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

FIELD OFFICE: Stillwater

NEPA NUMBER: DOI-BLM-NV-C0100-2012-0067-DNA

CASEFILE PROJECT NUMBER: SRP-LLNVC01000-12013

PROPOSED ACTION TITLE/TYPE:
Special Recreation Use Permit for VORRA Fallon 2012 Off Road Race

LOCATION/LEGAL DESCRIPTION:
The proposed action is located within the following public lands at the Salt Wells area near Fallon, Nevada:

T17N, R30E, Sec 14,15,22,23,25,26,27,32;
T17N, R30E, Sec 30,31,32;
T16N, R30E, Sec 3,4,9,10,15,22,26,27,35
T16N, R31E, Sec 4,5,9,15,16,22,26,35,36
T15N, R30E, Sec 1
T15N, R31E, Sec 7, 14,15,16,17,23,24,25
T15N, R31 ½ E,Sec 2,11,12,13,24,25
T15N, R32E,Sec 31

APPLICANT: Valley Off-Road Racing Association (VORRA)
Wes Harbor, Event Coordinator

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

Valley Off Road Racing Association (VORRA) has submitted a Special Recreation Permit application to conduct a competitive off road vehicle race (OHV) in Churchill, County, Nevada. The course is located on established dirt roads on public lands managed by the BLM in the Salt Wells area 15 miles southeast of Fallon. The race will be held on September 8th and 9th and will run from 12:00 noon to 3:00 p.m. for the All Terrain Vehicles (ATV) and Utility Terrain Vehicles (UTV) Class and from 4:00 p.m. to 1:00 a.m. at night for the Trucks and Buggies Class. Participants will begin arriving at the Start/Finish area on September 7th for vehicle preparation, race on September 8th th, and leave on September 9th post race. Participants will be allowed to preview the course, but pre-racing at high speeds will not be allowed by the event organizer. Overnight camping will occur at the Start/Finish area in a gravel pit where portable toilets and dumpsters will be provided by VORRA. This event has been authorized annually since 1993 and NEPA analysis was recently updated through an Environmental Assessment in 2009 (DOI-BLM-NV-C020-2009-0016 EA).

The OHV race will be conducted on established dirt roads in the Salt Wells Basin, Bass Flats, Bunejug and Cocoon Mountains south and adjacent to Highway 50. Approximately 30-50 race vehicles and estimated 100-150 spectators would attend the event. Racers will complete as many laps of the 42 mile course as possible in the 12 hours of allotted time on the first day, and will do the same the following day in reverse direction. Twelve miles of the course located along the pipeline road are also utilized by the Vegas to Reno race annually in August. There will be four pit/check points at various intervals along the course including the start/finish pit located along the Salt Wells Road in areas previously inventoried for cultural resources. This start/finish site would allow access for crew assistance, emergency response, and restrict public access to the course for public health and safety concerns. The width of the race route would vary from eight (8') feet to more than twenty (20') feet depending on topography. The course will be marked with flagging on the right-hand side of the route except where double-flagged or arrowed in areas to restrict passing, speed or travel. Activities from the race are not anticipated to impact the operations or facilities from the ENEL geothermal plant. All potential hazards from the geothermal infrastructure will be marked for participants to see.

Mitigation for the potential impacts from the event is provided for in the stipulations attached to the Special Recreation Permit.

B. Land Use Plan (LUP) Conformance

LUP Name: Consolidated Resource Management Plan
Date Approved: May 2001

The proposed action described in this document is in conformance with the Carson City Field Office *Consolidated Resource Management Plan* (May 2001) even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions):

Section 8 – REC-2: **Desired Outcomes**, 1: "Provide a wide variety of recreation opportunities on public land under the administration of the Carson City Field Office."

Section 8 – REC-2: **Land Use Allocations**, 1: "All public lands under CCFO jurisdiction are designated open to Off-Highway Vehicle (OHV) use unless they are specifically restricted or closed."

Section 8 – REC-6: **Administrative Actions**, 4: "On public land designated open for off highway vehicles, there will generally be no restrictions on use. Organized competitive OHV events have been allowed in Mason Valley, Wilson Canyon, Hungry Valley OHV Area, Moon Rocks, Lemmon Valley MX Area, Dead Camel Mountains, Salt Wells Area, Wassuk Range and in the Frontier 500 and Carson Rally OHV corridors. Organized events will be handled on a case-by-case basis through the Special Recreation Permit review and Environmental review process. Organized activity is generally restricted to existing roads and trail

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

Name of Document: VORRA Fallon 250
Document No.: NV-C010-2009-0015-EA
Date of Approval: 6/15/2009

Name of Document: Best in the Desert (BITD) – Vegas to Reno OHV Race
Document No.: NV-030-08-026 (EA)
Date of Approval: 7/30/2008

