

**United States Department of the Interior
Bureau of Land Management**

**Winnemucca Off-Range Corral
Environmental Assessment
DOI-BLM-NV-W010-2021-0036-EA**



U.S. Bureau of Land Management
Humboldt River Field Office
5100 E. Winnemucca Blvd.
Winnemucca NV 89445-2921



It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

BLM/NV/WN/EA/21-5+1792

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1.0 Introduction

The Bureau of Land Management (BLM) manages wild horses and burros (WH&B) as part of its overall multiple-use mission. Under the authority of the 1971 Wild Free-Roaming Horses and Burros Act (WFRHBA), the BLM manages and protects these living symbols of the Western spirit while ensuring that population levels are in balance with other public land resources and uses. To ensure that healthy herds thrive on healthy public lands, the BLM removes excess animals from the land to control the size of herds, which have limited natural predators and can double in population every four to five years.

As part of its responsibility to manage and protect WH&B, including those removed from herds roaming Western public lands, the BLM has solicited proposals for new, off-range corrals (ORC) located in Idaho, Nevada, and Utah, under Solicitation #140L0120R0008. The solicitation was open between October 30, 2020 and November 30, 2020.

The proposed ORCs for Nevada may be located anywhere within the State of Nevada or within 30 miles of the state and must accommodate a minimum of 500 and a maximum of 10,000 WH&B. Further, under the solicitation, all facility proposals must be accessible by an all-weather road or highway and each ORC must be able to provide humane care for a one-year period, with a renewal option under BLM contract for four or nine one-year extensions (option periods). The animals would remain in the ORC until they are placed into private maintenance through adoptions or sales or are transported to off-range pastures (ORP).

The Proposed Action, as described in Chapter 2, is for the BLM to fund a contract with JS Livestock for an ORC located near Winnemucca Nevada, with a capacity for up to 4,000 WH&Bs. The analysis and impacts disclosed in this environmental assessment (EA) would be limited to the proposed facility in Nevada.

The project inspector (PI) is typically the onsite assistant facility manager. Per the solicitation: The contracting officer representative (COR) and/or PI will be appointed by the contracting officer upon award of the contract. Such COR/PI would be responsible for giving the contractor any special instructions or guidance necessary to complete delivery as required by the contract. The COR or PI does not have the authority to modify or in any way amend the terms of this contract.

1.1 Purpose and Need for Action

The purpose of the Proposed Action is to construct, maintain and operate an ORC facility through a BLM contract with JS Livestock for a maximum of 4,000 excess WH&B on 100 acres of private land near Winnemucca, Nevada. The need for the Proposed Action is to provide holding space necessary to safely and humanely care for excess WH&B removed from public lands consistent with authority provided in Section 3 of the WFRHBA.

1.2 Land Use Plan Conformance

The Record of Decision (ROD) and Resource Management Plan (RMP) for the Winnemucca District Planning Area (USDI 2015) do not address ORCs on private land; however, the proposed project is consistent with the WH&B goals and objectives identified in the RMP. Relevant goals are provided below.

- Objective WHB 1: Administer HMAs to support healthy populations and achieve land health standards for WHB where a TNEB (thriving natural ecological balance) and multiple-use relationship can be achieved and maintained.

- Objective WHB 5: Maintain Appropriate Management Levels within Herd Management Areas (HMAs).

1.3 Relationship to Laws, Regulations, and Other Plans

The Proposed Action does not conflict with any known State or local planning or zoning ordinances. This action is not specifically addressed in the 2012 update to the Humboldt County Regional Master Plan (Humboldt County 2012) however, the proposal is consistent with the land uses occurring within agricultural areas identified in that document.

The award of a contract is to fund space, feeding, and care for up to 4,000 excess WH&B in an ORC on private land is considered a Federal action which requires BLM to comply with all applicable laws, including the National Environmental Policy Act (NEPA). As a result, this EA has been prepared to document and disclose BLM's site-specific analysis of the potential impacts that could result from the implementation of the Proposed Action or No Action Alternatives. The following statutes and resultant regulations are of primary concern to this EA:

- ☐ Clean Water Act of 1972, as amended.
- ☐ National Environmental Policy Act of 1969, as amended.
- ☐ National Historic Preservation Act of 1966, as amended.
- ☐ Threatened and Endangered Species Act of 1973, as amended.
- ☐ Wild Free-Roaming Horses and Burros Act of 1971, as amended.
- ☐ Title 43 Code of Federal Regulations (CFR) §4700.
- ☐ Migratory Bird Treaty Act of 1918
- ☐ Bald and Golden Eagle Protection Act (16 U.S.C. 668)

1.4 Decision to be Made

Based on the results of the NEPA analysis, the authorized officer from the Humboldt River Field Office will decide if and under what conditions, stipulations, and terms an ORC would be funded within their field office to provide containment, feed, and care for WH&B.

1.5 Required Permits

County building permits in addition to all other required permits would be the responsibility of the contractor. JS Livestock would be responsible for obtaining the necessary permits required for a Concentrated Animal Feeding Operation (CAFO) from the State of Nevada and for the construction and maintenance of any infrastructure associated with the CAFO permit. Generally, a permit for a CAFO identifies specific limitations applied to the facility, describes the types and methodologies of the monitoring to be done at the facility, and record keeping being conducted. Special conditions or standard conditions associated with the facility are identified as part of the permit for a CAFO as well (US Environmental Protection Agency (USEPA) 2012).

