



**Bureau of Land Management**  
Boise District Office  
Bruneau Field Office  
3948 Development Ave  
Boise, ID 83705  
<http://www.id.blm.gov>

---

**Determination of Land Use Plan Conformance and NEPA Adequacy (DNA)**  
U.S. Department of the Interior - Bureau of Land Management

---

**A. BLM Office:** Owyhee Field Office

**NEPA Log Number:** DOI-BLM-ID-B030-2014-0011-DNA

**Lease/Serial Case File No.:**

**Proposed Action Title/Type:** Coyote Springs Wild Horse Bait Trap

**Location/Legal of Proposed Action:** Rats Nest Allotment T1N, R4W, Section 22

**Applicant (if any):** N/A

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

BLM would remove approximately 25-35 horses from the Hardtrigger Herd Management Area (HMA) within the Rats Nest Allotment at one trap site near Coyote Springs. The gather method (capture technique) would be bait trapping. The bait trapping method involves utilizing bait (e.g., water or feed) to lure wild horses into a temporary trap. An open-ended un-baited temporary trap would be erected in a disturbed area near Coyote Springs prior to the gather to allow horses to become gradually accustomed to the trap. The gather begins when the traps are outfitted with a one-way gate that closes after a horse enters. Horses enter the trap to eat or drink and are captured. The stress level to the animals would be lower during the gather operation when utilizing bait trapping verses helicopter drive trapping. This is due to the animals becoming gradually accustomed to the trap whereas during helicopter trapping, the animals are driven into the trap with a helicopter. Although the bait trap method takes longer to gather animals because they are not actively driven into the traps, the gather operations are a low stress approach to gathering of wild horses when compared to helicopter gathers.

The goal of this proposal is to remove up to 35 wild horses from the Rats Nest Allotment portion of the Hardtrigger HMA to prevent further degradation of resources from excess horses concentrated in the area around Coyote Springs (See Map). Approximately 39 wild horses have remained in and around the Coyote Springs area of the Rats Nest Allotment in the Hardtrigger HMA because Coyote Springs is the only year round water source in this portion of the HMA.

The wild horses have not moved from the area since 2011 because long-term drought conditions and the lack of water elsewhere in the HMA. The area around Coyote Springs will continue to be heavily utilized during dry/drought conditions this summer (2014) as long as the horses remain in the area.

All animals removed (up to 35) in the Rats Nest Allotment would be sent to the Boise Wild Horse and Burro Corrals and made available for adoption or sale to individuals who can provide good homes. Some mares that are not adopted (or sold if sale eligible – 11 years of age or older) may be placed on the Fourmile, Sands Basin, Saylor Creek, or Black Mountain HMAs to improve the genetic diversity. Current policy (BLM Handbook H-4700-1, Page 22) recommends introducing 1-2 young mares every generation (about 10 years), from other herds living in similar environments. Mares were introduced into the Fourmile HMA in 2009, Sands Basin in 2009, Saylor Creek in 1999, and Black Mountain HMA in 2010 to improve the genetic diversity. Any age appropriate mares released back on any HMA would be treated with a two-year Porcine Zona Pellucida (PZP-22) or similar vaccine. Treated mares will be freeze marked to facilitate identification of treated mares in future operations. Fertility control treatment would be conducted in accordance with the approved standard operating and post-treatment monitoring procedures (Appendix B of the EA).

The gather would take about 10 days to complete and would begin after foaling season (August – September 2014 dependent on staff availability). Several factors such as herd health, drought severity, water availability, could result in adjustments to the schedule. Gather operations would be conducted in accordance with the Standard Operating Procedures (SOPs) described in the National Wild Horse and Burro Gather Contract attached to the BLM-ID-B030-2012-0010-EA on the BLM NEPA register at the following location: <https://www.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=22203&dctmId=0b0003e88020be1f>.

**B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans**

LUP/Document <sup>1</sup>	Sections/Pages	Date Approved
Owyhee RMP	WHRS #1- Pages 21 and 22	1999

<sup>1</sup>List applicable LUPs (e.g., Resource Management Plans, Management Framework Plans, or applicable amendments) and activity, project, management, water quality restoration, or program plans.

