

Commentor	Comment	Response
Carolyn Borkowski	<p>The burning of 14% of the HMA represents a substantial change in resource conditions. This alteration affects vegetation, wildlife habitats, soil stability, and the overall ecological balance. The geographic and resource conditions are not sufficiently similar to those analyzed previously, and the differences are substantial enough to warrant a new review.</p>	<p>The BLM has already analyzed the impacts of fire on the Buffalo Hills HMA in the Smoke Creek EA, including the impacts of large-scale wildfire. See Sections 3.2, 3.12, and 4.2. That analysis included wildfires that occurred within this area since 2002 which burned more than 108,000 acres of the Smoke Creek Complex which includes the Buffalo Hills HMA. As the BLM explained in the EA, wildfire events were expected to continue to occur. The EA also outlined and analyzed that wildfire emergency</p> <p>stabilization and rehabilitation efforts would continue as needs are identified and actions are approved. For that reason, the most recent wildfire that is referenced by the commenter is not a substantial change in resource conditions, and indeed the BLM already analyzed such incidents as part of the past, present, and reasonably foreseeable future scenario.</p> <p>Wildfires and other ground disturbance activities have introduced and spread invasive species throughout the area. These non-natives contributed to high levels of fine fuel loading, resulting in more frequent fires. Without rehabilitation, burned areas have and would continue to be extremely susceptible to invasive species dominance and would continue to be susceptible to wildlife ignition. With the continued population increase of wild horses, there is greater pressure on forage resources and a reduction in the ability of these habitats to recover. The removal of excess wild horses would provide immediate benefit to forage resources, ensure fire rehabilitation efforts are successful, and benefit wildlife through reduced competition for forage resources while improving rangeland health.</p>
	<p>The extensive fires constitute significant new information and circumstances that were not considered in the 2018 EA. The ecological impacts of such fires can dramatically alter habitat availability, forage conditions, and the environmental baseline. This new information could substantially change the analysis of the proposed action's environmental impacts, making the existing analysis insufficient.</p>	<p>The BLM has already analyzed the impacts of fire on the Buffalo Hills HMA in the Smoke Creek EA, including the impacts of large-scale wildfire. See Sections 3.2, 3.12, and 4.2. That analysis included wildfires that occurred within this area since 2002 which burned more than 108,000 acres of the Smoke Creek Complex which includes the Buffalo Hills HMA. As the BLM explained in the EA, wildfire events were expected to continue to occur. The EA also outlined and analyzed that wildfire emergency</p> <p>stabilization and rehabilitation efforts would continue as needs are identified and actions are approved. For that reason, the most recent wildfire that is referenced by the commenter is not a substantial change in resource conditions, and indeed the BLM already analyzed such incidents as part of the past, present, and reasonably foreseeable future scenario.</p> <p>Wildfires and other ground disturbance activities have introduced and spread invasive species throughout the area. These non-natives contributed to high levels of fine fuel loading, resulting in more frequent fires. Without rehabilitation, burned areas have and would continue to be extremely susceptible to invasive species dominance and would continue to be susceptible to wildlife ignition. With the continued population increase of wild horses, there is greater pressure on forage resources and a reduction in the ability of these habitats to recover. The removal of excess wild horses would provide immediate benefit to forage resources, ensure fire rehabilitation efforts are successful, and benefit wildlife through reduced competition for forage resources while improving rangeland health.</p>
	<p>The EA references the 2013 and 2015 Environmental Protection Agency (EPA) approvals for the use of GonaCon-Equine, stating that it is approved for application to wild and feral equids in the United States (Final EA, p. 21 PDF, p. 29). However, these approvals were superseded by a 2017 amendment that changed the interval between the primer and booster doses from 30 days to 90 days.</p>	<p>USDA APHIS NWRC is working with EPA to change the label on Gona-Con Equine to allow a booster as soon as 7 days after the initial injection. USDA APHIS NWRC is hopeful the new label will be in place in November of 2024. USDA APHIS NWRC has significant evidence that booster regardless of timing is safe for use in horses. If the label is not changed in time for treatment/release of the wild horses gathered from the Buffalo Hills HMA, the BLM will treat in accordance with the current label and hold the mares for the 90 day interval before applying the booster.</p>