1.6 Scoping and Identification of Issues

Interdisciplinary Teams from the BLM Nevada State Office and the Humboldt River Field Office identified resources that are present and potentially impacted (Appendix A) through internal scoping. The issues identified in the table presented in Appendix A have been carried forward in this EA for detailed analysis include:

- Soil Resources
- Raptors, Eagles, and Migratory Birds
- Terrestrial Wildlife (Big Game)

2.0 Description of the Alternatives

This EA analyzes only the Proposed Action and No Action alternatives since the decision to be made is whether to fund a contract with JS Livestock for an ORC near Winnemucca, Nevada. The No Action alternative is considered and analyzed to compare impacts with the Proposed Action.

2.1 Alternative 1- Proposed Action

The Proposed Action is to fund containment, feeding, and care for up to 4,000 excess WH&B on 100 acres of private land owned by JS Livestock. Solicitation #140L0120R0008 is incorporated into the Proposed Action by reference because of the specifications for ORC construction and care of the WH&B. The ORC site would be located in Humboldt County, Nevada between Paradise Valley and Winnemucca: six miles from highway 95 and 28 miles from Highway 80. Per the conditions set out in the Solicitation, the ORC facility would be required to:

- Handle, treat, and maintain all WHB in a humane manner in accordance with BLM guidance and policies, including Permanent Instruction Memorandum (PIM) 2021-002, Wild Horse and Burro Comprehensive Animal Welfare Program (CAWP).
- Provide land, pens, feed, salt, minerals, and water necessary for maintaining WHB in their care.
- Provide corrals and adequate facilities to load, unload, prepare, and sort WHB.
- Provide humane care of all WHB during receiving, holding and preparation, prior to shipment to other ORC or ORP, adoption or sale.
- Provide regular, on-the-ground observation of the WHB to ascertain their well-being and safety.
- Provide facility management by individuals who are knowledgeable and experienced about the behavior and nutritional requirements of WHB.
- Maintain and prepare excess WHB for placement into private care, from BLM wide gather operations or from other western ORCs.
- Provide the opportunity for the BLM to host private placement events for the public to select animals.
- Provide an office building equipped with electricity, phone, fax machine, internet, office furniture, and restrooms.
- Ensure entry gates into the ORC can be locked to provide adequate security during non-work hours.

The Winnemucca ORC would be constructed on private land in Township 39 North, Range 39 East, Section 03 (Mount Diablo Base and Meridian) (Figure 1), which is currently planted to alfalfa (*Medicago sativa*). The alfalfa currently under the pivot would be removed from about 100 acres of the site and the area would then be graded to facilitate construction of the corrals and working facility (Figure 2). The WH&B would be housed in 40 pens (Figure 3) measuring 250 feet long x 300 feet wide (75,000 sq. ft.), with a capacity of 100 head per pen. This would allow for 750 sq ft per horse, exceeding the required amount of 700 sq ft per head. The pens and alleyways would be constructed of 2 3/8 inch 14-gauge pipe, with 3-inch by 3-inch square tube posts. The overall height of the fence and gates would be 72 inches upon completion. The pens would have feed bunks that run along the perimeter of the pens. The facility would be capable of holding up to 4,000 WH&B upon completion.

Slopes within the pens at the ORC would provide for adequate drainage. All pens would be cleaned a minimum of twice per year and up to four times per year to remove excess manure or more often when warranted at the direction of the COR or PI. Separate corrals (with a minimum of 400 square feet per animal) at the facility would be available for confining lame or sick animals needing special care. These pens would have overhead cover along with a wind break. A perimeter fence at least 48 inches in height would be provided around the facility in the event a WH&B escapes from an individual pen.

Animals would be fed daily. Feed (grass/alfalfa hay) would always be stored on-site in quantities appropriate to the number of WH&B present. Providing some animals with needed grass hay or additional feed would be coordinated with the BLM COR/PI. Processed hay (cubes, chopped, pelleted or other processed) would need to be approved by the BLM COR/PI. Granulated, rock, or block salt would be accessible to all WH&B in each pen. Minerals necessary to maintain WH&B in good condition would be provided to WH&B in each pen as a supplement or added to the salt. An inventory of WH&B kept at the site would be maintained along with all treatments and records of deaths. WH&B would be observed daily. Any remains would be disposed of in accordance with State or local sanitation laws. Each pen would have a water trough, which would have a reliable water source capable of supplying a minimum of 16 gallons of clean water per animal, per day.

2.1.1 Design Features

Design Features are those specific means, measures or practices that would reduce or eliminate adverse effects. Permanent BLM Instruction Memorandum 2021-002, Wild Horse and Burro Comprehensive Animal Welfare Program (USDI 2020b) consolidates current humane practices, incorporates the existing Standard Operating Procedures to ensure humane care and handling of the animals, and increases transparency concerning the humane treatment of WH&B.

2.1.1.1 Dust Prevention and Control Plan

During construction activities, JS Livestock would apply water to the soils in order to reduce fugitive dust emissions. The facility would have a pressurized irrigation system in the corrals and would be used to mitigate dust problems by wetting corrals and alleyways. The facility would have paved feeding areas to help reduce dust. The corrals would be reviewed weekly by the contractor staff. The contractor and BLM COR/PI would meet to determine the proper method of eliminating any excess dust found and take the action needed to solve the problem. The pens would be cleaned every quarter, at minimum, to help eliminate an unwanted buildup of dust. Cleaning pens (i.e., removing manure) reduces dust, because as manure dries out it breaks down into finer particles. The finer particles may contribute to the amount of dust during surface disturbances.

2.1.1.2 Manure Management

To reduce the stress on horses, corrals would be cleaned regularly at least twice per year and up to four times per year. Additional cleaning would be conducted if the team determines that it is necessary.

