

## Appendix G. Public Comments and Responses Lahontan HMA PEA Gather

The PEA was made available to interested individuals, agencies and groups for a 30-day public review and comment period that opened on April 10, 2025, and closed on May 12, 2025. Comments were received from approximately 161 individuals or organizations, and agencies. Many of these comments contained overlapping issues/concerns which were consolidated into 116 distinct topics. Below is a detailed summary of the comments received for the Lahontan Wild Horse Gather Preliminary EA. Comments are summarized and/or paraphrased and grouped by similar topic. Where comments express a unique concern or cannot be effectively grouped, they are addressed separately.

| Not Supportive |   |  |  |
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| #              | Comment   | Commenter  | BLM Response   |
| 1              | Stop inflating numbers of wild horses.          | Not Provided   | This assertion is false. In its June 2013 report ("Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward"), the National Academy of Sciences (NAS) concluded that the BLM's "direct count" aerial survey method has resulted in population undercounts of 20 percent to 30 percent because it does not account for undetected animals. To more accurately estimate population size, the BLM has made use of peer-reviewed U.S. Geological Survey (USGS) population survey methods since approximately 2014. These methods include use of "simultaneous double-observer" aerial survey methods, as explained in EA section 1.1. The BLM aims to survey one-third of all Herd Management Areas annually, on a rolling basis, using the USGS methods, as recommended by NAS. Wild horses were counted during aerial Inventory flights and the associate estimates of population size were used to run population models. The Lahontan wild horse numbers from the Inventory flights are available in the EA. |
| 2              | Concern for injury and mortality during gather. | Not Provided, Vicki Skarda, Wendy Urruty, Cathy Scott, Rhonda Sheward, Nina Jackel | The Department of the Interior and the Bureau of Land Management care deeply about the well-being of wild horses. Please reference the EA for the actions that BLM takes to ensure the wellbeing of wild horses especially Appendix B.   |

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| #              | Comment  | Commenter  | BLM Response  |
| 3              | Horse gathers are cruel/inhumane.  | Valerie Pratt, Not Provided, Wendy Urruty, Julie Seracuse , Pam Bucher, Amanda Mott, Donna March, Rhonda Sheward, Nina Jackel, Mrs. N Lester | Opinion noted. See response to comment 2.   |
| 4              | These are feral horses, not wild, and BLM should not use the term “wild” when referring to them.   | Don Halterman  | Comment noted. The Lahontan horses are defined and protected by the WFRHB Act as wild horses.   |
| 5              | (Wild) Horses could be a substantial source of food, hair, and leather if the federal government would delist them and then NDOW could sell hunting tags.        | Don Halterman  | Opinion noted.  |
| 6              | Leave the horses alone. This is their natural environment and has been forever. They are not destroying anything.  | Traci Earixson, Not Provided, Joanna Henshaw, Jasmine Venkat, Eileen Groom, Donna March  | Opinion noted.  |
| 7              | Question about what will be done with horses after they are rounded up.  | Stacy Bousquet   | Animals gathered from within and outside the HMA would be removed and transported to BLM off-range corrals where they would be prepared for adoption and/or sale to qualified individuals, or for off-range pastures. The proposed action is described in EA section 2.2.   |
| 8              | Question about what will be done with land after gather.   | Paula  | The Lahontan HMA would continue to be managed as an HMA. A land use plan amendment would be needed to change the HMA status.  |
| 9              | Horses are protected symbols of the American West under the WFRHB Act of 1971, which mandates their preservation and humane management – not systematic removal. | Cyndi Boggan   | The WFRHBA requires BLM to remove excess horses when it determines this necessary to ensure a thriving natural ecological balance – regardless of whether some members of the public oppose such removals. The Proposed Action would help minimize the number of excess wild horses that would need to be removed over the next 10 years. This action is also consistent with the HMAP. |

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| #              | Comment   | Commenter   | BLM Response  |
| 10             | The term “excess” is subjective and reflects outdated population targets that fail to consider non-lethal management alternatives such as fertility control or habitat restoration. | Cyndi Boggan  | The number of wild horses the natural resources in the HMA can sustainably support, consistent with the BLM’s legally mandated multiple use mission, is referred to as the Appropriate Management Level (AML). The number of wild horses above AML are considered “excessive” because resources within the HMA cannot support a larger herd size.   |
| 11             | Removing these horses undermines the spirit of the WFRHBA and disrupts the beauty, cultural heritage, and biodiversity of public lands.   | Cyndi Boggan  | The WFRHBA requires BLM to remove excess horses when it determines removal is necessary to ensure a thriving natural ecological balance. Removing excess wild horses so that herd sizes is within established AML helps achieve the goal of healthy rangelands, including fostering biodiversity.   |
| 12             | Urge the BLM to seek humane, science-based, and community-supported solutions for coexistence and conservation  | Cyndi Boggan, Rhonda Sheward  | The management of natural resources on public lands and wild horse herds are science-based; please refer to the scientific literature cited in the EA. BLM collects data to establish HMAPs and set AMLs. Wild horse herds are humanely managed; please refer to the EA for the actions that BLM takes to ensure the well-being of wild horses, especially Appendix B. BLM engages with the public, including wild horse interest groups, regarding the management of wild horses through the NEPA process to implement the best possible management solutions consistent with law, regulation, and policy. |
| 13             | Concern for horses to be kept in small pens or sent to slaughter for meat.  | Vicki Skarda, Kathryn M, Cathy Scott, Kasey Wilson, Albiani, Amanda Mott, Donna March | Wild horses are not kept in small pens. The BLM’s short-term holding corrals provide ample space to horses, along with clean feed and water, while long-term holding pastures, large ranches located mainly in Kansas and Oklahoma, permit the horses to roam freely on hundreds or thousands of acres of grassland. Effects of the proposed action are described in EA section 2.2. The Department of the Interior and the Bureau of Land Management care deeply about the well-being of wild horses, both on and off the range, and it has been and remains the policy of the BLM not                     |

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|                |  |  | to sell or send wild horses or burros to slaughter, consistent with legal requirements from the Congress. As noted in a report issued in October 2008, the Government Accountability Office found the BLM not in compliance with a December 2004 amendment (the so-called Burns Amendment to the 1971 Wild Free-Roaming Horses and Burros Act) that directed the Bureau, at that time, to sell excess (unadopted or unsold) horses or burros "without limitation" to any willing buyer. Under current law, the BLM cannot sell wild horses without limitation. The bill of sale, among other things, states that the buyer agrees not to process any of the sold horses or burros into commercial products, or to knowingly sell or transfer ownership to any person or organization whose intent is to commercially process the animals. |
| 14             | Concern for horses to be subjected to horrors of being shipped.  | Vicki Skarda   | Wild horses travel with protections that come from BLM's comprehensive animal welfare program, in trucks and trailers that meet high safety standards. Horses rest at least 8 hours for every 24 hours of travel. See Appendix B.   |
| 15             | A fertility control program should be used to manage wild horses and burros in a safe and financially feasible manner. The American Wild Horse Conservation has shown that this works in the Virginia Range. | Karen R, Not Provided, Albiani, Amanda Mott  | Fertility control was not included in the Lahontan HMAP due to the small size of the HMA and an AML of 7 to 10 wild horses.   |
| 16             | BLM abuses its authority stating the (WFRHB) act as their reasoning. BLM hides behind smoke and mirrors rather than science.   | Erin Nevadan   | Opinion noted.  |
| 17             | BLM should administer (or work with AWHC to administer) birth control.   | Kathryn M, Wendy Urruty, Joann Gira, Jasmine Venkat, Dayna Chapman, Sandra Holloway, Mrs. N Lester | Fertility control was not included in the Lahontan HMAP due to the small size of the HMA and an AML of 7 to 10 wild horses.   |

