

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

**OFFICE:**

Rawlins Field Office

**TRACKING NUMBER:**

DOI-BLM-WY-D030-2025-0074-DNA

**PROPOSED ACTION TITLE/TYPE:**

2025 Wild Horse Gather in the Adobe Town Herd Management Area

**LOCATION/LEGAL DESCRIPTION:**

Adobe Town Herd Management Area, South Central, Wyoming

(Townships 12N-17N, Ranges 96W-92W)

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

The Proposed Action is to gather and remove excess wild horses from the Adobe Town Herd Management Area (HMA) to the low Appropriate Management Level (AML) of 259 wild horses. After the draft was published it was determined that there would be no fertility control used during this round up.

A population survey was completed for the Rawlins portion of the Adobe Town HMA from November 8th, 2024, to November 20th, 2024, and found that there were 1612 wild horses present in the HMA and surrounding lands both public and private outside the boundaries of the HMA at that time. Considering an estimated annual growth rate of 20%, the estimated number of wild horses within this HMA in 2025 is 1934 animals.[1] Based upon all information available at this time, the BLM has determined that 1675 excess wild horses[2] are present within the Rawlins portion of the Adobe Town HMA and adjacent lands including private lands and need to be removed to maintain a thriving natural ecological balance within this area. 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, White Mountain and Little Colorado Herd Management Areas.* ( The difference between the March 27, 2025 Press Release and the current numbers is due to the original count including the Rock Springs zero out portion in the count )

## **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.

Date Approved: May 8, 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 Adobe Town HMA and manage AML in accordance with MA009.” (BLM 2023, pg. 14, MA005)*

“Adobe Town:

- Acres: 23,600 Private, 6850 State, 347,924 BLM TOTAL ACRES: 378,924
  - AML: 259-536
- Livestock AUMs for the Adobe Town HMA: 24,789

*“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 “2020-0005-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 “2013-0001-RMP-EIS”): *Proposed Resource Management Plan Amendment and Final Environmental Impact Statement for Wild Horse Management for the BLM Rock Springs and Rawlins Field Offices.* The

- 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 both Alternative II and Alternative III of 2020-0005-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 2020-0005-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 Adobe Town 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 Adobe Town HMA. No other circumstances would require additional analysis 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 reduced the size of the Adobe Town HMA, and changed the AML from 610-800 to 259-536.

These changes in wild horse management in the Rock Springs and Rawlins Field Offices would not affect the validity of analysis related to the Adobe Town HMA., so there would be no additional impacts to this herd, outside of what has already been analyzed. Overall, the analyses provided in 2013-0001-RMP-EIS and 2020-0005-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 much higher-than-average snowfall in the Adobe Town HMA. Some areas saw very high winter mortality rates for mule deer and pronghorn; however, larger animals such as elk did not experience these high mortality rates. Wild horses in the Adobe Town HMA appeared to weather the winter without experiencing abnormal death loss. Body conditions of the wild horses were observed to be good throughout the winter. Additionally, there was no evidence of high mortality rates in the HMA, with only four wild horse deaths discovered in the spring that were attributed to winter conditions. Overall, the death rate for this herd did not appear to be any 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 analysis found in 2020-0005-EA.

analysis. The BLM responses are summarized in Appendix A Summary and Discussion of Public Comments

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


<b>Name</b>	<b>Title</b>	<b>Agency</b>	<b>Resource Represented</b>
Ed Vandenburg	Wild Horse Specialist	BLM	Wild Horses
Mike Murry	Range Specialist	BLM	Rangeland Management
Kirk Warrington	Planning and Environmental Coordinator	BLM	NEPA Compliance
Tim Novotny	Field Manager	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  
Signature of NEPA Coordinator  
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