

ENVIRONMENTAL ASSESSMENT

Bureau of Land Management
Ridgecrest Field Office
Regional Wild Horse and Burro Holding and Adoption Facility
Ancillary Facilities, Expansion and Improvements

DOI-BLM-CAD-05000-2011-029-EA

U.S. Department of the Interior
Bureau of Land Management
Ridgecrest Field Office
300 South Richmond Road
Ridgecrest, California 93555

This document will identify the ancillary facilities in support of the Ridgecrest Regional Wild Horse and Burro Holding and Adoption Facility and the analysis of site specific impacts of expanding and improving the facility. The expansion will improve the ability manage the number of wild horses and burros which typically averages 600-700 animals year round and up to 1,400 animals between late fall and early spring. Improvements include the construction of wind breaks to help control, manage and contain the manure within the boundaries of the facility, shade structures and the placement of a helispot. The project area was reviewed by Bureau of Land Management staff specialists, with respect to the proposed action and alternatives.

I. INTRODUCTION

The Ridgecrest Regional Wild Horse and Burro Holding and Adoption Facility (Ridgecrest WHB Facility) was established in 1982, through cooperation with the China Lake Naval Air Weapons Station and Death Valley National Park. The facility functions as a holding, preparation and adoption center for wild horses and burros removed from rangelands throughout the west, mainly from the states of California, Nevada and Arizona.

The Ridgecrest WHB Facility is located in the upper western Mojave Desert of southern California in San Bernardino County (See Illustration 1 and Illustration 2 Vicinity Maps). From the town of Ridgecrest, the facility is located 4 miles to the east at the intersection of Highway 178 (Trona Road) and Randsburg Wash Road. The Public Land Survey System legal description for the Ridgecrest WHB Facility is: Mount Diablo Meridian (MDM); Township 27 South, Range 41 East, Section 5 NWSW; Section 5 SWSW; Section 5 W1/2 NESW (China Lake NAWS); Section 6 E1/2 NESE; and Section 6 E1/2 SESE (See Illustration 3). The facility is about 67 acres in size and can accommodate 1,400 wild animals.

Visitors to the facility enjoy the opportunity to view and adopt animals on site.

II. PURPOSE AND NEED

Removals of wild horses and burros have always been a vital part of the management for these animals since the passage of the 1971 Wild Free-Roaming Horses and Burros Act. As a regional facility, we are requested to accommodate a large number of wild horses and burros removed from rangelands in the west. The winter months are typically the peak for gathered animals. The facility can accommodate 1,400 wild animals.

The expansion will enable better control, management and segregation of animals according to their removal areas, species (horse or burro), age, sex and health until the animals are freeze branded, vaccinated, wormed and blood drawn for coggins test, so they can be mixed with the general population. Reduced number of animals in each pasture reduces the stress of animals and provides additional space for animals coming in from the range.

The Nutrient and Medical Waste Management Plan for the Ridgecrest WHB Facility completed in Fiscal Year 2009 identified that wind fencing shall be constructed on the north east portion of the manure stock pile to help contain the manure within the boundaries of the facility. The plan also address the disposition of dead animals at the facility. The existing bone yard is filled to capacity. The expansion would allow for a new bone yard.

Pasture and holding pen shade structures would provide cover during hot and inclement weather for the animals.

Shade structure for the round pen will allow the wrangler crew to perform wild horse and burro preparation tasks during hot and inclement weather.

The helispot would provide the opportunity to have a helicopter stage at the Ridgecrest Facility when conducting wild horse and burro gathers for the Centennial, Slate Range and Panamint Herd Areas. These gathers require close coordination with the China Lake Naval Air Weapons Station (NAWS) for clearances with China Air Traffic Control, vehicle and gather personnel access onto the military facility. Currently, the helicopter, fuel truck driver and China Lake NAWS personnel meet at the Inyokern Air Port, 20 miles from the facility. This has created logistical problems in the past. The ability to have all personnel at the Ridgecrest Facility provides for increased safety, better coordination and understanding on how the gather operations shall be conducted for that day on the military installation, especially when there are changes to scheduled weapons testing.

The Ridgecrest area is included in an area classified by the EPA as non-attainment of the National Ambient Air Quality Standards for PM10 (small particulate matter) emissions. The area classified as non-attainment includes the Indian Wells Valley, Rose Valley and Searles Valley and is called the Searles Valley PM10 Planning area. A SIP (State Implementation Plan) has been prepared which addresses sources of emissions and lays out a plan of action to reduce emissions to acceptable levels. The SIP inventory included emissions from the Ridgecrest Facility. Identified emission problems include direct fugitive dust from the site and emissions caused by silt and debris carried onto the roads by wind and water. The proposed actions include the actions identified in the SIP to reduce PM10 emission from the Ridgecrest Facility. These actions have been addressed and identified in the Bureau of Land Management Ridgecrest Resource Area Wild Horse and burro Holding Facility Expansion and Improvement; CA-065-NEPA-94-26. These include:

A. Artificial Windbreaks

Artificial windbreaks in the form of snow drift fences will be constructed on the outer edge of the perimeter road along the eastern and northeastern side of the facility. There will be approximately 1,400 linear feet and a maximum of 8 feet tall fencing that will act as a drift fence to collect wind blown debris on the lee side of the windbreak. The debris deposition area on the lee side of the drift fence would be cleared of vegetation for 40 feet. The collected debris will be removed by a tire mounted front end loader and placed into a manure pile.

B. Vegetative Windbreaks

An area extending 100 feet away from the existing and proposed fence line along the west and south side of the facility will be used to plant rows of drought tolerant trees and shrubs (See Appendix 3 for list of potential plant species). A deep-root drip irrigation system will be used to supply them with water. The vegetative wind break on the south end of the facility may be planted south of Contel's right-of-way. If this happens, a pipeline for the irrigation system will be placed two feet under ground through Contel's right-of-way. No trees or shrubs will be planted in the right-of-way. Holes will be dug by an auger and shovel to plant the trees and shrubs. A ditch witch will be used to dig trenches for the water pipeline that will be placed in by hand one to two feet underground. The line will have the capability to be drained periodically.

C. Manure Disposal

Wind deposited manure and debris will be stock piled by a tire mounted front end loader in an area of approximately 35 feet wide and 900 feet long, that parallels the outer edge of the debris deposition area from the eastern drift fence (See Fig. 6). The manure will be disposed of in an appropriate manner. If manure from the stock piles should start to drift, a barrier or windbreak will be erected.

