



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

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DEC 28 2007

In Reply Refer To:
NV062 (4700)

Dear Interested Public,

RECEIVED

DEC 31 2007

DEPARTMENT OF ADMINISTRATION
OFFICE OF THE DIRECTOR
BUDGET AND PLANNING DIVISION

DECISION

South Shoshone Herd Management Area (HMA) Wild Horse Gather

INTRODUCTION

This decision is being issued to gather and remove approximately 318 wild horses from the South Shoshone HMA administered by the Battle Mountain Field Office (BMFO), and removal of wild horses residing outside of HMA boundaries.

The South Shoshone HMA is located approximately 30 miles south of Battle Mountain, and encompasses approximately 133,000 acres of the Shoshone Mountain Range and surrounding foothills. The majority of the HMA is located within the Carico Lake Allotment, with approximately 8% of the southern portion of the HMA included within the Austin Allotment. Refer to the attached map of the gather area.

Helicopter inventory of this HMA were completed in May 26-27, 2007. The current estimated population within the South Shoshone HMA is 378 wild horses. The Appropriate Management Level (AML) of 60-100 wild horses was established through the Carico Lake Allotment Final Multiple Use Decision (FMUD) issued in September 2005, and a gather to achieve this AML has not been conducted. A gather of the South Shoshone HMA has never been conducted by the BLM since the passage of the Wild Free Roaming Horses and Burros Act passed in 1971.

Through collection and analysis of monitoring data, review of wild horse census, distribution and habitat data, and issuance of the Carico Lake Allotment Rangeland Health Assessment, Conformance Determination, and FMUD in 2005, it has been determined that an excess population of wild horses exists within these HMA. It has also been determined achievement of

the established wild horse AML for the South Shoshone HMA, would promote a thriving natural ecological balance within this HMA.

On April 17, 2007, the BMFO issued the Shoshone Complex Wild Horse Gather Environmental Assessment (EA) # NV062-EA07-104 for public review. Refer to Attachment 4 for the interested public mailing list. The Shoshone Complex originally included the South Shoshone and Bald Mountain HMAs, and at the time, the gather was scheduled to be completed in July 2007. Due to emergency wild horse gathers that became necessary within Nevada and lack of available holding space, the proposed gather of the South Shoshone HMA was delayed to January 2008, and the Bald Mountain HMA gather rescheduled to coincide with the next gather of the Callaghan HMA in fiscal year 2009 (winter 2008-2009).

Written comments were received from the Nevada State Historic Preservation Office, Nevada Division of State Lands, and Cindy McDonald. Comments received have been reviewed and it has been determined that no changes or significant modifications to the EA are warranted. The Proposed Action and analysis of environmental consequences detailed within the EA for the South Shoshone HMA is still applicable to the South Shoshone HMA gather, and delay of the gather to winter 2008 will have no additional environmental consequences that have not previously been analyzed. Comments have been addressed in Attachment 3.

Upon analyzing the impacts of the Proposed Action and Alternatives, and following issuance of the EA for public review, I have determined that the Proposed Action will not have a significant impact to the human environment, and that an Environmental Impact Statement will not be prepared. Please refer to Attachment 2, Finding of No Significant Impact (FONSI).

DECISION

It is my decision to implement the Proposed Action in accordance with the South Shoshone HMA Wild Horse Gather EA # NV062-EA07-104 as follows:

- *Gather the South Shoshone HMA to the low end of AML as established in the 2005 FMUD.*

The following table displays the gather objectives.

Table 1. Population, Gather Numbers–Shoshone HMA

Area		Estimated current population	Estimated #'s to remove	Estimated #'s to remain post-gather
1	South Shoshone HMA - Carico lake Allotment	339	279	60
2	South Shoshone HMA, Austin Allotment	39	39	0
Total		378	318	60

This decision constitutes my final decision to gather and remove excess wild horses and burros from within and outside the boundaries of the South Shoshone HMA. Pursuant to Title 43 of the

Code of Federal Regulations at 4770.3(c), the South Shoshone HMA gather is approved for implementation upon the date of my signature below. Gather operations will begin on or about January 9, 2008.

