

FINAL ENVIRONMENTAL ASSESSMENT

Bulletproof Tactical LLC

Tactical Vehicle Off-Highway Operations Project

DOI-BLM-NV-C010-2014-0006-EA

U.S. Department of the Interior
Bureau of Land Management
Carson City District
Stillwater Field Office
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It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

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LIST OF ACRONYMS

4WD	four-wheel drive
ACEC	Area of Critical Environmental Concern
AOI	Area of Influence
BLM	Bureau of Land Management
BPT	Bulletproof Tactical LLC
CFR	Code of Federal Regulations
DOD	Department of Defense
EA	Environmental Assessment
FLPMA	Federal Land Policy and Management Act of 1976
GHG	greenhouse gas
HMMWV	high mobility multipurpose wheeled vehicles
ID	interdisciplinary
IPAC	Information, Planning, and Conservation System
M-ATV	MRAP-all terrain vehicle
MBTA	Migratory Bird Treaty Act of 1918
MOU	Memorandum of Understanding
mph	miles per hour
MRAP	mine resistant ambush protected
NDOW	Nevada Department of Wildlife
NEPA	National Environmental Policy Act
NMC	Navy Munitions Command
NNHP	Nevada Natural Heritage Program
NSCV	Non-standard commercial vehicle
OHV	off-highway vehicle
PGH	Preliminary General Habitat
Plan	Tactical Vehicle Off-Highway Operations Project Plan of Operations
PMC	Precision Maneuver Course
PPH	Preliminary Priority Habitat
Project	Tactical Vehicle Off-Highway Operations Project
ROW	right-of-way
USFWS	United States Fish and Wildlife Service
UTV	utility terrain vehicle

1.0 INTRODUCTION/PURPOSE AND NEED

1.1 INTRODUCTION

The Tactical Vehicle Off-Highway Operations Project (Project) is located in Churchill, Storey, and Washoe Counties, Nevada. The Project would be located on lands administered by the Bureau of Land Management, Carson City District Office (BLM), as well as small portions of private land. Off-highway vehicle training was provided to primarily civilian customers on BLM-administered land between the mid-1990s and 2002 through Rod Hall International on the same routes proposed for this Project. Annual special use permits were filed with the BLM during this period. Current activities under Bulletproof Tactical LLC (BPT) began in 2003 with training occurring primarily on state land administered by the Nevada Army National Guard at the Stead Training Center and federal land administered by the BLM. Based on training activities occurring in Fallon in December 2011 on BLM-administered land, the BLM indicated, in February 2012, that a permit would be necessary to continue training activities on BLM-administered land. The use of public lands for training activities provides increased opportunities for the utilization of different types of routes for different types of training activities.

In February 2013, the Tactical Vehicle Off-Highway Operations Project Plan of Operations (Plan) was submitted to the BLM. At the same time, a complete BLM Form 2920-1 Land Use Application and Permit was also submitted to the BLM for review. This Environmental Assessment (EA) has been prepared in compliance with the National Environmental Policy Act of 1969 (NEPA) to examine the effects of the issuance of a land use permit for the proposed Project.

1.2 PURPOSE AND NEED

The purpose of the Proposed Action is to provide BPT the opportunity to train military special operators, allied military, other government personnel, non-government personnel, and civilian drivers proper off-highway driving techniques, safe vehicle operations, vehicle maintenance, and vehicle recovery procedures in a desert environment on public lands within the BLM's Carson City District.

The need for the Proposed Action is established by the BLM's responsibility to respond to the BLM Form 2920-1 Land Use Application and Permit and the Plan submitted by BPT in February 2013 pursuant to the Federal Land Policy and Management Act of 1976 (FLPMA), and the BLM land use permit regulations at 43 Code of Federal Regulations (CFR) 2920. Issuance of a Land Use Permit would allow BPT to perform training activities on federal land for the three years following permit issuance.

1.3 LAND USE PLAN CONFORMANCE STATEMENT

The Proposed Action and alternatives described below are in conformance with the Carson City District Office Consolidated Resource Management Plan as follows:

1. Section 7, LND-7, Administrative Actions, 6: "Exchanges and minor non-Bureau initiated realty proposals will be considered where analysis indicates they are beneficial to the public."