JS Livestock would obtain the necessary permit required by the state of Nevada for a Concentrated Animal Feeding Operation permit (CAFO) and would maintain proper reporting documents and structures for this permit. The CAFO permit would include information on nutrient management. If at any time BLM requests a copy of the valid permit, it would be provided.

2.1.1.3 Soil Drainage Management

All corral pens will have adequate slopes for drainage, which would help to keep the pens from being wet and muddy. JS Livestock would establish a plan to mitigate any standing water that is found to occur and implement that plan immediately.

2.1.1.4 Disposal of Dead Horses

Dead horses would be identified and recorded by freeze mark, microchip number, physical description, age, sex, and cause of death. Animals would be disposed of at the Humboldt County regional landfill in Winnemucca Nevada in accordance with Nevada state and local sanitation laws as the nearest rendering plant is in Reno, Nevada.

The contractor shall notify the COR and/or PI immediately if the death of a horse is other than by natural causes or euthanasia, and it appears that a postmortem examination should be performed by a veterinarian.

Under the direction of the COR/PI, JS Livestock would euthanize an animal for reasons related to acts of mercy, health, or safety and would do it in accordance with the BLM euthanasia policy found in Permanent Instruction Memorandum 2021-007 (USDI 2020a). JS Livestock would record and give all information to the COR/PI including freeze marks, microchip number, sex, age, physical description, and cause of death.

2.1.1.5 Weed Control Management

All project personnel would prevent the spread of invasive non-native and noxious weed species:

- During construction of the facilities:
 - Vehicles would be washed before entering new locations and tires and under carriage would be washed when leaving a location.
 - Clothing would be inspected before entering and leaving the project area and removing any plant material.
- If the spread of noxious weeds is noted, appropriate weed control procedures would be determined by JS Livestock in coordination with the BLM COR/PI and would comply with State and local weed control laws and regulations.

2.1.1.6 Migratory Bird Treaty Act Compliance

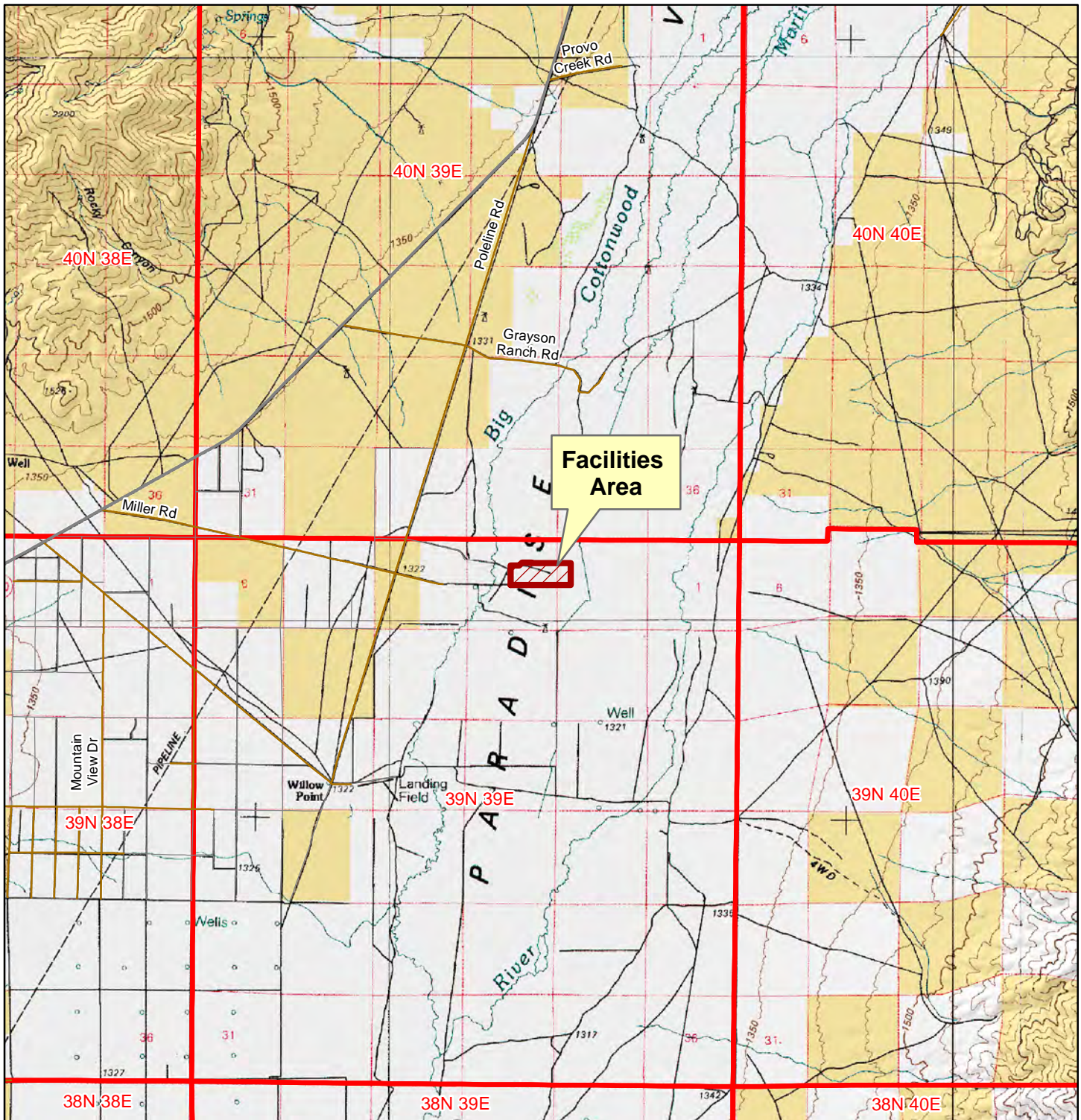
Migratory bird breeding season is between March 1 and August 31. Prior to the commencement of earthwork, standard pre-construction clearance surveys for migratory bird and raptor nests would be completed and avoidance buffers implemented during the breeding season. Buffers for non-raptor migratory birds is 260 feet and buffers for raptors is 1,320 feet (0.25 mile).

