

3.19 Wild Horse Management Areas

This section describes existing wild horse HMAs and HAs in the analysis area and discloses potential Project impacts on those HMAs and HAs.

3.19.1 Regulatory Background

Passage of the Wild Free-Roaming Horses and Burro Act (P.L. 92-195) in 1971 requires the BLM to protect, manage, and control wild free-roaming horses and burros on public lands. The act requires the BLM to manage wild horses and burros in a manner designed to achieve and maintain a thriving natural ecological balance on the public lands.

HMAs are areas designated within RMPs for wild horse management. HAs are those places where wild horses were counted but are not designated for wild horse management within an RMP. Appropriate management levels (AMLs) for wild horses and burros are established in accordance with objectives and management actions through Multiple Use Decisions. Multiple Use Decisions establish the appropriate minimum and maximum number of wild horses to be managed within each grazing allotment contained within an HMA. The BLM staff studies natural resources such as vegetation and wildlife habitat to help determine the AML, taking into consideration uses such as livestock grazing, wildlife use, recreation, and the BLM's multiple-use mission under FLPMA. Annual monitoring data are collected to evaluate progress toward meeting management objectives. When herd sizes exceed the AML or resource damages occur, animals are gathered and offered for adoption. Other factors such as drought, lack of forage, public nuisance or wildfire also may require the BLM to remove some animals from the range.

3.19.2 Data Sources

Information regarding wild horse resources within the analysis area was obtained from a review of existing published sources, RMPs, and applicable county land use plans. Current information regarding conditions in the HMAs/HAs was obtained from available GIS data, topographic maps, and internet-based tools including GoogleEarth™. A list of RMPs used in the development of this section is presented in **Table 1-3**. Vegetation species nomenclature is consistent with the NRCS Plants Database (NRCS 2010), unless otherwise specified.

Data sources include published maps and reports and internet websites of the USGS and UGS. Other data sources included academic and professional journals and publications. Livestock grazing allotment information was provided by the BLM FOs crossed by the various routes. There are no HMAs or HAs within NFS lands.

3.19.3 Analysis Area

The analysis area is defined as the 250-foot-wide transmission line ROW occurring within HMAs or HAs.

3.19.4 Baseline Description

The 10 wild horse HMAs/HAs shown in **Table 3.19-1** are located within the analysis area. These designated HMAs/HAs are located on BLM land. During periodic wild horse roundups, BLM uses helicopters within the HMAs/HAs to assist in directing the horses into the designated collection areas. Due to the necessary use of helicopters, BLM prefers that transmission lines located within HMAs/HAs be located parallel to existing transmission lines to the extent feasible.

Table 3.19-1 Wild Horse Herd Management Areas and Herd Areas within the Analysis Area

Location/Mgt Entity ¹	HMA/HA	Acreage	Description
Region I			
Wyoming/Rawlins FO	Adobe Town HMA	472,812	AML is 700 horses.
Wyoming/Rock Springs FO	Salt Wells Creek HMA	1,193,283	AML is 365 horses.
Colorado/Little Snake FO	Sand Wash Basin HMA	157,730	AML is 163 to 363 horses; population is about 411. The boundary of the HMA is fenced, except along State Highway 318, generally preventing wild horses from entering or leaving the HMA.
Region II			
Colorado/White River FO	Piceance-East Douglas Creek HMA	190,130	AML is 135 to 235 horses; 2010 population was about 265 within the HMA and 115 outside the HMA.
Colorado/White River FO	North Piceance HA	76,959	Managed for 0 to 10 years to provide forage for a herd of 0 to 50 horses in each HA. The objective for anything greater than 10 years would be to remove all wild horses from these areas; however, this decision currently is being challenged in court.
Colorado/White River FO	West Douglas Creek HA	123,387	Managed for 0 to 10 years to provide forage for a herd of 0 to 50 horses in each HA. The objective for anything greater than 10 years would be to remove all wild horses from these areas; however, this decision currently is being challenged in court.
Utah/Vernal FO	Hill Creek HMA	88,173	AML of 195.
Region III			
Utah/Cedar City District	Chloride Canyon HMA	211,585	2008 AML of 390, estimated horses population of 531.
Utah/Cedar City District	North Hills HMA	49,900	Managed in cooperation with the Dixie NF Pine Valley Ranger District's North Hills Wild Horse Territory (24,029 acres). Together, the combined area is referred to as the North Hills Wild Horse Management Plan Area (WHMPA) and comprises 74,000 acres. 250 wild horses within the HMA and Wild Horse Territory. AML of 40-60.
Nevada/Ely District	Eagle HMA	670,000	AML of 100 to 210 horses; 595 horses as of 2009.

