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**Eagle Lake  
Field Office**

**Susanville,  
CA 96130**

(11/20/07)

# Environmental Assessment

(CA-350-2007-35)

## RAVENDALE WILD HORSE GATHER

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## 1.0 PURPOSE AND NEED FOR THE ACTION

### Introduction/Background

The Ravendale (Rave) Wild Horse Herd Management Area (HMA) is a relatively small herd maintained at 15 to 25 wild horses in the Ravendale Allotment Management Plan (Rave AMP) about 50 miles north of Susanville, California. There are 3 large pastures (see attached map) within the 35,000 acre allotment and the wild horses are generally restricted to the East Pasture (about 10,000 acres), but there is some movement between the East and West Pasture. Wild horses can be observed occasionally from Highway 395 North along the eastern edge of this pasture near the town of Ravendale.

Currently, there are about 65 -75 wild horses in the area which is about 3 times higher than the management level based on observations made this summer. There is some horse drift between the Rave Herd and the larger Twin Peak HMA across Highway 395 in the Ravendale area. However, the BLM is unable to get an accurate count on this movement because it occurs during winter conditions and is infrequent. Both herd areas are fenced along the highway but gates and snow conditions may allow some drift which affects the population of the herd. It appears to be minor but should be monitored in the future.

There are large blocks of private land which are unfenced and intermingled in the allotment which provide water and forage for wildlife, wild horses, and livestock. The permittee (5-Dot Land and Cattle) generally supports the presence of wild horses on his private lands unless the numbers exceed the maximum herd of 25. He has made several requests over the last 10 years to BLM to remove excess horses and bring the numbers down to the management level of 15 to 25.

The most recent request was on July 11, 2007, when he requested the wild horse herd be reduced to management numbers because of drought conditions and lack of water. His primary complaint has to do with competition for forage and water on both private and public lands within the allotment during drought years and when the horse numbers exceed 25. His reasons were based upon reduced precipitation (about 60 % of normal for 2007) in this area, reduced forage production, and a serious shortage of spring and reservoir water that normally is available. The only water remaining in the area as of August 2007 is from 2 springs which occur on private land.

Due to below normal forage and water conditions, his cattle were removed from the East Pasture almost 30 days earlier than the normal grazing season in the area. The wild horses stay throughout the year in this area and consequently it does not receive any rest from grazing. Under normal growing conditions and wild horses at management numbers this is not a serious problem unless there are increased wild horse numbers and poor range and water conditions.

In addition, a wildfire occurred in the adjacent West Pasture of the allotment in 2006 and is being rested from livestock. The temporary loss of about 8,000 acres increases grazing pressure on other areas and where there is reduced forage and water.

Some wild horse use has occurred in the burn area which is outside their herd area this year which is currently being rested from livestock. If we rest the area from livestock we should keep horse use to a minimum to allow for recovery of the burn area.

### **1.0 Purpose and Need for the Proposed Action**

This environmental assessment (EA) will analyze the impacts of the methods used to maintain the wild horses at the existing management levels within the Ravendale Wild Horse Herd Management Areas (HMA).

The primary goal for managing wild horses is to achieve a thriving natural ecological balance of resources, while maintaining a healthy and viable population of wild horses. No additional information has been identified that would indicate a need to adjust the established appropriate management levels for the Rave Wild Horse Herd Management Area. However, the key limiting factors for wild horses within the HMA continues to be use of public and private riparian areas by wild horses, and the limited amount of public water available for wild horse use.

The proposed action includes gathering about 55 wild horses which would bring the total number down to management levels of 15 to 25.

The proposed capture and removal is needed at this time in order to achieve a thriving natural ecological balance between wild horse populations, wildlife, livestock, and vegetation, and to protect the range from the deterioration associated with overpopulation of wild horses. There was about 60 % of normal rain/snowfall in 2007 in this area with a moderate to heavy reduction in livestock, wildlife, and wild horse forage. The lack of snow pack last winter reduced the available water in the allotment which resulted in the permittee shortening his grazing season by 35 days. This in addition to a wildfire in an adjacent pasture of this allotment which is currently being rested by livestock added to the reduction of grazing lands available. Because wild horses cannot be moved to other areas where water and forage may be more available, this action to gather excess wild horses is proposed.

The Proposed Action objectives include the collecting information on herd characteristics, and determining herd health. All activities would be conducted according to a specified set of Standardized Operating Procedures (SOP's) as shown in Appendix 1 at the end of the EA.

### **1.1 Conformance with Existing Land Use Plans**

Governing land use plans are the Willow Creek Management Framework Plan (MFP)/Final Grazing Environmental Impact Statement (EIS) 1983, and Record of Decision, as amended by the Rangeland (Land) Health Standards and Guidelines for California and Northwestern Nevada (2000). The Proposed Action is in conformance with the MFP.

The MFP states:

Range Management

Page 7. E., Wild Horses. Maintain a viable herd of 10-25 wild horses.

Page 12. Item 9., Maintain the New Ravendale Wild Horse Herd population of 15 horses plus or minus 50 %.

## **1.2 Conformance with Rangeland Health Standards**

The allotment was assessed in 2001 for conformance with Rangeland Health Standards. Generally the allotment is meeting or making progress toward Rangeland Health Standards. Monitoring and routine inspections indicate the native plant community is represented in the area and wild horse and cattle use during normal conditions is compatible with the long term sustainability and health of the area.

Heavy utilization levels by wild horses and to a lesser extent by cattle occur on springs and riparian areas on an annual basis in the area. However, cattle are moved in and out of the area in association with the grazing plan which reduces the time cattle use the area. Use made before and after cattle use the area is attributed to wild horses. Because horse use is continuous and year long, there is no opportunity to rest the riparian areas. The horse use prevents rest and regrowth of riparian areas especially during below normal moisture years.

## **1.3 Relationship to Statutes, Regulations, Policies, Plans, or Other Environmental Analysis**

The Proposed Action is authorized under Section 3(b) (2) of the 1971 Free-Roaming Wild Horses and Burros Act and Section 302(b) of the Federal Land Policy and Management Act of 1976.

The Herd Management Area Plan (HMAP) for this herd affected by the Proposed Action was signed in 1989. The Management Framework Plan provides general management direction, the 1983 decision established the AML, and the HMAP provides management parameters.