2.2 Alternative 2 - No Action Alternative

The No Action Alternative would not fund nor authorize the holding of WH&B at the proposed ORC facility near Winnemucca, Nevada.

Winnemucca Wild Horse & Burro Off-Range Corral Project

Figure 1 Proposed Project Location



Winnemucca District
Bureau of Land Management
5100 E. Winnemucca Blvd
Winnemucca, NV. 89445

8/26/2021



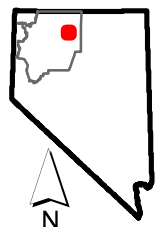
Osgood Mountains, NV USGS 100k Quadrangles
T. 39 N., R. 39 E., section 03

- State Highways
- County Road
- Other Road

- Proposed Corral Area
- Township
- Section

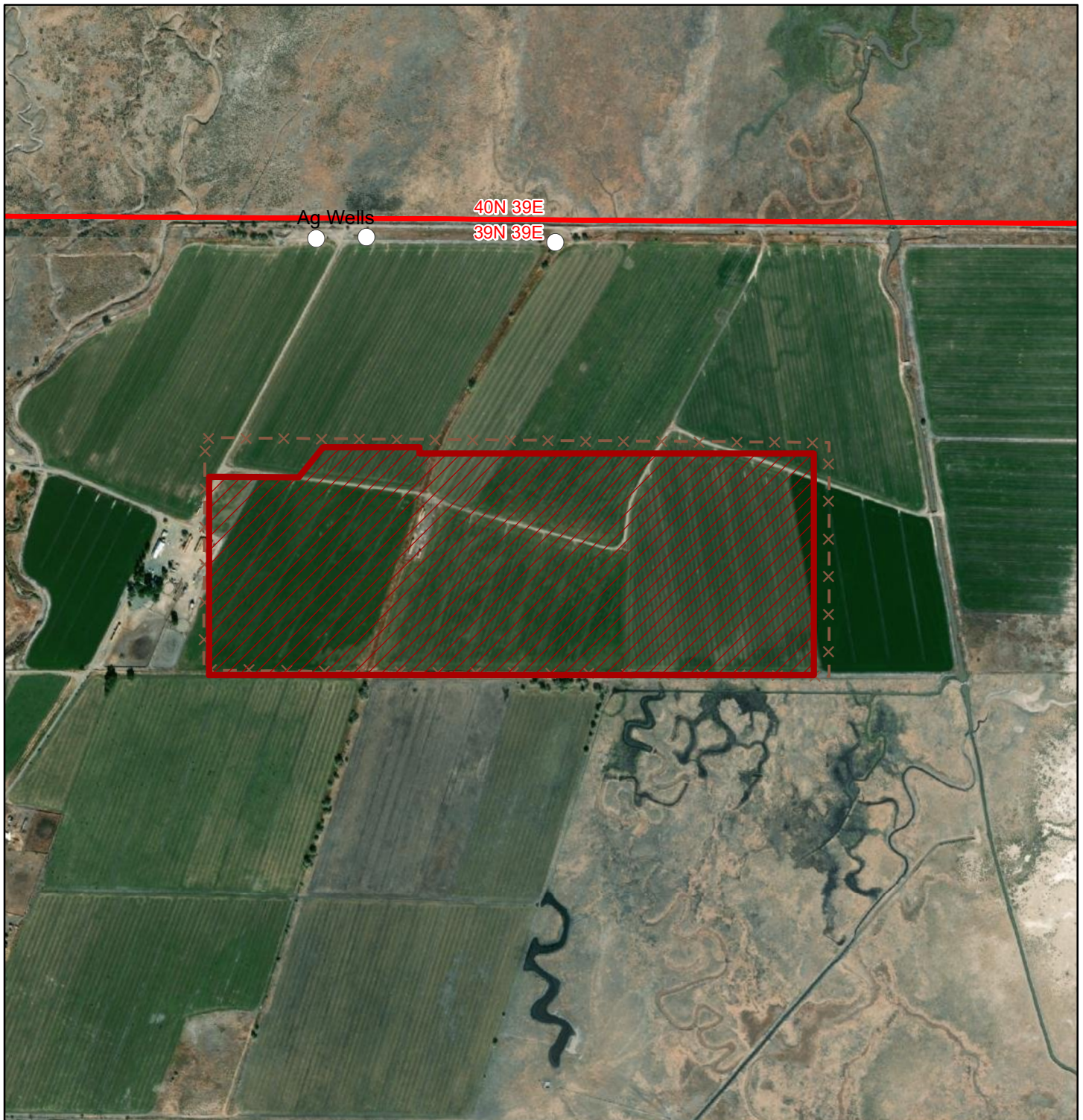
Land Status

- BLM
- PVT



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Figure 2 Proposed Project Area Aerial Photo Map



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Winnemucca, NV. 89445

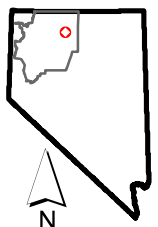
8/26/2021

0 500 1,000
Feet

Willow Point, NV USGS 24k Quadrangle
T. 39 N., R. 39 E., sec. 3 (Entire extent of map is private lands.)

