



Determination NEPA Adequacy (DNA)

A. BLM Office: Idaho State Office
 NEPA Log Number: DOI-BLM-ID-0000-2022-0001-DNA
 Lease/Serial Case File No.: NA
 Proposed Action Title/Type: Bruneau Off-Range Corrals for Wild Horses and Burros
 Location/Legal of Proposed Action: Bruneau, ID
 Applicant (if any): Simplot Livestock Co.

Description of the Proposed Action and any applicable design features:

The BLM proposes to continue funding operations at the applicant's Bruneau Off-Range Corral (ORC) facility to provide space, food and care for wild horses and burros (WHB). Operations currently accommodate up to 3,500 wild horses and burros on approximately 80 acres of private land owned by the applicant near Bruneau, Idaho. The applicant would provide care for one base year plus four option years. The applicant would obtain and abide by all required permits. The ORC facility would provide:

- Pens, feed, and water necessary for maintaining up to 3,500 wild horses and burros
- Corrals and adequate working facilities to load, unload, prepare and sort wild horses and burros
- Handle, treat, and maintain all wild horses and burros 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).
- Regular, on-the-ground observation of wild horses and burros by the applicant's employees to ensure their well-being and safety
- Management by individuals who are knowledgeable about and experienced with the behavior and nutritional requirements of wild horses and burros

The proposed facility, gates and crowding alleys are built with pipe for structural strength and belting for safety, windbreak and shade. The applicant would utilize equipment such as tractors and feed trucks to perform daily operations.

B. Conformance with the Land Use Plan (LUP)

LUP/Document	Sections/Pages	Date Approved
Bruneau Management Framework Plan	All	1983

The Bruneau Field Office does not include any WHB herd management areas, therefore, the Bruneau Management Framework Plan (BMFP, 1983) is silent on WHBs. However, the BMFP does not disallow such a management action, and this action is not inconsistent with the goals and objectives stated in the BMFP of maintaining and improving rangeland health conditions. This EA incorporates by reference the BMFP and Solicitations # L14PS00389

(2015 solicitation) and # 140L0120R0008 (2021 solicitation) because of the specifications for construction, maintenance, and care of the animals.

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
DOI-BLM-ID-B020-2015-0006-EA	All	May 6, 2015
FONSI - DOI-BLM-ID-B020-2015-0006-EA	All	May 7, 2015
Decision Record	All	May 8, 2015
Scoping Document	All	March 20, 2015

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?

Yes, this proposed action is the same as the proposed action analyzed and surveyed in the 2015 EA. The action was implemented to fund space, feeding and care for up to 3,500 excess wild horse and burros on 80 acres of private land owned by Simplot. In addition, it was determined that the Proposed Action does not constitute a major federal action affecting the quality of the human environment or causing unnecessary or undue degradation of the natural environment in the Finding of No Significant Impact (FONSI) (2015). Therefore, an Environmental Impact Statement was not prepared.

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?

Yes, there are no new environmental concerns, interest, or resource values that would necessitate analysis of additional alternatives other than the Proposed Action and No Action Alternative as analyzed in the 2015 EA.

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?

Yes, the existing analysis remains valid. No new issues, information, or circumstances have been identified since DOI-BLM-ID-B020-2015-0006-EA was prepared. Therefore, the existing analysis is adequate.

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?

Yes. The new proposed action would have the same environmental consequences and cumulative impacts in Chapter 3 of the 2015 EA. The type of care and general facilities would be the same as was previously analyzed.

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

Yes, section 4.0 of the 2015 EA identified parties the BLM consulted during the preparation of the EA. A scoping document was sent to the public on March 20, 2015, for review and comment of the proposed action and alternatives. The public was notified of the BLM's final action when the EA, finding of no significant impact and decision record were issued on May 8, 2015.

Name	Title	Resource/Agency Represented
Ruby Kyle	Bruneau ORC Facility Manager	Wild Horses and Burros/Idaho BLM
Chris Robbins	Rangeland Management Specialist	Rangeland Management, Vegetation, Noxious Weeds, Socio-Economics, Soils/Idaho BLM
Ethan Ellsworth	Wildlife Biologist	Wildlife, Riparian, Water Quality, Migratory Birds/Idaho BLM
Pam Murdock	Planning and Environmental Coordinator	NEPA/Idaho BLM
Kirk Halford	Archaeologist	Cultural Resources/Idaho BLM
Anne Halford	Botanist	Special Status Plants/Idaho BLM

E. Persons/Agencies /BLM Staff Consulted

Note: Refer to the EA for a list of team members who participated in the preparation of the original environmental analysis.

F. Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

CHRISTOPHER ROBBINS	Digitally signed by CHRISTOPHER ROBBINS Date: 2021.12.13 14:11:49 -07'00'	
Preparer	Digitally signed by PAMELA	
PAMELA	MURDOCK	
MURDOCK	Date: 2021.12.15 14:46:53 -07'00'	

Date

NEPA Specialist

Date

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Deputy State Director

12/17/21 Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.

Attachments: Working Animal Waste Management Plan Dust Prevention and Control Plan