## **1.4 Scope of This Environmental Analysis / Identification of issues:**

### **1.4.1 History of the Planning and Scoping Process**

Internal and external scoping was conducted for this project prior to the preparation of the EA. No additional or new issues were identified other than what is analyzed in the EA. No written comments were received.

The removal of excess wild horses was first identified in July/August 2007. This occurred after the receipt of the letter from the permittee requesting wild horses within the Herd Management Area (HMA) be reduced to established appropriate management levels (AML's). Rationale for the reduction was based on excess horse numbers above management levels, drought conditions, horses concentrating on private lands, and lack of water in the area.

Important dates associated with scoping for the project.

07/11/2007 Received a letter from the permittee in the Herd Management Area (HMA) of the Ravendale Allotment requesting removal of excess wild horses down to appropriate management level (AML's) established for the herd area.

09/13/2007 Eagle Lake Field Office Internal Scoping Document. A plan was presented to the BLM Interdisciplinary Team to discuss potential concerns and identify issues of reducing wild horse numbers down to management numbers. Various observations and inspections were made by BLM Range Staff during August/September 2007. The inspections indicated that the wild horse numbers were in excess of the management numbers and impacts were occurring on the remaining water locations and riparian areas after livestock had been removed for the grazing season.

09/17/2007 External Scoping letter was sent to known interested and/or affected parties describing the proposed action and providing information on how to provide comments which would be used in determining issues needing addressed and whether or not there are unresolved conflicts with available resources. See page 15 and 16 of the EA for list of interested publics and/or affected parties. No written response was received.

10/01/2007 Bob Parker, a wild horse advocate contacted the BLM (R. Mauck, Senior Rangeland Management Specialist) by phone to discuss the reduction of wild horses. He was convinced that the BLM would zero out or eliminate this herd if the proposed action went forward. This was not the case and by the end of the conversation, Mr. Parker indicated that he had a better understanding of the wild horse management in the Eagle Lake Field Office. He was assured the proposed action was a reduction down to management levels and not an elimination of this small herd. No further communication occurred.

10/16/ to 11/15/2007 Internal review of the EA by BLM staff before FONSI, and Final Decision was issued by the field manager.

11/29/2007 EA, FONSI, and final decision sent to interested and affected parties.

**1.4.2 Critical Elements of the Human Environment**

The following elements of the Human environment are subject to requirements specified in statute, regulation, or executive order and must be considered in this EA.

**Table 2.**

Critical Elements of the Human environment that have been considered for this environmental assessment (EA) are listed below. Elements that may be affected are further described in this EA. Rationale for those elements that will not be affected are listed in the table.

Critical Element	No Impact	May Impact	Not Present	Rationale
Air Quality	X			The effects to this element would be limited to the exhaust fumes from two or three pickup

				trucks, a tractor and a helicopter for 2 -3 days. Minor dust from horses running into the trap site during the gather.
Areas of Critical Environmental Concern			X	There are no Areas of Critical Environmental Concern in this area.
Cultural Resources	X			The trap site is on private land. Gathering with the use of a helicopter will cause no ground disturbing activities, other than the impact of hooves as the herd moves toward the trap site. Cultural resources in the area will not receive impacts that are different from the daily presence of wild horses and other wildlife.
Environmental Justice	X			There are no minorities or low income groups within the area potentially affected by the proposed action and it has been determined that the action will not affect such groups.
Farmlands, Prime or Unique			X	There are no farmlands within the area potentially affected by the proposed action.
Floodplains			X	There are no floodplains within the potentially area affected by the proposed action.
Invasive, Nonnative Weed Species	X			There are no invasive, non-native weed species within the area potentially affected by the proposed action.
Native American Religious Concerns	X			The BLM, Eagle Lake Field Office is consulting with several federally recognized tribes on the proposed action.
Threatened and Endangered Species	X			No known T&E Fauna/Flora on private land.
Waste-Hazardous/Solid	X			No hazardous or solid waste will be generated as a result of the proposed action.
Water Quality: surface/ground	X			There is one small spring on private land near the trap site but caution will be taken to avoid the area. There are no activities proposed that could potentially affect the ground water.
Wetlands/Riparian		X		There are riparian areas on private land within the herd area that is potentially affected by the proposed action. Gather activities may have a temporary affect to vegetation due to trampling but is not considered long term. Additional impacts to soils and the hydrologic function of the riparian area will occur if wild horse numbers continue to increase above the management level.
Wild & Scenic Rivers			X	There are no wild and scenic rivers within the areas potentially affected by the proposed action
Wilderness/Wilderness Study Areas			X	There are no wilderness study areas within the areas potentially affected by the proposed action

### 1.4.3 Identified Issues Studied in Further Detail.

The following, in addition to any critical elements above which have “may impact” ratings, have been determined to be issues and will be analyzed further in this EA.

**Table 3**

Other Issues/Resource	Rationale
Wild Horse and Burro Management.	Increases in the wild horse numbers above the AML or appropriate management level can have serious impacts to land health by concentrating use in small areas which does not receive any rest due to year long use by horses.
Livestock Grazing.	Current livestock use is in balance with long term sustainable forage. Intensive grazing management has proved beneficial as indicated by land health standards being met in this area. However, if wild horses are not maintained at management numbers they may exceed the carrying capacity and begin to impact existing native vegetation, especially riparian areas. Additional impacts occur because wild horses tend to concentrate in small areas year long as compared to livestock that are moved through the area which provides for rest and some regrowth. The extended use without any rest or deferment increases utilization and trampling of riparian areas.
Riparian Management.	Traditional riparian management in this area is accomplished through rest and deferment of livestock. Most of the permanent water is on private land in the herd area and as horse numbers increase, additional impacts to riparian areas by trampling and over use occur. Past observations indicate when horse numbers are maintained at management levels and the livestock grazing strategy is followed, recovery and improvement occurs and progress is made toward meeting health standards.