¹ There are no wild horse HMAs/HAs in Region IV.

Sources: BLM 2012a,b,c,d; 2011; 2010; 2008a,b,c; 1997a,b.

3.19.5 Impacts to Wild Horse HMAs and HAs

3.19.5.1 Impacts from Terminal Construction and Operation

There are no HMAs/HAs within or near the northern or southern terminal areas.

Under Design Option 2, the Southern Terminal would be located near the IPP in Utah instead of at the Marketplace Hub in Nevada, and the ground electrode system would be within 50 miles of the IPP in Mallard County, Utah. Design Option 2 would have no effects to HMAs/HAs because there are no HMAs/HAs within the relocated Southern Terminal or electrode bed facilities.

Under Design Option 3, a substation would be located near the existing IPP substation in Utah for AC operation until phase two of the Project is completed. This substation would not affect any HMAs/HAs.

3.19.5.2 Impacts Common to All Alternative Routes and Associated Facilities

In general, impacts to wild horses and HMAs/HAs would result from noise and increased human activity during installation of the transmission line towers, clearing and grading existing and new access roads, vehicle operation in areas where overland vehicle travel would occur, and use of temporary laydown areas. Construction activities and operation of the transmission line could impact the ability of the BLM to conduct future wild horse gathers in and near the transmission line area. Each HMA/HA is discussed separately by region below.

Design Option 2 would involve modifications of proposed transmission facilities that would apply to all alternatives. Under Design Option 2, the transmission line would be AC from Southern Terminal near the IPP to the Marketplace Hub in Nevada. Unlike DC power lines, AC transmission lines can cause induced current in nearby objects, such as fences or other equipment in very close proximity to the transmission line. In order to minimize the potential for electric shock, fences and other structures with metal surfaces located within 300 feet of the centerline would be grounded. All metal irrigation systems and fences that parallel the AC transmission line for distances of 500 feet or more within 300 feet of the centerline would be grounded. Additionally, all fences that cross under the AC transmission line also would be grounded (**Appendix D**). Section 3.18, Public Health and Safety, provides more information regarding impacts from AC lines.

Design Option 3 also would involve modifications of proposed transmission facilities that would apply to all alternatives. The difference between this design option and the Proposed Action include development of a substation on BLM lands directly adjacent to the IPP within Millard County, Utah. Design Option 3 would have no new or additional effects to HMAs/HAs because there are no HMAs/HAs within the proposed location for the substation. Timing of impacts to HMAs/HAs as described under the Proposed Project would vary due to construction schedule differences.

3.19.5.3 Region I

Within Region I, two HMAs would be impacted by the alternative routes. **Table 3.19-2** provides a summary of acreage impacts. The Salt Wells Creek HMA would not be affected by the proposed Project route or its alternatives.

Table 3.19-2 Impacts to Region I HMAs/HAs by Alternative

HMA	Alternative I-A	Alternative I-B	Alternative I-C	Alternative I-D
Adobe Town HMA				
250-foot-wide transmission line ROW miles/acres (% HMA)	13/407 (0.1%)	17/499 (0.1%)	N/A	1/36 (<0.1%)

Table 3.19-2 Impacts to Region I HMAs/HAs by Alternative

HMA	Alternative I-A	Alternative I-B	Alternative I-C	Alternative I-D
Surface disturbance: construction/operations (acres)	174/47	219/48	N/A	26/5
2-mile transmission line corridor (% HMA)	17,248 (3.6%)	20,948 (4.4%)	N/A	4,038 (0.9%)
Sand Wash Basin HMA				
250 foot-wide transmission line ROW miles/acres (% HMA)	8/244 (0.2%)	N/A	N/A	N/A
Surface disturbance: construction/operations (% HMA)	110/30	2/1	N/A	2/1
2-mile transmission line corridor acres (% HMA)	8,163 (5.2%)	695 (0.4%)	N/A	695 (0.4%)

Alternative I-A (Applicant Proposed)

Under Alternative I-A, two HMAs would be affected by construction and operation of the transmission line.

