

**Worksheet**  
**Determination of NEPA Adequacy (DNA)**  
**U.S. Department of the Interior**  
**Bureau of Land Management**

**OFFICE:**  
Rock Springs Field Office

**TRACKING NUMBER:**  
DOI-BLM-WY-D040-2024-0044-DNA

**PROPOSED ACTION TITLE/TYPE:**  
2024 Wild Horse Gather on the White Mountain Herd Management Area

**LOCATION/LEGAL DESCRIPTION:**  
White Mountain Herd Management Area, Southwest Wyoming  
(Townships 18N-20N, Ranges 105W-109W)

**A. Description of the Proposed Action and any applicable mitigation measures**

The Proposed Action is to gather and remove excess wild horses from the White Mountain Herd Management Area (HMA) to the low Appropriate Management Level (AML) of 205 wild horses. No fertility control treatments would occur under the Proposed Action. Under the Proposed Action BLM will gather and remove 586 excess wild horses from the White Mountain HMA, primarily via helicopter drive-trapping, with some helicopter-assisted roping or bait-trapping, as needed.

A population survey was completed for the White Mountain HMA in 2022 and found that there were 549 wild horses present on the HMA at that time. Considering an estimated annual growth rate of 20%, the estimated number of wild horses within this HMA in 2024 is 791 animals.<sup>1</sup> Based upon all information available at this time, the BLM has determined that 586 excess wild horses<sup>2</sup> are present within the White Mountain HMA and need to be removed to maintain a thriving natural ecological balance within this area.

**Excess Determination**

BLM's excess determination at this time is similar to those factors described on pages 3 and 4 of Environmental Assessment (EA) DOI-BLM-WY-D040-2020-0005-EA: *Wild Horse Gather to Appropriate Management Levels on the Adobe Town, Salt Wells Creek, Great Divide Basin*,

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<sup>1</sup> The estimated wild horse population for 2024 was calculated by adding a 20% population growth rate on January 1<sup>st</sup> 2023, and another 20% on January 1<sup>st</sup> 2024. Note, a foal is considered one year of age on January 1<sup>st</sup> of the year following its birth (see BLM Handbook H-4700-1 Section 4.2.1). Foals born in 2024 were not counted toward this population estimate.

<sup>2</sup> The number of excess wild horses is equal to the total estimated wild horse population within the White Mountain HMA (791), minus the low AML (205), which equals 586 wild horses.

*White Mountain and Little Colorado Herd Management Areas.* In the excess determination from the EA the BLM identified 5 factors that contributed to the excess determination at that time. Of those 5 factors, 2 are applicable to the current excess determination, as described below:

- 1) *The requirement from the 2015 RMP Amendment for Sage-grouse (BLM 2015) that wild horse herds within PHMA be managed within established AML ranges.* As described in Section 1.1 of DOI-BLM-WY-D040-2020-0005-EA the 2015 RMP Amendment directs the BLM to manage wild horses in Sage-grouse Priority Habitat Management Areas (PHMA) within the established AML range to prevent degradation to important sage-grouse habitat.
- 2) *The total number of wild horses over high AML.* Similar to what is described in Section 1.1 of DOI-BLM-WY-D040-2020-0005-EA the current wild horse population estimate is more than double the established high AML for the White Mountain HMA. As described in that section of the EA, that level of overpopulation is expected to result in detrimental impacts to rangeland health and overall TNEB if actions are not taken to reduce the population in this area.

#### Mitigation Measures

The following mitigation measures and best management practices were identified in EA# DOI-BLM-WY-D040-2020-0005-EA and would apply to this Proposed Action as well.

- Helicopter gather operations would not occur between March 1<sup>st</sup> and June 30<sup>th</sup> due to the peak foaling period for wild horses. This time frame also overlaps timing restrictions for sage-grouse breeding, nesting and early brood rearing periods. This time frame also overlaps a large portion of raptor and migratory bird nesting periods.
- Portions of the White Mountain HMA that are within big game crucial winter range would be subject to the timing restriction dates (November 15<sup>th</sup> to April 30<sup>th</sup>), particularly for trap and holding pen sites.
- In conducting all wild horse gather and removal operations, the BLM follows a set of best management practices to protect the health and safety of wild horses. BLM's Permanent Instruction Memorandum [PIM 2021-002](#) establishes policy for the Comprehensive Animal Welfare Program (CAWP). BLM follows this policy in all operations to ensure wild horses are treated humanely.
- Prior to using any new trap sites, BLM archeologists would evaluate the site to ensure no sensitive cultural resources are present.
- Prior to using any new trap sites, BLM wildlife biologists would evaluate the site to ensure there are no sensitive or threatened species present in the area.

