

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

FIELD OFFICE: Stillwater Field Office, Carson City District

NEPA NUMBER: DOI-BLM-NV-C010-2013-0039-DNA

CASEFILE PROJECT NUMBER: SRP-LLNVC01000-12007

PROPOSED ACTION TITLE/TYPE: Vegas to Reno Special Recreation Permit for Off-Highway Vehicle Race in the Stillwater Field Office.

LOCATION/LEGAL DESCRIPTION: Point-to point 543 mile race; approximately 130 miles through Mineral and Churchill Counties in the Stillwater Field Office

Stillwater Field Office :

T5N, R36E, Sec. 23, 24, 26
T5N, R37E, Sec. 4,5,6
T6N, R36E, Sec. 6,7,8,13,14,15,16,17,24
T6N, R35E, Sec. 1, 2
T7N, R35E, Sec. 25,26,27, 33, 34, 35
T7N, R36E, Sec. 1,11,12,14,15,16,19,20,21,30
T7N, R37E, Sec. 2,3,7,8,9,10
T8N, R37E, Sec. 1,12,13,24,25,35
T8N, R37.5E, Sec. 7,19,30
T9N, R37E, Sec. 1,12,13,24,25,26
T10N, R36E, Sec. 3,10,11,12
T10N, R37E, Sec. 7,8,9,15,16,22,23,25,26,36
T11N, R36E, Sec. 4,9,16,21,28,33
T12N, R34E, Sec. 2,3,4,5,12
T12N, R35E, Sec. 7,8,9,13,14,15,16,24
T12N, R36E, Sec. 19,20,21,27,28,33
T13N, R32E, Sec. 4,9,10,14,15,23,24,25,26,36
T13N, R33E, Sec. 25,26,27,28,29,30,31,36
T13N, R34E, Sec. 31,32
T14N, R32E, Sec. 6,7,18,20,29,32,33
T15N, R30E, Sec. 1
T15N, R31.5E, Sec. 25,26
T15N, R31E, Sec. 7,15,16,17,23,24,25
T15N, R32E, Sec. 31
T16N, R28E, Sec. 8,9,10,11,12,17,18
T16N, R27E, Sec. 24

T16N, R29E, Sec. 7,8,16,17,21,22,23,24,25
T16N, R30E, Sec. 19,20,21,26,27,35

Course Modification: Adds the following sections to the course

Section 1: 6.35 miles

T7N, R36E, Sec. 1,11,12

T7N, R37E, Sec. 3,7,8,9,10

Section 2: 1.7 miles

T8N, R37E, Sec. 1,12,13

T8N, 37.5E, Sec. 7,8

APPLICANT: Best In The Desert, Casey Folks

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

Best in the Desert (BITD) has submitted an application for a Special Recreation Permit to the Nevada State Office, to conduct the Vegas to Reno competitive off highway vehicle (OHV) race August 16th and 17th, 2013 on public lands in Nevada. This event has occurred within Nevada for the past 17 years with the lead SRP administration and responsibility assigned to the Tonopah (TFO), Sierra Front (SFFO) or Stillwater (SFO) Field Office. Tonopah F.O. is the project lead for 2013. Each field office however retains the responsibility for providing appropriate NEPA documentation, resource monitoring and personnel for the event.

As previously analyzed in the environmental assessment EA-NV-030-08-026 (2008) for the Carson City District Office (CCDO), the point-to-point (south to north) multi-field office race enters the SFO in Mineral County approximately 13 miles southeast of Mina, NV. The race is to be conducted on approximately 130 miles of improved bladed or dirt roads and sand washes and includes five vehicle pits located adjacent to the course at main intersections or access points.

In 2010, four and one-half miles of the Vegas-To-Reno course evaluated in the 2008 EA within the SFO was re-routed as it enters Mineral County onto an existing bladed county road that has been used prior to 2008, but was not included in the NEPA analysis. This re-route did not result in any significant changes or result in any negative impact. Conversely, the proposed section redirected the route further away from the Blue Link Spring, a biologically sensitive area described in the 2008 EA.