Rationale:

Removal of excess wild horses is needed to achieve a thriving natural ecological balance between wild horse populations, wildlife, livestock, vegetation, and the available water as authorized under Section 3(b)(2) of the 1971 WFRHBA and section 302(b) of the Federal Land Policy and Management Act of 1976.

Within the South Shoshone HMA, populations of wild horses in excess of established AMLs are negatively affecting the rangeland resources. The documents completed towards establishment of AML and identified on page 1 of this decision, as well as EA # NV062-EA07-104 details the condition of habitat and the negative affects current wild horse populations are having on the habitat. A gather is necessary to achieve the established AML, and remove wild horses from outside of HMA boundaries to protect the range from deterioration associated with overpopulation of wild horses to and to preserve wild horse health in light of continuing drought conditions that have reduced available forage and water. Implementing the AML established in the 2005 FMUD through the Proposed Action would also ensure that allotment objectives are met and significant progress made towards achieving the Resource Advisory Council (RAC) Standards for Rangeland Health.

The proposed action would:

- prevent future over utilization of forage species and the resulting reduction in vegetative ground cover,
- decrease forage competition among wild horses, wildlife, and livestock,
- promote improved forage availability, vegetation density, increased plant vigor, seed production, seedling establishment, and forage production over current conditions,
- Result in improvement of the vegetation, aspen and riparian resources throughout the HMA, resulting in upward trend and increased frequency of key species.

The following constitutes the rationale for issuing this decision effective upon issuance:

(a) Potential Impacts to Animal Health.

Native perennial vegetation species are lacking throughout the lower elevations of the HMA due to current range condition, continuing drought and past wildfires; and waters are limited in portions of the HMA. Wild horse health is at risk under the current situation, and unless the populations of wild horses within the HMA are reduced through the proposed removals, wild horse body condition will decline through the winter. In the absence of wild horse removals death due to starvation and dehydration may occur.

(b) Potential Damage to Rangeland and Riparian Resources.

As documented in EA# NV062-EA07-104 the condition of the rangeland vegetation throughout the HMA varies considerably, and has been negatively impacted by current and historic levels of wild horses and past use by livestock. The Carico Lake Allotment Conformance Determination (2005) concluded that many of the Resource Advisory Council (RAC) Standards for Rangeland Health are not being met and that wild horse populations are contributing to standards not being met in many cases. Resources will continue to deteriorate if the established AML is not achieved. Riparian areas and Aspen stands are being negatively impacted where wild horses are concentrating use. Continued over population of wild horses will result in overutilization of remaining forage and further degradation of habitat utilized by wild horses, wildlife and livestock.

In accordance with 43 CFR 4720.1, upon examination of current information and a determination by the authorized officer that an excess of wild horses or burros exists, the authorized officer shall remove the excess animals immediately.

AUTHORITY

The authority for this decision is contained in Section 3(b)(2) of the 1971 Free-Roaming Wild Horses and Burros Act, Section 302(b) of the Federal Land Policy and Management Act (FLPMA) of 1976, and Code of Federal Regulations (CFR) at 43 CFR §4700.

§4700.0-6 Policy

- (a) Wild horse and burros shall be managed as self-sustaining populations of healthy animals in balance with other uses and the productive capacity of their habitat;
- (b) Wild horses and burros shall be considered comparably with other resource values in the formulation of land use plans;
- (c) Management activities affecting wild horses and burros shall be undertaken with the goal of maintaining free-roaming behavior;
- (d) In administering these regulations, the authorized officer shall consult with Federal and State wildlife agencies and all other affected interests, to involve them in planning for and management of wild horses and burros on the public lands.

§4710.4 Constraints on Management

Management of wild horses and burros shall be undertaken with the objective of limiting the animals' distribution to herd areas. Management shall be at the minimum level necessary to attain the objectives identified in approved land use plans and herd management area plans.

§4720.1 Removal of excess animals from public lands

Upon examination of current information and a determination by the authorized officer that an excess of wild horses or burros exists, the authorized officer shall remove the excess animal immediately in the following order.