D. Dust Free Parking Lot and Entrance Ways

Treatment to the soil surface of public access ways and the parking lot of the facility to reduce dust emissions into the air by vehicle traffic will be evaluated. If it is necessary to treat the soil surface, asphalt or dust palliatives will be considered.

The proposed expansion identifies additional wind breaks/snow fencing to help control, manage and contain the manure within the boundaries of the facility.

The Right-of-Way grant is being amended to include the Ancillary Facilities and become official record for the Ridgecrest WHB Facility.

The plat map for the Ridgecrest WHB Facility (See Attachment 1) does not accurately have the boundaries for the facility identified. The historical reference for the plat map for the wild horse and burro facility can be located on page 4 on attachment 1. The proposed action and alternatives address submitting an Application for Transportation and Utility Systems and Facilities on Federal Lands which will amend the existing authorization CACA 35423 (Wild Horse and burro Hold Facility) and update the plat map, identifying the current facility, associated ancillary facilities and if the decision to expand is chosen, will include the expansion area (See Attachment 2) including the proposed ancillary facilities.

The improvements are necessary to maintain a positive image to the public.

III. AUTHORITY AND PLANNING CONFORMANCE

1. California Desert Conservation Area Plan – 1980; Land Class L (limited).
2. Codes of regulations in handbook of "Maintenance and Care of Wild Horses and Burros".
3. The Searles Valley PM10 Planning Area State Implementation Plan.
4. Mojave Desert Air Quality Management District rule 403.1 Respirable Particulate Matter (PM10).
5. Environmental Assessment: Bureau of Land Management Ridgecrest Resource Area Wild Horse and Burro Holding Facility Expansion and Improvement; CA-065-NEPA-94-26.
6. Bureau of Land Management Ridgecrest Wild Horse and Burro Holding and Adoption Facility Nutrient and Medical Waste Management Plan, 2009.
7. Memorandum of Agreement between Commander, Navy Region Southwest and Bureau of Land Management, Ridgecrest Field Office signed May 25, 2010.
8. Memorandum of No Affect to the desert tortoise or critical desert tortoise habitat.

IV. PROPOSED ACTION AND ALTERNATIVES

Standard Operating Procedures (SOP's) for the Proposed Action and Alternative 1:

A. Air Quality:

The current levels and projected increase in particulate matter emissions will need to be compensated by reducing the fugitive dust emissions at other sites. This may involve reductions in ORV use in open areas and stricter guidelines on mining operations.

B. Wildlife Protection: The stipulations listed will be followed.

1. A survey for desert tortoises and their burrows in the area of the proposed actions will be conducted 24 hours prior to construction. If any burrows are found, these will be flagged and avoided by machinery.
2. Should tortoises be encountered that cannot be avoided by construction activity, BLM biologist will contact the USFWS, and all activity that affects that tortoise will be stopped until the consultation can be completed. If the tortoise moves out of danger, activity may resume. Without a Formal consultation, tortoises affected by this project cannot be handled.
3. All employees shall be made aware of the status of the desert tortoise, penalties for "take", and the stipulations to be followed for this project.
4. There will be no removal of vegetation unless essential for the operation.
5. Vehicles will move only after checking underneath for tortoises. Tortoises will not be handled or approached, but will be allowed to move off the road on their own.
6. Vehicles will use existing roads where available and travel cross country only when needed and while keeping an eye out for tortoises. Except on county-maintained roads, vehicle speeds shall not exceed 20 miles per hour.
7. Garbage shall be kept in closed containers to discourage ravens from coming to the site.
8. All dogs shall be restrained on leashes or enclosures.
9. All trenches or post holes left unattended shall be covered to prevent any wildlife from falling in.
10. Rodent and other burrows will be avoided during construction where possible, especially when flagged.

3. Cultural/Paleontological Protection:

All ground disturbing activities must be confined to the areas identified as the proposed project area and inventoried as described above. Additional cultural resource inventory will be required if the project area boundaries are modified. In the event that cultural or paleontological resources not previously identified are encountered during development activities and surface disturbance, operations in the vicinity of the discovered resources shall cease immediately and the BLM archaeologist will be notified. The BLM will, as appropriate, evaluate the significance of the site and determine the need for mitigation. The authorization to resume work will be issued by the Field Office Manager upon determination of mitigation needs.

1. Proposed Action: Amend Right-of-Way Grant for Ancillary Facilities associated with the Ridgecrest WHB Facility, Develop Improvements for the Existing Facility and Expand Facility – 6 pastures (Preferred Action):

A. Ancillary Facilities for the Ridgecrest WHB Facility:

The Memorandum of Agreement between Commander, Navy Region Southwest and Bureau of Land Management, Ridgecrest Field Office (See Attachment 3), identifies under Part 4: Agreement; Sub Part a: Responsibilities; Item 2 - c2: The Bureau of Land Management shall be responsible for the operating and maintenance of the 50 acre corral facility used to hold captured horses and burros for adoption.

The plat map for the Ridgecrest WHB Facility does not accurately have the boundaries for the facility identified. An Application for Transportation and Utility Systems and Facilities on Federal Lands will be completed and submitted after the Decision Record DOI-BLM-CAD-05000-2011-029-EA is signed. This will amend the existing authorization CACA 35423 (Wild Horse and Burro Hold Facility) and update the plat map, identifying the current facility, associated ancillary facilities and the proposed expansion area including the proposed ancillary facilities.

The following existing ancillary facilities will be amended into the right-of way grant:

1. Legal description from the Public Land Survey for the facility is:
T27S, R41E, Sec 5, NWSW; T27S, R41E, Sec 5, 1/2W NESW;
T27S, R41E, Sec 5, NW SWSW; T27S, R41E, Sec 5, NWNE SWSW
T27S, R41E, Sec 6, NE SESE; T27S, R41E, Sec 6, 1/2E NESE.
2. Buildings/Compound:
 - (a) WHB Office
 - (b) Salt Wells Fire Station
 - (c) Public Parking
 - (d) Chute-Preparation Area
 - (e) Shop/Garage
 - (f) Fueling Station (Diesel Tank)

- (g) Hay Storage
 - (h) Multipurpose Shade Structure
 - (i) Holding Pen / Saddle Horses Corral Shade Structures
3. Electrical Lines.
 4. Phone Lines.
 5. Perimeter Road, Pasture Fencing, Holding Pens, Bone Yard, Manure Disposal Site and Shade Structures.
 6. Water lines, Storage Tanks and Troughs.