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| #              | Comment   | Commenter   | BLM Response   |
| 18             | Request BLM to work with cattle ranchers to make room for both horses and cattle. | Kathryn M, Rebecca Falk   | The removal of wild horses from public rangelands is carried out to ensure rangeland health, in accordance with land-use plans that are developed in an open, public process. Implementing BLM land-use plans is the means by which the BLM carries out its core mission, which is to manage the land for multiple uses while protecting the land's resources. Since the Congress passed the Wild Free-Roaming Horses and Burros Act, livestock grazing across all BLM-managed lands has declined by about 31 percent, from 12.2 million livestock AUMs in 1971 to 8.4 million AUMs in 2022. Please reference the EA, the AUMs available in the Lahontan HMA are split equally between livestock and wild horses. Any change to livestock permits and their associated administrative management is outside the scope of this document. Any change in authorized grazing use must follow the requirements set forth in the 43 CFR Part 4100 regulations. |
| 19             | Proposed reduction is too high.   | Wendy Urruty, Cathy Scott, Janet Cools, Rebecca Shurtleff, Paula, Toni DiVincenzo, Amanda Mott, Linda Wagner, Mrs. N Lester, Rebecca Falk | The WFRHBA requires BLM to remove excess horses when it determines it is necessary to ensure a thriving natural ecological balance. AML was set in the HMAP and its reconsideration is outside the scope of the gather EA.   |
| 20             | Removal is psychologically damaging to the horses.                                | Rebecca Shurtleff   | Opinion noted.   |
| 21             | Public land is set aside for horses.  | Julie Seracuse  | Yes. Herd Management Areas (HMA) are lands under the supervision of the United States Bureau of Land Management (BLM) that are managed to include, but not for the exclusive benefit of, wild free-roaming horses and burros. The areas outside the HMAs are not designated to be managed for wild horses.   |
| 22             | Cost of removal and holding horses in facilities is too high to taxpayers.        | Julie Seracuse, Victor Martin, Brenda Myers, Tina   | The cost associated with running the wild horse and burro program is outside the scope of this document.   |

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| #              | Comment   | Commenter   | BLM Response   |
|                |   | Paxton, Cheryl Enyinnaya, Dayna Chapman, Not Provided, Nina Jackel, Linda Wagner, Saundra Holloway      |  |
| 23             | Request BLM to hire a position responsible for culling horses to desired population numbers.  | Victor Martin   | Request noted.   |
| 24             | BLM has no right to decide what is best for the horses or for the state.  | Joanna Henshaw  | Section 1333 of the 1971 Wild Free-Roaming Horses and Burros Act mandates that once the Interior Secretary "determines...on the basis of all information currently available to him, that an overpopulation exists on a given area of the public lands and that action is necessary to remove excess animals, he shall immediately remove excess animals from the range so as to achieve appropriate management levels."   |
| 25             | If the land cannot sustain herds, nature will thin the herd.  | Joann Gira, Not Provided  | See EA section 2.4. This Alternative was eliminated from further consideration in the EA because it is contrary to the WFRHBA which requires the BLM to prevent range deterioration associated with an overpopulation of wild horses. Nationally, there were an estimated 25,300 wild horses and burros in 1971, and those numbers rose to a peak of more than 60,000 before the BLM was authorized and able to effectively use helicopters for gathers. If left unchecked, nature would regulate the wild horse and burro population through the classic boom-and-bust cycle, where the population increases dramatically, food becomes scarce, and the population crashes through starvation or dehydration. |
| 26             | 7-10 horses is not a viable herd / AML too low. Increasing the AMLs is necessary to preserve a healthy and sustainable population of wild horses. | Michelle Gilmore, Amanda Mott, Linda Wagner, Saundra Holloway, Friends of Animals, The Cloud Foundation | See EA sections 3.6.8.1 Affected Environment Wild Horses Genetic Diversity and 3.6.8.2. Environmental Consequences – Wild Horses. The proposed alternative includes actions that reflect the expectation that a small herd size The AML is based on data and was set in the HMAP (Appendix F).   |

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| #              | Comment   | Commenter  | BLM Response   |
| 27             | Request BLM remove cattle instead of wild horses. | Fred G, Albiani, Tina Paxton, Donna March, Rhonda Sheward, Not Provided, Mrs. N Lester | <p>The BLM has determined that it is necessary to remove excess wild horses from the Lahontan HMA following its review of the available monitoring data. The appropriate management action is to remove the excess horses for the health of the range and for the well-being of the herd in the long run. To the extent this comment suggests that livestock grazing should be eliminated, even though resource damage is directly attributable to the wild horses, livestock grazing can only be reduced or eliminated if the BLM follows regulations at 43 CFR § 4100 and must be consistent with multiple use allocations set forth in the land -use plan. Forage allocations are addressed at the planning level. Such changes to livestock grazing cannot be made through a wild horse gather decision or through 4710.5(a), and are only possible if BLM first revises the land -use plans to allocate livestock forage to wild horses and to eliminate or reduce livestock grazing.</p> <p>Administration of livestock grazing on public lands falls under 43 CFR Subpart D, Group 4100. Additionally, livestock grazing is also managed under each District's respective RMP. Livestock grazing on public lands is also provided for in the Taylor Grazing act of 1934. Removal or reduction of livestock would not be in conformance with the existing RMP, is contrary to the BLM's multiple-use mission as outlined in the FLPMA and PRIA, and would be inconsistent with the WFRHBA, which directs the Secretary to immediately remove excess wild horses when such removal is necessary. Additionally, this would only be effective for the very short term as the horse population would continue to increase even further beyond the current overpopulation and would cause range damage even with fewer or no livestock. Eventually the HMA and adjacent lands would</p> |