#### **B. Land Use Plan (LUP) Conformance**

LUP Name: Green River Resource Management Plan and Record of Decision, as amended

Date Approved: August 8, 1997

Other Document: Record of Decision and Approved Resource Management Plan Amendment for Wild Horse Management for the BLM Rock Springs and Rawlins Field Offices. DOI-BLM-WY-D040-2013-0001-RMP-EIS.<sup>3</sup>

Date Approved: May 9, 2023

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decision:

*“Selective gathering programs will be implemented in each of the wild horse herd management areas. Gathering plans will be prepared for removal of excess horses from inside and outside the wild horse herd management areas.” (BLM 1997, pg. 23).*

*“Retain the White Mountain HMA and manage AML in accordance with MA009.” (BLM 2023, pg. 14, MA005)*

*“White Mountain:*

- *Acres: 388,488 (BLM: 207,350)*
- *AML: 205-300*
- *AUMs: 2,460-3,600” (BLM 2023, pg. 15, MA009).*

*“Prepare gather plans for removal of excess wild horses from inside and outside the wild horse HMAs.” (BLM 2023, pg. 15, MA013).*

#### **C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.**

EA# [DOI-BLM-WY-D040-2020-0005-EA](#) (hereinafter “**the 2021 EA**”): *Wild Horse Gather to Appropriate Management Levels on the Adobe Town, Salt Wells Creek, Great Divide Basin, White Mountain and Little Colorado Herd Management Areas.* The associated Finding of No Significant Impact and Decision Record were signed for this EA on July 22, 2021.

EIS# [DOI-BLM-WY-D040-2013-0001-RMP-EIS](#) (hereinafter “**the 2023 FEIS**”): *Proposed Resource Management Plan Amendment and Final Environmental Impact Statement for Wild Horse Management for the BLM Rock Springs and Rawlins Field Offices.* The associated Record of Decision was signed for this Resource Management Plan Amendment on May 9, 2023.

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<sup>3</sup> This gather decision is being made pursuant to the 1997 Green River Resource Management Plan and pursuant to the 2023 RMPA Record of Decision (DOI-BLM-WY-D040-2013-0001-RMP-EIS). However, the 2023 Record of Decision left management of the White Mountain HMA unchanged from the 1997 Green River RMP. After BLM issued the Final Decision for the 2023 RMPA, the primary private landowner of checkerboard lands within the White Mountain HMA notified BLM that it was revoking consent for wild horses to be present on its lands and demanded that BLM remove all wild horses from its private lands. BLM will be considering the private landowner's revocation of consent through future planning amendments.

## **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?**

Under the Proposed Action a total of 586 wild horses would be gathered and removed from the White Mountain HMA and no fertility control treatments would occur. This Proposed Action is similar to Alternative III in the 2021 EA. Alternative II was the original Proposed Action for the 2021 EA and was the selected alternative in the associated Decision Record. Under that alternative a total of 478 wild horses would be gathered from the White Mountain HMA. Of those 478 wild horses, 358 would be permanently removed from the HMA and 60 mares would be treated with fertility control treatments and released back into the HMA, along with an equal number of untreated stallions. Under Alternative III of the 2021 EA a total of 358 wild horses would be gathered and removed from the HMA, with no fertility control treatments taking place under that alternative.

The current Proposed Action is similar to Alternative III in several ways. The Proposed Action would take place within the White Mountain HMA, which is one of the same geographic locations that was analyzed for a wild horse gather in the 2021 EA (a total of 5 HMAs were analyzed in that EA, with White Mountain being one of those analyzed). The Proposed Action and Alternative III from the 2021 EA involve the same overall activity: removal of excess wild horses to low AML. The Proposed Action would permanently remove 228 more wild horses than was analyzed under the 2021 EA.