B. Proposed Improvements for Ridgecrest WHB Facility:

The following proposed ancillary facilities will be amended into the right-of way grant (See Illustration 4):

1. Pasture Shade Structures:

As funding provides, a 40 ft. (W) X 100 ft. (L) X 18 ft. (H) (approximate specifications) shade structures will be erected within the existing pastures. The structures would be designed and constructed to meet or exceed San Bernardino County and BLM engineering specifications. The shade structures would be made up of steel posts and steel framing to support a heavy gauged shade cloth. These structures would be installed via a contract.

2. Round Pen Shelter:

As funding provides, a 100 ft. (W) X 100 ft. (L) X 18 ft. (H) open sided shade shelter will be constructed over the round pen of the existing facility. The structure would be designed and constructed to meet or exceed San Bernardino County and BLM engineering specifications. The shelter would be made up of steel posts and steel framing to support a metal roof. These structures would be installed via a contract.

3. Manure Drift Fence

A 9 gauge, 1 inch mesh, 8 foot high chain link fence or a 3-4 foot tall x 2-3 wide x 5-6 feet long cement barriers will be constructed/placed on the northeastern portion of the manure stock pile, approximately 650 feet east-west and 450 feet north-south linear feet, to decrease wind blown debris from leaving the manure disposal area.

The equipment to install the chain link fence or the cement barriers may need to blade the perimeter of the manure stock pile to clear the site of debris and shrubs. This would not be more than 5 feet wide and no more than 5 inches of top soil disturbance. The shrubs and debris will be deposited at the manure stock pile and the top soil will be separated and spread back to where it was scraped from.

If the chain link fence is selected, a tractor equipped with an auger will be used to dig 2-3 feet deep holes for the placement of steel posts. The posts will be placed in the hole and set in concrete as each hole is dug. The concrete would be mixed on site and poured into the holes as needed. The fence would be installed via a contractor and the contractor would be responsible for clean up and disposal of any unused material. There would be no holes left open during the building process.

4. Helispot:

A 30 ft. x 30 ft. helispot for the landing of type 3 - medium helicopters and type 4 - light helicopters (i.e. Bell 206 and Bell 47, respectively) will be located at the northwest section of the existing facility. The helispot would be identifiable with marked touch down pads.

This helispot will have a Project Aviation Safety Plan which will address aviation policies and procedures contained in the Departmental Manual, Bureau Aviation Manual, Bureau of Land Management California Aviation Management Plan and the Interagency Helicopter Operations Guide (IHOG). The following items would be addressed in the plan:

1. Wind Indicators.
2. Placement of fire extinguisher(s)
3. Dust Abatement
4. Approach-Departure Path.
5. Touchdown Pads and Safety Circles.
6. Vehicle Parking and Movement.
7. Security.
8. Personnel and Cargo Staging Areas.
9. Signing. Post warning and informational signs (helispot, no smoking, etc.) as appropriate.

C. Facility Expansion - 6 Pastures:

The following proposed expansion and associated ancillary facilities will be amended into the right-of way grant:

Land Status and legal description from the Public Land Survey for the proposed pasture expansion is:

T27S, R41E, Sec. 5, NE SWSW (BLM); T27S, R41E, Sec. 5, SW SWSW (BLM); T27S, R41E, Sec. 5, NW SE SWSW (BLM); T27S, R41E, Sec. 6, SE SESE (BLM) – See Illustration 5.

The southern portion of the facility would be extended to the south up to 600 feet and 1,600 feet east-west. This expansion would create 6 new pastures measuring 200ft by 800ft each. The expansions is planned to be built in 3 phases. The first phase would build 2 pastures, the second phase would complete another 2 pastures and the third phase would build the last 2 pastures. The total area of the expansion would be 23 acres, with an estimated total cost of \$74,808.00 (\$24,936.00/phase).

1. Perimeter / Pasture Fence – See Illustration 6:

The San Bernardino County, Department of Public Works, Transportation Right - of-Way found no Public nor County road rights along “E. Bowman Road” at the Ridgcrest WHB Facility (See Attachment 4).

The expansion would start at the corners of the existing southern pasture fence where 2 - 12 foot long gates will be place at each corner and along the alley way, such that if there needs to be access to the underground telephone line (LA 087509) right-of-way, the gates can be opened to allow non-impeding access for underground telephone line maintenance. A sign with point of contacts shall be placed at each of the gates.

The perimeter, alley and pasture fencing totaling 7,200 linear feet will be constructed of no-climb horse fencing and or panels. The fence height will be between 6 – 8 feet high. The wood fence posts to support the fence will be placed every 10 – 12 feet. The equipment to install the pasture fence may need to blade the fence line to clear the site of debris and shrubs. This would not be more than 5 feet wide and no more than 5 inches of top soil disturbance. The shrubs and debris will be deposited at the manure stock pile and the top soil will be separated and spread back to where it was scraped from. The construction of the fence will be in several phases where up to two pastures could be constructed at each interval.

A tractor equipped with a 6 or 8 inch auger will be used to dig 2-3 feet deep holes for the placement of the wood posts. The posts will be placed in the hole and set after each hole is dug. There would be no holes left open during the building process.

- A) Estimated Total Costs = \$36,660.00
1. No Climb Fencing: $\$2.60/\text{ft} \times 7,200 \text{ feet} = \$18,720.00$
 2. Panels for the alley: $1200 \text{ ft} / 12 \text{ ft panels} = 100 \text{ panels}$
 $100 \text{ panels} @ \$160.00 \text{ ea} = \$16,000.00$
 3. Wood Posts (5in x 8 ft): $\$12.00 \text{ ea} \times 720 = \$8,640.00$
 4. 12 foot x 6 foot gates: $\$200.00 \text{ ea} \times 8 = \$1,600.00$
 5. Tractor = \$2,500.00
 6. Labor = \$6,000.00

2. Water Lines and Troughs – See Illustration 6:

A pipeline totaling approximately 2,500 linear feet consisting of 2 inch Schedule 80 Black PVC pipe (or like material) will be used to pipe water to water troughs in each pasture. The water line will be spliced into the existing water line on the eastern portion of the facility.

