

**U.S. Department of the Interior  
Bureau of Land Management  
Little Snake Field Office  
455 Emerson St  
Craig, CO 81625**

**FINDING OF NO NEW SIGNIFICANT IMPACT (FONSI)**

**Sand Wash Basin Wild Horse Herd Management Area Bait/Water Trapping  
Gather/Population Control  
DOI-BLM-CO-N010-2016-0023-EA**

**BACKGROUND**

The most recent inventory of the Sand Wash Herd Management Area (HMA), conducted in June 2016 (visual ground count conducted by volunteers), found that there are approximately 550 wild horses in the HMA, not including 2016 foals. This is 188 wild horses over the high end of the Appropriate Management Level (AML) which is 163-362 wild horses within the Sand Wash HMA.

The need for this action is based upon the review of **Appendix A - 2014 Sand Wash Herd Management Area (HMA) Wild Horse Utilization Monitoring** within the Environmental Assessment (EA) DOI-BLM-CO-N010-2016-0023-EA; inventories; the Little Snake Resource Management Plan and all applicable Resource Management Plan Amendments; and other information in accordance with The Wild Free-Roaming Horses and Burros Act of 1971, as amended. The BLM has now determined that excess wild horses exist on the public lands within the Sand Wash HMA which requires that population management actions be applied.

DOI-BLM-CO-N010-2016-0023-EA has outlined how the wild horses that reside in the Sand Wash HMA are impacting the landscape and the ability to maintain a thriving, natural ecological balance and multiple-use relationship in the area. After a careful review of the EA and the current land use plan, the LSFO Field Manager concluded that a number of wild horses within the Sand Wash HMA meet the statutory definition of excess animals, and therefore, consistent with the authority provided in 16 USC § 1333 (b) (2), the Bureau of Land Management (BLM) shall immediately remove excess animals from the range. In the current proposal, only a small number of the total excess horses would be removed and a fertility control program would be authorized for the use of the fertility control drug, porcine zona pellucida (PZP). The application of PZP shall continue for at least five (5) years or until a thriving natural ecological balance is restored to protect the range from deterioration associated with an overpopulation of wild horses.

**FINDING OF NO NEW SIGNIFICANT IMPACT**

Based upon a review of this EA and the supporting documents, I have determined that the Proposed Action will not have a significant effect on the quality of the human environment, individually or cumulatively with other actions in the general area. No environmental effects meet the definition of significance in context or intensity, as defined at 40 CFR 1508.27, or

exceed those effects as described in the Little Snake Record of Decision and Approved Resource Management Plan (2011). An environmental impact statement (EIS) is not required. This finding is based on the context and intensity of the project as described below.

### **Context**

The project is a site-specific action directly involving BLM administered public lands that do not in and of itself have international, national, regional, or state-wide importance. This EA specifically considers the methods to be used to gather excess wild horses that reside in the Sand Wash HMA. The BLM has prepared this EA to disclose and analyze the environmental consequences of the methods used to gather excess wild horses in the Sand Wash HMA in compliance with the National Environmental Policy Act (NEPA).

For this project, BLM would conduct most, if not all, of the necessary activities on previously disturbed lands which is estimated at impacting less than 50 acres in the short-term. Design features are included for pre-construction in previously disturbed and undisturbed locations, as well as, post-construction monitoring on all lands. Existing disturbances within the analysis area include: grazing by livestock, wild horses and wildlife; and construction and/or maintenance associated with range improvement projects; vegetation treatments; and both wildfires and prescribed burns. Further, the energy development in the area was conducted decades ago with few new exploration wells being drilled in recent times, however, the maintenance of these energy related facilities continues and is necessary to keep those facilities operational (i.e., producing wells).

Affected interests for this project may include wild horse special interest groups, grazing permittees, and people who use the area for recreation.

### **Intensity**

The following discussion is organized around the 10 Significance Criteria described at 40 CFR 1508.27. The following have been considered in evaluating intensity for this Proposed Action:

#### **1. Impacts that may be both beneficial and adverse**

Beneficial and adverse effects of the Proposed Action and alternatives were described in the EA. Design features to reduce potential short-term impacts to soils, distribution of invasive non-native species, sensitive plants, migratory birds, wildlife, cultural and paleontology are identified.

The beneficial effects of the Proposed Action include: maintaining a thriving natural ecological balance and multiple use relationship consistent with other resource needs.

None of the environmental impacts disclosed in the EA exceed what has been already been documented in the Little Snake Resource Management Plan (Record of Decision, October 2011), as amended by the Northwest Colorado Greater Sage-Grouse Approved Resource Management Plan Amendment (September 2015).

None of the environmental impacts, both beneficial and adverse, would have a significant impact on the human environment.

## **2. Degree of effect on public health and safety**

Gather operations would comply with the BLM's policy and guidelines, and other federal, state, and local laws. The potential for risks to public health and safety would be low, however, if they occurred, would occur over limited, brief periods. There would be no effects on public health and safety.

## **3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas**

There are no park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas in the area of Proposed Action. As described in the EA, impacts to cultural resources were identified for the Proposed Action. As this action is not a new action but a continuation of historic land uses in this area there would be no affect to unique characteristics of the geographic area.

## **4. Degree to which the possible effects on the quality of the human environment are likely to be highly controversial**

The decision to utilize bait trapping and remove a small number of excess horses from the Sand Wash HMA will continue wild horse management that has been conducted on those public lands since 1971. Multiple comments and concerns regarding the removal of wild horses from public lands have been received regarding the possible effects on the quality of the human environment during scoping. The effects of the Proposed Action on the quality of the human environment are not considered to be controversial.

## **5. Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risk**

The project is not unique or unusual in this area. Approximately seven other such gather operations have occurred in this area. No highly uncertain or unknown risks to the human environment were identified during analysis of the Proposed Action.

## **6. Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration**

The Proposed Action neither establishes a precedent for future BLM actions with significant effects nor represents a decision in principle about a future consideration. This decision is not precedent setting. The Proposed Action was considered in the context of past, present and reasonably foreseeable actions. This decision is not unusual and impacts from gather operations have been previously evaluated in several EAs: CO-100-2001-044-EA, CO-100-2005-051-EA, and DOI-BLM-CO-110-2010-0088-EA. Impacts from the Proposed Action are not predicted to exceed previously disclosed impacts and an EIS is not required. This decision does not entail any known issues or elements that would create a precedent for wild horse gather methods. The decision does not represent a decision in principle about a future consideration.

**7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts**

The EA did not reveal any significant cumulative effects. The interdisciplinary team evaluated the possible actions in context of past, present and reasonably foreseeable actions. Significant new cumulative effects are not expected.

**8. Degree to which the action may adversely affect district, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources:**

No potential impacts to districts, sites, highways, or structures have been identified within the project area. Per the design features included in the EA all traps and temporary holding facilities locations will be surveyed for cultural resources prior to placement. Bait or water trapping would also avoid all known sites and the traps sites themselves would not cause any impacts to known sites.

**9. Degree to which the action may adversely affect an endangered or threatened species or its critical habitat**

There are no threatened or endangered species or habitats for such species present within the HMA. The proposed action would have no adverse effect on any other threatened or endangered species or habitat that is critical under the Endangered Species Act, BLM sensitive species, or species proposed for listing as threatened or endangered.

**10. Whether the action threatens a violation of federal, state, or local environmental protection law**

Neither the Proposed Action or alternatives nor impacts associated with the Proposed Action or Alternatives with it violate any laws or requirements imposed for the protection of the environment.

**SIGNATURE OF AUTHORIZED OFFICER**



Bruce Sillitoe, Field Manager

21 September 2016

Date