**1.4.4 Resource (s)/Concerns discussed but eliminated as an Issue**

Other Issues/Resource	Rationale for Elimination
Elimination of all wild horses in the Rave HMA.	<p>A wild horse advocate (B. Parker) voiced a concern (by phone) that the proposed action was just a ruse or a scam to eliminate or zero out all wild horses in the Rave HMA. The BLM (R. Mauck, Senior Rangeland Management Specialist) discussed matter in depth with Mr. Parker and emphasized our goals were to reduce the herd to management numbers and not to eliminate the herd. This herd has been managed this way since the early 1980”s. The BLM has not taken any actions to eliminate the herd. After the discussion, Mr. Parker appeared to understand the Eagle Lake Field Office did not intend to eliminate this herd and thereby was less concerned.</p> <p>This issue was eliminated from further analysis.</p>

**2.0 ALTERNATIVES, INCLUDING THE PROPOSED ACTION**

**2.1 Alternatives to be considered in detail**

**2.1.1 Alternative 1 (Proposed Action)**

The proposed action is to gather and reduce the herd to 15 to 25 horses or the Appropriate Management Levels (AML) identified for this herd. Currents estimates place the herd at about 75 horses or three times higher than AML. The proposed action is in conformance with BLM's 2001 Wild Horse Strategy, which is to implement population management for each HMA.

The removal of excess wild horses would be accomplished by the use of a helicopter herding the horses into traps constructed of portable panels. The proposed capture site is entirely on private land near Ravendale, Ca. This operation would be accomplished either by BLM employees, contract, or a combination of both and the wild horses will be herded from public and private lands to the trap site. All capture logistics including temporary corrals, transportation, and holding areas will be on private land.

All capture and handling activities would be conducted in accordance with the Standard Operating Procedures (SOP's) described in Appendix 1. Selection of capture techniques would be based on several factors such as the season of removal, condition of animals, herd health, and environmental considerations. The excess horses removed from the area will be processed and those that meet the criteria will be put up for public adoption.

The actual gathering process is estimated to be completed in about 2-3 days. It is expected that the Proposed Action would be initiated between November and December 2007. If the gather does not occur during this time it will be rescheduled for 2008.

Part of the Proposed Action for each HMA would be to capture approximately 90 to 100 % of the wild horses. All animals would be examined in the field to determine sex, age, and color; blood samples may be acquired for genetic analysis; and to assess herd health (pregnancy, parasite loading, physical condition, etc.). Determination of which horses would be returned to the range would be based on an analysis of existing population characteristics and post gather data for age, sex ratio, and colors. The representation of age classes returned to the range would include several horses under 5 years old, and a balanced representation of horses over 6 years old. The sex ratio of horses returned would be 10% studs, and 90% mares. This overall age structure would assure genetic viability, and a healthy sustainable population while slowing the population growth. This ratio of males to females has produced young horses with color and confirmation that are desirable for adoption. These horses are becoming popular because of these traits.

### **2.1.2 Alternative 2 (No Action)**

This alternative consists of no direct management of wild horse numbers. Wild horses would be allowed to regulate their numbers naturally through forage, predation, disease, water, space availability, and affects of severe winters. It is estimated, based on population modeling, Rave Herd wild horse numbers would increase dramatically to over 300 in 10 years, and may be as high as 500 wild horses in 15 years.

This alternative is not in compliance with the Land Use Plan, Land Health Standards, and the requirements of the 1971 Free-Roaming Wild Horses and Burros Act which mandates the Bureau to protect the range from the deterioration associated with overpopulation, and to preserve and maintain a thriving natural ecological balance and multiple-use relationship in that area. However, for comparative purposes, the No Action Alternative will be included in this analysis. In addition, this alternative is not responsive to complaints of wild horse use on private lands and their removal or reduction. The BLM is required to address complaints on private land.



### **2.1.3 Alternatives Eliminated From Detailed Study**

One alternative considered but eliminated from further study was using fertility control measures only to regulate wild horse populations. Periodic capture operations would be required to administer an immunocontraceptive vaccine to inhibit reproduction of mares, or suitable remote delivery methods would need to be developed. This alternative was eliminated from further analysis since the vaccine has not been formally approved by the Food and Drug Administration for management based applications. Even with formal approval, an effective remote delivery methodology (aerial or water based) has not been developed for current formulations. Furthermore, the current data suggest that repeated long-term applications of the vaccine may affect fecundity (productivity).

In addition to the above rationale, the BLM does not recommend the use of immuno-contraceptives in this area at this time primarily because of the small herd size. The area has successfully been gathered several times in the past and the BLM does not feel the use of fertility control necessary for management horse numbers in the herd area. Therefore, this alternative will not be further analyzed.

## **3.0 ENVIRONMENTAL ANALYSIS**

This chapter will assess the environmental impacts on the identified issues affected by the Proposed Action and alternatives. This section is organized by resource/issue, with a discussion of the affected environment and analysis of the environmental consequences of each alternative for each resource/issue.

### **3.1 Wild Horse Management**

#### **3.1.1 Affected Environment**

The herd area is composed of big sagebrush/juniper/grass vegetation type in rolling hills to mountains that range from 5,300 to 5,800 feet. Range condition is generally good and reflects the expected plant communities for this area. Water sources are limited to surface springs and reservoirs that receive water from snow melt and infrequent rain storms. During below normal year precipitation, reservoirs may not fill or maintain water past May/June. The only remaining waters are springs which occur on private lands.

Wild horses depend upon a large area of private land for forage and water which is intermingled with public land in the herd area. Available water was limited in 2007, as a result of below normal precipitation. This forced livestock, horses, and wildlife to fewer water locations. The result was increased utilization and trampling with less water being available.

#### **3.1.2. Predicted effects on Wild Horses by all Alternatives:**

##### **3.1.2.1 Effects of Alternative 1 (Proposed Action)**

Direct & Indirect Effects:

The proposed action will reduce the existing wild horse herd from about 70 to 75 horses to the appropriate management level of 15-25. There will be short term disturbance to the various horse bands that make up the total herd during the gather, sorting, and release process.

Implementation of the Proposed Action would allow immediate achievement of AML. With the exception of changes to herd demographics, direct population-wide impacts over the last 20 years have proven to be temporary in nature with most, if not all, impacts disappearing within hours to several days of release.

No observable effects associated with these impacts would be expected within one month of release except a heightened shyness toward human contact. Observations of animals following release have shown horses relocate themselves back to their home ranges within 12 to 24 hours of release. Overall, the effects of reducing the horse herd to AML will have a positive effect on available forage and water because there are fewer horses to compete for limited resources on a year long basis.