A trenching machine (ditch witch) will be utilized to dig a trench measuring 4 - 5 inches wide by 2 feet deep to place the PVC pipe, except across the road where the trench will be dug by hand tools. The PVC pipe will be placed immediately once the trench is dug. This trench would then be backfilled. There would be no trenches left open during the construction process.

The equipment to install the water line may need to blade the line clear of debris and shrubs. This would not be more than 3 feet wide and no more than 5 inches of top soil disturbance. The shrubs and debris will be deposited at the manure stock pile and the top soil will be separated and spread back to where it was scraped from.

A) Estimated Total Costs = \$17,050.00

1. 2 inch Schedule 80 Black PVC pipe: $\$4.50/\text{ft} \times 2,500 \text{ feet} = \$11,250.00$
2. Pipe Adaptors = \$400.00
3. Trencher = \$1,500.00
4. Troughs = \$2,400.00
5. Labor = \$1,500.00

3. Manure Drift Fence- See Illustration 6:

Approximately 400 linear feet of a 9 gauge, 1 inch mesh, 8 foot high chain link fence or 3-4 foot tall x 2-3 wide x 5-6 feet long cement barriers would be placed on the northeastern portion of the expansion area adjacent to the perimeter road, to keep wind blown debris from the expanded area on site. This accumulation of debris will be relocated to the manure disposal area via a front end loader, dump truck or similar earth moving devices to keep the debris from accumulating on the perimeter road and beyond the barrier perimeter.

The equipment to install the chain link fence or the cement barriers may need to blade the perimeter of the manure stock pile to clear the site of debris and shrubs. This would not be more than 5 feet wide and no more than 5 inches of top soil disturbance. The shrubs and debris will be deposited at the manure stock pile and the top soil will be separated and spread back to where it was scraped from.

If the chain link fence is selected, a tractor equipped with an auger will be used to dig 2-3 feet deep holes for the placement of steel posts. The posts will be placed in the hole and set in concrete as each hole is dug. The concrete would be mixed on site and poured into the holes as needed. The fence would be installed via a contractor and the contractor would be responsible for clean up and disposal of any unused material. There would be no holes left open during the building process.

A) Estimated Total Costs = \$2,998.00

1. Chain link: $\$2.12/\text{ft} \times 400 \text{ feet} = \848.00
2. Chain link hardware = \$300.00
3. Tractor = \$350.00
4. Labor = \$1,500.00

4. Perimeter Road Extension – See Illustration 6:

A single lane perimeter road approximately 2,800 linear feet will be constructed following the fence line of the expanded area. The road will be 12 feet wide. The equipment to construct the road will either be a front end loader, grader or similar type of earth moving equipment. The road way would be cleared of debris and shrubs. The shrubs and debris will be deposited at the manure stock pile. The construction of the road would blade no more than 5 inches of top soil. The disturbed top soil will be separated and used to help contour the road.

Periodic grading will be done to maintain the road for vehicle traffic.

- A) Estimated Total Costs = \$1,000.00
 - 1. Tractor = \$500.00
 - 2. Labor = \$500.00

5. Vehicle Turnouts – See Illustration 6:

Vehicle turnouts, approximately 8 feet wide and 20 feet long, will be placed on the new perimeter road. There will be a total of 6 turnouts, two turn outs on each side of the new perimeter fence to allow for vehicles to pass and park.

The equipment to construct the vehicle turnouts will either be a front end loader, grader or similar type of earth moving equipment. The turnouts would be cleared of debris and shrubs. The shrubs and debris will be deposited at the manure stock pile. The construction of the turnouts would blade no more than 5 inches of top soil. The disturbed top soil will be separated and used to help contour the turnouts.

Periodic grading will be done to maintain the vehicle turnouts.

- A) Estimated Total Costs = \$300.00
 - 1. Tractor = \$150.00
 - 2. Labor = \$150.00

6. Right of Way / Underground Utilities:

Prior to any excavation for the fence or waterline, DIG ALERT (1800-227-2600) shall be notified to schedule a representative to mark any underground utilities.

2. ALTERNATIVE 1: Amend Right-of-Way Grant for Ancillary Facilities associated with the Ridgecrest WHB Facility, Develop Improvements for the Existing Facility and Expand Facility – 4 pastures:

A. Ancillary Facilities associated with the Ridgecrest WHB Facility:

Same as described in the proposed action.

B. Existing Facility Proposed Improvements:

Same as described in the proposed action.

C. Facility Expansion – 4 Pastures:

Land Status and legal description from the Public Land Survey for the proposed pasture expansion is:

Mount Diablo Meridian; T27S, R41E, Sec. 5, SWSW (BLM); T27S, R41E, Sec. 5, NWSW SESW (BLM); T27S, R41E, Sec. 5, SWSW SESW (BLM) – See Illustration 7.

The southern portion of the facility would be extended to the south up to 800 feet and

800 feet east-west. This expansion would create 4 new pastures measuring 200ft by 800ft each. The expansions is planned to be built in 2 phases. The first phase would build 2 pastures, the second phase would complete the next 2 pastures. The total area of the expansion would be 15 acres with an estimated cost of \$61,468.00 (\$30,734.00/phase).

1. Perimeter / Pasture Fence – See Illustration 8:

The San Bernardino County, Department of Public Works, Transportation Right - of-Way found no Public nor County road rights along “E. Bowman Road” at the Ridgecrest WHB Facility (See Attachment 4).

The expansion would start at the southeast corner of the existing southern pasture fence and along the alley way where 2 - 12 foot long gates will be place at the corner and along the alley way, such that if there needs to be access to the underground telephone line (LA 087509) right-of-way, the gates can be opened to allow non-impeding access for underground telephone line maintenance.

The perimeter, alley and pasture fencing totaling 5,600 linear feet will be constructed of no-climb horse fencing and or panels. The fence height will be between 6 – 8 feet high. The wood fence posts to support the fence will be placed every 10 – 12 feet. The equipment to install the pasture fence may need to blade the fence line to clear the site of debris and shrubs. This would not be more than 5 feet wide and no more than 5 inches of top soil disturbance. The shrubs and debris will be deposited at the manure stock pile and the top soil will be separated and spread back to where it was scraped from.

A tractor equipped with a 6 or 8 inch auger will be used to dig 2-3 feet deep holes for the placement of the wood posts. The posts will be placed in the hole and set after each hole is dug. There would be no holes left open during the building process.

