares in the Dayton area were treated with PZP before being re-released into the HMA.

Presently the BLM has limited capacity to remove wild horses and is doing so only in emergency situations. Regular administration of PZP to mares can lead to reduced or no population growth. This pilot project would dart mares remotely, and/or bait/water trap mares that could not be darted. An certified darter would administer the PZP over two, 10-day visits. Under this pilot project, PZP would be administered in April 2014 and a booster would be applied in May 2014 or later. Approximately 20 to 25 mares would be treated with PZP.

Data and photos would be collected on all treated mares including: physical markings, band affiliation etc. The effectiveness of PZP application would be documented by monitoring in herd foaling rates.

The project area (Figure 2) includes privately-owned lands; at the time of PZP administration, wild horse herds may be residing on private lands. Prior to entry onto private lands the BLM would obtained written permission from the landowner.

During project implementation, motorized vehicles will remain on existing roads. Off-road use of motorized vehicles on public lands will not be permitted.'

Mitigation measure. If the BLM determines that water and/or bait trapping is necessary, the temporary use of catch corral(s) would occur. If the site for the catch corral(s) is undisturbed, the BLM would first survey the site to ensure that cultural resources are not present. If determined present, the site may be moved to avoid affecting cultural resources.

B. Land Use Plan (LUP) Conformance

This action is in conformance with the Carson City Field Office Consolidated Resource Management Plan under the following sections:

- WHB-1, objective 1: "Protect, manage, and control wild horses and burros on public lands as an integral part of the public land's ecosystem."

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

Pine Nut Herd Management Areas Gather Plan Environmental Assessment (EA) (DOI-BLM-NV-C020-2010-0019-EA), Finding of No Significant Impact and Decision Record approved on October 20, 2010. These documents are hereby incorporated by reference.

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?

Yes, this action is the same as described in the final EA in Sections 2.2.1 and 4.2.1. The analysis was for the geographic area including areas within and adjacent to the Pine Nut Herd Management Area, including the Fish Springs area.

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?
Yes, this action is the same as described in the final EA in Sections 2.2.1 and 4.2.1. This action has been vetted in the community and seeks to find a solution to public safety concerns and wild horses that reside on private lands.

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?
Yes, there is no new information or circumstances that warrant re-evaluation of the existing analysis.

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?
The direct, indirect, and cumulative effects from the administration of PZP was analyzed in the existing EA. This action is the same as described in the final EA in Sections 2.2.1, 4.2.1.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?
Yes. On August 23, 2010 the BLM provided a 30-day public comment period on the Clan Alpine, Pilot Mountain, *Pine Nut Herd Management Areas Gather Plan Environmental Assessment* (EA) (DOI-BLM-NV-C020-2010-0019-EA). A dear reader notification letter was sent to 61 individuals, organizations, and agencies on the project mailing list, including the Nevada State Clearinghouse. A news release was issued; articles appeared in the *Lahontan Valley News*, *My News 3**, *My News 4**, *Reno Gazette-Journal* (*web versions) and the *Mineral County Independent*. The comment period closed on September 23, 2010. On October 20, 2010 the BLM signed a Finding of No Significant Impact and Decision Record, which is hereby incorporated by reference.

In 2013 the BLM held a series of public workshops on the issues concerning the management of the Fish Springs area wild horses. One meeting was held at the BLM, Carson City District Office on June 26, 2013, and two meetings were held at the East Fork Fire Station in Fish Springs, Nevada on July 17 and July 31, 2013. The BLM issued a press releases on June 21, July 7 and July 24, 2013. Articles appeared in the *Virginia City News*, *This is Reno* on July 24, 2013, along with multiple wild horse advocacy group webpages. BLM staff were available for discussion and to answer questions, and to make a presentation. Approximately 50 individuals attended the workshop at the BLM office, while 100-130 individuals attended the two workshops in Fish Springs.

E. Persons/Agencies/BLM Staff Consulted

Name	Title	Resource/Agency Represented
Rachel Crews	Archaeologist	BLM

Note: Refer to the final EA for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

Conclusion: Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

Signature of Project Lead

Signature of NEPA Coordinator

Leon Thomas
Field Manager
Sierra Front Field Office

Date 4-3-14

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. See attached Decision Record for appeal information.