### **Cumulative Effect:**

Long-term, the impacts of maintaining an AML designed to achieve a thriving, natural ecological balance would be a benefit to the wild horses in the HMA. At this population level, wild horses would be assured adequate forage and water during even the hottest and driest periods of the year. This would lead to wild horses in better physical condition, and better able to endure severe winters and drought. Direct impacts to wild horses under the Proposed Action may occur to individual animals. These impacts include:

- 1) Handling stress associated with the herding, capture, processing, and transportation of animals from temporary trap sites to temporary holding facilities (if used), and from the trap sites or temporary holding facilities to an adoption preparation facility. Some wild horses gathered in the HMA would be transported, by truck while some may be released on site the same day. The Litchfield wild horse corrals are approximately 45 miles from the trap site. Animals selected for return to the HMA would be transported by truck back to the HMA after further inspection was completed. The advantages of transporting all of the animals to Litchfield include access to better veterinary care for immunizations, genetic work, and treatment of injuries; access to better sorting facilities (chutes, pens, etc.) that allow for safer and more humane handling of horses; and access to larger and safer pens, water, and forage facilities for horses to be kept in while gather and processing operations are conducted.

- 2) Exposure of wild horses to domestic horse diseases, such as strangles. Domestic horses used during gather operations would be present at the capture sites. The trucks, chutes, and panels used at the capture sites have been used to handle horses in the past and may harbor disease agents. Domestic and wild horses from other areas are also present at the Litchfield holding facility and may transmit diseases to the HMA wild horses, even though horses from the herd would not be kept in the same corrals as the other horses.

The effect of removing wild horses from the population would not be expected to have a significant impact on herd dynamics or population variables; as long as the selection criteria for removal ensured a typical population structure was maintained. Obvious potential impacts on horse herds and populations from exercising poor selection criteria not based on herd dynamics include modification of age or sex ratios to favor a particular class of animal.

The Proposed Action would mitigate the potential adverse impacts on wild horse populations by establishing a procedure for determining what selective removal criteria is warranted for the herd. The flexible procedures (Appendix 1 - SOP's) would allow for correction of any existing discrepancies in herd demographics that could predispose a population to increased chances for catastrophic impacts. The Proposed Action would also establish a standard for selection that would minimize the possibility for developing negative age or sex based selection effects to the population in the future.

Implementation of the Proposed Action would allow immediate achievement of AML. Population-wide impacts include the temporary displacement of bands during capture and the associated re-dispersal, modification of herd demographics (age and sex ratios), temporary separation of members of individual bands of horses, re-establishment of bands following releases, and the removal of animals from the population. With the exception of changes to herd demographics, direct population-wide impacts over the last 20 years have proven to be temporary in nature with most, if not all, impacts disappearing within hours to several days of release. No observable effects associated with these impacts would be expected within one month of release except a heightened shyness toward human contact. Observations of animals following release have shown horses relocate themselves back to their home ranges within 12 to 24 hours of release.

### **3.1.2.2 Effects of Alternative 2 (No Action)**

#### **Direct & Indirect Effects**

This alternative consists of no direct management of wild horse numbers. Wild horses would be allowed to regulate their numbers naturally through forage, predation, disease, water, space availability, and affects of severe winters. It is estimated the Rave Horse Herd numbers would increase dramatically to over 300 in 10 years, and may be as high as 500 wild horses in 15 years.

The increase in horses would impact existing vegetation and ultimately reduce and/or eliminate desirable forage and water quality and quantity. Wild horses are large ungulates with few natural predators. They are present year-long in native plant communities within the HMA and they congregate around water sources and trail through riparian drainages affecting water quality riparian ground cover. As wild horse numbers increase trampling and compaction occurs reducing overall plant production and creating the opportunity for less valuable annual forage plants such as cheatgrass to increase reducing overall forage quantity and nutritional value.

Because most of the long term water sources and a large portion of the forage production occur on private land, impacts to these areas would prompt more complaints (Personal Communication

from Land Owner) from the land owner. If horse numbers continued to increase this could lead to a request for total removal of wild horses from private land in the HMA. If wild horses were restricted from private lands this action would seriously affect the long term viability of this herd.

### **Cumulative Effects**

As horse numbers increase and exceed normal forage production, utilization of vegetation and associated trampling/compaction of soils will reduce root reserves and plant productivity. The impacts are greatest where wild horses tend to congregate as they tend to do with in their individual bands which make up the herd. When vegetation is used year long and soils are trampled and compacted, plant vigor, production, and diversity are reduced and affect long term sustainability of forage.

Eventually, the forage demands will exceed forage production and diminished horse health may result in starvation and could lead to die-offs, especially during extended drought or severe winters.

## **3.2 Livestock Grazing**

### **3.2.1 Affected Environment**

There is one Allotment within this HMA, the Ravendale Allotment Management Plan (AMP). There are 3 large pastures (see map) with one permittee within the 35,000 acre allotment. The wild horses are generally restricted to the East Pasture (about 10,000 acres) however, some movement occurs between the East and West Pasture.

The allotment currently operates under the AMP developed in the late 1980's. Changes and refinements have been made to the intensive grazing strategy over time and with the creation new fenced pastures this has become one of best managed allotments in the field office.

The allotment is permitted for 437 cows from 04/01 to 10/15 for 2848 AUMs. A normal grazing season does not usually begin until late April and the off dates vary from 09/01 to 10/01 depending on the annual conditions. The cattle rotate through all the pastures each year and the rotation is modified to provide rest and/or deferment in each pasture.

Utilization criterion is 40% maximum on key species: needle grass, bluebunch wheatgrass, bitterbrush, Idaho Fescue, and other native perennial grass. Actual grazing patterns are based on the location of waters, available forage, and are generally moderate (20 - 40%) depending upon the amount of livestock herding, pasture rotation, and horse numbers.

### **3.2.2. Predicted effects on Livestock Grazing by all Alternatives**

#### **3.2.2.1 Effects of Alternative 1 (Proposed Action)**

##### **Direct & Indirect Effects**

The proposed action alternative would have least impacts to livestock operations, and the social and economic values associated with livestock grazing. The adjustment of wild horse numbers down to recommended management numbers reduces head to head competition between cattle and horses in this area. Currently, the intensive livestock grazing strategy provides both rest and deferment on an annual basis. This management allows native plants time to produce seed and plant material, increase ground cover (as plant litter), improved vigor, and root reserves. Because the cattle numbers and season of use period is based on annual adjustments for production and water there is usually residual plant material available after cattle leave the allotment. This provides for the health of the plants as well as provides forage for wildlife and horses during the winter.

### **Cumulative Effect:**

The removal of horses down to AML would reduce utilization of riparian and upland vegetation. This management coupled with a progressive livestock grazing program which manages for long term sustainability of vegetation would result in improved rangeland health.