Approximately 13 miles of the 250-foot-wide transmission line ROW would cross the 472,812-acre Adobe Town HMA. During construction, up to 407 acres (less than 0.1 percent of the HMA) would be within the 250-foot-wide transmission line ROW. This area would be subject to surface disturbance and/or vegetation removal and maintenance that could affect forage for wild horses. Approximately 174 acres (less than 0.05 percent of the HMA) would be disturbed for tower placement and road development during the construction phase; a third of that disturbance (about 47 acres) would be permanent. Approximately 8 miles of the 250-foot-wide transmission line ROW would cross the 157,730-acre Sand Wash Basin HMA. During construction, up to 244 acres (less than 0.2 percent of the HMA) would be within the 250-foot-wide transmission line ROW. Approximately 110 acres (less than 0.1 percent of the HMA) would be disturbed for tower placement and road development during construction phase; a quarter of that disturbance (approximately 30 acres) would be permanent. The land area within each HMA that would not be affected by tower placement or road development would remain available for wild horse forage and shelter. All water sources would be completely avoided (i.e., spanned by aerial crossing). Any areas of temporary disturbance would be restored to pre-construction contours and restored with BLM-approved seed mixtures (see **Appendix C; Table C-1, VEG-2**).

Wild horses within the HMAs also would be subject to noise and increased human activity during installation of the transmission line towers, clearing and grading of existing and new access roads, vehicle operation in areas where overland vehicle travel would occur, and use of temporary laydown areas and tensioning sites. Depending on topography, noise could travel the width of the 2-mile transmission line corridor. This would impact up to 17,248 acres within the Adobe Town HMA (3.6 percent of the HMA), and 8,163 acres within the Sand Wash Basin HMA (5.2 percent of the HMA). This disturbance would likely last 3 to 12 weeks, depending on the length of time it takes for the line to be constructed across the HMA.

Construction activities and operation of the transmission line could impact the ability of the BLM to conduct future wild horse gathers in and near the transmission line area. However, no gathers currently are planned within either HMA.

Alternative I-B

Under Alternative I-B, impacts to the Adobe Town HMA would be similar to those described under Alternative I-A, but would affect slightly more acreage (up to 4.4 percent of the HMA would be within the 2-mile transmission line corridor).

The transmission reference line would not cross Sand Wash Basin HMA and there would be less than 2 acres of construction disturbance within the HMA. Approximately 0.4 percent of the HMA would be within the 2-mile transmission line corridor, with impacts similar to those described under Alternative I-A.

Alternative I-C

Alternative I-C would not cross any designated HMAs.

Alternative I-D (Agency Preferred)

Alternative I-D would cross less than 1 mile of the Adobe Town HMA. Impacts would be similar to those described under Alternative I-A, except much less acreage would be impacted (approximately 10 percent of the Alternative I-A acreage within the 250-foot-wide transmission line ROW and 25 percent of that within the 2-mile transmission line corridor).

Impacts to the Sand Wash Basin HMA would be the same as those described under Alternative I-B.

The three Tuttle easement micro-siting options would not change impacts to wild horses as described above.

Alternative I-D would affect approximately 0.8 percent of 2 HMAs.

Alternative Connectors in Region I

There are no HMAs/HAs affected by the Mexican Flats, Baggs, Fivemile Point North, or Fivemile Point South connectors.

Alternative Ground Electrode Systems in Region I

A ground electrode system of approximately 600 acres in size within 50 to 100 miles of the Northern Terminal in Region I would be required. The ground electrode system alternative approximate locations in Region I are depicted in Chapter 2.0 on **Figure 2-21**. Approximately 25,283 acres of the conceptual Shell Creek Ground Electrode System siting area would be located within the 1,193,283 acre-Salt Wells Creek HMA and 23 acres would be located within the 472,812-acre Adobe Town HMA. Approximately 19 miles of the accompanying 34.5-kV AC overhead line transmission line would be located within the Salt Wells Creek HMA. During construction, there would be 223 acres of construction disturbance within the Salt Wells Creek HMA (less than 0.01 percent of the HMA), of which about 89 acres would be permanent. There would be no construction disturbance within the Adobe Town HMA. Impacts from construction would be similar to those described under the Region I alternatives. There would be no impacts to Sand Wash Basin HMA.

Region I Conclusions

Alternative I-A would have the most impact on wild horses, affecting between 4 and 5 percent of two HMAs.

3.19.5.4 Region II

Within Region II, four HMAs/HAs would be impacted by alternative routes. The HMAs/HAs crossed by the alternatives in Region II are summarized in **Table 3.19-3**.