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| #              | Comment  | Commenter                          | BLM Response  |
|                |  |                                    | <p>become even more degraded and would not only not be capable of supporting the wild horse populations, but would also not be able to support wildlife or other multiple uses of the public lands.</p> <p>By law, BLM is required to manage wild horses in a thriving natural ecological balance and multiple use relationship on the public lands and to remove excess immediately upon a determination that excess wild horses exist.</p> <p>BLM cannot use regulations at 43 CFR 4710.5 to manage wild horses and livestock in a manner that is inconsistent with the RMPs. A land-use plan amendment or revision would be necessary to reallocate use in this manner between livestock and wild horses.</p> <p>Livestock adjustments have been made through other actions and documents, after following the required regulatory process for grazing decisions. The purpose of the EA is not to adjust livestock use. There is no requirement of the WFRHBA or the regulations to reduce or eliminate livestock as a means to restore TNEB. Administration of Livestock grazing on public lands fall under 43 CFR Part 4100 regulations. Livestock grazing on public lands is also provided for in the Taylor Grazing act of 1934.</p> |
| 28             | Description of how BLM can provide additional water sources to reduce damage to water resources. Secure a water for wild horses. | Saundra Holloway, Joy Burk, Fred G | Provision of water sources for wild horse use is outside the scope of this proposed action.   |
| 29             | Federal funds should be used for human welfare.  | Toni DiVincenzo                    | Opinion noted.  |
| 30             | Wild horses should remain free and could be an opportunity for tourism.  | Deb, Jasmine Venkat                | Opinion noted.  |
| 31             | Request BLM to use local cowboys instead of helicopters.   | Sean Burton                        | As described in Section 2.5 of the EA, use of wranglers on horseback drive trapping to remove excess wild horses can be somewhat effective on a   |



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| #              | Comment           | Commenter  | BLM Response   |
|                |                   |  | small scale but due to the number of horses to be gathered, the size of the HMA and surrounding area, and lack of approachability of the animals, this technique would be ineffective and impractical as a substitute for helicopter trapping. Wild horses often outrun and outlast domestic horses carrying riders. Helicopter assisted roping is typically only used if necessary and when the wild horses are in close proximity to the gather site. For these reasons, this method for gathering the HMA horses was eliminated from further consideration in the EA. See EA section 2.4. |
| 32             | Leave them alone. | Deborah Fitzpatrick, Malaver Parada, Brenda Jones, Patricia Jubin, Neale Walker, Dawn Beluzar, Not Provided, Viktoria Parker, Christina Gilliland, Melanie Carney, Gretchen, Debbie Newell , Cheryl Sullivan, Amanda Mott, Not Provided, R Carter, Margaret Paddock, Keri Bailey-Gregerich, Linda Nemeth, Karen Richele Burke, Charlene Williams, Dawn Arguello, Robin Black, Cathy, Cheryl Enyinnaya, Julia DeRush, Debra Hanus, Annette Estes, Jane Hamilton, Cindy Harris, Maria, Virginia Howell, Not Provided 1, Not Provided 2, Susan Smith, Martha Wright, Lori Ugolik, Heather Mills, Linda Mutti, | Section 1333 of the 1971 WFRHBA mandates that once the Interior Secretary "determines...on the basis of all information currently available to him, that an overpopulation exists on a given area of the public lands and that action is necessary to remove excess animals, he shall immediately remove excess animals from the range so as to achieve appropriate management levels.   |

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| #              | Comment   | Commenter   | BLM Response  |
|                |   | Saundra Holloway, Kathy Weinberg, Angela Ramirez      |   |
| 33             | <p>Insufficient consideration of alternatives.</p> <p>EA dismisses several meaningful alternatives—such as adjusting livestock authorizations or more robustly using water/bait trapping in targeted areas. The EA does not explain why more moderate and targeted approaches, or smaller scale gathers over a longer timeframe, were not given stronger consideration.</p> <p>Alternatives that allow BLM to achieve a stated purpose or need must be considered. Achieving TNEB and reducing overpopulation, which presumably is to protect rangeland health, and clearly the protected animals before, during, and after roundups. There are clearly alternative actions that could be taken (e.g. reduce or eliminate livestock grazing) to preserve natural resources and to create a more sustainable and humane management plan for this herd.</p> | Carolyn Borkowski, Linda Wagner, The Cloud Foundation | <p>In EA section 2.4, ten alternatives were considered but dismissed from detailed analysis. A full analysis was completed for the proposed action and no action alternatives.</p> <p>As discussed in Section 2.4 of the EA, bait and/or water trapping is not a practical primary method for reduction of horses due to the size of the HMA and is therefore not a meaningful alternative.</p> <p>See response to comment 27 regarding adjustment of livestock authorizations.</p> |
| 34             | <p>Questionable Data on Range and Forage Degradation.</p> <p>The proposal relies on forage utilization data showing heavy use and attributing nearly all degradation to wild horses (EA Table 7). While overgrazing is a concern, the EA does not sufficiently disentangle the impacts of livestock</p>   | Carolyn Borkowski, Linda Wagner                       | Opinion noted. Professionals used standardized science-based monitoring methods to collect and analyze the data presented in the EA.  |

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| #              | Comment   | Commenter  | BLM Response   |
|                | <p>grazing, wildlife use, or other land disturbances (e.g., recreation, energy projects) from the impacts of wild horses—especially outside the HMA boundary. The National Research Council (2013) specifically advised BLM to incorporate more robust, holistic range-monitoring protocols. The range-health conclusions here appear based on limited or overlapping data that may place disproportionate blame on wild horses.</p> <p>Furthermore, the EA (Section 1.4) cites compliance with multiple use objectives under the Federal Land Policy and Management Act (FLPMA) but does not explain how livestock grazing—authorized at significant AUM levels (EA Table 5)—has been adjusted, suspended, or re-allocated in response to the same observed rangeland degradation. If the BLM truly seeks a thriving natural ecological balance (TNEB), then all major factors contributing to excessive resource use should be more comprehensively examined.</p> |  |  |
| 35             | <p>Extreme and Repetitive Helicopter Gather Methods.</p> <p>The EA indicates that multiple helicopter gathers may be used over the next several years (EA Sections 2.3 and 3.6.8.2). Although BLM cites an approximate gather-related mortality rate of below 1% (GAO 2008; Scasta</p>  | Carolyn Borkowski, Mrs. N Lester, The Cloud Foundation | The BLM's helicopter-assisted gathers are conducted humanely. See EA section 3.6.8.2 and Appendix H for a summary of expected effects of gathers. BLM gathers have proven to be more humane, effective, and efficient than other types of gather methods when large numbers of animals need to be removed over wide areas or rugged terrain, and they lead to lower rates of injury and mortality than comparable capture operations for other large ungulate species. |