Management adjustments to the grazing strategy and the maintenance wild horse numbers at or near management levels have resulted in improved range condition as indicated by standards for land health being met and maintained in this allotment.

### **3.2.2.2 Effects of Alternative 2 (No Action)**

#### **Direct & Indirect Effects:**

Implementation of Alternative 2, the No Action Alternative, would result in the most rapid increase in wild horse numbers, and would not be consistent land health goals and livestock operations on public lands. Because horses graze year-long there would be severe grazing and trampling damage to uplands and the riparian areas as populations increase. Since most of the permanent water is on private lands more impacts are expected where water exists.

If there is no reduction of wild horses an increase in forage utilization and need for water would be expected and competition between cattle and livestock would increase. When horse numbers exceed the current carrying capacity of the forage production as they would under this alternative impacts to livestock operations would increase. Social and economic values associated with livestock grazing would be negatively impacted because the amount and competition for forage and water would increase and the permittee would be required to find forage elsewhere at an increase cost of production.

The permittee has indicated he would request routine and more severe gathers on his private public land to prevent long term damage by horses. The permittee has indicated his willingness to allow wild horses to use his private land as long as the numbers are reasonable and near the AML.

Under current regulations the BLM is required to act on any request to remove wild horses from private lands. As stated earlier, there appears to be a balance between cattle and wild horses as long as horse numbers are maintained near AML.

### **Cumulative Effect:**

Long-term impacts are expected with a large increase in the wild horse population. This herd tends to reproduce at a higher rate as compared to other herd areas primarily due to the improved range condition and available forage therefore; horse numbers are expected to increase faster. As wild horse numbers increase there would be greater competition between cattle and horses for forage and water. Because horses tend to stay in small herd areas the impacts of overgrazing are greater, especially if the only available water during drought condition is on private land.

Over the long term, range condition would decline as horse number increase and overgrazing occurs. Desirable native plants would be selected and over grazed as compared to less desirable annual plants. If horse numbers continue to increase in less than 15-20 years invasive grasses such as cheatgrass, could dominate this site. The shift from native perennial plants to annuals would reduce the overall forage production and nutrition for cattle and horses. Long term impacts would result in starvation and die off of an unregulated horse herd. Livestock grazing would be reduced as a result of loss of forage and require additional expense and effort by the permittee for their operation.

## **3.3 Riparian Management**

### **3.3.1 Affected Environment**

There are several springs in the HMA but most occur on private land. The springs support riparian vegetation consisting mainly of herbaceous plant communities, including grasses, forbs, sedges, and rushes. There are two drainages within the herd area which supports small concentration of woody riparian vegetation, including willow, and rose. The springs in this area are unfenced and open to grazing.

### **3.3.2. Predicted effects on Riparian Management by all Alternatives:**

#### **3.3.2.1 Effects of Alternative 1 (Proposed Action)**

##### **Direct & Indirect Effects:**

Under the Proposed Action, the springs on private and public land would be maintained at a static to upward trend as observations suggest. Impacts to riparian areas by livestock (cattle) are mitigated by a management strategy that incorporates routine movement or rotation, rest, and deferment. Because cattle move through these pastures in a timely manner and have upper utilization limits there are fewer impacts as compared to Alternative 2 – No Action.

When horse numbers are maintained at or near AML, impacts to riparian areas are moderate with year horse long use. Past observations indicate when horses are near AML, overall use is reasonable and residual plant material in the uplands is abundant and available to horses during winter months. As grazing use shifts from springs to uplands in the fall and winter, there is significantly less use around springs and riparian areas thereby reducing impacts.

**Cumulative Effect:**

Past, Present, Foreseeable future actions not part of the proposed action.

Stabilization of riparian areas is expected to continue with slight improvement as seen as increased ground cover and increase water availability under this alternative because the rotation of cattle. There are indicators when horse numbers are at or near AM, yearlong use does not appear to be limiting long term sustain forage production.

**3.3.2.2 Effects of Alternative (No Action)**

**Direct & Indirect Effects:**

The No Action Alternative #2 would allow wild horses populations unrestricted growth resulting in increased use of private and public riparian areas by wild horses. As the wild horse population continues to grow, wild horses would utilize private water sources, increasing trampling damage to springs. Heavier utilization of riparian areas would be result in significant reduction of forage for livestock and wildlife and reducing long term sustainability.

Uncontrolled or unlimited horse growth would impact water production and storage in riparian areas by removing plant cover. The loss of ground cover increases evaporation and damages roots through hoof action which could ultimately dry up a spring source resulting in significant impacts to wildlife, horses, and livestock.

**Cumulative Effect:**

Impacts to ground cover, soil disturbance, and compaction reduce land health of riparian areas is expected with unlimited horse growth. The cumulative impacts of large numbers of wild horses would increase each year that horses are not gathered. These impacts would affect all of the resources that depend on stable soils and native vegetative communities, including water quality and quantity, and riparian areas. Land health would decline and standards would not be met or progress would not continue.

**4.0 CONSULTATION & COORDINATION**

**4.1 Persons, Groups and Agencies Consulted**

Susanville Indian Rancheria  
Tribal Chairman Stacy Dixon  
745 Joaquin Street,  
Susanville CA 96130

Comm. for the Preservation of Wild Horses  
Attn: C. Barcomb  
885 East Lake Blvd.  
Carson City, NV 89704

Pit River Tribal Council  
Tribal Chairperson Jessica Jim  
37118 Main Street  
Burney CA 96013

Harold "Angelo" O'Neil  
P.O. Box 12  
Hat Creek, CA 96040  
Atsugewi Band Representative

Twoo Martin Craig  
339 Chimney Rock  
P.O. Box 372  
Alturas, CA 96101  
Hammawi Band Representative

Susanville Indian Rancheria  
Tim Keesey  
Environmental Department  
745 Joaquin St.  
Susanville, CA 96130

Robert Boyce, Pit River Tribal Administrator  
37118 Main Street  
Burney, CA 96013  
Bob Parker  
1026 Poplar  
Ramona, Ca 92065