- (a) Old, sick, or lame animals shall be destroyed in accordance with subpart 4730 of this title;
- (b) Additional excess animals for which an adoption demand by qualified individuals exists shall be humanely captured and made available for private maintenance in accordance with subpart 4750 of this title; and
- (c) Remaining excess animals for which no adoption demand by qualified individuals exists shall be destroyed in accordance with subpart 4730 of this part.

§4770.3 Administrative Remedies

(a) Any person who is adversely affected by a decision of the authorized officer in the administration of these regulations may file an appeal. Appeals and petitions for stay of a decision of the authorized officer must be filed within 30 days of receipt of the decision in accordance with 43 CFR, part 4.

(c) Notwithstanding the provisions of paragraph (a) of §4.21 of this title, the authorized officer may provide that decisions to remove wild horses or burros from public or private lands in situations where removal is required by applicable law or is necessary to preserve or maintain a thriving natural ecological balance and multiple use relationship shall be effective upon issuance or on a date established in the decision.

APPEAL PROVISIONS

Within 30 days of receipt of this wild horse decision, you have the right to appeal to the Board of Land Appeals, Office of the Secretary, in accordance with regulations at 43 CFR 4.4. If an appeal is taken, you must follow the procedures outlined in the enclosed, "Information on Taking Appeals to the Board of Land Appeals." Please also provide this office with a copy of your Statement of Reasons. An appeal should be in writing and specify the reasons, clearly and concisely, as to why you think the decision is in error.

In addition, within 30 days of receipt of this decision you have a right to file a petition for a stay (suspension) of the decision together with your appeal in accordance with the regulations at 43 CFR 4.21. The petition must be served upon the same parties identified in items 2, 3, and 4 of the enclosed form titled "Information on Taking Appeals to the Board of Land Appeals." The appellant has the burden of proof to demonstrate that a stay should be granted.

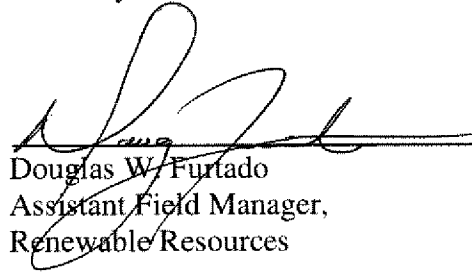
A petition for a stay of decision pending appeal shall show sufficient justification based on the following standards:

- 1) The relative harm to the parties if the stay is granted or denied;

- 2) The likelihood of the appellant's success of the merits;
- 3) The likelihood of immediate and irreparable harm if the stay is not granted; and
- 4) Whether the public interest favors granting the stay.

At the conclusion of any document that a party must serve, the party or its representative must sign a written statement certifying that service has been or will be made in accordance with the applicable rules and specifying the date and manner of such service (43 CFR 4.401 (c) (2)).