Table 3.19-3 Impacts to Region II HMAs/HAs by Alternative

HMA	Alternative II-A	Alternative II-B	Alternative II-C	Alternative II-D	Alternative II-E	Alternative II-F
Piceance-East Douglas Creek HMA						
250-foot-wide transmission line ROW miles/acres (% HMA)	N/A	1/31 (<0.02%)	1/31 (<0.02%)	N/A	N/A	N/A
Surface disturbance: construction/operations (acres)	N/A	< 1/<1	<1/<1	N/A	N/A	N/A
2-mile transmission line corridor acres (% HMA)	N/A	1,049 (0.6%)	1,049 (0.6%)	N/A	N/A	N/A
North Piceance HA						
250-foot-wide transmission line ROW miles/acres (% HA)	N/A	7/218 (0.3%)	7/218 (0.3%)	N/A	N/A	N/A
Surface disturbance: construction/operations (acres)	N/A	91/23	91/23	N/A	N/A	N/A
2-mile transmission line corridor acres (% HA)	N/A	5,902 (7.7%)	5,902 (7.7%)	N/A	N/A	N/A
West Douglas Creek HA						
250-foot-wide transmission line ROW miles/acres (% HA)	N/A	13/390 (<0.3%)	13/390 (<0.3%)	N/A	N/A	N/A
Surface disturbance: construction/operations (acres)	N/A	192/49	192/49	N/A	N/A	N/A
2-mile transmission line corridor acres (% HA)	N/A	13,966 (11%)	13,966 (11%)	N/A	N/A	N/A
Hill Creek HMA						
250-foot-wide transmission line ROW miles/acres (% HMA)	N/A	N/A	N/A	N/A	N/A	N/A
Surface disturbance: construction/operations (acres)	N/A	N/A	N/A	1/0	N/A	1/0
2-mile transmission line corridor acres (% HMA)	N/A	N/A	N/A	123 (<0.1%)	N/A	123 (<0.1%)

Alternative II-A (Applicant Proposed)

Alternative II-A would not cross any designated HMAs/HAs. The Strawberry IRA micro-siting options would not affect wild horses, as there are no HMAs or HAs within the micro-siting locations.

Alternative II-B

Under Alternative II-B, approximately 1 mile of the 250-foot-wide transmission line ROW would cross the 190,130-acre Piceance-East Douglas Creek HMA. During construction, up to 31 acres (less than 0.02 percent of the HMA) would be within the 250-foot-wide transmission line ROW. This area would be subject to surface disturbance and/or vegetation removal and maintenance that could affect forage for wild horses. Less than one acre would be disturbed for tower placement and road development during construction and operation phases. The land area in the HMA that would not be affected by tower placement or road development would remain available for wild horse forage and shelter and all intermittent streams, waterholes, or reservoirs used by wild horses would be completely avoided (i.e., spanned by aerial crossing). Any areas of temporary disturbance would be restored to pre-construction contours and restored with BLM approved seed mixtures (see **Appendix C; Table C-1, VEG-2**).

Wild horses within the Piceance-East Douglass Creek HMA would also be subject to noise and increased human activity during installation of the transmission line towers, clearing and grading existing and new access roads, vehicle operation in areas where overland vehicle travel would occur, and use of temporary laydown areas and tensioning sites. Depending on topography, noise could travel the width of the 2-mile transmission line corridor. This would impact up to 1,049 acres (0.6 percent of the HMA). This disturbance would likely last 3 to 12 weeks, depending on the length of time it takes for the line to be constructed across the HMA.

Under Alternative II-B, the 250-foot-wide transmission line ROW would cross 7 miles of the 76,959-acre North Piceance HA and 13 miles of the 123,387-acre West Douglas HA. Impacts to these HAs would be similar to those identified for the Piceance-East Douglas Creek HMA but would affect a greater portion of both of these HAs. The 250-foot-wide transmission line ROW would encompass 218 acres of the North Piceance HA (0.3 percent of the HA). Approximately 91 acres (0.1 percent of the HA) would be disturbed for tower placement and road development during the construction phase; a quarter of that disturbance (approximately 23 acres) would be permanent. The 2-mile transmission line corridor would encompass 7.7 percent of the HA. The 250-foot-wide transmission line ROW would encompass 390 acres of the West Douglas HA (less than 0.3 percent of the HA). Approximately 192 acres (0.2 percent of the HA) would be disturbed for tower placement and road development during the construction phase; a quarter of that disturbance (about 49 acres) would be permanent. The 2-mile transmission line corridor would encompass 11 percent of the HA.