5-Dot Land and Cattle  
PO Box 50  
Standish, Ca 96128

#### 4.2 List of Preparers and Specialists Consulted

<b>Name</b>	<b>Resource/Activities</b>	<b>Project Role</b>
Sharynn Blood	Cultural/Paleo	Interdisciplinary Team
Duane Jackson	Land / Realty	Interdisciplinary Team
Ralph Mauck	Riparian Coordinator, Senior Rangeland Management Specialist	Project Lead, EA Preparer and Interdisciplinary Team
Mike Kuyper	Range/Environmental Coordinator	Interdisciplinary Team



Mike Kuyper	Rangeland Management Specialist, EA Coordinator	Interdisciplinary Team
Carolyn Gibbs	Veg. T&E/Sensitive	Interdisciplinary Team
Josh Gibbs	Noxious Weeds	Interdisciplinary Team
Stanly Bailes	Recreation	Interdisciplinary Team
Missi Nelson	Wildlife	Interdisciplinary Team

## Appendix 1: Standard Operating Procedures (SOP's)

### APPENDIX I STANDARD OPERATING PROCEDURES

Gathers would be conducted by utilizing contractors from the Wild Horse and Burro Gathers-Western States Contract, or BLM personnel. The following procedures for gathering and handling wild horses and burros would apply whether a contractor or BLM personnel conduct a gather. For helicopter gathers conducted by BLM personnel, gather operations will be conducted in conformance with the *Wild Horse and Burro Aviation Management Handbook* (March 2000).

Prior to any gathering operation, the BLM will provide for a pre-capture evaluation of existing conditions in the gather area(s). The evaluation will include animal conditions, prevailing temperatures, drought conditions, soil conditions, road conditions, and a topographic map with wilderness boundaries, the location of fences, other physical barriers, and acceptable trap locations in relation to animal distribution. The evaluation will determine whether the proposed activities will necessitate the presence of a veterinarian during operations. If it is determined that capture operations necessitate the services of a veterinarian, one would be obtained before the capture would proceed. The contractor will be apprised of all conditions and will be given instructions regarding the capture and handling of animals to ensure their health and welfare is protected.

Trap sites and temporary holding sites will be located to reduce the likelihood of undue injury and stress to the animals, and to minimize potential damage to the natural resources of the area. These sites would be located on or near existing roads.

The primary capture methods used in the performance of gather operations include:

1. Helicopter Drive Trapping. This capture method involves utilizing a helicopter to herd wild horses and burros into a temporary trap.
2. Helicopter Assisted Roping. This capture method involves utilizing a helicopter to herd wild horses or burros to ropers.
3. Bait Trapping. This capture method involves utilizing bait (water or feed) to lure wild horses and burros into a temporary trap.

The following procedures and stipulations will be followed to ensure the welfare, safety and humane treatment of wild horses and burros in accordance with the provisions of 43 CFR 4700.

#### **A. Capture Methods used in the Performance of Gather Contract Operations**

1. The primary concern of the contractor is the safe and humane handling of all animals captured. All capture attempts shall incorporate the following:

All trap and holding facilities locations must be approved by the Contracting Officer's Representative (COR) and/or the Project Inspector (PI) prior to construction. The Contractor may also be required to change or move trap locations as determined by the COR/PI. All traps and holding facilities not located on public land must have prior written approval of the landowner.

2. The rate of movement and distance the animals travel shall not exceed limitations set by the COR/PI who will consider terrain, physical barriers, weather, condition of the animals and other factors.
3. All traps, wings, and holding facilities shall be constructed, maintained and operated to handle the animals in a safe and humane manner and be in accordance with the following:
  - a. Traps and holding facilities shall be constructed of portable panels, the top of which shall not be less than 72 inches high for horses and 60 inches for burros, and the bottom rail of which shall not be more than 12 inches from ground level. All traps and holding facilities shall be oval or round in design.
  - b. All loading chute sides shall be a minimum of 6 feet high and shall be fully covered, plywood, metal without holes.
  - c. All runways shall be a minimum of 30 feet long and a minimum of 6 feet high for horses, and 5 feet high for burros, and shall be covered with plywood, burlap, plastic snow fence or like material a minimum of 1 foot to 5 feet above ground level for burros and 1 foot to 6 feet for horses. The location of the government furnished portable fly chute to restrain, age, or provide additional care for the animals shall be placed in the runway in a manner as instructed by or in concurrence with the COR/PI.
  - d. All crowding pens including the gates leading to the runways shall be covered with a material which prevents the animals from seeing out (plywood, burlap, plastic snow fence, etc.) and shall be covered a minimum of 1 foot to 5 feet above ground level for burros and 2 feet to 6 feet for horses
  - e. All pens and runways used for the movement and handling of animals shall be connected with hinged self-locking gates.

4. No modification of existing fences will be made without authorization from the COR/PI. The Contractor shall be responsible for restoration of any fence modification which he has made.
5. When dust conditions occur within or adjacent to the trap or holding facility, the Contractor shall be required to wet down the ground with water.
6. Alternate pens, within the holding facility shall be furnished by the Contractor to separate mares or jennies with small foals, sick and injured animals, and estrays from the other animals. Animals shall be sorted as to age, number, size, temperament, sex, and condition when in the holding facility so as to minimize, to the extent possible, injury due to fighting and trampling. Under normal conditions, the government will require that animals be restrained for the purpose of determining an animal's age, sex, or other necessary procedures. In these instances, a portable restraining chute may be necessary and will be provided by the government. Alternate pens shall be furnished by the Contractor to hold animals if the specific gathering requires that animals be released back into the capture area(s). In areas requiring one or more satellite traps, and where a centralized holding facility is utilized, the contractor may be required to provide additional holding pens to segregate animals transported from remote locations so they may be returned to their traditional ranges. Either segregation or temporary marking and later segregation will be at the discretion of the COR.
7. The Contractor shall provide animals held in the traps and/or holding facilities with a continuous supply of fresh clean water at a minimum rate of 10 gallons per animal per day. Animals held for 10 hours or more in the traps or holding facilities shall be provided good quality hay at the rate of not less than two pounds of hay per 100 pounds of estimated body weight per day. An animal that is held at a temporary holding facility after 5:00 p.m. and on through the night, is defined as a horse/burro feed day. An animal that is held for only a portion of a day and is shipped or released does not constitute a feed day.
8. It is the responsibility of the Contractor to provide security to prevent loss, injury or death of captured animals until delivery to final destination.
9. The Contractor shall restrain sick or injured animals if treatment is necessary. The COR/PI will determine if injured animals must be destroyed and provide for destruction of such animals. The Contractor may be required to humanely euthanize animals in the field and to dispose of the carcasses as directed by the COR/PI.
10. Animals shall be transported to final destination from temporary holding facilities within 24 hours after capture unless prior approval is granted by the COR/PI for unusual circumstances. Animals to be released back into the HMA following gather operations may be held up to 21 days or as directed by the COR/PI. Animals shall not be held in traps and/or temporary holding facilities on days when there is no work being conducted except as specified by the COR/PI. The Contractor shall schedule shipments of animals

to arrive at final destination between 7:00 a.m. and 4:00 p.m. No shipments shall be scheduled to arrive at final destination on Sunday and Federal holidays, unless prior approval has been obtained by the COR. Animals shall not be allowed to remain standing on trucks while not in transport for a combined period of greater than three (3) hours. Animals that are to be released back into the capture area may need to be transported back to the original trap site. This determination will be at the discretion of the COR.