2. Section 8, REC-2, Land Use Allocations, 1: “All Public lands under Carson City Field Office jurisdiction are designated open to Off-Highway Vehicle (OHV) use unless they are specifically restricted or closed” (BLM 2001a).
3. Section 8, REC-7, Standard Operating Procedures, 1: “All public lands designated as open for off highway use are subject to Conditions of Use in 43 CFR 8341 where no person shall operate an off highway vehicle in a manner causing, or likely to cause significant, undue damage to or disturbance of soil, wildlife, wildlife habitat, improvements, cultural, or vegetative resources or other authorized uses of the public lands. Additionally, competitive or commercial OHV use will remain subject to environmental review and the discretionary authority of the authorized officer.”
4. Section 8, REC-8, Standard Operating Procedures, 5: “Where the authorized officer determines that OHVs are causing or will cause considerable adverse affects upon soil, vegetation, wildlife, wildlife habitat, cultural resources, historical resources, threatened or endangered species, wilderness suitability, other authorized uses, or other resources, the authorized officer shall close the areas effected to the type(s) of OHV causing the adverse affect until the adverse affects are eliminated and mitigating measures implemented to prevent recurrence (43 CFR 8341.2). Emergency closures and interim designations will not require a planning amendment.

1.4 RELATIONSHIP TO STATUTES, REGULATIONS, AND OTHER PLANS

The Proposed Action is in conformance with the FLPMA, 43 CFR 2920, the National Environmental Policy Act of 1969, and the National Historic Preservation Act (Public Law 89-665; United States Code 470, et seq.).

1.5 DECISION TO BE MADE

The decision that the BLM’s Authorized Officer would make is whether to approve or deny BPT’s Plan and land use permit and authorize training activities on public lands, as proposed, or approve the Plan with applicable stipulations. The decision may include additional mitigation measures identified as a result of the analysis presented in this EA in order to prevent unnecessary or undue degradation of public lands and protect sensitive resource values.

1.6 SCOPING AND IDENTIFICATION OF ISSUES

An interdisciplinary (ID) team Project review was conducted at the BLM office in Carson City on May 20, 2013. During the review, the ID team identified the following resources to be addressed in this document in Chapter 3:

- Migratory Birds;
- Special Status Species; and
- Wildlife (General).

2.0 PROPOSED ACTION AND ALTERNATIVES

2.1 PROPOSED ACTION

Bulletproof Tactical LLC (BPT) is proposing to utilize approximately 679,391 linear feet or approximately 129 miles of existing roads and primitive roads, and rights-of-way (ROWs), with approximate 12-foot running widths, within the three counties to provide off-highway tactical vehicle training in a desert environment for military special operators, allied military, other government personnel, non-government personnel, and civilian drivers (Proposed Action). Training activities would also occur at the Navy Munitions Command (NMC) Fallon Gravel Quarry. Training would be comprised of proper off-highway driving techniques, safe vehicle operations, vehicle maintenance, vehicle recovery procedures, and vehicle evaluation services of military prototype vehicles. BPT would also provide training to their trainees on the “Leave No Trace” and “Tread Lightly!” principles. No new surface disturbance, including new road construction, creation of primitive roads, or overland travel, would be involved with this Project. The volume of proposed training activities is the same as the volume of current training activities. The Project would be located on BLM-administered lands within Churchill, Storey, and Washoe Counties.

2.1.1 Legal Description

Table 2.1-1 lists the proposed route names and lengths by township, range, section, aliquot part, and county. Figure 2.1-1 shows a general overview of the Project and provides an index to subsequent detailed maps. Figures 2.1-2 through 2.1-6 provide greater details on specific areas identified on Figure 2.1-1 (Appendix A).

Table 2.1-1: Legal Description of the Project

Route Number	Proposed Route Name	County	Length (in feet)	Township, Range, Section and Aliquot Part
1	Sand Mountain Drill 1	Churchill	1,597	T. 17 N., R. 32E., section 32, NE ¼.
2	Sand Mountain Drill 2	Churchill	6,317	T. 17 N., R. 32 E., section 32, NE ¼.
3	Sand Mountain Culmination	Churchill	10,600	T. 17 N., R. 32E., section 29, SE ¼. section 32, NE ¼.
4	HMMWV Culmination – Fallon	Churchill	2,216	T. 18 N., R. 33 E., section 20, SW ¼.
5	MATV Culmination – Fallon	Churchill	2,399	T. 18 N., R. 33 E., section 29, NW ¼.
6	VC Recovery Training Area 2	Storey	4,379	T. 17 N., R. 21 E., section 20, SE ¼. section 21, SW ¼.
7	Intro to Rocks	Washoe	1,080	T. 23 N., R. 20 E., section 27, SE ¼. section 27, SW ¼.
8	MATV Intro to Rocks	Washoe	1,293	T. 23 N., R. 20 E., section 21, SW ¼.