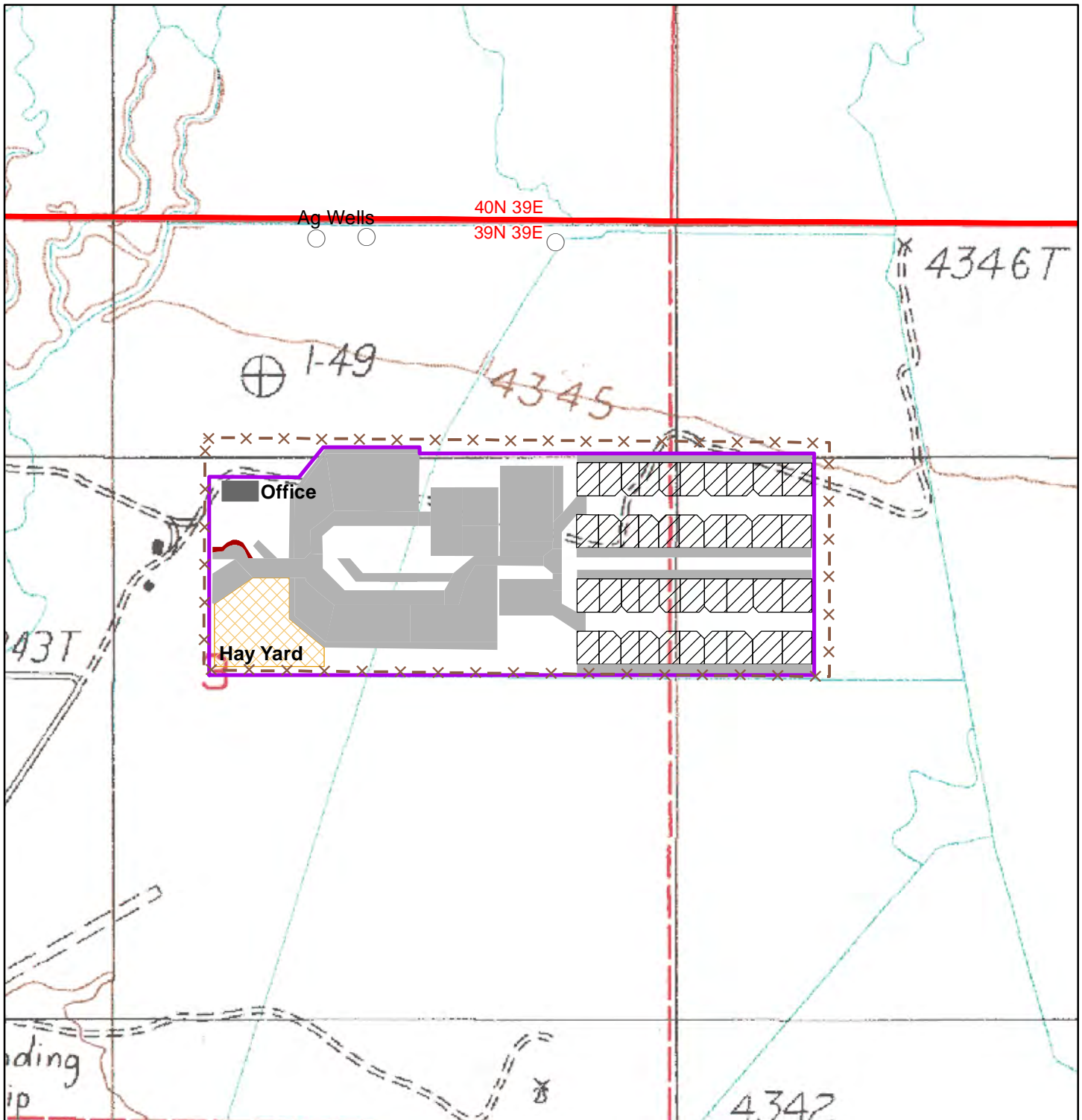
○ Ag Wells × — Fence □ Township ▨ Facilities

Service Layer Credits: Source: Esri, Maxar, GeoEye,
Earthstar Geographics, CNES/Airbus DS, USDA, USGS,
AeroGRID, IGN, and the GIS User Community



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Figure 3 Proposed ORC Facility Layout near Winnemucca, Nevada



Winnemucca District
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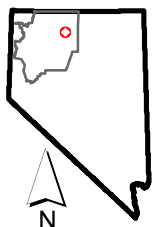
0 500 1,000
Feet

Willow Point, NV USGS 24k Quadrangle
T. 39 N., R. 39 E., sec. 3 (Entire extent of map is private lands.)

○ Ag Wells × — Fence □ Township

Off-Range Corral Facilities

▨ Pen □ Facility ■ Access Road
▤ Hay Yard ■ Office ■ Other



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3.0 Affected Environment and Environmental Consequences

This chapter describes the affected environment, specifically the existing or baseline conditions relevant to each issue identified in Table 1 (Appendix A), followed by a description of the impacts projected to result from each alternative.

3.1 Soils

3.1.1 Affected Environment

The analysis area for soils is the 100-acre project area. The proposed project area is located on Delvada Silty Clay, which are very poorly drained, subject to occasional flooding, and may have a high water table (USDA Natural Resources Conservation Service (NRCS) 2021). The soils are fine textured with high amounts of silt and clay and have a fairly high erodibility index for wind erosion. These are soils that become “powdery” when disturbed (pers com. Novak-Echenique 2021).