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| #              | Comment  | Commenter  | BLM Response   |
|                | <p>2020), any extended or repeated helicopter pursuits inevitably increase the risk of stress, injury, and family-band disruption. Many horses currently living outside the HMA boundary have already been forced to travel long distances to find forage and water; additional helicopter pressure can exacerbate their compromised body condition, especially in times of drought or temperature extremes.</p> <p>The plan's references to humane handling standards (Appendix B and BLM's Comprehensive Animal Welfare Program) are positive. However, these do not negate the inherent risks of repeated helicopter drives over rugged terrain. Multiple scientific reviews (e.g., AAEP 2011; Greene et al. 2011) highlight that helicopter gathers can still cause severe stress to mares and foals, particularly if terrain, weather, or flight distances become challenging. Helicopter gathers are not humane.</p> |  | <p>Helicopters start the horses moving in the right direction and then back off sometimes one-quarter to one-half mile from the animals to let them travel at their own pace; horses are moved at a more rapid pace when they need to be turned or as they reach the entrance to the capture site. Helicopter pilots are better able to keep mares and foals together than horseback riders; pilots can also more effectively move the animals around such barriers as deep ravines, fences, or roads.</p> |
| 36             | <p>Genetic Viability Compromised by Over-Reduction.</p> <p>The BLM has established an AML range of merely 7 to 10 horses for the Lahontan HMA (EA Table 1). This number is extremely low and poses a serious risk of inbreeding, as recognized by both BLM's own genetic monitoring protocols (EA Section 3.6.8.1) and external genetic experts.</p>   | <p>Carolyn Borkowski, Steve Paige, Linda Wagner, Sandra Holloway</p> | <p>Genetic diversity will be monitored in the Lahontan herd, and mitigation actions will occur if monitoring indicates that is necessary. Genetics and BLM's plan for managing a small herd are discussed in the EA; see section 3.6.8.2.</p>  |

| Not Supportive |  |  |  |
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| #              | Comment  | Commenter  | BLM Response   |
| 37             | <p>Uncertain Impacts to Broader Ecosystems.</p> <p>Although the EA mentions perceived competition for resources with wildlife (EA Sections 3.6.5 and 3.6.6), it does not sufficiently address how drastically reducing the herd to below 10 total horses will influence predator-prey dynamics, vegetation composition, or the prevalence of invasive weeds. For instance, Beever et al. (2008) noted that removing horses can improve certain riparian plant communities, yet the Lahontan HMA is also subject to livestock use, motorized recreation, and other stressors. Addressing wild horse population alone, without corresponding adjustments in other uses, could lead to incomplete or misleading conclusions about long-term ecosystem health.</p> | Carolyn Borkowski  | <p>AML for this herd was set in HMAP (Appendix F). An in-depth analysis was conducted during the development of the HMAP which considered wild horses livestock and wildlife. Additional data was collected which supports the proposed gather to bring the wild horse population down to AML.</p> |
| 38             | Work with the AWHC or The Cloud Foundation.  | Eileen Groom   | This is a gather EA. Partnerships are beyond the scope of this EA.   |
| 39             | The gathering plan for the Lahontan HMA is flawed as the proposed gather boundary is 25 times the area of the HMA. Consequently, horses from the Horse Mountain HMA could wrongly be gathered as being in the Lahontan HMA.  | Richard Lemming, Robert Fleck, Karen Drennen, Janis Lovi, Shelley McKee, Christine Snow, Patricia Dangle, Linda Wagner | The areas outside of the HMAs are managed as horse-free areas. The gather area does not overlap with the Horse Mountain. HMA.  |
| 40             | The AML needs to be reassessed.  | Linda Wagner, Sandra Holloway, Rebecca Falk  | Assessment of the AML is outside the scope of this wild horse gather EA. The AML was set in the decision for the Herd Management Area Plan (HMAP) and a copy of the HMAP is in Appendix F of the EA.   |

| Not Supportive |  |  |  |
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| #              | Comment  | Commenter                                | BLM Response   |
| 41             | Need to consider impact to the horses from the Horse Mountain HMA. Move 100 horses from this HMA.  | Saundra Holloway                         | The proposed Lahontan gather area does not overlap with the Horse Mtn. HMA.  |
| 42             | BLM Must not use motorized vehicles until the annual motorized vehicles hearing releases an analysis of findings   | Wild Horse Education                     | Opinion noted. See section 1.7 external involvement for a discussion on motorized vehicle use public hearings.                             |
| 43             | BLM must formalize a welfare policy through the formal rulemaking process.   | Wild Horse Education                     | Opinion noted. See Appendix B for CAWP.  |
| 44             | Prior to a gather BLM must analyze the impacts of gathering on wild horses and burros on the animals themselves. Finally, before BLM decides to conduct any roundups, it must consider the impacts of the roundup and subsequent captivity on the wild horses. Furthermore, BLM should fully consider the impacts of its proposed action and alternatives, including the physical, social and behavior impact on wild horses.                              | Wild Horse Education, Friends of Animals | See 3.6.8.2 Environmental Consequences – Wild Horses   |
| 45             | BLM must clearly define current and site-specific foaling season.  | Wild Horse Education                     | Opinion noted. BLM does not use helicopters to gather during the peak foaling season of March 1 to June 30, in accordance with BLM policy. |
| 46             | BLM's increased management and restriction of wild horses strays from the vision of freedom and wildness that Congress sought to protect. Friends of Animals asks BLM to consider giving wild horses room to roam freely in the limited space allocated to them. Friends of Animals believes (and Congress sought) a place on our public lands devoted principally to <i>wild</i> horses that should remain free from human exploitation and manipulation. | Friends of Animals                       | Opinion noted. There is no fencing within the HMA that would prohibit herd movement.   |

| Not Supportive |  |                    |   |
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| #              | Comment  | Commenter          | BLM Response  |
| 47             | Include alternatives to limit conflicting extant uses in the HMA that have adverse impacts to the environment, such as livestock grazing, motorized recreation, hunting, energy development, and mineral development.  | Friends of Animals | Allowable uses on public lands are outside scope of this wild horse gather EA. Typically these types of designations are made in Land Use Plans.  |
| 48             | Include an alternative to increase the AML for the Lahontan HMA.   | Friends of Animals | Setting of the AML is outside the scope of this wild horse gather EA; see EA section 2.4. The AML was set in the decision for the Herd Management Area Plan (HMAP) and a copy of the HMAP is in Appendix F of the EA.   |
| 49             | Include an alternative to expand the HMA to nearby Herd Areas.   | Friends of Animals | Setting of the HMA boundary is outside the scope of this wild horse gather EA. Typically these types of designations are made in Land Use Plans.  |
| 50             | It is also imperative that BLM conduct a more thorough EA or Environmental Impact Statement that considers the positive impacts of wild horses   | Friends of Animals | The BLM's analysis is thorough and complies with NEPA, including analyzing both positive and negative environmental impacts of wild horses.   |
| 51             | In the Lahontan HMA, BLM has assigned equal amounts of animal unit month (AUMs) to livestock and wild horses, suggesting that livestock create at least as much, if not more, impact on the HMA than wild horses. In fact, BLM actually plans to gather so many horses (to the low AML) that their AUMs will be <i>less</i> than livestock grazing AUMs. | Friends of Animals | To clarify if the wild horse population was at the AML of 7-10 wild horses the forage in the HMA would be split equally between wild horses and cattle. However, in the spring of 2024 there were 510 wild horses present. See Table 5 on page 38 of the EA, wild horses are consuming 7,404 AUMs but only 120 are allocated for wild horses. |
| 52             | BLM fails to provide any scientific evidence to support the existing AML in the Lahontan HMA.  | Friends of Animals | Setting of the AML is outside the scope of this wild horse gather EA. The AML was set in the decision for the Herd Management Area Plan (HMAP) and a copy of the HMAP is in Appendix F of the EA.   |
| 53             | BLM does not disclose what analysis led to the AML's reaffirmation. Nor has BLM disclosed the information that BLM used in establishing the AMLs.  | Friends of Animals | The AML was set in the decision for the Herd Management Area Plan (HMAP) and a copy of the HMAP is in Appendix F of the EA. As outlined in the EA, the AML was determined based on an in-depth  |