- A) Estimated Total Costs = \$50,320.00
1. No Climb Fencing: $\$2.60/\text{ft} \times 5,600 \text{ feet} = \$14,560.00$
 2. Panels for the alley: $1600 \text{ ft} / 12 \text{ ft panels} = 134 \text{ panels}$
 $134 \text{ panels} @ \$160.00 \text{ ea} = \$21,440.00$
 3. Wood Posts (5in x 8 ft): $\$12.00 \text{ ea} \times 560 = \$6,720.00$
 4. 12 foot x 6 foot gates: $\$200.00 \text{ ea} \times 8 = \$1,600.00$
 5. Tractor = \$1,500.00
 6. Labor = \$4,500.00

2. Water Lines and Troughs – See Illustration 8:

A pipeline totaling approximately 1,100 linear feet consisting of 2 inch Schedule 80 Black PVC pipe (or like material) will be used to pipe water to water troughs in each pasture. The water line will be spliced into the existing water line on the eastern portion of the facility.

A trenching machine (ditch witch) will be utilized to dig a trench measuring 4 - 5 inches wide by 2 feet deep to place the PVC pipe, except across the road where the trench will be dug by hand tools. The PVC pipe will be placed immediately once the trench is dug.

This trench would then be backfilled. There would be no trenches left open during the construction process.

The equipment to install the water line may need to blade the line clear of debris and shrubs. This would not be more than 3 feet wide and no more than 5 inches of top soil disturbance. The shrubs and debris will be deposited at the manure stock pile and the top soil will be separated and spread back to where it was scraped from.

A) Estimated Total Costs = \$7,750.00

1. 2 inch Schedule 80 Black PVC pipe: $\$4.50/\text{ft} \times 1,100 \text{ feet} = \$4,950.00$
2. Pipe Adaptors = \$300.00
3. Trencher = \$1,000.00
4. Troughs = \$400.00
5. Labor = \$1,100.00

3. Drift Fence – See Illustration 8:

Approximately 550 linear feet of a 9 gauge, 1 inch mesh, 8 foot high chain link fence or 3-4 foot tall x 2-3 wide x 5-6 feet long cement barriers would be placed on the northeastern portion of the expansion area adjacent to the perimeter road, to keep wind blown debris from the expanded area on site. This accumulation of debris will be relocated to the manure disposal area via a front end loader, dump truck or similar earth moving devices to keep the debris from accumulating on the perimeter road and beyond the barrier perimeter.

The equipment to install the chain link fence or the cement barriers may need to blade the perimeter of the manure stock pile to clear the site of debris and shrubs. This would not be more than 5 feet wide and no more than 5 inches of top soil disturbance. The shrubs and debris will be deposited at the manure stock pile and the top soil will be separated and spread back to where it was scraped from.

If the chain link fence is selected, a tractor equipped with an auger will be used to dig 2-3 feet deep holes for the placement of steel posts. The posts will be placed in the hole and set in concrete as each hole is dug. The concrete would be mixed on site and poured into the holes as needed. The fence would be installed via a contractor and the contractor would be responsible for clean up and disposal of any unused material. There would be no holes left open during the building process.

A) Estimated Total Costs = \$2,498.00

1. Chain link: $\$2.12/\text{ft} \times 550 \text{ feet} = \848.00
2. Chain link hardware = \$150.00
3. Tractor = \$200.00
4. Labor = \$1,300.00

4. Perimeter Road Extension – See Illustration 8:

A single lane perimeter road approximately 2,400 linear feet will be constructed following the fence line of the expanded area. The road will be 12 feet wide. The

equipment to construct the road will either be a front end loader, grader or similar type of earth moving equipment. The road way would be cleared of debris and shrubs. The shrubs and debris will be deposited at the manure stock pile. The construction of the road would blade no more than 5 inches of top soil. The disturbed top soil will be separated and used to help contour the road.

Periodic grading will be done to maintain the road for vehicle traffic.

A) Estimated Total Costs = \$600.00

1. Tractor = \$300.00
2. Labor = \$300.00

5. Vehicle Turnouts – See Illustration 8:

Vehicle turnouts, approximately 8 feet wide and 20 feet long, will be placed on the new perimeter road. There will be a total of 6 turnouts, two turn outs on each side of the new perimeter fence to allow for vehicles to pass and park.

The equipment to construct the vehicle turnouts will either be a front end loader, grader or similar type of earth moving equipment. The turnouts would be cleared of debris and shrubs. The shrubs and debris will be deposited at the manure stock pile. The construction of the turnouts would blade no more than 5 inches of top soil. The disturbed top soil will be separated and used to help contour the turnouts.

Periodic grading will be done to maintain the vehicle turnouts.

A) Estimated Total Costs = \$300.00

1. Tractor = \$150.00
2. Labor = \$150.00

6. Right of Way / Underground Utilities:

Prior to any excavation for the fence or waterline, DIG ALERT (1800-227-2600) shall be notified to schedule a representative to mark any underground utilities.

3. ALTERNATIVE 2: Amend Right-of-Way Grant for Ancillary Facilities associated with the Ridgecrest WHB Facility and Existing Facility Proposed Improvements Only.

A. Ancillary Facilities associated with the Ridgecrest WHB Facility:

Same as described in the proposed action.

B. Existing Facility Proposed Improvements:

Same as described in the proposed action.

4. NO ACTION ALTERNATIVE:

The No Action Alternative forms the basis from which all impacts and alternatives are measured from. This alternative would deny the construction of the Ridgecrest WHB Facility expansion and improvements. This alternative does not meet the objectives of the facility and is inconsistent with the Bureau's mission in meeting environmental standards.

IV. AFFECTED ENVIRONMENT

The following resources were identified as most likely to be impacted by the proposed action and alternatives: hydrology (water quality), threatened and endangered species, visual, wastes (solids), lands (existing right-of-ways), air quality, fire management objectives, wild horse and burro, wildlife, soils, vegetation, recreation, paleontology and cultural resources. The following resources were identified as not likely to be impacted by the proposed action and alternatives: areas of critical environmental concern, wilderness, riparian, range, farm or wet lands, floodplains, timber harvesting/forestry, minerals, Native American religious concerns, wild and scenic rivers. Consequently, these resources will not be addressed further in the analysis.