Sincerely,

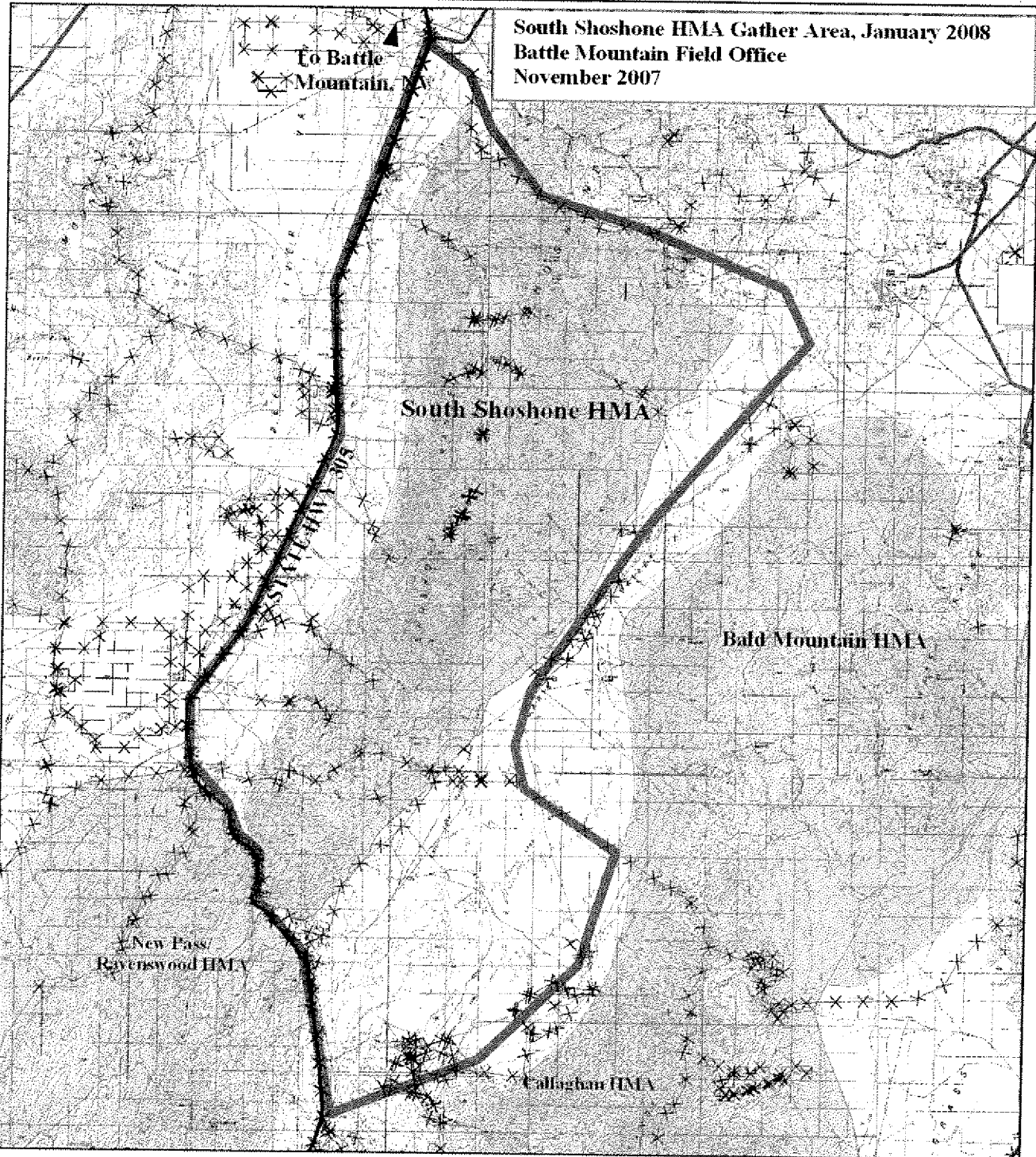

Douglas W. Furtado
Assistant Field Manager,
Renewable Resources

12/24/07
Date

Attachments: (4)

Attachment 1: Map of South Shoshone HMA Wild Horse Gather Area

South Shoshone HMA Gather Area, January 2008
 Battle Mountain Field Office
 November 2007



Legend

- Major Roadways
- 2007 Proposed Gather Area
- Private Land
- Herd Management Areas



No Warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.

Attachment 2

FINDING OF NO SIGNIFICANT IMPACT For the South Shoshone HMA Project # NV062-EA07-104

INTRODUCTION

The Environmental Assessment (EA) #NV062-EA07-104, dated April 17, 2007, has been reviewed through the interdisciplinary team process. After consideration of the environmental effects described in the EA and supporting documentation, it has been determined, that the Proposed Action identified in the EA is not a major Federal action and would not significantly affect the quality of the human environment, individually or cumulatively with other actions in the general area. 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.

I have determined the Proposed Action is in conformance with the Battle Mountain Field Office (BMFO) Shoshone-Eureka Resource Area Management Plan (RMP), Record of Decision (ROD) dated 1986 and the Shoshone-Eureka RMP Amendment, ROD dated 1987. The Proposed Action is also consistent with the plans and policies of neighboring local, county, state, tribal, and federal agencies and governments.

