

**UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
BATTLE MOUNTAIN DISTRICT/MOUNT LEWIS FIELD OFFICE**

FINDING OF NO SIGNIFICANT IMPACT

I have reviewed the Final Callaghan Complex and New Pass/Ravenswood Herd Management Area (HMA) Wild Horse Gather Environmental Assessment (EA), DOI-BLM-NV-B010-2010-0087-EA, dated October 2010. After consideration of the environmental effects as described in the EA, and incorporated herein, I have determined that the Proposed Action, with the project specifications, including minimization or mitigation measures identified in the EA will not significantly affect the quality of the human environment. No environmental effects meet the definition of significance in context or intensity as described in 40 CFR 1508.27. Therefore, preparation of an Environmental Impact Statement (EIS) is not required as per section 102(2)(c) of the National Environmental Policy Act (NEPA).

This finding and conclusion is based on my consideration of the Council on Environmental Quality's (CEQ) criteria for significance (40 CFR 1508.27), both with regard to the context and the intensity of impacts described in the EA.

Context

The gather area is administered by the Bureau of Land Management's Mount Lewis Field Office. The Callaghan Complex consists of the Callaghan, Bald Mountain and Rocky Hills HMAs, and is located in Lander County, about 55 miles south of Battle Mountain, Nevada and 45 miles northwest of Eureka, Nevada. The New Pass/Ravenswood HMA is located several miles west of the Callaghan HMA, also within Lander County, and several miles northwest of Austin, Nevada. A portion of the New Pass/Ravenswood HMA is located within Churchill County within the administrative boundaries of the Carson City District Office (CCDO). The Battle Mountain District Office (BMDO) currently administers the entire HMA.

The proposed gather area includes areas within and outside of the HMA boundaries throughout the Allotments that include these HMAs. The HMAs involved total 640,148 acres in size.

The most recent helicopter population inventory flights were conducted in September 2009. Based on the direct count obtained during that inventory and estimated foaling rates in 2010, the current estimated population of the Callaghan/New Pass Complex is 1,083 wild horses. The total AML range for these HMAs is 894-1,161 wild horses.

The Preliminary Environmental Assessment and Gather Plan was made available to the interested public on September 2, 2010 for a 30 day review and comment period. All comments were reviewed and considered in completion of the Final Gather EA. Several letters were received in support of the gather as well as against the gather. Numerous

form letters were received, which were generated from members of an animal welfare organization. These comments are summarized within Appendix E of the Final EA. Some additions were made to the EA for clarification purposes; however, no substantial modifications were made to the EA as a result of the comments received.

The proposed gather involves treating approximately 323 mares with fertility control vaccine to slow population growth rates, reduce gather frequency and reduce the number of excess animals that would have to be removed from the range in future gathers. It is estimated that approximately 862 wild horses would be gathered, with 221 excess wild horses removed (to achieve low range of AML) and transported to BLM adoption or holding facilities. The remaining 645 gathered wild horses would be re-released back to the range once all mares designated for release were vaccinated with the fertility control vaccine PZP-22. Alternative 1 would be to delay the gather for several years (likely until 2012 or 2013), with no fertility control administered at this time.

The Proposed Action would ensure healthy wild horses within the Callaghan Complex and New Pass/Ravenswood HMA, promote improved health of rangeland vegetation communities, and prevent degradation of rangeland resources, and promote significant progress towards Standards for Rangeland Health. The Proposed Action would also reduce annual wild horse population growth rates thereby minimizing the numbers of excess wild horses that would have to be removed during future gathers and which would have to be sent to Long Term Holding Pastures (LTHPs).

Intensity

1. Impacts that may be both beneficial and adverse.

The Environmental Assessment considered both beneficial and adverse impacts of the gather, fertility control application, and removal of excess wild horses from the Callaghan Complex and New Pass/Ravenswood HMA.