3.1.2 Alternative 1- Proposed Action

Environmental Impacts

Grading of the site will be accomplished to allow for the proper draining of the soils within the site. Design features, the dust prevention and control plan, and the CAFO plan would reduce the risk of runoff and erosion. This plan would ensure all solid and liquid wastes along with sediment are stored on-site in a manner that prevents wastes and sediment from entering surface water and seepage of nutrients into ground water. Based on past agricultural work on the proposed project area, it is expected that agricultural work would continue within the project area. This trend in agricultural practices on the proposed project area would not create additional impacts outside of the impacts to soils that have already occurred.

3.1.3 Alternative 2- No Action

Environmental Impacts

Alternative 2 would result in the BLM not funding the contract for the ORC to hold WH&B, thereby eliminating a Federal Action and NEPA nexus. It would be speculative to assume how the contractor would use the existing agriculture land. Since this activity would be beyond the BLM’s influence, the effects of this would be outside the scope of this analysis.

3.2 Raptors and Migratory Birds

3.2.1 Affected Environment

On January 11, 2001, President Clinton signed Executive Order 13186 (Land Bird Strategic Project) placing emphasis on conservation and management of native migratory birds. These migratory species are protected under the Migratory Bird Treaty Act of 1918. Management of these species is based on BLM Instruction Memorandum – IM 2008-050, dated December 18, 2007. The analysis area for migratory birds and raptors is the 100-acre project area. The proposed project area is located on existing alfalfa fields in Paradise Valley, Nevada. These alfalfa fields provide migratory bird nesting and foraging habitat as well as foraging habitat for raptors. Migratory bird species known to use agricultural lands include bobolink (*Dolichonyx oryzivorus*), long-billed curlew (*Numenius americanus*), sandhill crane (*Grus canadensis*), and white-faced ibis (*Plegadis chihi*). Raptor species known to hunt in agricultural lands include prairie falcon (*Falco mexicanus*), short-eared owl (*Asio flammeus*), Swainson’s hawk (*Buteo swainsoni*), and western burrowing owl (*Athene cunicularia hypugaea*). In addition, golden eagles (*Aquila chrysaetos*) forage for prey in irrigated agriculture fields. This species has additional protection under the Bald and Golden Eagle Protection Act.

3.2.2 Alternative 1- Proposed Action

Environmental Impacts

Impacts to migratory birds and raptors would include displacement, loss of habitat, or destruction/disturbance to nests. These impacts may occur due to the conversion of the agricultural fields/habitat to pens and other supporting structures within the proposed project area. The proposed project area is 100 acres in size; it is expected that migratory birds and raptors would relocate permanently to other, similar habitat available in the vicinity of the proposed project area. Effects to nests and breeding behaviors could be avoided by implementation of the Migratory Bird Treaty Act Compliance design feature.

3.2.3 Alternative 2- No Action

Environmental Impacts

Alternative 2 would result in the BLM not funding the contract for the ORC to hold WH&B, thereby eliminating a Federal Action and NEPA nexus. It would be speculative to assume how the contractor would use the existing agriculture land. Since this activity would be beyond the BLM's influence, the effects of this would be outside the scope of this analysis.

3.3 Terrestrial Wildlife (Big Game)

3.3.1 Affected Environment

The analysis area for big game wildlife is the 100-acre project area. The proposed project area is located on existing alfalfa fields in Paradise Valley, Nevada. The ranch on which the proposed project is located is completely fenced. The proposed project area is located within mule deer (*Odocoileus hemionus*) habitat and year-round pronghorn antelope (*Antilocapra americana*) habitat in Hunt Unit 051. This Hunt Unit is composed of approximately 1.6 million acres of mapped mule deer habitat and approximately 213,088 acres are classified as agricultural habitat for the Paradise Valley herd. The proposed project area accounts for less than 0.01% of mapped mule deer habitat that would be lost for both the Paradise Valley herd as well as other mule deer in Hunt Unit 051. Existing fencing associated with the alfalfa fields effectively precludes pronghorn antelope from accessing the project area.

3.3.2 Alternative 1- Proposed Action

Environmental Impacts

Based on past agricultural work on the proposed project area, it is expected that agricultural work would continue within the project area. Impacts to pronghorn antelope are not expected because the agricultural fields surrounding the project area are already fenced to exclude them. Because the proposed project area represents such a small percentage of mule deer habitat, it is expected that mule deer would find other, more suitable habitat permanently.

3.3.3 Alternative 2- No Action

Environmental Impacts

Alternative 2 would result in the BLM not funding the contract for the ORC to hold WH&B, thereby eliminating a Federal Action and NEPA nexus. It would be speculative to assume how the contractor would use the existing agriculture land. Since this activity would be beyond the BLM's influence, the effects of this would be outside the scope of this analysis.

4.0 Consultation and Coordination

On August 25, 2021, a project proposal letter, with an ePlanning link to the preliminary draft environmental assessment, was sent to the Winnemucca Indian Colony, Burns Paiute Tribe, Summit Lake Tribe, and McDermitt Paiute-Shoshone Tribe.

On September 2, 2021, the EA was released to the public for a 15-day comment period on the BLM ePlanning website. A letter with a project description and directions on accessing the preliminary EA were delivered via mail or email to 93 individuals, organizations, and State and county agencies.