The only course change for the 2013 from the approved course is the 6.35 mile re-route, identified as Section 1 and the 1.7 mile re-route identified as Section 2, on public lands near the Mineral County and Nye county line east of Stewart Valley. These two sections were reviewed in the field by Stillwater Staff on May 15th. The change in route for Section 1 will provide greater variability in course selection for the event by connecting two adjacent loops of the

approved course. This will allow for greater flexibility and allow the permittee to avoid course areas that may need additional rehabilitation time from previous use. It will also allow the event to avoid an area of silty soils along Highway 361 south of Gabbs which has created visibility issues with dust along the highway during past events. This 6.35 mile section was created using mechanical equipment, and has seen recent grading in some segments from mining exploration activities. A two hundred yard section of the road will require maintenance by the permittee to correct erosion problems to allow vehicle passage, but this action will improve the road for other users and will help reduce future erosion of the road surface. All maintenance activities and vehicles will remain on existing road boundaries.

The course change identified as Section 2 is 1.7 miles in length and will keep the event on the primary bladed access road in this area. The section of the course that is being avoided is an old fence line road that is essentially a two track road that is seldom traveled. Rerouting this section and keeping the event on the primary access road will prevent the degradation of the two track fence line road and allow for easier course maintenance upon completion of the event. Both the existing approved route and the proposed change in route pass within 1.2 mile of Humdinger Spring but the event activities will not be on the spur road to the spring. Approving the reroute will provide a positive impact in the area by eliminating the use of the two track road.

GENERAL INFORMATION AND MITIGATION:

In addition to crossing public land, the event also uses roads that traverse private lands, county maintained roads, and cross over/under state highways. The permit applicant is responsible for notifying private land owners and for securing additional permissions and permits from the U.S. Forest Service, state, counties, cities, towns and regulatory agencies if affected by the race event. This race has been widely supported by the Nevada Department of Tourism and the rural counties in need of economic stimulus provided by the event.

The race would involve several vehicle classifications including but not limited to trophy trucks, buggies, Hummers, motorcycles, quads and side-by sides. It is anticipated that 240 vehicles, including 100 motorcycles and 140 trucks/buggies, would begin the race, however; about 1/3 or more of the vehicles typically do not finish for various reasons related to mechanical or equipment failures. During the event, participants would be spread out over the course as a result of staggered starts and driver experience. Highway/road crossings would be manned and pits would be located in previously disturbed areas. Portable toilets would be provided in each pit area. Activities involving authorized race-related pit personnel, families, and friends would be limited to official gas stops and pit locations. All authorized gas stops and pit area are located on previously disturbed sites along the edge of roads. Spectators would typically view the race in or near small communities along the race route. Event notification letters are mailed to local stakeholders such as grazing permittees, miners, and resource companies prior to the event.

Some chase vehicles and pit crews would travel on the highways and dirt access roads leap-frogging to new check points and pits. However, due to the point to point nature of the race,

many of the pit crews will be providing service to multiple vehicles, reducing the need to keep ahead of the participants. Support teams and/or event staff would track their racer through radio communications and live computer graphic interactive tracking systems using Global Positioning Systems (GPS) and aircraft. Local ham radio operators will be establishing radio relay stations along the course for communications. The applicant would provide for all emergency services including rescue. This entails providing aircraft and ground support personnel. Four BLM law enforcement rangers as well as recreation staff from each field office will be monitoring the race and pits for SRP compliance.

The applicant annually acquires paved road crossing permits from Nevada Department of Transportation, and coordinates with County Commissioners and road maintenance crews. Road wardens, with flags, would be stationed at all cross roads to ensure safe, managed event vehicle crossings. Checkpoints established along the course serve two purposes: to ensure that shortcuts are not taken and to ensure that each entrant is tracked for safety.

The entire course will be marked on either side of the approved route with temporary directional and hazard warning signs placed throughout the course to direct the participants and warn drivers of potentially hazardous obstacles. Hazards that cannot be moved are brightly flagged and bannered to reduce the risk of a rider collision or fall.

The CCDO Special Recreation Policy requires that all OHV events be monitored. The objective of event monitoring is to ensure that events are conducted in a safe and organized manner and in accordance with BLM regulations and permit stipulations. Monitoring is also conducted to confirm approved routes prior to the race and to identify and document actual resource impacts for post use analysis, recommendations and the development of future alternatives, where applicable. Typical monitoring methods include photo documentation, GPS mapping and personal observations in a post event report format.