Construction activities and operation of the transmission line could impact the ability of the BLM to conduct future wild horse gathers in and near the transmission line area. As of September 2011, the BLM White River FO proposed to gather approximately 382 wild horses from the Piceance-East Douglas Creek HMA. Additionally, as of 2012, there were approximately 185 wild horses within the West Douglas Creek HA, and BLM was awaiting the Decision Record for a proposed emergency gather of excess horses due to ongoing drought conditions. The BLM also has indicated that it may be necessary to conduct multiple gathers (pursuant to NEPA analysis) in the West Douglas Creek HA over the duration of drought conditions (BLM 2012). The following mitigation is proposed to reduce impacts to planned gathers:

WH-1: Construction activities would be suspended as needed during wild horse gathers, as determined through consultation with the BLM.

Application of **WH-1** would reduce impacts to wild horse management during construction but would not mitigate for the impacts to gathers during operations of the line.

The 250-foot-wide transmission line ROW would cross the Piceance-East Douglas Creek HMA and North Piceance HA near their western borders, leaving the majority of the HMA and HA unaffected. The 250-foot-wide transmission line ROW would bisect the western portion of the West Douglas HA. Presence of a transmission line in this area would affect the use of helicopters for the gather of wild horses.

Alternative II-B would not cross the Hill Creek HMA.

Alternative II-C

Impacts to HAs and HMAs under Alternative II-C would be the same as described under Alternative II-B because the routes and mileages are the same.

Alternative II-D

The 250-foot-wide transmission line ROW for Alternative II-D would not cross any designated HMAs. Approximately 123 acres of the 88,173-acre Hill Creek HMA would be within the 2-mile transmission line corridor. This is 0.1 percent of the HMA. Impacts would be similar to those described for the 2-mile

transmission line impacts discussed under Alternative II-B, and primarily would be limited to noise disturbance.

Alternative II-E

Alternative II-E would not cross any designated HMAs or HAs.

Alternative II-F (Agency Preferred)

Impacts to HMAs and HAs would be the same as under Alternative II-D.

The two Cedar Knoll IRA micro-siting options would not affect wild horses, as there are no HMAs or HAs within the micro-siting locations.

Alternative Variation in Region II

Emma Park

The Emma Park Alternative Variation would not cross any designated HMAs or HAs.

Alternative Connectors in Region II

The Lynndyl, IPP East, Castle Dale, Price, or Highway 191 alternative connectors would not cross any designated HMAs or HAs.

Region II Conclusions

Alternatives II-B and II-C would have the most impact on wild horses, affecting between 0.6 and 11 percent of three HMAs/HAs. Alternatives II-A and II-E would not affect any HMAs/HAs.

Alternative II-D and Alternative II-F would each affect less than 1 percent of one HMA.

3.19.5.5 Region III

Within Region III, three HMAs would be impacted by the alternative routes. **Table 3.19-4** provides a summary of acreage impacts to the HMAs within Region III.

Alternative III-A (Applicant Proposed)

Under Alternative III-A, approximately 2 miles of the 250-foot-wide transmission line ROW would cross the 211,585-acre Chloride Canyon HMA. During construction, up to 69 acres (less than 0.03 percent of the HMA) would be within the 250-foot-wide transmission line ROW. This area would be subject to surface disturbance and/or vegetation removal and maintenance that could affect forage for wild horses. Approximately 100 acres (0.05 percent of the HMA) would be disturbed for tower placement and road development during the construction phase; a quarter of that disturbance (approximately 24 acres) would be permanent. The land area in the HMA that would not be affected by tower placement or road development would remain available for wild horse forage and shelter. All water sources would be completely avoided (i.e., spanned by aerial crossing). Any areas of temporary disturbance would be restored to pre-construction contours and restored with BLM approved seed mixtures (see **Appendix C; Table C-1, VEG-2**).

Wild horses within the Chloride Canyon HMA also would be subject to noise and increased human activity during installation of the transmission line towers, clearing and grading existing and new access roads, vehicle operation in areas where overland vehicle travel would occur, and use of temporary laydown areas and tensioning sites. Depending on topography, noise could travel the width of the 2-mile transmission line corridor. This would impact up to 2,909 acres (1.4 percent of the HMA). However, it is important to note that transmission line construction is sequential in nature; therefore, it is not likely that all 10 miles of line would be undergoing construction at any one time.