4.1 List of Preparers

Humboldt River Field Office

Shannon Deep – Native American Consultation
 Heather O’Hanlon – Public Affairs
 Holley Kline – Wildlife
 Robin Michel – Planning & Environmental Coordinator
 Zwaantje Rorex – GIS Cartography
 Dane Silva – Cultural Resources

Nevada State Office

Kimberly Allison – Weeds and Grazing
 Nancy E. Army – Project Manager and NEPA
 Patti Novak-Echenique – Soils
 Jamie Fields – Wilderness Areas, Wilderness Study Areas, and Land with Wilderness Characteristics
 Coreen Francis – Forest and Woodland
 Robert Gibson – Hydrology
 Frank Giles – Noise and Air Quality
 Miles Gurtler – Recreation, Access, and Visual Resource Management
 Lara Kobelt – Botany
 Virginia Morales – Realty Rights-of-Way, Communication Sites, Film Permits
 Sarah Peterson – Soils
 David Pritchett – NEPA
 Carolyn Sherve – NEPA
 Bill Stevens – Socioeconomics & Environmental Justice
 Ruth Thompson – Wild Horses and Burros
 Madeline Van der Voort – Cultural Resources

Appendix A. Impacts Analysis Table

To comply with NEPA, the BLM is required to address specific elements of the environment that are subject to statute, regulation, or by executive order. The following tables outline the elements that must be addressed in all environmental analyses, as well as other resources deemed appropriate for evaluation by the BLM. Interdisciplinary Teams (IDT) from the Nevada State Office and Humboldt River Field Office identified resources that are present and potentially impacted.

Table 1. Interdisciplinary Checklist

Determination ¹	Resource	Rationale for Determination
Present, but not affected to a degree that detailed analysis is required.	Air Quality	Air quality impacts are expected to be minimal. proposed operations would not be expected to have significantly different impacts from the current agricultural uses at the site. Construction-related fugitive dust emissions will be mitigated by obtaining and complying with a NDEP Surface Area Disturbance air permit for the project. The proposed new use of the site is not expected to significantly affect GHG emissions or climate change affects in Nevada. The alfalfa being replaced was presumably used as feed and so does not represent significant carbon storage. The horses are being moved from other locations to the new corrals. Their expected small GHG emissions are not new but have merely changed locations within the Nevada State airshed.
Not present in the area impacted by the Proposed Action or Alternative.	Geology and Minerals	
Present with potential for impact analyzed in detail in this EA.	Soil Resources	See section 3.1 for analysis
Present, but not affected to a degree that detailed analysis is required.	Riparian Areas and Aquatic Wildlife	Impacts to riparian areas and aquatic wildlife, potential for nutrient release during flood events or creating nutrient plumes, would be negligible when the requirements of the CAFO permit are implemented.
Not present in the area impacted by the Proposed Action or Alternative.	Botany	
Not present in the area impacted by the Proposed Action or Alternative.	Special Status Animal Species	No threatened or endangered animal species are known to occur within footprint of project area. Potential habitat for TES species outside of the project area should not be affected by continuation of horse holding activities within the existing facility and project footprint. Impacts are not expected for Greater sage-grouse (GRSG) or their habitat as the project area does not overlap or occur in proximity to GRSG habitat.
Not present in the area impacted by the	Special Status Plant Species	No threatened or endangered plant species are known to occur within footprint of project area. Potential habitat for special status

Proposed Action or Alternative.		plant species should not be affected by the continuation of current activities.
Present with potential for impact analyzed in detail in this EA.	Raptors and Migratory Birds	See section 3.2 for analysis
Present with potential for impact analyzed in detail in this EA.	Terrestrial Wildlife (Big Game)	See section 3.3 for analysis.
Present, but not affected to a degree that detailed analysis is required.	Wild Horses	There are no free roaming wild horses, burros, or HMAs near the proposed project area. Holding for removed excess horses is analyzed in site specific wild horse and burro gather EAs.
Present, but not affected to a degree that detailed analysis is required.	Cultural Resources	There are no known historic properties present within the 100-acre project area. There is no potential to affect historic properties since the project would be conducted in existing disturbance and any properties present would lack integrity.
Not present in the area impacted by the Proposed Action or Alternative.	Paleontological Resources	The project is located in an area designated by the BLM as Potential Fossil Yield Classification Class 2 (PFYC 2), indicating the project area are not likely to contain paleontological resources. There are no known fossil localities within the Project area or in its vicinity.
TBD	Native American Religious Concerns	TBD
Not present in the area impacted by the Proposed Action or Alternative.	Visual Resources	
Present, but not affected to a degree that detailed analysis is required.	Hazardous or Solid Wastes	Design features, including the dust control measures (installation of a pressurized irrigation system throughout the facility to control dust), and the CAFO plan would reduce the risk of runoff and erosion. The Solicitation required that the ORC must obtain the required permits, which includes constructing proper, State approved, CAFO infrastructure and drainage ponds. An engineered drainage system will catch all run off, even during high water events, and drains it into the CAFO ponds to evaporate or is applied to farm fields owned and operated by the JS Livestock (if the CAFO allows that). These plans would ensure all solid and liquid wastes along with sediment are stored on-site in a manner that prevents wastes and sediment from entering surface water and seepage of nutrients into ground water.
Not present in the area impacted by the Proposed Action or Alternative.	Fire Management	
Present, but not affected to a degree that	Social and Economic Conditions	The proposed action and no action alternatives would have very minor impacts relative to the overall economy of the planning area.