B. Land Use Plan (LUP) Conformance

The proposed action 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: Best in the Desert, Vegas to Reno OHV Race
Document No.: NV-030-08-026 (EA)
Date of Approval: FONSI/DR signed 7/30/2008

Name of Document: Best in the Desert, Vegas to Reno OHV Race
Document No.: EA-NV-030-04-013
Date of Approval: 2004

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

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 2013 event is similar to the action analyzed in the 2008 EA and essentially the same as the approved 2008 through 2012 events. The course and pits are similar to the 2011 approved race with the exception of the use of an alternate 30 mile section that is on approved course from the 2008 EA. The 2013 event consists of the same type of vehicles, estimate number of entrants (240), spectators, and pit stops as the 2011 approved course. The event is being held the same time of year as analyzed in the 2008 EA. The only notable difference in the course from the 2011 event is the 6.35 mile re-route, identified as Section 1 and the 1.7 mile re-route identified as Section 2, on public lands near the Mineral County and Nye county line east of Stewart Valley.

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?

Yes. The environmental concerns, interests, and resource values have not changed from the analysis performed in the referenced 2008 EA. The range of alternatives in the 2008 EA is still appropriate.

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, and 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?

On March 5, 2010, the U.S. Fish and Wildlife Service announced that listing the greater sage-grouse (range wide) and Bi-State population (previously referred to as the Mono Basin area population) under the Endangered Species Act (ESA) is warranted, but precluded by higher priority listing actions. As a result, both populations are now candidate species for ESA protection. According to BLM Manual 6840 – Special Status Species Management, all Federal candidate species are to be conserved as Bureau sensitive species. The course analyzed in the 2008 EA does not pass through any identified PPH or PGH Sage Grouse habitat.

The anticipated impacts to the resources have not significantly changed from the 2008 EA. The proposed action will not have any adverse effect on the range-land health, human health or environment of minority and low income populations. The proposed action describes measures that will be taken which will limit and prevent cumulative impacts.

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?

Yes. The direct, indirect, and cumulative effects of the current proposed action are the same as those analyzed in the 2008 EA both quantitatively and qualitatively and are sufficient.

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

Yes. The 2008 EA provided adequate internal and external review opportunities.

E. Persons/Agencies/BLM Staff Consulted

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Jason Wright	Archaeologist	Stillwater Field Office
Chris Kula	Wildlife Biologist	Stillwater Field Office
Ken Depaoli	Minerals Specialist	Stillwater Field Office
Jill Devaurs	Range Specialist	Stillwater Field Office
Linda Appel	Range Specialist	Stillwater Field Office
Matt Simons	Realty Specialist	Stillwater Field Office

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

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<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Jason Wright - <i>Jan 7-22-13</i>	Archaeologist	Stillwater Field Office
Chris Kula - <i>7/22/13</i>	Wildlife Biologist	Stillwater Field Office
Ken Depaoli - <i>KD 7/22/13</i>	Minerals Specialist	Stillwater Field Office
Jill Devaurs - <i>Soils OS 7/22/13</i>	Range Specialist	Stillwater Field Office
Linda Appel - <i>la 7/22/13</i>	Range Specialist/ <i>WFB</i>	Stillwater Field Office
Matt Simons - <i>MS 7/22/13</i>	Realty Specilist	Stillwater Field Offcie
<i>Chely Simerson OS 7/22/13</i>	<i>RMS</i>	<i>SFO</i>

Note: Refer to the EA 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 the NEPA.