The proposed bait trap is in conformance with the Owyhee Resource Management Plan, Management Action 4 (USDI 1999 pp. 22) which directs the Owyhee Field Office to: *“Manage wild free-roaming horses as a component of the public lands in a manner that maintains or improves the rangeland ecosystem”*. Continued heavy utilization by wild horses in the Coyote Springs area is not maintaining or improving the rangeland ecosystem. Removing up to 35

horses from this heavily utilized site would allow this to happen by improving the vegetative resources for the entire Rats Nest Allotment.

**C. Identify applicable NEPA documents and other related documents that cover the Proposed Action. List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).**

NEPA/Other Related Documents	Sections/Pages	Date Approved
Environmental Assessment DOI-BLM-ID-B030-2012-0010-EA	All	9/26/12

**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?**

**Summary**

This new proposed action is essentially the same as the trapping proposed in the BLM-ID-B030-2012-0010-EA except, as discussed above, this proposal would use bait trapping instead of helicopter driving to capture the horses. This proposal would remove up to 35 horses versus 100 proposed for removal in the EA. Therefore this proposal is a subset of the proposal in the EA.

It should be noted that BLM-ID-B030-2012-0010-EA didn't consider bait trapping as a viable alternative to capture 100 horses HMA-wide. The EA states:

*“The BLM considered the use of bait or water trapping to capture wild horses. The BLM determined it would not be cost-effective or practical to use bait and/or water trapping as the primary gather method because the number of water sources on both private and public lands within and outside the HMA would make it almost impossible to restrict wild horse access only to the selected water trap sites. As a result, this alternative was eliminated from detailed analysis.”*

The extended drought has changed the operating environment in the HMA by limiting other available water sources for these wild horses and caused them to congregate at Coyote Springs. This proposal is now viable because of the limited water sources in this portion of the HMA and the small area being considered for gather operations (Coyote Springs versus the entire HMA) make bait trapping cost-effective and practical.

Below is a description of -BLM-ID-B030-2012-0010-EA so the reader will understand how the proposal falls within the range of alternatives analyzed in the original EA.

### **BLM-ID-B030-2012-0010-EA (EA)**

The Black Mountain and Hardtrigger HMA Wild Horse Capture, Treat, and Release and Removal Plan Environmental Assessment analyzed removal of excess wild horses (Hardtrigger – 66 wild horses, Black Mountain – 30 wild horses) and treatment of remaining adult mares with immune-contraception using a helicopter to gather the horses. The Decision, dated September 2012, would have brought the population inside the HMA to as close to low AML (Hardtrigger – 66 wild horses, Black Mountain – 30 wild horses) as possible. The analysis, in Section 3 of the EA, found that lower horse numbers will provide for some improvement to the rangeland ecosystem and, thus, will promote a thriving natural ecological balance.

The Decision Record for BLM-ID-B030-2012-0010-EA specifically stated: *“Should gather operations be postponed due to constraints outside of this office’s control, this decision authorizes Alternative A to be implemented in either 2013 or 2014. I base my rationale for this on the expectation that herd and resource conditions will be similar over the near term, and the expectation that impacts to resources will increase over the intervening years as the populations increase.”*

### **Differences between this proposal and BLM-ID-B030-2012-0010-EA**

The proposed action would differ from the existing NEPA such that:

- Up to 35 excess horses would be removed versus up to 100 in the existing NEPA document.
- Gather operations would occur by bait trap rather than helicopter-drive-trap method.

## **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, resource values, and circumstances?**

This proposal falls entirely within the range of alternatives analyzed in the EA. This new proposed action is essentially the same as the trapping proposed in the BLM-ID-B030-2012-0010-EA except, as discussed above, this proposal would use bait trapping instead of helicopter driving to capture the horses. This proposal would remove up to 35 horses versus 100 proposed for removal in the EA. Therefore this proposal is a subset the proposal in the EA.