## **B. CAPTURE METHODS THAT MAY BE USED IN THE PERFORMANCE OF A GATHER**

1. Capture attempts may be accomplished by utilizing bait (feed or water) to lure animals into a temporary trap. If the contractor selects this method the following applies:
  - a. Finger gates shall not be constructed of materials such as "T" posts, sharpened willows, etc., that may be injurious to animals.
  - b. All trigger and/or trip gate devices must be approved by the COR/PI prior to capture of animals.
  - c. Traps shall be checked a minimum of once every 10 hours.
2. Capture attempts may be accomplished by utilizing a helicopter to drive animals into a temporary trap. If the contractor selects this method the following applies:
  - a. A minimum of two saddle-horses shall be immediately available at the trap site to accomplish roping if necessary. Roping shall be done as determined by the COR/PI. Under no circumstances shall animals be tied down for more than one hour.
  - b. The contractor shall assure that foals shall not be left behind, and orphaned.
3. Capture attempts may be accomplished by utilizing a helicopter to drive animals to ropers. If the contractor with the approval of the COR/PI selects this method the following applies:
  - a. Under no circumstances shall animals be tied down for more than one hour.
  - b. The contractor shall assure that foals shall not be left behind, or orphaned.
  - c. The rate of movement and distance the animals travel shall not exceed limitations set by the COR/PI who will consider terrain, physical barriers, weather, condition of the animals and other factors.

## **C. USE OF MOTORIZED EQUIPMENT**

1. All motorized equipment employed in the transportation of captured animals shall be in compliance with appropriate State and Federal laws and regulations applicable to the humane transportation of animals. The Contractor shall provide the COR/PI with a current safety inspection (less than one year old) for all motorized equipment and tractor-trailers used to transport animals to final destination.
2. All motorized equipment, tractor-trailers, and stock trailers shall be in good repair, of adequate rated capacity, and operated so as to ensure that captured animals are transported without undue risk or injury.
3. Only tractor-trailers or stock trailers with a covered top shall be allowed for transporting animals from trap site(s) to temporary holding facilities, and from temporary holding facilities to final destination(s). Sides or stock racks of all trailers used for transporting animals shall be a minimum height of 6 feet 6 inches from the floor. Single deck tractor-trailers 40 feet or longer shall have two (2) partition gates providing three (3) compartments within the trailer to separate animals. Tractor-trailers less than 40 feet shall have at least one partition gate providing two (2) compartments within the trailer to separate the animals. Compartments in all tractor-trailers shall be of equal size plus or minus 10 percent. Each partition shall be a minimum of 6 feet high and shall have a minimum 5 foot wide swinging gate. The use of double deck tractor-trailers is unacceptable and shall not be allowed.
4. All tractor-trailers used to transport animals to final destination(s) shall be equipped with at least one (1) door at the rear end of the trailer which is capable of sliding either horizontally or vertically. The rear door(s) of tractor-trailers and stock trailers must be capable of opening the full width of the trailer. Panels facing the inside of all trailers must be free of sharp edges or holes that could cause injury to the animals. The material facing the inside of all trailers must be strong enough so that the animals cannot push their hooves through the side. Final approval of tractor-trailers and stock trailers used to transport animals shall be held by the COR/PI.
5. Floors of tractor-trailers, stock trailers and loading chutes shall be covered and maintained with wood shavings to prevent the animals from slipping.
6. Animals to be loaded and transported in any trailer shall be as directed by the COR/PI and may include limitations on numbers according to age, size, sex, temperament and animal condition. The following minimum square feet per animal shall be allowed in all trailers:
  - 11 square feet per adult horse (1.4 linear foot in an 8 foot wide trailer);
  - 8 square feet per adult burro (1.0 linear foot in an 8 foot wide trailer);
  - 6 square feet per horse foal (.75 linear foot in an 8 foot wide trailer);
  - 4 square feet per burro foal (.50 linear feet in an 8 foot wide trailer).
7. The COR/PI shall consider the condition and size of the animals, weather conditions, distance to be transported, or other factors when planning for the movement of captured

animals. The COR/PI shall provide for any brand and/or inspection services required for the captured animals.

8. If the COR/PI determines that dust conditions are such that the animals could be endangered during transportation, the Contractor will be instructed to adjust speed.

#### **D. SAFETY AND COMMUNICATIONS**

1. The Contractor shall have the means to communicate with the COR/PI and all contractor personnel engaged in the capture of wild horses and burros utilizing a VHF/FM Transceiver or VHF/FM portable Two-Way radio. If communications are ineffective the government will take steps necessary to protect the welfare of the animals.
  - a. The proper operation, service and maintenance of all contractor furnished property is the responsibility of the Contractor. The BLM reserves the right to remove from service any contractor personnel or contractor furnished equipment which, in the opinion of the contracting officer or COR/PI violate contract rules, are unsafe or otherwise unsatisfactory. In this event, the Contractor will be notified in writing to furnish replacement personnel or equipment within 48 hours of notification. All such replacements must be approved in advance of operation by the Contracting Officer or his/her representative.
  - b. The Contractor shall obtain the necessary FCC licenses for the radio system
  - c. All accidents occurring during the performance of any task order shall be immediately reported to the COR/PI.
2. Should the contractor choose to utilize a helicopter the following will apply:
  - a. The Contractor must operate in compliance with Federal Aviation Regulations, Part 91. Pilots provided by the Contractor shall comply with the Contractor's Federal Aviation Certificates, applicable regulations of the State in which the gather is located.
  - b. Fueling operations shall not take place within 1,000 feet of animals.