| Not Supportive |  |                    |   |
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| #              | Comment  | Commenter          | BLM Response  |
|                |  |                    | analysis of habitat suitability, resource monitoring, and population inventory data following opportunities for public involvement.   |
| 54             | BLM should not proceed with the proposed action without first recalculating the AMLs based on current information.   | Friends of Animals | Setting of the AML is outside the scope of this wild horse gather EA. However, there is data analysis in the EA which demonstrates the goals and objectives within the HMAP are not being achieved because the wild horse population is over AML.   |
| 55             | BLM must perform more genetic testing before it creates a Final EA or EIS, and it should ensure that management promotes a healthy, self-sustaining, viable population of wild horses.   | Friends of Animals | Opinion noted. Genetic testing is not required to perform a gather. However, the Proposed Action includes periodic and ongoing genetic monitoring.  |
| 56             | BLM does not have authority to remove wild horses within the AML, or to issue a decision calls for the removal of wild horses based on specific population targets.  | Friends of Animals | The Lahontan horses are not within the AML. AML is 7-10 wild horses but the wild horse population in the spring of 2024 was 510.  |
| 57             | In interpreting these statutory requirements, BLM has issued guidance that in making an excess determination the authorized officer must first analyze: (1) grazing utilization and distribution; (2) trend in range ecological condition; (3) actual use; (4) climate (weather) data; (5) current population inventory; (6) wild horses located outside the HMA in areas not designated for their long-term maintenance; and (7) other factors such as the results of land health assessments which demonstrate removal is needed to restore or maintain the range in a thriving, natural ecological balance. Such determination should be made before every removal, with input from independent parties and the public. | Friends of Animals | These items are not required to make a gather decision. However, BLM used the following information to prepare the EA. (1) grazing utilization and distribution; Table 7 Forage Utilization and Census Data; (2) trend in range ecological condition; General Vegetation; (3) actual use; Livestock Grazing; (4) climate (weather) data; Diet; (5) current population inventory; Census Data; (6) wild horses located outside the HMA in areas not designated for their long-term maintenance; Aerial Survey Data |



| Not Supportive |   |                      |  |
|----------------|---|----------------------|--|
| #              | Comment   | Commenter            | BLM Response   |
|                | BLM has not provided the data to analyze these factors. BLM must provide such data to support its analysis and recirculate an EA or EIS for additional public comment.  |                      |  |
| 58             | The WHBA also mandates that BLM must consult with various individuals when deciding whether an overpopulation exists and whether to remove excess animals. Such determination must be made before every removal with the input of independent parties and the public.   | Friends of Animals   | Please reference EA sections 1.7 External Involvement and 5.0 persons, groups and agencies consulted in the EA.  |
| 59             | We strongly recommend that the BLM focus primarily on the use of water and bait trapping for gathering wild horses – especially in the warm summer months when helicopter gathers pose inherent risks and water and bait traps may be most attractive.  | Return to Freedom    | Comment noted. Consideration will be given to the comment moving forward with the EA. The primary gather techniques would be the helicopter-drive and water/bait trapping. The use of roping from horseback could also be used when necessary. |
| 60             | Disclose the breed and weight of cows that graze in and around the HMA. This site-specific information is necessary for BLM to determine forage consumption of livestock within and around the HMA and to accurately determine the impact of different range users. BLM also fails to consider the size and weight of the livestock added to the range – as stated in our scoping comments: the size and weight of cows has a direct impact on the quantify of their grazing and BLM's AUM system is shown to be out-of-date and, as announced by independent organizations, BLM under-represents | The Cloud Foundation | Please see response to comment 27.   |

| Not Supportive |   |                      |  |
|----------------|---|----------------------|--|
| #              | Comment   | Commenter            | BLM Response   |
|                | actual livestock grazing. TCF's scoping comments provided the attachments for these points.   |                      |  |
| 63             | The Animal Unit Months (AUM's) permitted for livestock (and wildlife, if any) and the <i>actual use</i> of AUMs by livestock for the HMA for <b>each of the past 10 years</b> . Averages are not helpful and fail to show grazing patterns or trajectory; additionally actual annual data is necessary to understand the range conditions.  | The Cloud Foundation | Please see response to comment 27.   |
| 64             | Disclosure of any illegal livestock grazing in or around the HMA over the past 15 years.  | The Cloud Foundation | Please see response to comment 27.   |
| 65             | Rangeland health assessments (full assessments should be provided in the Appendix) conducted over the past 15 years for all areas within the HMA – including pastures, allotments, etc.   | The Cloud Foundation | Request noted. Rangeland health assessments are not required for a gather EA.              |
| 66             | Maps that show all water sources (noting the seasons of <i>availability</i> and ownership) in the HMA, with complete information about water that is made available to livestock but fenced off from horses, or seasonal water sources including how they are regulated and the months of operation. Data is necessary to determine whether wild horses must leave the HMA to access water. | The Cloud Foundation | Figures 1 & 2 in the EA depict land status (ownership) and surface water resources.        |
| 67             | Without disclosing and analyzing the added commercial livestock for <b>each of the past 15 years</b> it is impossible to determine whether the range is in the poor condition as claimed in the EA and  | The Cloud Foundation | Livestock grazing has been within permitted use levels. Please see response to comment 27. |

