



# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Elko District Office  
3900 East Idaho Street  
Elko, Nevada 89801  
[http://www.blm.gov/nv/st/en/fo/elko\\_field\\_office.html](http://www.blm.gov/nv/st/en/fo/elko_field_office.html)

In Reply Refer To:  
4170(NVE0300)

DEC 21 2017

**FINDING OF NO SIGNIFICANT IMPACT (FONSI)**  
**for**  
**Antelope and Triple B Complexes Gather Environmental Assessment (EA)**  
**Wells and Bristlecone Field Offices**  
**DOI-BLM-NV-E030-2017-0010-EA**

Based on the interdisciplinary analysis conducted in the Antelope and Triple B Complexes Wild Horse Gather Plan Final EA, DOI-BLM-NV-E030-2017-0010-EA, dated December 20, 2017 and my consideration of the Council on Environmental Quality's criteria for Significance (40CFR 1508.27), both with regard to the context and the intensity, I have determined that the impacts associated with implementation of any of the Action Alternatives will not significantly affect the quality of the human environment. Therefore, preparation of an Environmental Impact Statement (EIS) is not required as per Section 102(2)(C) of the National Environmental Policy Act (NEPA).

**Context:**

The Antelope, Antelope Valley, Goshute, Maverick-Medicine, Spruce-Pequop, and Triple B Herd Management Areas (HMAs), collectively referred to as the Antelope and Triple B Complexes, are located 50 miles southeast of Elko, NV in the southeastern portion of Elko county and the northern portion of White Pine county.

The gather area is within the administrative boundaries of the Bureau of Land Management (BLM) Ely District, Bristlecone Field Office (BFO), and Elko District, Wells Field Office (WFO). The Antelope and Triple B Complexes include approximately 2,815,664 acres but the gather area consists of approximately 3,870,919 acres, which encompasses additional lands where wild horses are residing outside of the HMAs that make up the Complexes. Wild horses have moved outside of the HMAs in search of forage, water, and space due to the current overpopulation of wild horses in the Complexes. The estimated population of wild horses within the Antelope and Triple B Complexes is 9,525 wild horses based on population inventories conducted in February 2016 and March 2017, which is almost 11 times above the low appropriate management level (AML) of 899 wild horses.

The environmental analysis was prepared with input from the interested parties.

**Intensity: There is no evidence that the severity of impacts is significant:**

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

Beneficial and adverse effects of the Proposed Action and alternatives are 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, and cultural resources 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. Although the gather and removal of excess wild horses is expected to have short term-term impacts on individual animals, over the long-term, it is expected to benefit wild horse herd health by improving forage and habitat conditions in the Complexes and would be beneficial for rangeland resources such as vegetation communities, riparian resources and wildlife habitat.

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

***2. The degree to which the proposed action affects public health and safety.***

The proposed action would have minimal effects on public health or safety. The SOPs and Observation Protocols would be followed to conduct the gather and are designed to protect human health and safety, as well as the health and safety of the wild horses. The SOPs and Protocols can be found in the Antelope and Triple B Complexes Wild Horse Gather Plan Final EA Appendices 1-3.

***3. Unique characteristics of the geographic area such as proximity of 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 within the gather area. Direct impacts to cultural resources are not anticipated because gather sites and temporary holding facilities would be placed in previously disturbed areas or inventoried for cultural resources prior to construction. Wild horse gather activities could be conducted within Wilderness Study Areas as outlined in the EA. The Proposed Action would not impact resources and/or special designations identified above. Achievement and maintenance of the established AML over the next ten years through the phased gathers and implementation of population controls would protect these landscapes from adverse impacts caused by the current over-population of wild horses.

***4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.***

The effects that would occur from implementation of the gather are well known and understood. This is demonstrated through the effects analysis in the EA. Some members of the public advocate that no wild horses should be removed from any public lands and urge removal of livestock or letting "nature take its course". However, the effects of wild horse gathers on the

*quality of the human environment* are well documented through the many years of management of wild horses through gathers and other population controls (ZonaStat-H, Porcine Zona Pellucida PZP, PZP-22, GonaCon or gelding), and are not highly controversial. No unresolved issues concerning the impacts to resources or the human environment were raised following public notification of the proposed gather.

***5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.***

The Proposed Action has no known effects on the human environment which are considered highly uncertain or involve unique or unknown risks. This is demonstrated through the effects analysis in the EA.

Helicopter drive trapping as well as bait/water and horseback drive trapping are not new methods of capturing wild horses and have been successfully used for decades. There are no uncertain or unknown risks to the human environment associated with these capture methods. PZP and other fertility or reproductive control treatments (such as gelding) (see question 4 above) are not uncertain nor do they pose unknown risks to the human environment associated with such treatments.

***6. The 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.***

Future projects occurring within the gather area would be evaluated with the appropriate level of NEPA documentation. The Proposed Action does not set a precedent for future actions.

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

The Proposed Action is not related to other actions within the project area that would result in cumulatively significant impacts. Proper environmental analysis would be completed for all future actions.

***8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historic resources.***

The Proposed Action would not affect significant scientific, cultural, or historical resources. A cultural resource inventory would be completed prior to gather site and corral construction. Temporary gather sites and holding facilities would be cleared to determine the presence of sites that are unclassified, eligible, or potentially eligible for the National Register of Historic Places. Archaeological site clearances and avoidance measures would ensure that loss or destruction of significant scientific, cultural, or historical resources does not occur.

**9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.**

The Proposed Action and Alternatives B and C would not have any negative impact to threatened or endangered species or habitat identified to be critical under the Endangered Species Act. The EA has identified two endangered species located on private lands (Independence Valley Speckled Dace and Clover Valley Speckled Dace) within the project area. The endangered species are expected to meet life cycle requirements. Therefore, it has been determined the proposed activities would not adversely affect the species or their critical habitat.

**10. Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.**

The Proposed Action, Alternative A is in conformance with Federal, State, or local laws or requirements imposed for the protection of the environment.

The Proposed Action, Alternative A is in conformance with all applicable regulations under 43 CFR (Code of Federal Regulations). The Proposed Action is in conformance with the Migratory Bird Treaty Act and Endangered Species Act.

All practicable means to avoid or minimize environmental harm and unnecessary or undue degradation of the public land are inherent to the Proposed Action, Alternative A.

Jill C. Silvey Jill C. Silvey Date 12/20/2017  
Manager  
Elko District Office