Treatment of the mares within these HMAs with the fertility control vaccine PZP-22 would reduce growth rates and slow population size increase. The fertility control vaccine PZP has been used in Nevada on wild horses since 1992. PZP is relatively inexpensive, meets BLM requirements for safety to mares and environment, and can easily be administered in the field. In addition, among mares, PZP contraception appears to be completely reversible. The goal of re-treatment of these HMAs with fertility control is to maintain the populations within the established AMLs, preventing an overpopulation of wild horses, to extend the time until another gather is needed, and to reduce or eliminate the number of excess wild horses that must be removed from the range and placed for adoption, sale or maintained in LTHPs.

SOPs are in place to minimize stress and injury to the gathered horses and are also in place to minimize the disturbance of natural resources and wildlife. Archaeological site clearances would be conducted prior to the construction of temporary gather sites and holding facilities.

Maintaining the AML within these HMAs would prevent degradation of rangeland and riparian resources, and promote continued improvement in the quality of wild horse habitat over the long term. Preventing an overpopulation of wild horses and ensuring a thriving natural ecological balance within these HMAs will allow for the recovery and improvement of natural resources, such as soils, vegetation, watersheds, and important wildlife habitat. A healthy population of wild horses will remain in the HMAs in balance with the available forage, water and space.

2. The degree to which the proposed action affects public health and safety.

The SOPs would be used to conduct the gather and are designed to protect human health and safety, as well as the health and safety of the wild horses. The Proposed Action would have minimal effects on public health or safety.

3. Unique characteristics of the geographic area such as proximity of historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

There are no park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas within the gather area. A cultural resources inventory would be completed prior to constructing temporary gather sites and holding facilities. If cultural resources are found in an area, a new location would be identified in which to set up temporary gather sites and holding corrals. Wild horse gather activities would not be conducted within Wilderness Study Areas.

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.

The effects that would occur from implementation of the gather are well known and understood. This is demonstrated through the effects analysis in the EA. Some members of the public advocate that no wild horses should be removed from any public lands and urge removal of livestock or letting "nature take its course". However, the effects of wild horse gathers on the *quality of the human environment* are well documented through the many years of management of wild horses through gathers and other population controls, and are not highly controversial. No unresolved issues were raised following public notification of the proposed gather.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

The Proposed Action has no known effects on the human environment which are considered highly uncertain or involve unique or unknown risks. This is demonstrated through the effects analysis in the EA.

6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

Future projects occurring within the gather area would be evaluated through the appropriate process and impacts would be analyzed under a site-specific environmental analysis. The Proposed Action does not set a precedent for future actions.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

The Proposed Action is not related to other actions within the project area that would result in cumulatively significant impacts. Proper environmental analysis would be completed for all proposed actions in the future, including an assessment of cumulative impacts. Cumulative impacts were analyzed in the EA.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historic resources.

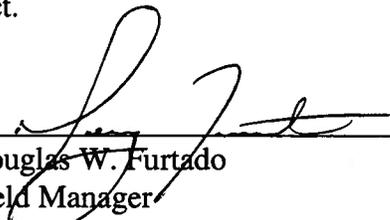
The Proposed Action would not affect significant scientific, cultural, or historical resources. A cultural resource inventory would be completed prior to gather site and corral construction. Temporary gather sites and holding facilities would be cleared to determine the presence of sites that are unclassified, eligible, or potentially eligible for the National Register of Historic Places. Archaeological site clearances and avoidance measures would ensure that loss or destruction of significant scientific, cultural, or historical resources does not occur.

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

There are no known threatened and endangered species present in the project area.

10. Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

The Proposed Action would not violate or threaten to violate any Federal, State, or local law or requirement imposed for the protection of the environment. The Proposed Action is in conformance with all applicable 43 CFR (Code of Federal Regulations). The Proposed Action would not violate the Migratory Bird Treaty Act or Endangered Species Act.



Douglas W. Furtado
Field Manager
Mount Lewis Field Office

10/29/10

Date