#### **G. SITE CLEARANCES**

Personnel working at gather sites will be advised of the illegality of collecting artifacts.

Prior to setting up a trap or temporary holding facility, BLM will conduct all necessary clearances (archaeological, T&E, etc). All proposed site(s) must be inspected by a government archaeologist. Once archaeological clearance has been obtained, the trap or temporary holding facility may be set up. Said clearance shall be arranged for by the COR, PI, or other BLM employees.

Gather sites and temporary holding facilities would not be constructed on wetlands or riparian zones.

#### **H. ANIMAL CHARACTERISTICS AND BEHAVIOR**

Releases of wild horses would be near available water. If the area is new to them, a short-term adjustment period may be required while the wild horses become familiar with the new area.

#### **I. PUBLIC PARTICIPATION**

Opportunities for public viewing (i.e. media, interested public) of gather operations will be made available to the extent possible; however, the primary consideration will be to protect the health and welfare of the animals being gathered. The public must adhere to guidance from the on site BLM representative. It is BLM policy that the public will not be allowed to come into direct contact with wild horses or burros being held in BLM facilities. Only authorized BLM personnel or contractors may enter the corrals or directly handle the animals. The general public may not enter the corrals or directly handle the animals at anytime or for any reason during BLM operations.

#### **J. RESPONSIBILITY AND LINES OF COMMUNICATION**

**Contracting Officer's Representative**

Videll Retterath or Leona Parker

**Eagle Lake Field Office - Project Inspector**

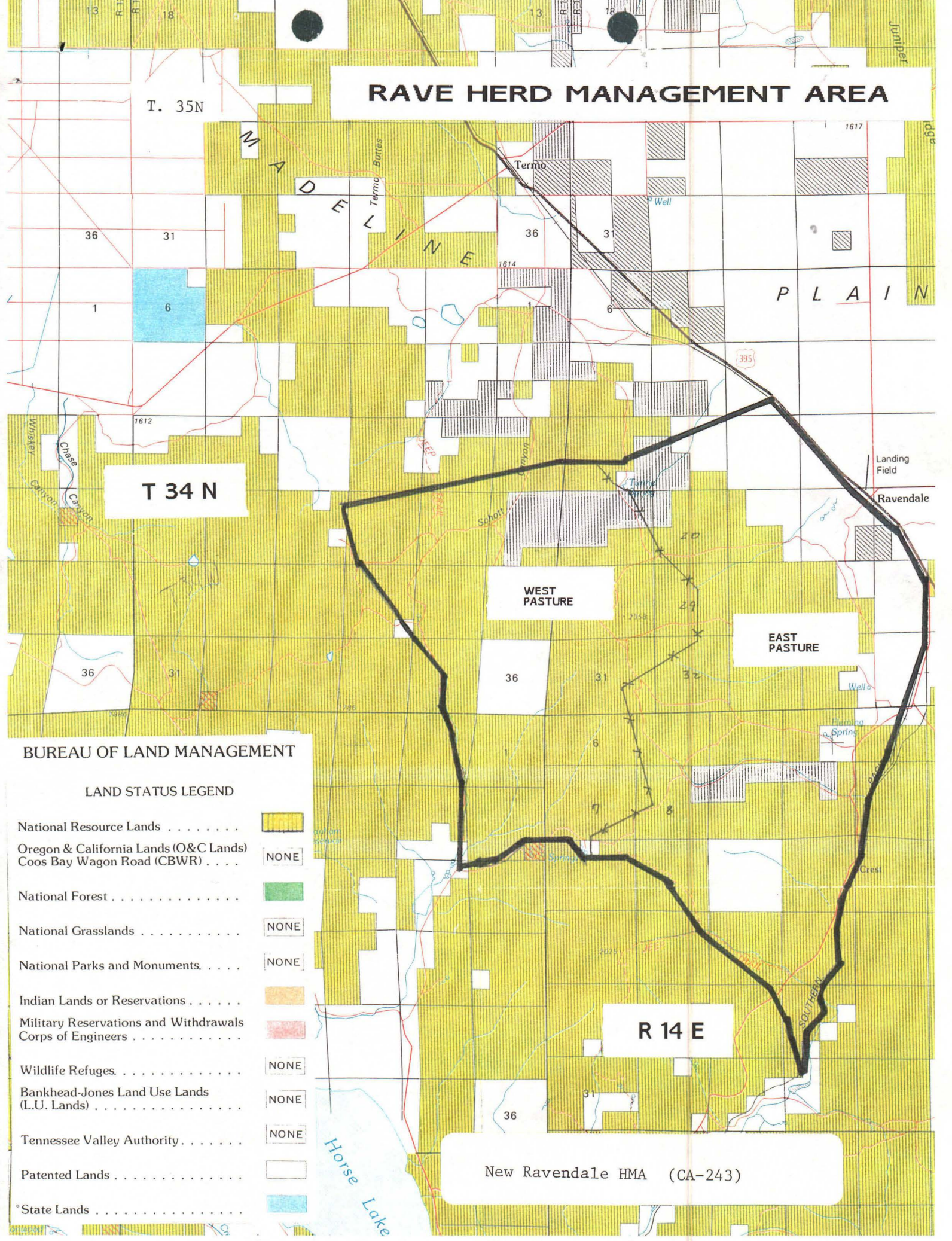
Doug Satica

The contract specifications require humane treatment and care of the animals during removal operations. These specifications are designed to minimize the risk of injury and death during and after capture of the animals. The specifications will be vigorously enforced.

Should the Contractor show negligence and/or not perform according to contract stipulations, he will be issued written instructions, stop work orders, or defaulted.



# RAVE HERD MANAGEMENT AREA



## BUREAU OF LAND MANAGEMENT

### LAND STATUS LEGEND

National Resource Lands . . . . .	
Oregon & California Lands (O&C Lands) Coos Bay Wagon Road (CBWR) . . . . .	NONE
National Forest . . . . .	
National Grasslands . . . . .	NONE
National Parks and Monuments . . . . .	NONE
Indian Lands or Reservations . . . . .	
Military Reservations and Withdrawals Corps of Engineers . . . . .	
Wildlife Refuges . . . . .	NONE
Bankhead-Jones Land Use Lands (L.U. Lands) . . . . .	NONE
Tennessee Valley Authority . . . . .	NONE
Patented Lands . . . . .	
State Lands . . . . .	

New Ravendale HMA (CA-243)