The analysis of impacts for Alternative III in the 2021 EA are similar to the impacts associated with the current Proposed Action. Potential impacts to wild horses were primarily analyzed as impacts to individual animals as a result of the gather and removal process. These impacts would remain the same under the Proposed Action, even though more horses would be removed. When the EA analyzed impacts to wild horses on a population scale, it did so in reference to the AML, particularly removing wild horses to low AML. These impacts would be identical under the Proposed Action, even though more horses would be removed. The analysis of other resource values in the 2021 EA primarily discussed impacts associated with the presence of excess wild horses and the benefits to these resources from managing wild horses within AML. Other potential impacts to these resources were related to the process of gathering and removing wild horses from the HMA, which would be the same under the current Proposed Action.

The impacts analyzed under the No Action alternative in the 2021 EA would be the same as a No Action alternative associated with the current Proposed Action.

- 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, and resource values?**

In the 2021 EA the following alternatives were analyzed in detail:

- Alternative I: No Action
- Alternative II: Proposed Action - Gather and Removal to the Low End of AML and Use Non-Permanent Fertility Control Treatments (i.e. Immunocontraceptives and Intrauterine Devices (IUDs))
- Alternative III: Gather and Removal to the Low End of AML (With No Fertility Control Treatments)
- Alternative IV: Gather and Removal to the Low End of AML with Permanent Sterilization Control and Mare to Stud Ratio Skewing

As discussed under Question 1, the Proposed Action is essentially similar to Alternative III of the 2021 EA. In addition to this, the range of alternatives analyzed in that EA are still appropriate for the current Proposed Action. This range of alternatives still represents the potential options for addressing the presence of excess wild horses within the White Mountain HMA.

**3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?**

Since July 2021, when the 2021 EA was finalized, there have been no changes to conditions or policy that would require new analysis. There has not been an updated Land Health Assessment for the White Mountain area since that time, and general observations do not indicate that there has been a change in resource conditions in that area. No new BLM-sensitive species have been identified within the White Mountain HMA. No new endangered species listings would affect the White Mountain HMA. No other circumstances would require additional analysis in order to properly assess the potential impacts of the Proposed Action.

On May 9, 2023 the BLM issued a Record of Decision and Approved Resource Management Plan Amendment for Wild Horse Management for the BLM Rock Springs and Rawlins Field Offices. The purpose of this Resource Management Plan Amendment was to address conflicts with wild horses on private land. In the Record of Decision, the BLM reverted the Great Divide Basin HMA and the Salt Wells Creek HMA to Herd Areas, managed for zero wild horses. Additionally, it reduced the size of the Adobe Town HMA, and changed the AML from 610-800 to 259-536. No changes were made to wild horse management within the White Mountain HMA.

These changes in wild horse management in the Rock Springs and Rawlins Field Offices would not affect the validity of analysis related to the White Mountain HMA. No changes were made in wild horse management for the White Mountain HMA, so there would be no additional impacts to this herd, outside of what has already been analyzed. Overall, the analyses provided in the 2023 FEIS and the 2021 EA (including the cumulative impact analysis) are still relevant regarding the current Proposed Action (see Question 4 for more details).

The winter of 2022-2023 was extremely harsh in Wyoming, with higher than average snowfall in the White Mountain HMA. Many of the surrounding areas in Wyoming experienced much higher winter precipitation and snow accumulation than occurred in the White Mountain HMA, especially in the areas closer to Rawlins. Therefore, even though winter conditions in the White Mountain HMA were worse than an average year, they were not as extreme as other parts of the state that reported much worse winter conditions.

These harsh conditions caused some big game animals to experience very high winter mortality rates, especially mule deer and pronghorn. While elk had higher than average winter mortality rates in Wyoming, they were not as extreme as those experienced by mule deer and pronghorn. Overall, larger animals, like elk, that were able to dig through snow to find forage fared better during the winter than smaller animals, like mule deer and pronghorn.