FINDING OF NO SIGNIFICANT IMPACT

Based on the analysis of potential environmental impacts detailed in Environmental Assessment NV062-EA07-104, I have determined that the impacts associated with the Proposed Action are not significant. Therefore, preparation of an environmental impact statement is not required.

RATIONALE

The Proposed Action identified in the accompanying Decision would, as best as can be determined, prevent unnecessary or undue degradation of public land resources. Resource review and analyses have been coordinated with other federal and state agencies. Resources determined to be potentially impacted were analyzed in the EA specific to the Proposed Action. Based on the analysis, impacts, including cumulative impacts, to these resources are considered insignificant (see definition of significance in 40 CFR 1508.27).

CONTEXT

The South Shoshone HMA has never been gathered by the BLM. An AML range of 60-100 wild horses was established for this HMA through Final Multiple Use Decision (FMUD) issued in 2005, and currently, wild horse populations are in excess of this AML. Additionally, wild horses exist outside of HMA boundaries.

The wild horse removal proposed in the EA involves removing approximately 318 excess wild horses from within and outside of the boundaries of the South Shoshone HMA, to result in a post gather population of approximately 60 wild horses. Achievement of the established AML, would prevent the wild horse population from exceeding the upper range of AML for 3-4 years, promote recovery of drought stressed rangeland vegetation communities, avoid further degradation to the range, and prevent deteriorating health of the wild horse population. The gather area is administered by the Bureau of Land Management's Battle Mountain Field Office, and is located approximately 30 miles south of Battle Mountain in Lander County.

INTENSITY

1) *Impacts that may be both beneficial and adverse.* The Environmental Assessment considered both beneficial and adverse impacts of the gather and removal of wild horses across the identified HMA. Removing excess wild horses from within the HMA and from areas not within designated Herd Management Area boundaries would reduce the level of use endured by rangeland and riparian vegetation, and help alleviate competition for resources between wildlife, livestock, and wild horses. Removal of excess wild horses will allow for the recovery of natural resources, such as soils, vegetation, watersheds, wildlife, fisheries and wild horse habitat.

Archaeological site clearances would be conducted prior to the construction of temporary trap sites and holding facilities. Standard Operating Procedures would be followed to minimize stress on wild horses and impacts to other resources. Wild horses removed from the project area would be transported to wild horse and burro holding facilities and prepared for adoption or long-term holding.

2) *The degree to which the proposed action affects public health or safety.* The Wild Horse and Burro Standard Operating Procedures (EA, Appendix A) 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 and burros. The Proposed Action would have minimal affects to public health or safety.

3) *Unique characteristics of the geographic area such as proximity to 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 trap sites and holding facilities. If cultural resources are found in an area, a new location would be determined to set up temporary trap 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.* It was determined that the implementation of the proposed action would not be highly controversial in terms of the effects on the quality of the human environment. Few public comments were received following issuance of the Gather Plan/EA on April 17, 2007.

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 NEPA process and analyzed under a site-specific NEPA document. The Proposed Action does not set a precedent for future actions.

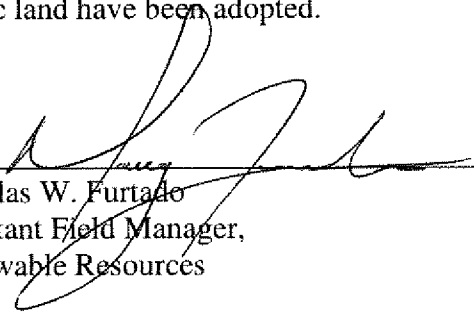
7) *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.* The Proposed Action is not related to other actions within the project area that would result in cumulatively significant impacts. Proper NEPA analysis would be completed for all proposed actions in the future. Cumulative impacts of the Proposed Action 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 NRHP or may cause loss or destruction of significant scientific, cultural, or historical resources.* The Proposed Action would not affect significant scientific, cultural, or historical resources. A cultural resource inventory would be completed prior to trap and corral construction. Temporary trap sites and holding facilities would be cleared to determine the presence of sites that are unclassified, eligible, or potentially eligible for the NRHP. 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 in the ESA of 1973.* The bald eagle (*Haliaeetus leucocephalus*) is the only known threatened and endangered species that may occur in the gather area; however, no critical eagle habitat exists in the area, and no documented reports of the eagle occurring in the proposed gather area exist. There are no known threatened and endangered plants 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.