It should be noted that BLM-ID-B030-2012-0010-EA didn’t consider bait trapping as a viable alternative to capture 100 horses HMA-wide. However, the extended drought has changed the operating environment in the HMA by limiting other available water sources for wild horses and caused the horses to congregate at Coyote Springs. Bait trapping is now a

viable alternative because of the limited water sources in the HMA and the small area being considered for gather operations (Coyote Springs verses the entire HMA).

**3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (e.g., riparian proper functioning condition reports; rangeland health standards assessments; inventory and monitoring data; most recent USFWS lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances would not substantially change the analysis of the new proposed action?**

The impacts to soil and vegetation resources from bait trapping in this proposal would be the same type but of less intensity as the effects disclosed for helicopter-drive-trapping in the EA because the physical characteristics of the trap will not change from that proposed in the EA and there will only be one trap constructed with this proposal verses up to five proposed in the EA.

Bait trapping would result in reduced stress level to the horses and wildlife (when compared to helicopter gathers) because there would be no active herding used to gather horses into the trap with the bait trap scenario proposed. Horses gradually become accustomed to the bait trap, walk in to eat or drink, and they are trapped; whereas with helicopter trapping, the animals are driven into the trap. Wildlife stress levels would be reduced under this proposal (when compared to the EA) because this proposal would not include a helicopter, and wildlife would not be required to move out of the way of horses being herded by the helicopter. However, wildlife in the area would be restricted from accessing water at Coyote Springs during gather operations. These impacts will be minimal because gather operations will not occur at night and the gate to the trap will be left open from approximately 10 pm to 5 am to allow for access to water.

Soil and watershed conditions could improve over the short term (4 years) because populations would be lower (BLM-ID-B030-2012-0010-EA pp. 26 and 30). Reducing wild horse numbers would benefit vegetation resources by reducing vegetation utilization (grazing by horses) and levels of mechanical damage (trampling) in concentrated use area around Coyote Springs. Any improvement in the vegetative community as a result if the proposed reduction in wild horse numbers would result in benefits to wildlife through slight improvements in habitat conditions and forage availability (BLM-ID-B030-2012-0010-EA pp. 44)

**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?**

This proposal would have similar direct, indirect, and cumulative effects those disclosed in the EA because the one trap proposed would be physically the same as proposed in the EA. However, the intensity of the effects would be less because only one trap would be constructed in an already disturbed area. The bait trapping scenario would cause less stress to the horses during the trapping when compared to helicopter trapping. This proposal is a subset of the proposal described in the EA and would therefore result in fewer effects because of the difference in the magnitude of this proposal. **This proposal is the same as proposed in the EA except it is on a much smaller scale without the added stress level to the horses from helicopter herding into the trap; therefore the effects of this proposal are substantially less than those disclosed in the EA.**

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

A scoping information letter requesting feedback on the proposed action, possible alternatives, and potential issues that should be addressed in the NEPA process was sent to 61 interested publics, organizations, government agencies, and tribes on December 30, 2011. Comment letters were received from 3,713 individuals and organizations. All comments were carefully considered and addressed in the Environmental Assessment.

Boise District Manager signed the decision to authorize the wild horse gather as described in Alternative A (Proposed Action) of the Environmental Assessment #DOI-BLM-ID-B030-2012-0010-EA. The proposed action is to gather 156 to 180 (assuming an 80 to 91% capture rate) wild horses from the Hardtrigger and Black Mountain Herd Management Areas (HMAs) in Fall of 2012. This decision was never appealed.

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

<b>Name</b>	<b>Title</b>	<b>Resource/Agency Represented</b>
Steve Leonard	Wild Horse Specialist	BLM Wild Horse
Seth Flanigan	NEPA Specialist	NEPA
Jonathan Beck	Planning and Environmental Coordinator	Document Review
Eric Mayes	Idaho BLM NEPA Coordinator	Document Review
Christopher Robbins	Idaho BLM Wild Horse and Burro Program Lead	Document Review

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