BLM personnel monitored the condition of wild horses throughout the winter of 2022-2023. Body conditions of the wild horses were observed to be good throughout the winter. There was no evidence of high mortality rates in the HMA, with only two wild horse deaths discovered in the spring that were attributed to winter conditions. Additionally, the BLM observed numerous foals during the 2023 field season, indicating that winter conditions did not dramatically affect the foal crop for that year. Overall, the death rate for the White Mountain wild horse herd did not appear to be higher than on a typical year, despite the harsh winter conditions. Therefore, the harsh conditions from the 2022-2023 winter would not affect the adequacy of the population estimate provided in Section A of this DNA, or the analysis found in the 2021 EA.

**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?**

As discussed under Question 1, the Proposed Action is essentially similar to Alternative III in the 2021 EA, with some differences in the number of wild horses to be removed to reach low AML. Under the Proposed Action there would be 228 more wild horses removed from the HMA than what is considered in Alternative III of the EA. However, as discussed under Question 1, this would not lead to a difference in direct, indirect or cumulative effects as analyzed in the subject EA.

In the Affected Environment and Environmental Effects section of the 2021 EA, eleven issue statements were analyzed in detail and described potential impacts associated with the removal of excess wild horses on a variety of resource conditions, including: wild horses, livestock, vegetation, special status plants, soils, rangeland health, big game habitat, sage-grouse habitat, raptors, migratory birds, recreational wild horse viewing and recreational hunting. No additional direct, indirect, or cumulative effects would result from the implementation of the Proposed Action.

Both the 2021 EA and the 2023 FEIS contain cumulative impact analyses that are applicable to the Proposed Action. The 2023 FEIS provided a cumulative impact analysis that demonstrated what the cumulative effects would be for removing all wild horses from the Great Divide Basin and Salt Wells Creek HMAs, as well as reducing the AML for the Adobe Town HMA and

managing wild horses within the established AML on the White Mountain HMA. The analysis in the 2021 EA analyzes the cumulative effects of gather operations on the wild horses, and other resource values, within the White Mountain HMA. Overall, the cumulative impact analysis from the 2021 EA and the 2023 FEIS is still relevant regarding the current Proposed Action.

## **5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

For the 2021 EA, the BLM initiated public scoping on November 21, 2019. A total of 556 letters were received from individuals, organizations and cooperating agencies. On March 31, 2021 the BLM released the EA for a 30-day public review period. The BLM received a total of 1,754 comment letters. These comments were all addressed in the EA, and its appendices. The BLM also released this DNA for a 30-day public review period on February 21, 2024. A total of 406 comment letters were received. A summary of these comments and BLM's responses are provided in Appendix A of this DNA.

Most of these comments were the same, or essentially similar, to comments BLM has received on other wild horse gathers for this HMA over the past decade. Therefore, the BLM has determined that the combination of past public involvement along with the public involvement for this DNA has been adequate to help inform decisions regarding this Proposed Action to remove excess wild horses to achieve AML in the White Mountain HMA.

## **E. Persons/Agencies /BLM Staff Consulted**

<b>Name</b>	<b>Title</b>	<b>Agency</b>	<b>Resource Represented</b>
Jay D'Ewart	Wild Horse Specialist	BLM	Wild Horses
Spencer Allred	Supervisory Range Specialist	BLM	Rangeland Management
Maura Bradshaw	Planning and Environmental Coordinator	BLM	NEPA Compliance
Mark Snyder	Assistant Field Manager – Resources	BLM	Management

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

## **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 the NEPA.

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Signature of Project Lead

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Signature of NEPA Coordinator

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Signature of the Authorized Officer

**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. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

#### References

Bureau of Land Management (BLM) 1997. Record of Decision and Green River Resource Management Plan. BLM/WY/PL-97-027+1610. BLM Wyoming State Office, Rock Springs District Office, October 1997.

BLM. 2015. Bureau of Land Management Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Springs Field Offices Approved Resource Management Plan Amendment for Greater Sage-grouse. BLM/WY/PL-15/023+1610. U.S. Department of the Interior, Bureau of Land Management, Wyoming State Office. September 2015.

BLM 2023. Record of Decision and Approved Resource Management Plan Amendment for Wild Horse Management for the BLM Rock Springs and Rawlins Field Offices. BLM Wyoming State Office, May 2023.