The Proposed Action detailed in the EA and FONSI have led to my decision that all practicable means to avoid or minimize environmental harm and unnecessary or undue degradation of the public land have been adopted.



Douglas W. Furtado
Assistant Field Manager,
Renewable Resources

12/28/07
Date

**Attachment 3
RESPONSE TO COMMENTS**

The following written comments were received from Cindy McDonald (1-5), the Nevada Division of State Lands (6) and the Nevada Historic Preservation Office (6).

Comment/Response Bald Mountain/South Shoshone HMAs	
1	<p>Comment: I found this environmental assessment one of the most comprehensive and informative EA's I have read to date and was very pleased to find so much information provided on the history, management activities and wild horse herds within the proposal areas.</p> <p>Response: Thank you.</p>
2	<p>Comment: I support the 50-50 gender ratio under the proposed action but would like to encourage the use of bait-trapping instead of helicopter driving . . . I would like to see this capture method employed since it would prove less traumatic and more cost-effective.</p> <p>Response: Comment noted. Bait and water trapping involves the construction of a trap, and baiting the wild horses into the trap with the use of hay or water. Specialized one-way gates are often used to prevent the animals from leaving the trap once inside. Bait and water trapping methods are usually only effective in areas where water and forage is significantly lacking, resulting in high motivation for wild horses to enter the trap to access them. These types of situations may occur during drought emergencies. Typically, small groups of horses enter the traps at a time, necessitating many days to many weeks to remove more than a few animals from an area.</p> <p>Within the South Shoshone HMA, forage and water is not absent and emergency conditions do not yet exist. Forage and waters are still available throughout the Complex. Wild horses would not be sufficiently motivated to enter a trap through these methods. Additionally, the Complex is large, involving 378 wild horses distributed across nearly 200,000 acres. The purpose and need would not be met through these gather methods. For these reasons, water and bait trapping methods were not considered.</p> <p>Public hearings are held annually on a state-wide basis regarding the use of helicopters and motorized vehicles to capture wild horses (or burros). During these meetings, the public is given the opportunity to present new information and to voice any concerns regarding the use of these methods to capture wild horses (or burros). The Nevada BLM State Office held a meeting on May 16, 2007; 2 oral comments, 8 written comments and approximately 120 e-mail comments were entered into the record for this hearing.</p> <p>Based on the number of concerns expressed with respect to the use of helicopters and motorized vehicles, BLM thoroughly reviewed the Standard Operating Procedures to assure that all necessary measures are in place to humanely capture, handle and transport Nevada's wild horses and burros during the upcoming gather season. No changes to the SOPs were indicated based on this review.</p> <p>The use of helicopter to gather wild horses is well established. The method is safe, humane, and effective. The contract pilots are very experienced and skilled at safely moving wild horses through all types of terrain. Additionally, BLM staff is on-site at all times to observe the gather, monitor animal health, and coordinate the gather activities with the contractor. This method can be utilized to capture large numbers of wild horses throughout large areas with few injuries and minimal death loss. During most gathers, wild horse death resulting from the helicopter capture method occurs in less than one percent of the horses captured.</p>
3	<p>Comment: After having given a great deal of thought to the potential utilization of micro chipping/freeze branding and weighing the advantages and disadvantages of this option, I have concluded the disadvantages outweigh the benefits and recommend not to implement it.</p> <p>The most significant issue that was the deciding factor is the freeze brand itself, a trademark of BLM managed public wild horses and burros. As I see it, the issue is that this would be an experiment in foundational information to determine viability of utilizing microchips in future management of wild horses and burros on a National scale. The ultimate goal of someday being able to use satellite tracking</p>

Comment/Response Bald Mountain/South Shoshone HMAs

via these chips certainly has some benefits but most of those can already be achieved.