A. General Conditions

1. Climate:

The weather is typical of the Mojave Desert. Temperature for summer highs average 98°F with 65°F for average lows. Extreme summer high temperatures reach 118°F. Winter highs average 62°F, with lows of 32°F. Extreme winter low temperatures reach 0°F. Precipitation over the area is usually quite variable, averaging 3.81 inches per year. June is on the average the driest month, with 0.02 inches, while January and February are the wettest, each averaging 0.49 inches. Winds predominately are from the southwest. Wind speeds of 15-25 mph in the spring and fall is typical with gusts up to 40 mph.

B. Specific Resource Values

1. Wild Horse and Burro:

To maintain wild horse and burro herds at appropriate management levels, the excess animals are gathered and placed into the Bureau of Land Management's National Adoption Program. This facility accommodates gathered animals mostly from California, Nevada and Arizona. An estimated yearly average of 900 animals has passed through the facility for the past three years. The animals are kept at the facility for an average of 120 days, equaling 108,000 horse days. During this period, they are vaccinated; freeze branded, treated for any health ailments, watered and fed. These animals are then placed into the adoption system. This includes on site adoptions, regional satellite adoptions and shipment of animals by semi trucks to the eastern United States.

In addition, this facility receives many visitors curious about the wild horses and burros. It is within a 20 minute drive of 35,000 residents of the Indian Wells Valley and within 3 hours of 18 million residents of the Los Angeles basin. At the Ridgecrest WHB Facility, visitors come to take photos and view and learn about a piece of the American culture and history. It is also a site families can go together to learn about the wild horse and burro program and the importance how

the BLM preserves, protects, and humanely manages the animals and resources. A positive management image of the animals is important to portray with the increase in site promotion by the BLM and the Ridgecrest Convention and Visitor's Bureau.

One of the goals for the BLM for this facility is to provide the public with a recreational experience that teaches them about the wild horses and burros while they visit the Ridgecrest WHB Facility and enhancing visitors' experiences.

2. Vegetation:

A creosote (*Larrea tridentata*)/burro bush (*Ambrosia dumosa*) scrubland association is represented in the area of the holding facility. Subdominate species includes cheesebush (*Hymenoclea salsola*), desert senna (*Cassia armata*) and saltbush (*Atriplex* spp.). No threatened, endangered or sensitive plant species is located in this area.

3. Hydrology:

There are numerous small drainages around and across the facility that flow northwesterly where they intercept a west southwest drainage that drains water away from the highway into an abandoned gravel pit. There is a slope of approximately 6 degrees.

4. Wildlife

The area of proposed actions is within desert tortoise habitat and the Mohave Ground Squirrel Conservation Area. It is composed of a scrub community dominated by Creosote with some understory, but some of the understory has been suffocated by blown hay. The area of proposed expansion and road extension was surveyed in November, 2010 for desert tortoise sign using USFWS protocols. No tortoises or sign was found. Rodent burrows were observed, but none positively identified as Mohave ground squirrels. Numerous lizard burrows were encountered during the survey, but no active desert tortoise, burrowing owl (*Athene cunicularia*), kit fox (*Vulpes macrotis*), or badger (*Taxidea taxus*) burrows were found. No avian nests were found in the shrubs, but a group of sage sparrows live in the vicinity.

There would also be a small area of disturbances due to the drift fences that will put up to the northeast of the proposed expansion. This area however is heavily disturbed by blown hay and the understory diversity and annual plants are lacking due to this. A few small rodent and lizard burrows were located.

5. Visual

The surrounding area of the facility is typical of a creosote/burro bush scrubland association. The east side of the facility has an obvious accumulation of manure and hay. Within this zone of deposition, there is an impact to the vegetative community. The high nitrogen content of the manure is stunting growth of vegetation near the facility, while further out, invader/weedy species are becoming established.

6. Wastes (Solids)

The amount of manure produced will vary throughout the year, depending on the number of animals at the facility. An estimated daily average output per animal is 1.0 cubic feet. This equals an estimated yearly output of 11,538 cubic yards of manure. The manure deposited by the animals is typically wind blown to the east side of the facility where the vegetation slows it down and most is deposited. Solid wastes generated by animals which are returned to the soils as fertilizers are not hazardous wastes (40cfr ch.1 [7-1-91 Edition] 261.4).

7. Lands (Existing Right-Of-Ways)

Verizon has a 10 foot (5 feet a side) right-of-way for an underground telephone line (LA 087509) that runs in an east-west direction at the south end of the facility (See Fig. ??).

County of San Bernardino, Department of Public Works, Transportation Right-of-Way recorded that there is no public nor County road rights along E. Bowman Road or Randsburg Wash Road southeasterly of State Highway Route 178 and through the subject area (see attachment ??).

8. Air Quality

The Ridgecrest area is included in an area classified by the EPA as non-attainment of the National Ambient Air Quality Standards for PM10 (small particulate matter) emissions. The area classified as non-attainment includes the Indian Wells Valley, Rose Valley and Searles Valley and is called the Searles Valley PM10 Planning area. A SIP has been prepared which addresses sources of emissions and lays out a plan of action to reduce emissions to acceptable levels. The SIP inventory included emissions from the Wild Horse and Burro Facility. Identified emission problems include direct fugitive dust from the site and emissions caused by silt and debris carried onto the roads by wind and water. The SIP and the BLM emission reduction plan identified actions to reduce PM10 emission from the Ridgecrest WHB Facility. These actions include rerouting runoff water away from the highway; windbreaks to reduce wind velocity; stabilizing the parking lot; erect drift fences to intercept and remove the windblown debris.

9. Fire Management Objectives

The manure and hay deposited on the east side of the facility creates a fire hazard. With the increased public visitation, the hazard increases. There are 2 hydrants that have been placed alongside the manure disposal area to help in distinguishing smoldering fires.

10. Soils

The soil are a sandy-loam that has fine particles that can become air born during wind storms and by vehicle traffic. Erosion is moderate to high during rain storms. Water carried soil increases the potential of fugitive dust emissions generation into the atmosphere by the wind and vehicle traffic when it dries.

11. Recreation

The Wild Horse and Burro Holding and Adoption Facility has become a major attraction for visitors and equestrian enthusiasts. Educational tours and adoptions are scheduled regularly. The public is allowed to drive the perimeter of the facility to view the animals any time during the day.