Don Wilton - ORP
Signature of Project Lead

Date 7-22-13

Agell Noel
Signature of Stillwater Field Office NEPA Coordinator

Date 7/23/13

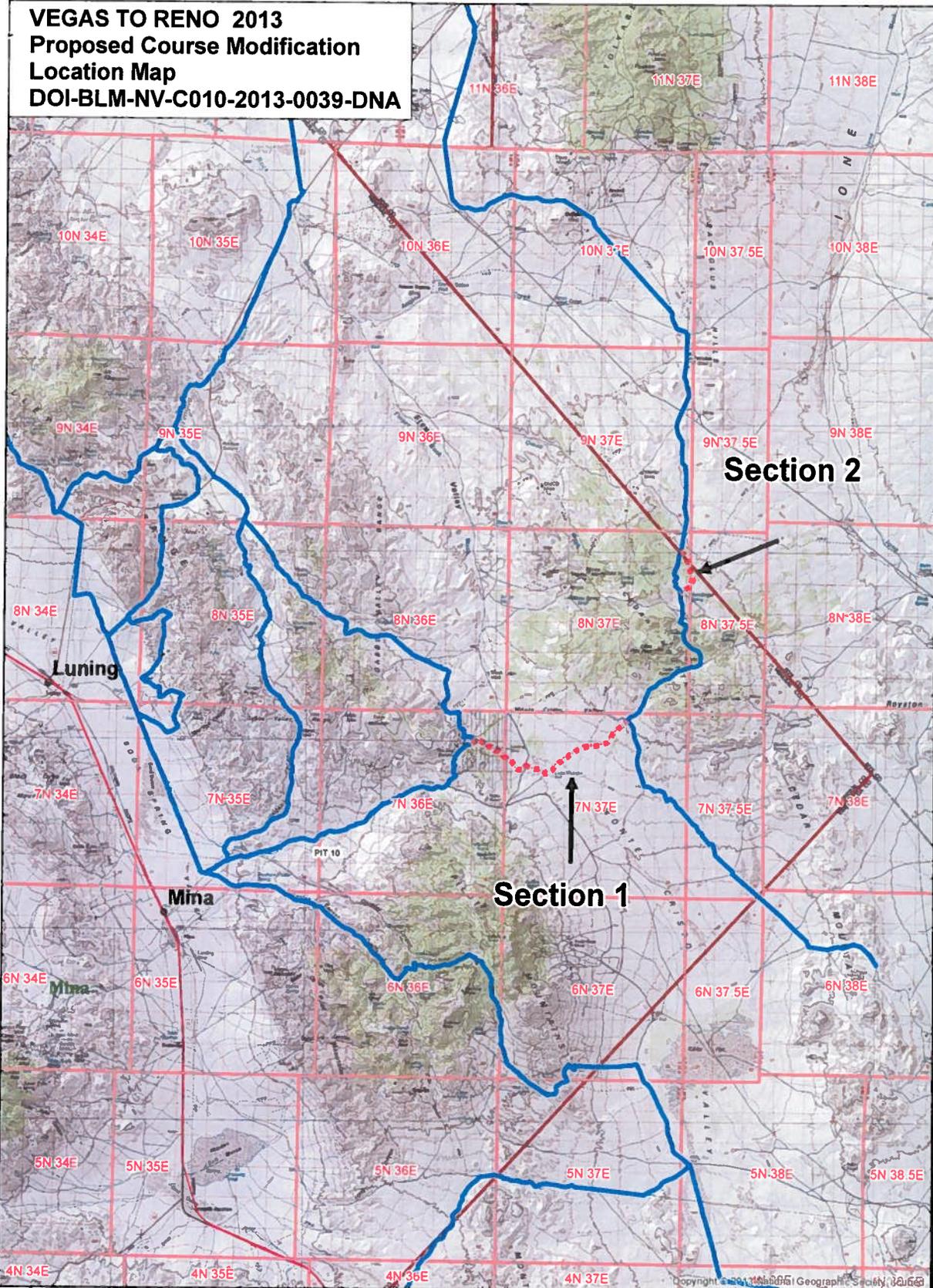
Theresa J. Kuntz
Signature of Responsible Official
Stillwater Field Office

Date 7/25/2013

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.