The single biggest protection that wild horses and burros have from slaughter is their freeze brand when they enter the adoption program. It is easily recognizable, requires no special technology or skill to identify, and makes them traceable by anyone. If chips replace these brands entirely, it will open the door for easy "disposal" because only someone with the proper equipment could tell a wild horse or wild burro apart from any other horse or donkey.

However, I can appreciate the desire to want to more fully understand their migratory patterns, especially in these HMA's, since there is so much known and suspected movement. Because of this, I am tempted to recommend just freeze branding them for the same reasons as cited above; it will make visual identification easier and patterns can be noted through this method.

The concern I have about utilizing this option though is, not only does the "ideal" of a wild horse or burro being branded on the range defeat the purpose of "wild", the more practical issue is, will it affect their future adoption potential? Their mane can hide the neck brands but not the hip brands. Will potential adopters be concerned about this highly visual double branding? I'm not sure how others would view it but it would be something that I would consider a negative if I was going to adopt - I want to look at the beauty of the horse, not graffiti.

Response: The brand that would be utilized would be approximately 4 inches in height, and located on the left hip. Only wild horses released back to the range would be branded, and most of those would exceed 5 years of age. When captured in the future, these animals would not be removed from the range and offered for adoption, but would be re-released to the HMA. There would be no "double branding". This type of brand has been utilized for identification of mares vaccinated with fertility control drug. Post gather, the brands are not easily visible except at close range, which is rare to achieve. The brands can often be observed from the air when conducting helicopter flights, but again, it is difficult at best. To the viewing public, the brands would be difficult to see.

There is no indication that microchip use would ever replace the freezebranding of adopted wild horses. The objective of the proposed use of microchips in conjunction with this gather would be for horses released back to the range.

Comment: The other option that was presented was the possibility of an on site adoption, with first come first serve, auction or lottery. I do not favor or recommend this option. Adopting wild horses out that are only hours off the range, fresh from the trauma of just being run for miles, with no adjustment period or opportunity to get familiar with the domestic scene or humans does not seem beneficial to either horse or human.

The only exception would be that a potential adopter could immediately secure a wild horse that they were interested in but I believe that could be remedied just through a "Reserve" process as this option utilizes prescreened adopters. Simply reserve the animals that they are expressing interest in and then of course, make sure that it is honored. If other comments seem to express a great deal of interest in having an on site adoption, then I would like to recommend the Reserve idea instead and process them normally.

4

The only benefit I see from having an on site instant adoption is to save a little money and I don't think this is the correct place to cut costs. If the adopters are serious, they won't mind waiting and this would give BLM time to complete all the necessary shots, worming, etc., and give the horses a little bit of time to orient themselves and get familiar with their "new life" outside of the wild.

Concern of potential illegal activity, and abuse of wild horses that slip through the cracks.

Response: The Battle Mountain Field Office conducted "trapsite" adoptions in the Eureka area in 2001 and 2005. During the preparation and adoption of these animals, it was observed that the wild horses adjusted quickly to the human presence, and were not overly affected by the recent gather. Within days of the gather, staff and the public were able to hand feed and pet many of the horses through the fences. Through follow-up compliance inspections, it was observed that the adopted horses quickly bonded with the adopters, and were gentled and trained easily. All horses adopted at trapsite events are vaccinated, de-wormed and Coggins tested. In the case of the proposed 2007 gathers, the objective would be to freemark, vaccinate, and de-worm the horses while being haltered in the chute prior to loading into the