| Not Supportive |   |                      |   |
|----------------|---|----------------------|---|
| #              | Comment   | Commenter            | BLM Response  |
|                | whether adding commercial livestock is the issue or wild horses.  |                      |   |
| 68             | The EA also fails to disclose and consider the quantity of livestock grazing AUMs throughout the Field and District Offices' jurisdictions compared to AUMs allocated for wild horses and burros. This must be disclosed and considered because the National Environmental Policy Act (NEPA) requires the agency to consider the cumulative effect each decision has.   | The Cloud Foundation | Please see response to comment 27.  |
| 69             | The EA claims that merely deeming wild horses are "excess" removal automatically follows. However, <i>Oregon Natural Resources Council</i> , 490 U.S. 360, 109 S.Ct. 1851 (1989) (companion case to <i>Robertson v. Methow Valley Citizens Council</i> ) outlines that federal agencies must take a hard look"  | The Cloud Foundation | The AML is based on data and was set in the HMAP (Appendix F).  |
| 71             | The courts have found that Environmental Reviews must have documentation and discussion regarding issues raised pertaining to the Proposed Action and cannot merely rely on Land Use Plans. <i>Marble Mountain Audubon Society v. Rice</i> , 914 F. 2d 179 (9th Cir. 1990) This means agencies need to consider all significant aspects of the environmental impact and inform the public about their analysis. Proposing to remove 99.9% of the wild horses is a significant actions that will not only impact this herd, but the larger wild horse population under management by the Field and District offices. | The Cloud Foundation | The RMP or Land Use Plan sets the sideboards for management and the HMAP and gather EA are in conformance with the RMP. Furthermore, the HMAP sets the AML, which the proposed gather would attain. |

| Not Supportive |  |                      |  |
|----------------|--|----------------------|--|
| #              | Comment  | Commenter            | BLM Response   |
| 72             | The EA fails to consider the possibility of accommodating more than seven wild horses—or a number above the current AML—through the implementation of range improvements (such as fencing off sensitive areas and protecting riparian zones) and/or a temporary or permanent reduction or elimination of livestock grazing pursuant to 43 C.F.R. 4710.5(a). This alternative would reduce removals and accommodate wild horses above AML by using the agency's Adaptive Management (see more below on Adaptive Management) mandate and its discretion under 43 C.F.R. 4710.3-2 and 43 C.F.R. 4710.5(a), which allows for the reduction or elimination of grazing for privately-held animals to improve conditions and forage availability for wild horses or burros. Nothing in the CFR indicates that this authority can or should only be used for “emergency” situations. | The Cloud Foundation | The WFRHBA requires BLM to remove excess horses when it determines removal is necessary to ensure a thriving natural ecological balance. Removing excess wild horses to AML helps achieve the goal of healthy rangelands including biodiversity. The AML was set in the HMAP based on multiple use data. |
| 73             | The EA fails to disclose and analyze the scientific data that is the basis of the HMA boundary and AML.  | The Cloud Foundation | Both the HMA boundary and setting of the AML are outside the scope of this document. The HMA boundary was set in the RMP and the AML was set in the HMP see Appendix F.  |
| 74             | Given that the Proposed Action includes the removal of wild horses and burros outside the HMA boundary, the DNA and EA fail to disclose and consider science/data that is the basis for the HMA boundary. The HMA boundary clearly does not take into consideration seasonal movement or why wild horses would only occur in a small island as   | The Cloud Foundation | Establishment of the HMA boundary is outside the scope of this document. The HMA boundary was set in the RMP.  |

| Not Supportive |  |                      |  |
|----------------|--|----------------------|--|
| #              | Comment  | Commenter            | BLM Response   |
|                | depicted by the current HMA boundary. While common sense makes clear wild horses would never have been confined to the configuration of the current HMA boundary. Despite TCF raising this issue in our scoping comments, the EA fails to address this important issue.  |                      |  |
| 75             | The EA fails to disclose the number and location of wild horses who were claimed to be private property (by November 15, 1973) which led to those public lands being excluded as HA status.  | The Cloud Foundation | This issue is outside the scope of this gather EA. Designations of HA and HMA boundaries are contained within the RMP.                             |
| 76             | This information must be disclosed and considered by the EA given the drastic proposal to remove 99.9% of the wild horses from the HMA and surrounding area. This herd is isolated and reduced to a BLM-created AML of just 7-10 horses – clearly not a sustainable AML.   | The Cloud Foundation | See 3.6.8.1 Affected Environment Wild Horses Genetic Diversity and 3.6.8.2. Environmental Consequences – Wild Horses. The AML was set in the HMAP. |
| 77             | The EA fails to provide for public transparency and analyze the following: <ul style="list-style-type: none"> <li>• Original documents (including census maps identifying where wild horses and burros were presently found in the 1970s) that were used to establish the boundaries for the HMA;</li> <li>• BLM justification (data and science) that supports the boundaries for the HMA;</li> <li>• BLM justification (data and science) that establish the original AML and science and data that supports the current AML;</li> </ul> | The Cloud Foundation | This issue is outside the scope of this gather EA. That information is contained within the RMP or HMAP  |

| Not Supportive |  |                      |  |
|----------------|--|----------------------|--|
| #              | Comment  | Commenter            | BLM Response   |
|                | <ul style="list-style-type: none"> <li>• Original documentation that established the zeroing out HAs in the Carson City District.</li> </ul>   |                      |  |
| 78             | <p>Additionally, the Proposed Action includes removal of wild horses to low AML, but to implement that action, the EA must and fails to provide the data that is the basis for the AML. The EA must and fails to provide and consider the following:</p> <ul style="list-style-type: none"> <li>• Data and science that supports the boundary for the HMA;</li> <li>• Original documents that established the boundary for the HMA;</li> <li>• Data and science that is the basis of AML; and</li> <li>• Original documents that established AML.</li> </ul> | The Cloud Foundation | This is a gather EA. An RMP amendment and/or development of a new HMAP are beyond the scope of this document.  |
| 79             | Given the purpose of the Proposed Action is to preserve and maintain a Thriving Natural Ecological Balance (TNEB), the EA must and fails to consider and review the rangeland health assessments conducted over the past 10 years for all areas within the HMA – including pastures, allotments, etc. and recent rangeland health assessments for grazing in and around the HMA. BLM includes 8 appendices to the EA yet fails to provide the most recent rangeland health assessments for grazing allotments in and around the HMA.                         | The Cloud Foundation | Rangeland health assessments are not required to conduct a wild horse gather. Data that documents the resource damage that is occurring due to exceeding AML are included in the EA. |
| 80             | The EA p28 claims that:<br><i>Further, this alternative was not brought forward for analysis because it is inconsistent with the 2001 Carson City</i>  | The Cloud Foundation | This is a proposed gather EA not an RMP amendment, which would be required in order to implement the alternative referenced.   |