**VEGAS TO RENO 2013
Proposed Course Modification
Location Map
DOI-BLM-NV-C010-2013-0039-DNA**

BLM



Legend

- Course Modification 2013
 - Approved Course
 - Township
- 0 1.25 2.5 5
Miles



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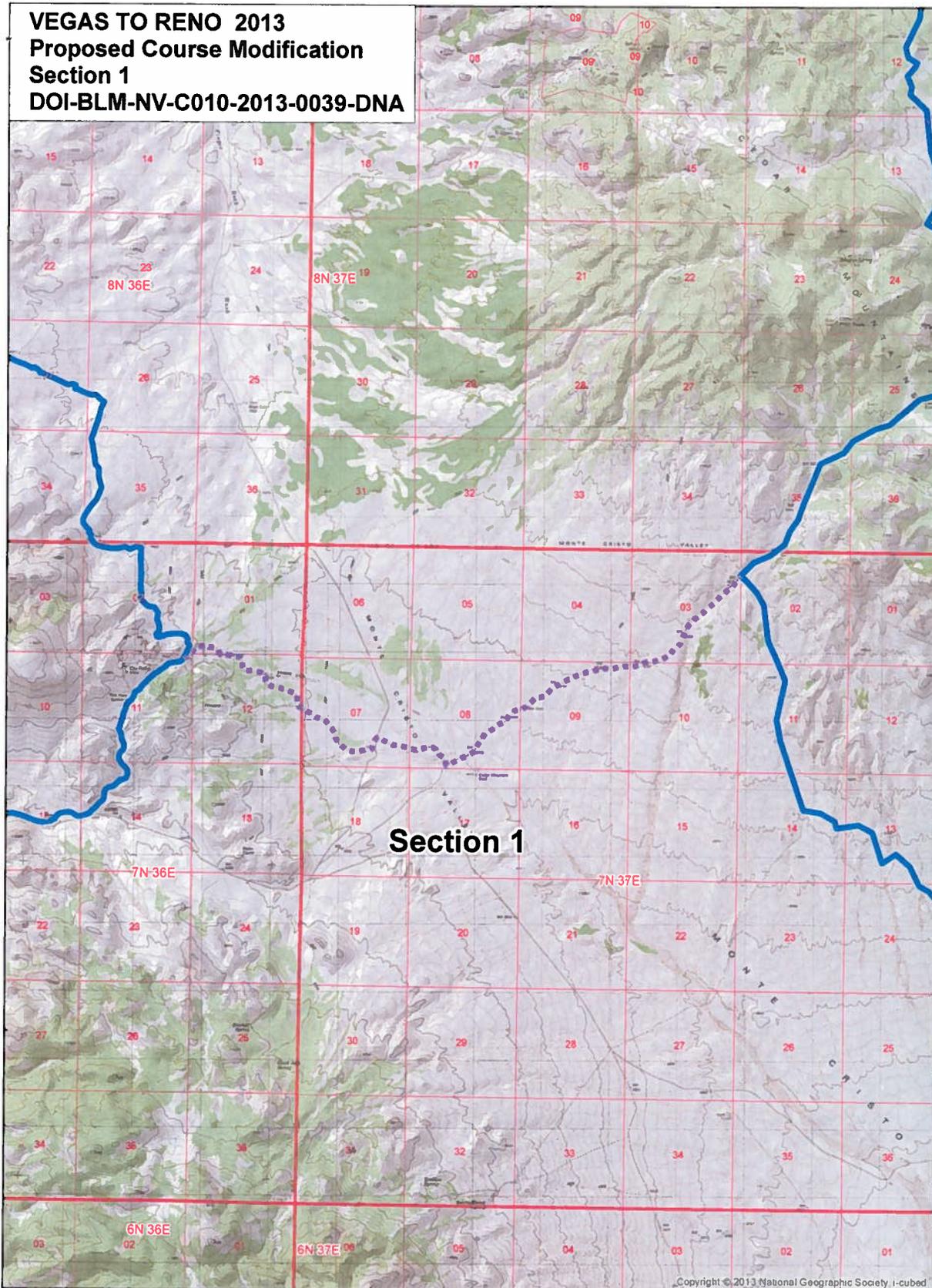
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Map Produced by DMW 7/19/13