12. Paleontology / Cultural Resources

A review of cultural resource records and site files within the Ridgecrest Field Office Bureau of Land Management Heritage Division archives was conducted for the proposed areas of potential effect for all alternatives in November 2010. The search results were negative for previously recorded cultural resources and National Register eligible properties. The subsequent Class III pedestrian surveys conducted on 11/15/2010, 11/19/2010, and 2/4/2011 of the proposed project areas, including all possible acreage incorporated in the proposed Ridgecrest WHB Facility expansion and the acreage associated with the manure drift fence and containment area, identified isolated occurrences of cultural material. The identified isolated occurrences are limited to historic debris interspersed with modern trash, and include tin cans, glass fragments, car parts, and wood fragments, dated between the late 1950s and early 1960s. All of the items observed have been used for target practice. The isolated occurrences of historic material represent occasional use of the area for unpermitted refuse disposal and single loci of public use of Bureau of Land Management lands rather than representing the debris of historic habitation. Isolated occurrences are generally exempt from consideration to the National Register of Historic Properties because of their limited associations or information potential. No cultural properties with the exception of isolated occurrences were recorded during the course of this inventory. The proposed project will have no impact or affect to properties listed or eligible for listing on the National Register of Historic Places (See BLM Cultural Resources Report CA-650-2011-013).

V. DIRECT and INDIRECT ENVIRONMENTAL IMPACTS

1. Wild Horse and Burro:

A. Proposed Action: Amend Right-of-Way Grant for Ancillary Facilities associated with the Ridgecrest WHB Facility, Develop Improvements for the Existing Facility and Expand Facility – 6 pastures (Preferred Action):

The Application for Transportation and Utility Systems and Facilities on Federal Lands will update the Master Title Plats including the ancillary facilities associated with the Ridgecrest WHB Facility.

The expansion will enable better control and segregation of animals according to their removal areas, species (horse or burro), age, sex and health. Reduced number of animals in each pasture, reduces the stress of animals coming in from the range.

This action will allow for the implementation of The Nutrient and Medical Waste Management Plan for the Ridgecrest Wild Horse and Burro Holding and Adoption Facility completed in Fiscal Year 2009. The manure drift fences would increase the ability to manage the manure and keeping it on site. There would be no increase in the amount of manure deposited. Manure which is collected from the expanded area would be relocated to the manure stock pile.

The existing boneyard is filled to capacity. The expansion would provide a new area which can be designated as a replacement.

Pasture and pen shade structures would provide cover for the animals during hot and inclement weather, reducing heat and cold related stress factors.

Shade structure for the round pen will allow the wrangler crew to perform wild horse and burro preparation tasks during hot and inclement weather, increasing proficiency in preparation of the animals.

The helispot would allow closer coordination with the China Lake NAWS for clearances with China Air Traffic Control, vehicle and gather personnel access onto the military facility. The ability to have all personnel at the Ridgecrest Facility provides for increased safety, better coordination and understanding on how the gather operations shall be conducted for that day on the military installation, especially when there are changes to scheduled weapons testing.

2. Vegetation:

The vegetation in the 23 acre proposed expansion will eventually be lost due to the high concentration of animals in a confined area. The larger creosote bushes will be more tolerant to this impact than the smaller vegetation which will disappear quickly. The results will be an area scarified of the small vegetation with interspersed creosote bushes. Careful maneuvering of the tractor pulled feed trailer will be taken to reduce impacts to the remaining shrubs.

The vegetation along the east side of the facility will continue to receive the impacts of windblown manure.

The 2,800 foot road extension and vehicle turn outs will be cleared of vegetation, so that a designated route is established to prevent vehicles from creating their own routes of travel and to allow vehicles an area to pull off.

3. Hydrology:

No negative impacts to water sources or drainage patterns are expected.

4. Wildlife:

There will be no loss of tortoises or occupied tortoise habitat. Informal consultation with the BLM State Threatened and Endangered Species lead resulted in a concurrence with this assessment. This is therefore a "No Affect" situation. It is possible that a tortoise could wander into the area from higher quality tortoise habitat to the south, but protective stipulations have addressed this possibility.

There would be a loss of 23 acres of low-quality suitable squirrel habitat, much of which is already disturbed. Many lizard, snake and rodent burrows would be affected, due to the presence of new disturbance and trampling by equine.

The proposed drift fence will provide a benefit to the surrounding area by preventing more windblown hay from suffocating the plants. A small number of rodent and lizard burrows may be affected by the initial fence construction, but will be avoided when possible.

Wildlife protection stipulations presented in the standard operating procedures will reduce impacts to wildlife, including tortoises and ground squirrels.

5. Visual:

The artificial wind breaks will be noticeable when driving along the perimeter road and from the Randsburg Wash road. Even though it will be obvious that these barriers exist, it should not deter from the visual qualities of the surrounding desert.

Depositing the manure in the piles, will reduce the visual impacts that are associated with the road side accumulation of manure. If a vegetative windbreak is planted to the east of the piles, this area would almost be unnoticeable.

There will be an increase in the size of the facility. There will be an accumulation of manure on the east side where the expansion will occur which would be periodically removed to the main manure disposal site. Depositing the manure in the piles, will reduce the visual impacts that are associated with the road side accumulation of manure.

6. Lands (Right-Of-Ways):

There will be no encroachment onto Verizon's right-of-way LA087509. USA Dig Alert will be contacted prior to any construction along the right-of-way. A letter (Pual do we have a copy) was sent to Verizon informing them of this project.

7. Air Quality:

Emission levels are below de minimis and the emissions are accounted for in the SIP attainment demonstration therefore no conformity determination is necessary. However, there will be an increase in fugitive dust emissions as a result of the action. It is unknown if the increase will be significant. The increase could compromise BLMs ability to meet their SIP mandated goal to reduce PM10 emissions by 20% in the area. This could result in a non-conformity determination.

8. Fire Management Objectives:

The amount of manure that could accumulate on the east side of the expanded area could increase the chance for potential fires. The fire hydrant located at the southeast corner of the existing facility would be adequate to cover the expansion area.

9. Soils:

There will be an increase in wind erosion, due to the increased soil surface exposed to the wind. It is unknown if the amount would be significant.

10. Recreation:

The vehicle turnouts will provide an area for the public to get out of their vehicles without impeding vehicle traffic on the perimeter road.

11. Paleontology / Cultural Resources:

Class III Cultural Resource inventories of the proposed project area were negative for cultural resources eligible for listing or listed on the National Register of Historic Places. There will be no impact from the proposed action.

B. Alternative 1: Amend Right-of-Way Grant for Ancillary Facilities associated with the Ridgecrest WHB Facility, Develop Improvements for the Existing Facility and Expand Facility – 4 pastures:

1. Wild Horse and Burro:

The impacts will be the same as proposed action, however, there would be two less pastures to hold animals.