| Not Supportive |   |                      |   |
|----------------|---|----------------------|---|
| #              | Comment   | Commenter            | BLM Response  |
|                | <p><i>Field Office Consolidated Resource Management Plan (CRMP) and the WFRHBA which directs the Secretary to immediately remove excess wild horses where necessary to ensure a thriving natural ecological balance and multiple use relationship.</i></p> <p>This is not in conformance with BLM's Adaptive Management policy.</p>   |                      |   |
| 81             | <p>The EA is required to and fails to consider the cumulative impacts of the Proposed Action – which includes consideration of the <b>actual use</b> of livestock grazing <b>throughout the Carson City District Office's jurisdiction</b>; specifically, livestock usage must be compared to AUMs allocated for wild horses.</p>   | The Cloud Foundation | This is a proposed gather EA not an RMP amendment nor an HMAP.  |
| 82             | <p>The EA fails to disclose and consider cumulative impacts that will result from the Proposed Action. The data will show that wild horses are a minority grazer on BLM-managed public lands managed by the Sierra Front Field and Carson City District Offices. The EA fails to disclose and analyze the permitted and <b>annual actual use</b> of livestock grazing <b>throughout the Field and District Office's jurisdiction</b>.</p> | The Cloud Foundation | Cumulative effects for these are discussed under 3.6.1.3 Environmental Effects – Livestock Grazing and 3.6.8.3 Environmental Effects – Wild Horses. Opinion noted. This is a gather EA a RMP amendment and development of a new HMAP are beyond the scope of this document. |
| 83             | <p>Proposing to reduce this herd to just 7-10 wild horses knowing it is an isolated population fails to humanely manage these horses as a self-sustaining herd. The cumulative impacts of the Proposed Action on wild horses and livestock must be disclosed and analyzed.</p>  | The Cloud Foundation | This is a gather EA proposed to attain AML. BLM is not setting AML, the AML was set in the HMAP see Appendix F.   |

| Not Supportive |   |                      |  |
|----------------|---|----------------------|--|
| #              | Comment   | Commenter            | BLM Response   |
| 84             | EA fails to analyze adaptive management to increase AML. The EA fails to take a critical look at the goals and objectives outlined in the Resource Management Plan (RMP). BLM's Adaptive Management (AM) mandate specifically instructed the agency <i>how</i> to treat RMPs:   | The Cloud Foundation | Opinion noted. This is not an RMP amendment. The AML was established in the HMAP.  |
| 85             | The EA cannot merely state that the issues herein are "outside the scope" of the EA and ignore them claiming all goals and objectives have been predetermined by the RMP. The National Environment Policy Act (NEPA) requires that the BLM consider the human environment. Therefore, when the EA re-examines the RMP goals and objectives it must consider the "human environment".  | The Cloud Foundation | Opinion noted. HMA management goals and objectives were set in the HMAP consistent with the RMP. This is not an RMP amendment. |
| 86             | The BLM must consider and analyze the societal opposition to the removal of horses. Over the past few years, the BLM has received hundreds of thousands of letters from American citizens opposing roundups and in favor of reform to the Wild Horse and Burro Program. This includes a shift away from roundup and removal and a move toward on-the-range management of wild horses and burros, as well as favoring re-slicing the resource allocation pie (AUMs) to give horses and burros a fairer share of the land resources by decreasing or eliminating livestock grazing in HMAs. | The Cloud Foundation | This is a gather EA proposed to attain AML. BLM is not setting AML, the AML was set in the HMAP see Appendix F.                |



| Not Supportive |  |                      |  |
|----------------|--|----------------------|--|
| #              | Comment  | Commenter            | BLM Response   |
| 87             | The EA cannot claim that re-allocating livestock AUMs [to wild horses/burros] would not achieve a thriving natural ecological balance because wild horses/burros graze year-round. This is not based on science, and should the BLM authors elect to use this rationale the EA must provide the scientific data that supports this premise -- the site-specific data that supports this premise -- and the data and criteria utilized to differentiate livestock usage impact from wild horse/burro impacts. | The Cloud Foundation | This is a gather EA proposed to attain AML. BLM is not setting AML, the AML was set in the HMAP see Appendix F.                                      |
| 88             | The EA fails to include requirements to adequately address the protection of wild horses/burros during all management actions. The BLM's "Comprehensive Animal Welfare Program (CAWP)" is woefully inadequate in establishing humane standards for the treatment of wild horses and burros during a roundup. It must go further in its protection of these animals.  | The Cloud Foundation | Opinion noted. Please reference Appendix B in the EA.  |
| 89             | The EA fails to disclose and consider the public comments received during scoping. The EA must consider the interests of those who cherish the opportunity to observe, photograph, read about and otherwise enjoy wild horses, their natural behaviors, along with the wild burros living in and around the Lahontan HMA.  | The Cloud Foundation | BLM received and considered public scoping comments during the development of the EA. There are no wild burros living in or around the Lahontan HMA. |

| Not Supportive |   |                      |  |
|----------------|---|----------------------|--|
| #              | Comment   | Commenter            | BLM Response   |
| 90             | The EA fails to include meaningful public observation of government activities at wild horse/burro roundups.  | The Cloud Foundation | Opinion noted. Please reference the EA at Section 2.2 and Appendix E for standard public observation opportunities that will be provided. There are no burros within this HMA or proposed to be removed under this action.   |
| 91             | BLM's failure to consider the social acceptability/preferences of how they treat and manage wild horses/burros during roundups. Under NEPA, "agencies are required to determine if their proposed actions have significant environmental effects and to consider the environmental and related social and economic effects of their proposed actions."<br>Reduce adverse impacts to members of the public who have recreational, emotional, and aesthetic interests in these animals and their welfare. | The Cloud Foundation | Comment noted. See EA section 3.6.11.  |
| 92             | All removal operations must be located on public lands to provide meaningful public observation of all activities. No government operations should be located on private lands for which the owners will not give permission for public observation of activities.  | The Cloud Foundation | Comment noted. As outlined in section 2.2 of the EA, observation locations are selected to reduce safety risks to the public, the wild horses, contractors, and BLM staff. As feasible, observation locations would be located near gather or holding sites, although safety, gather efficiency, terrain, and land status factor into how close observation locations will be. |
| 93             | BLM must reassess the current boundary of the HMA given it is more likely than not that this is not the natural area that would support a healthy horse population.   | The Cloud Foundation | Modification of the HMA boundary would require a RMP amendment and is outside the scope of the gather EA.  |
| 94             | Stakeholders may participate in the setting of goals, design of experiments, monitoring and interpretation of results, and adjustment of management practices   | The Cloud Foundation | This EA is proposing a wild horse gather to achieve the management goals identified for the Lahontan HMA in the HMAP (Appendix F in the EA), management is consistent with the RMP. Public   |

| Not Supportive |  |           |  |
|----------------|--|-----------|--|
| #              | Comment  | Commenter | BLM Response   |
|                | to various degrees that depend on the situation. |           | involvement is incorporated into the gather EA and was part of the creation of the HMAP and RMP. |