Table 3.19-4 Impacts to Region III HMAs/HAs by Alternative

HMA	Alternative III-A	Alternative III-B	Alternative III-C
Chloride Canyon HMA			
250-foot-wide transmission line ROW miles/acres (% HMA)	2/69 (<0.03%)	N/A	N/A
Surface disturbance: construction/operations (acres)	100/24	N/A	N/A
2-mile transmission line corridor acres (% HMA)	2,909 (1.4%)	N/A	N/A
North Hills HMA			
250-foot-wide transmission line ROW miles/acres (% HMA)	N/A	N/A	N/A
Surface disturbance: construction/operations (acres)	N/A	11/3	10/2
2-mile transmission line corridor acres (% HMA)	N/A	2,795 (5.6%)	2,721 (5.5%)
Eagle HMA			
250-foot-wide transmission line ROW miles/acres (% HMA)	N/A	N/A	N/A
Surface disturbance: construction/operations (acres)	N/A	<1/<1	<1/<1
2-mile transmission line corridor acres (% HMA)	N/A	56 (<0.01%)	56 (<0.01%)

Construction activities and operation of the transmission line could impact the ability of the BLM to conduct future wild horse gathers in and near the transmission line area. Application of **WH-1** would reduce impacts to wild horse management during construction, but would not mitigate for the impacts to gathers during operations of the line.

Alternative III-B would not cross the North Hills or Eagle HMAs.

Alternative III-B (Agency Preferred)

The 250-foot-wide transmission line ROW for Alternative III-B would not cross any designated HMAs. Approximately 2,795 acres of the 49,900-acre North Hills HMA and 5.6 acres of the 670,000-acre Eagle HMA would be within the 2-mile transmission line corridor. These acreages comprise 5.6 percent of the North Hills HMA and less than 0.01 percent of the Eagle HMA. Impacts would be similar to those described under Alternative II-A, and would primary be limited noise disturbance. The area of disturbance represents maximum disturbance and would vary by topography.

Application of **WH-1** would reduce impacts to wild horse management during construction, but would not mitigate for the impacts to gathers during operations of the line.

Alternative III-C

Impacts under Alternative III-C would be the same as under Alternative III-B except that slightly less acreage (5.5 percent) of the North Hills HMA would be within the 2-mile transmission line corridor.

Application of **WH-1** would reduce impacts to wild horse management during construction, but would not mitigate for the impacts to gathers during operations of the line.

Alternative Variations in Region III

Under the Pinto Alternative Variation, the 250-foot-wide transmission line HMA would cross 0.4 mile of the Chloride Canyon HMA. These impacts would be the same as the comparable portion of Alternative III-A. The Ox Valley East and West Alternative Variations would not cross any HMAs.

Alternative Connector in Region III

The Moapa Alternative Connector and the Avon Alternative Connector would not cross any HMAs.

Alternative Ground Electrode Systems in Region III

A ground electrode system of approximately 600 acres in size would be necessary in Region III within 50 to 100 miles of the southern terminal as discussed in Chapter 2. The ground electrode system alternative locations in Region III are depicted in Chapter 2.0 on **Figure 2-23**. The locations are not within or near HMAs.

Region III Conclusions

Alternatives III-B and III-C would have very similar impacts on wild horses, affecting approximately 6 percent of one HMA (with a minimal acreage within a second HMA). Alternative III-A would have the least impact on HMAs, affecting approximately 1 percent of one HMA.

3.19.5.6 Region IV

There are no wild horse HMAs/HAs within Region IV.

3.19.5.7 Residual Impacts

Residual effects to HMAs/HAs from the transmission line would be the same as those described under each action alternative and would consist primarily of loss of vegetation and forage as well as potential impacts to wild horse gathers due to the presence of a transmission line that could impinge upon helicopter use in portions of the HMA/HA.

3.19.5.8 Impacts to Wild Horses from the No Action Alternative

Under the No Action Alternative, the Project would not be developed. There would be no impacts to HMAs/HAs beyond existing conditions and trends.

3.19.5.9 Irreversible and Irretrievable Commitments of Resources

All operation impacts to the values of HMAs/HAs described above would be irretrievable until transmission line decommissioning, after which time the full value of impacted HMAs/HAs would be reclaimed. However, it should be noted, that reclamation activities may have limited success in areas with poor soils, some vegetation communities would take years to reestablish, and some areas may never return to their former vegetation cover and composition. As such, these impacts may represent an irreversible commitment of vegetation resources.

3.19.5.10 Relationship Between Local Short-term Uses and Long-term Productivity

Implementation of the Project would result in the use of portions of some HMAs/HAs as ROW corridors. Long-term productivity of the HMAs/HAs would be largely unaffected except for areas where reclamation may have limited success.