2. Vegetation:

The impacts will be the same as proposed action, except the area in size is 15 acres.

3. Hydrology:

The impacts will be the same as proposed action.

4. Wildlife:

Negative impacts to wildlife species and their habitat will be reduced with the reduction of disturbed habitat.

5. Visual:

The impacts will be the same as proposed action.

6. Lands (Right-Of-Ways):

The impacts will be the same as proposed action.

7. Air Quality:

The impacts will be the same as proposed action.

8. Fire Management Objectives:

The impacts will be the same as proposed action.

9. Soils:

The impacts will be the same as proposed action.

10. Recreation:

The impacts will be the same as proposed action.

11. Paleontology / Cultural Resources:

The impacts will be the same as proposed action.

C. ALTERNATIVE 2: Amend Right-of-Way Grant for Ancillary Facilities associated with the Ridgecrest WHB Facility and Develop Proposed Improvements Within the Existing Ridgecrest WHB Facility Only

1. Wild Horse and Burro:

The existing bone yard is almost filled to capacity. An existing pasture would need to be designated as the new bone yard, reducing the amount of space which can be used to separate the wild horses and burros and potentially increasing the number of horses or burros within the remaining pastures.

There would not be the ability to better control and segregate wild horses and burros according to their removal areas, species (horse or burro), age, sex and health. The potential of stress on the animals increases as more wild horses and burros are brought into the facility.

The impacts for the proposed facility improvements will be the same as described in the proposed action.

2. Vegetation:

The impacts from this alternative would be minimal due to little to no ground disturbance.

3. Hydrology:

Not affected.

4. Wildlife:

The impacts from this alternative would be minimal due to little to no ground disturbance.

5. Visual:

The impacts will be the same as proposed action, except for the visual aspects of the expanded area.

6. Lands (Right-Of-Ways)

The impacts will be the same as proposed action.

7. Air Quality:

The dust emissions would not increase from the levels where they are currently at.

8. Fire Management Objectives:

The existing fire management objectives would not change.

9. Soils:

There would not be an increase in surface area disturbance.

10. Recreation:

Not affected.

11. Paleontology / Cultural Resources

The impacts will be the same as proposed action.

D. No Action Alternative:

1. Wild Horse and Burro:

The existing bone yard is almost filled to capacity. An existing pasture would need to be designated as the new bone yard, reducing the amount of space which can be used to separate the wild horses and burros and potentially increasing the number of horses or burros within the remaining pastures.

There would not be the ability to better control and segregate wild horses and burros according to their removal areas, species (horse or burro), age, sex and health. The potential of stress on the animals increases as more wild horses and burros are brought into the facility.

This action will allow for the implementation of The Nutrient and Medical Waste Management Plan for the Ridgecrest Wild Horse and Burro Holding and Adoption Facility completed in Fiscal Year 2009. The manure drift fences would increase the ability to manage the manure and keeping it on site. There would be no increase in area and the amount of manure deposited.

No additional pasture and pen shade structures would be constructed to provide cover for the animals during hot and inclement weather.

No shade structure for the round pen would be constructed upon which the wrangler crew would be limited to perform wild horse and burro preparation tasks during hot and inclement weather, decreasing proficiency in preparation of the animals.

Without the designation of a helispot, there would be a decrease in efficiency and coordination with the China Lake NAWS for clearances with China Air Traffic Control, vehicle and gather personnel access onto the military facility, because the helicopter flight crew and fuel truck driver would be operating out of the Inyokern Airport. This reduces the ability to have all personnel at the Ridgecrest Facility, decreasing safety, coordination and understanding on how the gather operations shall be conducted for that day on the military installation, especially when there are changes to scheduled weapons testing.

2. Vegetation:

The impacts associated with windblown accumulation of manure will increase. The impact area will continue to expand and the shift to invader/weedy species will increase.

3. Hydrology:

The hydrologic features of the facility would not be affected.

4. Wildlife:

No ground disturbance would occur, therefore no impacts to current wildlife would occur in the proposed project area.

5. Visual:

The accumulation of manure and the impacts to the surrounding area would continue to increase, creating an image to the visitors of poor facility maintenance.

6. Lands (Right-Of-Ways):

The Application for Transportation and Utility Systems and Facilities on Federal Lands will not be updated. The Master Title Plat including the ancillary facilities associated with the Ridgecrest WHB Facility will not be legal.

7. Air Quality:

The BLM may not meet the requirements in the State Implementation Plan to reduce PM 10 emissions within the Searles Valley PM10 Planning Area.

8. Fire Management Objectives:

The fire management objectives will not be impacted.

9. Soils:

There would not be an increase in soil disturbance in the proposed expansion areas, decreasing the amount of fugitive dust.

10. Recreation:

As the number of visitor increases, the public perception of the facility will become more important. Without the proposed improvements, the perception may reflect negatively to the program.

11. Paleontology / Cultural Resources:

There will be no impact from the no action alternative.

VII. Residual Impacts:

Between 15 acres (Alternative 1) and 23 acres (Proposed Action) will be impacted and the fauna dispersed. The associated standard operating procedures for the proposed action and alternative 1, no significant residual impacts would occur.

VIII. Cumulative Impacts:

General:

This section will address the cumulative impacts of the proposed action and alternatives on the affected environment, continuing activities in and around the project area and any foreseeable future activities. Because other activities within the potentially cumulative impact area (project area and vicinity) are generally isolated from each other and from the proposed actions, either by distance or by topography, the potential for a cumulative impact on most of these identified resources is minimal.

Based upon these considerations and upon the recommended standard operating procedures that would be applied to the proposed action and alternative 1 and any potential future actions to

cover the range of impacts anticipated, the effects of other existing and reasonably foreseeable future activities including the proposed action would not significantly affect an environmental resource or the continuation of existing land use.

Specific:

Proposed Action:

The Ridgecrest WHB Facility expansion would:

1. Increase efficiency in the management of wild horses and burros at the Ridgecrest WHB Facility.
2. Reduce stress on animals brought in from the range.

The associated improvements would:

1. Reduce PM 10 emissions within the Searles Valley PM 10 Planning Area.
2. Increase flexibility for manure management.

Alternative 1:

Same as the proposed action.

Alternative 2:

Would not change from the current management.

Alternative - No Action

Would not change from the current management.