Carson City District Office

**VEGAS TO RENO 2013
Proposed Course Modification
Section 1
DOI-BLM-NV-C010-2013-0039-DNA**

BLM

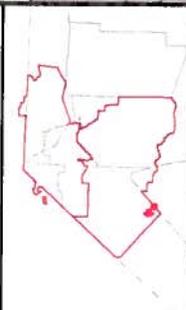


Section 1

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Legend

-  Course Modification 2013
-  Approved Course
-  Township
-  Section



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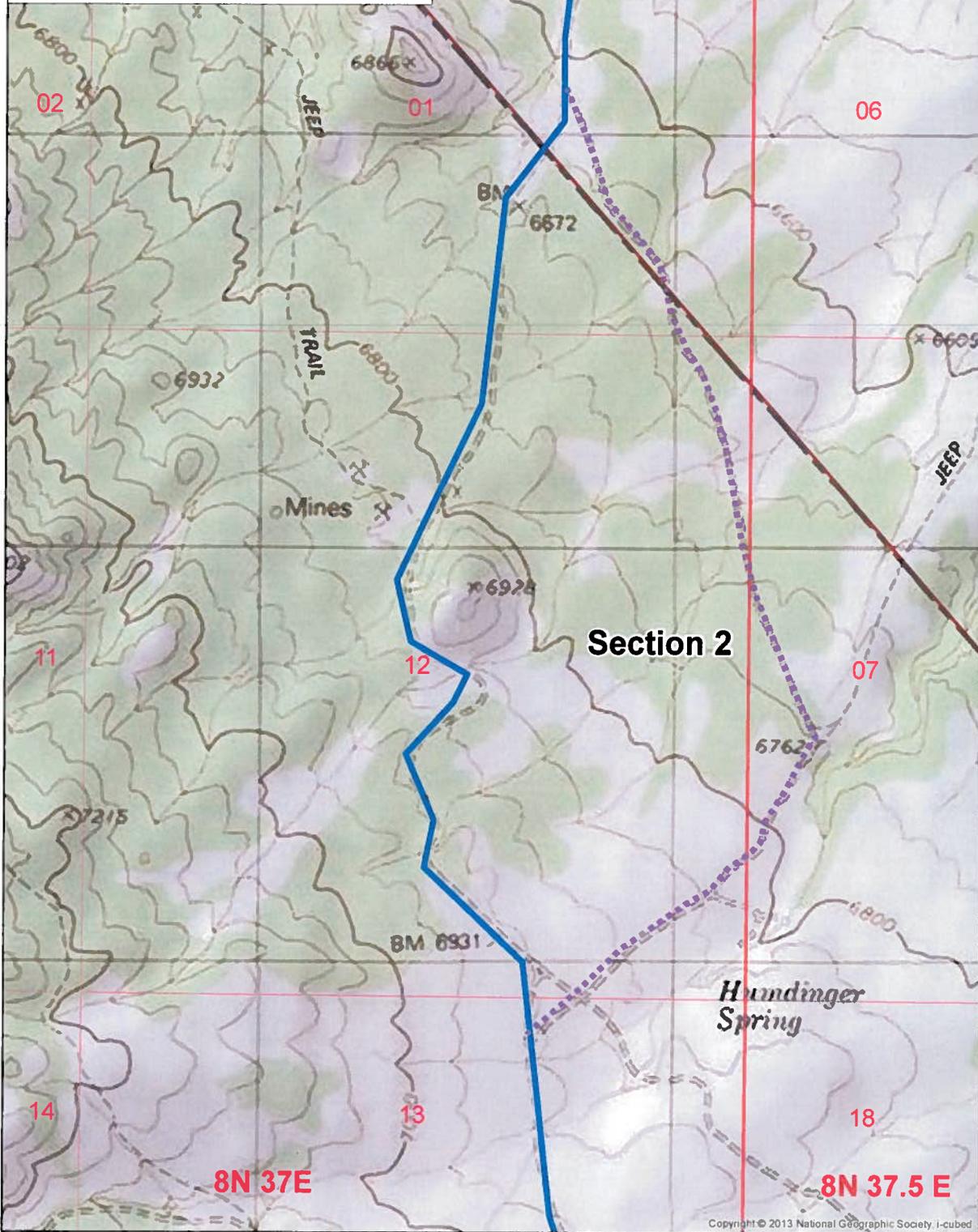
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**VEGAS TO RENO 2013
Proposed Course Modification
Section 2
DOI-BLM-NV-C010-2013-0039-DNA**

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Legend

- - - - Course Modification 2013
- Approved Course
- Section
- Township



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