Form Letter	<p>I oppose the proposed removal of 32 wild horses to the low AML of 188 (well below the high AML of 314) and the removal of all burros. The proposed removals are unnecessary as the animals will move into the adjoining HMA if forage is low due to the 2024 Stockyard fire, which affected approximately 10% of the HMA. I also oppose the administration of the Gonacon Sterilization agent to all mares as this will set in motion the slow destruction of this now healthy herd.</p>	<p>Thank you for your concern, reference section 3.2, 3.12, and 4.2 in the Smoke Creek Complex EA for further fire analysis. Sections 3.14, 4.1.13, and 4.2.1.10 analyze the direct, indirect, and cumulative effects from the gather, removal, and fertility control applications.</p>
Kathy Gregg	<p>The U.S. Bureau of Land Management is not allowed to "remain studiously ignorant of material scientific evidence". Therefore, I require that this DNA, as written, be withdrawn and rewritten to include the alternative of reducing and/or removing livestock in order to protect wild horses and burros from the proposed harassment and injuries caused by the proposed capture and removal and sterilization, both temporarily or permanently, procedures.</p>	<p>Removal of livestock was addressed in section 2.6 Alternatives considered but not analyzed in detail (2.6.6 Remove or Reduce Livestock within the Smoke Creek Complex). This alternative would be inconsistent with the WFRHBA, which directs the Secretary to immediately remove excess wild horses. Livestock grazing can only be reduced or eliminated if BLM follows regulations at 43 CFR 4100. The Buffalo Hills HMA boundary encompasses the majority of the Buffalo Hills Pasture of the Buffalo Hills Allotment. The Buffalo Hills Pasture of the Buffalo Hills Allotment was rested from grazing in the 2024 grazing season. This pasture is scheduled to be rested in the 2025 grazing season due to the Stockade Canyon fire and emergency stabilization and rehabilitation efforts within this pasture.</p>

The Cloud Foundation	<p>We strongly oppose the Proposed Actions outlined in the DNA that:</p> <p>Remove the remaining 33 wild burros and removing 32 of the 235 wild horses;</p> <p>Utilize the Gonacon Sterilization “fertility control” that destroy reproductive organs which jeopardize the natural, wild behaviors and natural social behaviors of wild horses and their long-term welfare given that they live under extreme environmental conditions and must be self-reliant to survive;</p> <p>Utilize Gonacon Sterilization on all 100 mares to be released to the Herd Management Area (HMA) causing permanent sterilization after as few as two to three applications thereby jeopardizing the sustainability of the herd;</p> <p>Artificially alter the natural sex ratio of the herd, favoring males over females. These actions, including removing dozens of females and releasing 100 mares and 103 stallions, would disrupt the natural social structure, leading to heightened competition and aggression among males competing for fewer females. This imbalance threatens the wellbeing of the horses, creating social instability and increasing the risk of harm due to intensified male aggression.</p>	<p>The current population estimate within the Buffalo Hills HMA is 315 wild horses and 33 wild burros. This HMA is not managed for wild burros, based on the Winnemucca District Resource Management Plan (RMP)(2015). Sections 3.14, 4.1.13, and 4.2.1.10 analyze the direct, indirect, and cumulative effects from the gather, removal, and fertility control applications.</p>
Jessica Johnston	Based on the 2022 flight inventory the current population estimate is questionable due to the significant population increase since 2024.	The direct count map from the June 2024 census flight was made available on the NEPA register page. The BLM complied with its protocol for wild horse and burro population counts.
	Return the burros to the Twin Peaks HMA.	The Buffalo Hills HMA is not managed for burros. This decision was reinforced in the Winnemucca District RMP (2015). The Twin Peaks HMA wild burro population is currently over the AML range, this would not achieve the BLM mission to return animals to an HMA that is already of AML.
Charlotte Roe-Bravo	Just one example of an intensely impactful use is the annual permitting of Burning Man, which attracts up to 80,000 revelers each year. How does this festival affect the fragile landscape? What affect does it have on wild horses and burros and the scarce water resources? The DNA is silent. This is one of many glaring omissions.	Outside the Scope of this document. The Burning Man event takes place outside of the Buffalo Hills HMA. The EIS that guides the management of the Burning Man event is available on the national NEPA register for further analysis.
	Another key issue where analysis is gravely lacking are BLM 's plans for helicopter roundup, transportation and holding.	This information is available in the Smoke Creek Complex EA in sections 2.1, 3.14, 4.1.13, and 4.2.1.10
	The EA and DNA are silent regarding the need to have enforceable welfare rules regarding the use of motorized vehicles in gathers, capture, transport and holding.	This information is available in the Smoke Creek Complex EA in Appendix A (CAWP).