Name of Document: VORRA Fallon 250 OHV Race
Document No.: NV-030-93057 (EA)
Date of Approval: 7/22/93

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

The proposed event is located within the area analyzed in the 2009 EA and, includes the identical course route, start and end locations, checkpoints, camping areas and estimated number of participants. The applicant proposed to expand the course into Arterial Canyon and GZ Canyon to the east, but this area was not assessed in the 2009 EA and therefore, could not be approved without additional evaluation of the impacts to resources. Although these two canyon roads were part of the race event in the past, the 1993 EA does not address current concerns with BLM sensitive species found in the area. The BLM continues to monitor for permit stipulation compliance, resource protection and public safety through pre, post and event monitoring. There are no changes proposed for the conduct of the event. Therefore the current proposed action and the action previously analyzed in the 2009 EA are the same.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

A reasonable range of alternatives were analyzed in the 2009 document including a No Action Alternative. Internal BLM review and public response to notification letters sent out to solicit comments on the 2009 EA did not identify new issues, new impacts, new information or errors in the previous analysis that would require the creation and analysis of additional alternatives. Since the proposed action is the same, the range of alternatives analyzed in the 2009 EA is deemed adequate.

3. Is the existing analysis valid in light of any new information or circumstances (such as, range- land health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

There has been no significant change in circumstances or significant new information relevant to the proposed action since 2009. The existing environmental conditions have not changed from those previously analyzed and the EA addressed biological, physical, social and economic resources and issues in the event area. Analysis presented determined no significant impacts to wildlife, livestock, vegetation, soils, cultural resources or socio-economics would result from implementation of the proposed action. Economically, the event provides a moderate financial infusion into the local communities. BLM review of the proposed action has not revealed any new issues or information that would require additional analysis. All use continues to be on the existing, previously analyzed course. There have been no new discoveries of T & E plants or animals, cultural resources or additional issues that would change the existing analysis. Thus it is logical to conclude that continuation of the proposed off highway vehicle race in this area is unlikely to result in significant impacts to the human environment.

The proposed action would not change the previous analysis of cumulative impacts. Cumulative impacts were addressed directly in the EA. It was anticipated that the route would be used for OHV racing over a minimum 5-year term. It was determined at that time that the environmental impacts had been accurately anticipated. Direct impacts are to road surfaces where road ruts, center hump and turn berms are generated by the large tired vehicles. It has been observed that the effects are temporary and can be reduced with mechanized equipment. Post-event maintenance, if needed, is required by event stipulations. Post event monitoring has confirmed that repeated use of these race routes combined with casual use of the area has not resulted in unusual cumulative effects to the biological, physical or social elements of the human environment analyzed in the previous EA. Continuation of the same or similar events is unlikely to generate unpredicted cumulative effects in the future.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Since the course is identical to the course analyzed in the 2009 EA, the direct and indirect impacts of the proposed action are not significantly different from those identified in the existing documents. Post event monitoring of the course confirms the finding of no significant impacts. The current proposed action is the same as the actions analyzed in the 2009 EA. No new issues or information regarding the proposed action have been revealed. Previous analysis was subject to BLM and public review so it is logical to conclude that the direct and indirect impacts of the current proposed action will remain unchanged. This methodology and approach remains appropriate for the current proposed action.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Public involvement in the 2009 EA analyses provided appropriate coverage of the proposed action. The EA followed approved BLM scoping and review processes. This process included internal BLM and public scoping processes followed by internal BLM and public review of the EA. Notification of Fallon area Tribes, Nevada State Historic Preservation Officer and local County Commissioners are documented. Based on the analysis in the EA and few comments submitted during the scoping and review process the BLM authorized officer rendered a decision in regards to the proposed action. The County Commissioners, other permittees, right-of-way holders and the general public are advised by letter or phone of proposed events each year. This provides an opportunity for re-evaluation of existing information and consideration of new information and issues prior to the event. This on-going process is considered adequate public involvement for the current proposed action.

E. Persons/Agencies/BLM Staff Consulted

Name	Title	Resource/Agency Represented
Steve Kramer	Planning Environmental Coordinator	BLM 8/20/12
Jill Devaurs	Public Health & Safety/Grazing/Noxious Weeds	BLM 8-20-12
Dan Westermeyer	Recreation/Wilderness/VRM/LWC	BLM 8/20/12
John Wilson	Wildlife, T&E Species	BLM 8-19-12
Susan McCabe	Archeology Apc 20b+21	BLM 8/21/12
	Water Quality	BLM
Jill Devaurs/Linda Appel/Chelsy Simerson	Soils	BLM CS 8/20/12

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Signature of Project Lead

Signature of NEPA Coordinator

Signature of Responsible Official

Date 8/22/2012

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.