| Supportive |                                     |  |  |
|------------|-------------------------------------|--|--|
| #          | Comment                             | Commenter  | BLM Response                               |
| 95         | Support herd size reduction/gather. | PJ White, Brent Tucker ,<br>Not Provided, Zachary Manha, Maureen Jefferson, Curtis Hutchinson, James Glover, Marcial Evertsen, Dave Emmons, Forrest Cross, Daniel Coyne, Betty Savini, Brad Pillsbury, Theo McCormick, Jake, John Hill, Frank, George Forbush, Ryan Sexton, Ashton Caselli, Nathan Walton, Alexa Walton, Daniel Walton, Julia Laca, Mike Walton, Stephen Walton, Lou Benetti, Not Provided (4/16/25), Maureen Jefferson, Max Lyon , Chris Oberman, Tom Riggins , Not Provided 4-16-25, Greg Ackerman, Mary Talbott, Cassidy Talbott, Daniel Coyne, Christine Mills, Jason Molina, Gary Johnson, Cody Knight, Samatha Forbush , Not Provided 4-11-25, Not Provided 4-12-25, Not Provided 4-27-25, | Support noted. Thank you for your comment. |

| Supportive |   |   |   |
|------------|---|---|---|
| #          | Comment   | Commenter   | BLM Response  |
|            |   | Churchill County Board of Commissioners, Nevada Department of Agriculture   |   |
| 96         | Horses have negative impacts on (native) wildlife.  | PJ White, Jim White, Andrew Shuman, Travis Lamborn, Forrest Cross , Natasha Zittel, Jake , John Hill, Frank, Nathan Walton, Alexa Walton, Daniel Walton, Julia Laca, Mike Walton, Stephen Walton, Lou Benetti Chris Oberman | Comment noted. Current conditions of wildlife and their habitat are described in the EA.                                |
| 97         | Need for more areas in Nevada to be addressed.      | Brent Tucker , Not Provided, Zachary Manha  | Wild horse management throughout the state of Nevada is outside the scope of this document. Thank you for your comment. |
| 98         | Want to see horse levels at appropriate numbers.    | Andrew Shuman, Natasha Zittel, Nevada Department of Agriculture   | Comment noted.  |
| 99         | Feral/wild horses are degrading ecosystems/habitat. | Not Provided, Don Halterman , Wes Coons , Natasha Zittel, Theo McCormick, Jake , Frank, Nathan Walton, Alexa Walton, Daniel Walton, Julia Laca, Mike Walton,  | Comment noted. Consideration will be given to the comment moving forward with the EA.                                   |

| Supportive |  |  |   |
|------------|--|--|---|
| #          | Comment  | Commenter  | BLM Response  |
|            |  | Stephen Walton, Lou Benetti                            |   |
| 100        | The 1971 (WFRHB) act needs to be altered for effective management of horses.   | Not Provided   | Revision of the WFRHBA is outside the scope of this document.                         |
| 101        | BLM needs to manage the herds.   | Zachary Manha , Travis Lamborn, Wes Coons              | Support noted. Thank you for your comment.  |
| 102        | Supportive of sterilization  | Maureen Jefferson, Stacy Bousquet, Vicki Skarda, Frank | Sterilization of WHB is outside the scope of this document.                           |
| 103        | Annual herd management assessments to ensure numbers stay below capacity.  | Maureen Jefferson                                      | Comment noted.  |
| 104        | Supportive of lethal removal.  | Justin J , Nick Brooks                                 | Outside scope of this document.   |
| 105        | Horses seem skinny and unhealthy.  | Daniel Coyne   | Comment noted. Consideration will be given to the comment moving forward with the EA. |
| 106        | Wild horses in this area pose a significant risk to human life due to proximity to high speed roadways and it is not practical to fence them out.  | Not Provided   | Comment noted. Consideration will be given to the comment moving forward with the EA. |
| 107        | Threat to domestic horses and property   | Sarai Angelle  | Comment noted. Consideration will be given to the comment moving forward with the EA. |
| 108        | Negative impact of wild horse population above AML on habitat and water sources.   | NDOW   | Comment noted. Consideration will be given to the comment moving forward with the EA. |
| 109        | Supports efforts to bring population to AML  | NDOW   | Comment noted. Consideration will be given to the comment moving forward with the EA. |
| 110        | Supports other population control methods.   | NDOW   | Comment noted. Consideration will be given to the comment moving forward with the EA. |
| 111        | Recommends reevaluating rangeland conditions and adjust AML accordingly.   | NDOW   | AML was set in the HMAP and adjustment is outside the scope of this proposed action.  |
| 112        | Maybe you should reach out to states like Montana where horses are wildly sought they will gather them up and keep them if you post them for free I'm sure some Nevada ranchers would jump on the idea | Delana Watts   | Comment noted. Consideration will be given to the comment moving forward with the EA. |

| Supportive |   |                                  |  |
|------------|---|----------------------------------|--|
| #          | Comment   | Commenter                        | BLM Response   |
|            | of you catch them you keep them free round up   |                                  |  |
| 113        | <p>When you remove some wild horses in the Silver Springs area make sure you get the buckskin stallion that is seen around the Citrus and Deodar street areas. He has been fed by some homes in the past. He now rummages through garbage cans and has become a pest. He has been seen threatening people out for a ride on their horses. He screams over the fence to my 24 year old mare.</p> <p>There are several stallions in the area that fight and chase each other. All coming back to the house that used to feed them. They fly around the area chasing each other and are a danger to drivers and people on horseback.</p> <p>Please remove the stallions!</p> | Not Provided                     | Comment noted. Consideration will be given to the comment moving forward with the EA.                      |
| 114        | <p>The NDA recommends the use of fertility control (e.g., PZP, SpayVac, GonaCon, or other approved agents) to slow population growth rates to maintain a four-year gather cycle at minimum (longer cycles preferred). The use of immunocontraception shall be done in a manner to ensure maximum efficiency, including the administration of boosters, even if this means holding treated horses off-range for additional weeks to allow for the correct administration of boosters. Specifically, NDA-preferred fertility control is the use of SpayVac and GonaCon.</p>   | Nevada Department of Agriculture | Due to the AML, use of contraceptives was not included in the HMAP.  |
| 115        | Analyze the use of fertility control agents upfront and coupled with this gather plan.  | Return to Freedom                | Alternatives considered but dismissed (Alternative 4 & Alternative 9) in the EA included exclusive methods |

| Supportive |  |                                  |  |
|------------|--|----------------------------------|--|
| #          | Comment  | Commenter                        | BLM Response   |
|            | A multi-faceted approach to wild horse management must include some removals, some on-range fertility control (via darting and/or bait/water trapping), and/or some gather-administer-release fertility control (as can be optimized during a well-supported and -resourced gather operation). These modalities should not be implemented only when AML is achieved, but as a way to begin stabilizing the population immediately while methodically working towards lowering populations, where applicable. |                                  | for population control. The HMAP acknowledged various forms of contraceptives (strategic plan) may be used to slow the rate of population increase. However, due to the low number of horses that the HMA is capable of supporting contraceptives were not considered as part of the HMAP management plan. |
| 116        | NDA suggests adjusting the sex ratio of studs to mares. Adjusting the sex ratio to 70/30 males/females as needed during gathers pending monitoring results will slow population growth across the HMA.   | Nevada Department of Agriculture | Due to the AML, adjusting sex ratios was not included in HMAP.   |