detailed analysis is required.		
Present, but not affected to a degree that detailed analysis is required.	Environmental Justice	At this time, no segments of the population are known to be disproportionately affected. BLM's EJ analysis has identified low income and NA populations within and close to the project area, but BLM has not determined if they are disproportionately affected. See Appendix C for BLM's EJ screening.
Not present in the area impacted by the Proposed Action or Alternative.	Lands with Wilderness Characteristics	
Not present in the area impacted by the Proposed Action or Alternative.	Forestry and Woodland Products	
Not present in the area impacted by the Proposed Action or Alternative.	Livestock Grazing	
Present, but not affected to a degree that detailed analysis is required.	Hydrology and Water Rights	Impacts to surface and ground water, potential for nutrient release during flood events or creating nutrient plumes, would be negligible when the requirements of the CAFO permit are implemented.
Not present in the area impacted by the Proposed Action or Alternative.	Lands and Realty	
Not present in the area impacted by the Proposed Action or Alternative.	Recreation	
Not present in the area impacted by the Proposed Action or Alternative.	Public Access	
Not present in the area impacted by the Proposed Action or Alternative.	Prime and Unique Farmlands	
Not present in the area impacted by the Proposed Action or Alternative.	Areas of Critical Environmental Concern	
Not present in the area impacted by the	Wilderness Study Areas	

Proposed Action or Alternative.		
Not present in the area impacted by the Proposed Action or Alternative.	Wild and Scenic Rivers	
Not present in the area impacted by the Proposed Action or Alternative.	Scenic Byways & Historic Trails (Including visual setting)	The California National Historic Trail is the closest resource and is approximately 14 miles south of the Project and would not be impacted.
Present, but not affected to a degree that detailed analysis is required.	Noise	The proposed facility is not expected to have significantly different noise impacts than the current agricultural uses of the site.
Present, but not affected to a degree that detailed analysis is required.	Weeds	There would be a negligible potential for weed infestations to occur when the weeds control management design features are implemented.
Present, but not affected to a degree that detailed analysis is required.	Floodplains	The project area is in Federal Emergency Management Agency (FEMA) designated Zone X (FEMA 2021), which is "...the area determined to be outside the 500-year flood and protected by levee from 100-year flood. (FEMA undated)"
Not present in the area impacted by the Proposed Action or Alternative.	Wetlands	Irrigation runoff from the alfalfa fields has resulted in establishment of some riparian vegetation in the ditches and natural channels between fields in the project area. This vegetation would likely be removed during project installation and operation, but any riparian vegetation associated with stream flows would not be affected.

Appendix B. Literature Cited

Humboldt County 2012	Humboldt County Regional Master Plan 2012 Update. Accessed on 18 August 2021. Master Plan Humboldt County, NV (humboldtcountynv.gov)
FEMA 2021	National Flood Hazard Layer FIRMet. Map generated on September 1, 2021.
FEMA Undated	Definitions of FEMA Flood Zone Designations. Accessed on September 1, 2021. Microsoft Word - fema-flood-zone-definitions.docx (snco.us)
USDA NRCS 2021	Custom Soil Resource Report for Humboldt County, Nevada, East Part.
USEPA 2012	NPDES Permit Writers' Manual for Concentrated Animal Feeding Operations.
USDI 2015	USDI Bureau of Land Management. 2015. Record of Decision and Resource Management Plan for the Winnemucca District Planning Area.
USDI 2020a	USDI Bureau of Land Management Permanent Instruction Memorandum 2021-007 Euthanasia of Wild Horses and Burros Related to Acts of Mercy, Health or Safety. Euthanasia of Wild Horses and Burros Related to Acts of Mercy, Health or Safety. Bureau of Land Management (blm.gov)
USDI 2020b	USDI Bureau of Land Management Permanent Instruction Memorandum 2021-002 Wild Horse and Burro Comprehensive Animal Welfare Program. Wild Horse and Burro Comprehensive Animal Welfare Program Bureau of Land Management (blm.gov)

Appendix C Environmental Justice Screening Report

Wild Horse & Burro Off Range Corral Environmental Justice Analysis

August 25, 2021

Bill Stevens
Socioeconomic Specialist
BLM

A low income EJ population is present. The percentage of the population classified as low income in some of the blockgroups analyzed is equal to or greater than 50 percent or more than 10 percentage points higher than that of the State of Nevada, which serves as the reference population for this analysis. In addition, Winnemucca City (not included in the blockgroups below) has a low income population more than 10 percentage points higher than the State reference population. A low income EJ population, therefore, is present for the purposes of this analysis.

An American Indian EJ population is present. There are concentrated populations of American Indians living within one or more of the blockgroups included in the analysis. An American Indian EJ population, therefore, is present for the purposes of this analysis.

Population	Low Income	Minority	American Indian
BLM SEP (Humboldt River FO)	13.1%	30.7%	4.8%
Blockgroup: 320130105001	38%	41%	25%
Blockgroup: 320130105003	13%	26%	1%
Blockgroup: 320130106002	34%	33%	17%
City: Winnemucca	27%	37%	2%
State of Nevada (reference population)	13.1%	50.8%	1.3%

Data sources:

- EPA EJScreen: <http://www.epa.gov/ejscreen> (accessed 8/25/21)
- Headwaters Economics BLM SEP (Humboldt River FO):
<https://headwaterseconomics.org/tools/blm-profiles/> (accessed 8/20/21)

It is not anticipated that there would be any disproportionate impacts on the existing EJ population(s) within the project area./It is anticipated that there could be disproportionate impacts on the existing EJ population(s) within the project area. (Additional explanation as needed.)

Determination: Present/Not present; (if present) Affected/Not affected. (Additional explanation as needed. Formal determination language could include a statement regarding disproportionate adverse impacts to one or more of any EJ populations present being anticipated or not anticipated.)

Appendix D. Response to Public Comments

Cmt #	Commenter	Comment	BLM Response
1			
2			
3			
4			
5			
6			
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