Comment/Response Bald Mountain/South Shoshone HMAs	
	<p>adopters trailer. Unadopted wild horses would not be freezemarked or vaccinated at that time, and would be unaffected.</p> <p>The use of trapsite adoptions prevents the wild horses from having to be shipped 2-8 hours to a maintenance facility, mixed with new animals, sorted, freezemarked, vaccinated, and revaccinated. Most of the horses gathered in Nevada are loaded again to be transported across the United States to be off loaded, resorted, re-worked and transported to multiple adoption events. The trapsite adoptions not only save the additional expense, but avoid additional handling stress that the wild horses would encounter if transported to a maintenance facility. All activities conducted at the trapsite events are planned to minimize the stress to the wild horses and facilitate a pleasant transition to their new adoptive home. Trapsite adoptions allow the wild horse to go directly from the gather site to their new home. There is not a period of time when the horses get used to different maintenance facilities and animals only to be sorted and transported to other locations before finally being adopted. Many times, a wild horse will have resided at as many as 4-5 facilities and been to several adoption events before actually being adopted.</p> <p>As with regularly scheduled adoption events, adoptions conducted through trapsite events require approved applications and adequate pre-screening of potential adopters. Compliance inspections are also conducted as with regular adoptions, and compliance issues addressed when necessary. There has never been any indication that trapsite adoption events involve higher potential for improper treatment of the adopted wild horses. In fact, the opposite appears to be true, in that many of the horses are adopted to local individuals that have experience with horses, that utilize their wild horses for pleasure riding, and ranch work. These horses are cared for no differently than the domestic horses in their care, and lead quality lives.</p>
5	<p>Comment: Despite the fact that the current proposal is only focused on removing wild horses to achieve an "appropriate management level" and thriving ecological balance, I find nothing "appropriate" about a recently approved "allowable management level" that allocates 17,308 AUM's to livestock operations and only 3,780 AUM's towards wild horses in their lawfully "protected" habitat. While I support multiple-use of public lands, as a taxpayer that is subsidizing the cost of this removal proposal of wild horses from their lawfully reserved habitat, as well as the cost of their containment to achieve this "appropriate" level of utilization, I find the current allocations are excessively weighted to benefit the livestock allotments. The current estimated cost of this proposal to remove 529 wild horses is \$1,148,459.00*. I find the current allocations excessively favorable for a few while the majority of the American public receives little benefit from the currently established "thriving ecological balance". Furthermore, I would like to recommend that future management decisions regarding livestock grazing in reserved and protected wild horse and burro habitat be issued new fees that reflect the livestock operators "fair share" towards the cost of removing and containing our wild horses and burros for their exclusive benefit.</p> <p>Response: This issue is beyond the scope of the analysis. Removal of livestock was addressed within section 2.3.4 of the EA, under Alternatives Considered but Eliminated from Detailed Analysis.</p> <p>The appropriate time to comment on the establishment of AMLs is during the public comment periods offered for the review of Rangeland Health Assessments, Environmental Assessments, and Proposed Multiple Use Decisions in which data is presented, and analyzed in relation to the use of the areas by livestock, wild horses, and wildlife. The Land Use Planning process is also an appropriate avenue to submit comments pertinent to the approved uses for Public Lands. The Battle Mountain Field Office will be revising the existing Land Use Plan in future years, and the interested public will be notified of the opportunity to identify issues and provide comments.</p>
6	<p>Comment: Proposal supported as written.</p> <p>Response: Comment noted.</p>

Attachment 4
South Shoshone HMA Interested Public Mailing List

KATIE FITE, BIODIVERSITY DIRECTOR
 WESTERN WATERSHEDS PROJECT
 PO BOX 2863
 BOISE, ID 83701

LARRY TESKE, BIOLOGIST
 NEVADA DEPARTMENT OF WILDLIFE
 113 CARSON ROAD
 BATTLE MOUNTAIN, NV 89820

LILLY E. O'TOOLE
 O'TOOLE RANCHES
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 AUSTIN, NV 89310

MIKE PODBORNE
 NEVADA DEPARTMENT OF WILDLIFE
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 EUREKA, NV 89316

ROBERT MCQUIVER
 NEVADA DEPARTMENT OF WILDLIFE
 1100 VALLEY RD.
 RENO, NV 89512

LYNETT PIFFERO, CHAIR
 1745 SILVER EAGLE
 ELKO, NV, 89801

RACHEL BUZZETTI
 NEVADA CATTLEMENS ASSOCIATION
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 ELKO, NV 89803-0311

WILLIAM J GANDOLFO
 GANDOLFO RANCH
 HC 61 BOX 6165
 AUSTIN, NV 89310

DENNIS BILL, CHAIR
 HC 61 BOX 6275
 AUSTIN, NV, 89310

STEVE FOREE, SUPERVISORY HABITAT
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