Route Number	Proposed Route Name	County	Length (in feet)	Township, Range, Section and Aliquot Part
9	Side Slopes	Washoe	1,377	T. 23 N., R. 20 E., section 34, SW ¼.
10	MATV Ascents/Descents	Washoe	1,871	T. 23 N., R. 20 E., section 21, NE ¼. section 21, NW ¼.
11	NVG Practical	Washoe	6,109	T. 23 N., R. 20 E., section 27, NW ¼. section 27, SW ¼. section 28, NE ¼. section 28, SE ¼. section 34, NW ¼.
12	Thundercat Trail	Washoe	13,449	T. 23 N., R. 21 E., section 4, NW ¼. section 5, NW ¼.
				T. 24 N., R. 21 E., section 32, SE ¼. section 32, SW ¼. section 33, SW ¼.
13	MATV Open Trail 1	Washoe	16,966	T. 22 N., R. 20 E., section 4, NE ¼.
				T. 23 N., R. 20 E., section 32, SE ¼. section 33, all. section 34, SW ¼.
14	HMMWV Martini 1	Washoe	2,269	T. 23 N., R 20 E., section 21, NE ¼.
15	HMMWV Martini 2	Washoe	1,304	T. 23 N., R 20 E., section 21, NE ¼.
16	Intro to Unbalanced Obstacles	Washoe	2,055	T. 23 N., R 20 E., section 34, NW ¼.
17	MATV ADV Trail 2	Washoe	2,377	T. 23 N., R 20 E., section 21, SW ¼.
18	Side Slopes Practical	Washoe	3,791	T. 23 N., R 20 E., section 27, SE ¼. section 27, SW ¼.
19	Mullen Pass West Training Area	Washoe	43,939	T. 23 N., R 21 E., section 2, SW ¼. section 3, NW ¼. section 3, SE ¼. section 3, SW ¼. section 4, all. section 5, SE ¼. section 8, NE ¼. section 8, SE ¼. section 8, SW ¼. section 9, NE ¼. section 9, NW ¼. section 17, NE ¼. section 17, NW ¼.
				T. 24 N., R 21 E., section 33, SE ¼.

Route Number	Proposed Route Name	County	Length (in feet)	Township, Range, Section and Aliquot Part
20	Mullen Pass East Training Area	Washoe	46,943	T. 23 N., R 21 E., section 9, SE ¼. section 10, NW ¼. section 10, NE ¼. section 10, SW ¼. section 11, NW ¼. section 11, SW ¼. section 15, NE ¼. section 16, all. section 17, NE ¼. section 21, NE ¼. section 21, NW ¼.
21	Hilux Open Trail – Practical V2	Washoe	51,697	T. 24 N., R 19 E., section 14, NE ¼. section 14, NW ¼. section 14, SW ¼. section 15, SE ¼. section 16, SE ¼. section 22, all. section 23, NW ¼. section 27, NW ¼. section 28, NE ¼. section 28, SW ¼. section 29, NW ¼. section 29, SE ¼. section 30, N ½.
22	MATV Practical	Washoe	24,322	T. 23 N., R 19 E., section 14, SE ¼. section 14, SW ¼. section 15, NE ¼. section 15, NW ¼. section 16, NE ¼. section 23, NE ¼. section 24, NE ¼. section 24, NW ¼. T. 23 N., R 20 E., section 19, SE ¼. section 19, SW ¼. section 30, NE ¼. section 30, SE ¼. section 30, SW ¼.
23	ADV Open Trail North	Washoe	13,455	T. 23 N., R 20 E., section 27, SW ¼. section 28, SE ¼.
24	ADV Open Trail South	Washoe	7,198	T. 23 N., R 20 E., section 28, SE ¼. section 28, SW ¼. section 33, NE ¼. section 33, NW ¼.
25	Sand Mountain Transit to Drill1	Churchill	1,434	T. 17 N., R 32 E., section 32, NE ¼. section 33, NW ¼.

Route Number	Proposed Route Name	County	Length (in feet)	Township, Range, Section and Aliquot Part
26	Sand Mountain Transit to Drill 2	Churchill	792	T. 17 N., R 32 E., section 32, NE ¼.
27	Hungry Valley Recreation Area (HVRA) to SR 445	Washoe	45,660	T. 23 N., R 20 E., section 3, SE ¼. section 3, SW ¼. section 4, SE ¼. section 10, NE ¼. section 10, NW ¼. section 10, SW ¼. section 11, NW ¼. section 11, SE ¼. section 12, SE ¼. section 12, SW ¼. section 13, NE ¼. section 15, NW ¼. section 15, SE ¼.
				T. 23 N., R 21 E., section 18, NW ¼. section 18, SW ¼. section 19, NW ¼. section 19, SE ¼. section 19, SW ¼. section 20, SW ¼.
28	Access Route 1	Washoe	42,053	T. 23 N., R 19 E., section 36, SE ¼. section 36, SW ¼.
				T. 23 N., R 20 E., section 15, SE ¼. section 15, SW ¼. section 21, NE ¼. section 21, SW ¼. section 22, NE ¼. section 22, NW ¼. section 22, SE ¼. section 26, SW ¼. section 27, NE ¼. section 27, SE ¼. section 28, NW ¼. section 29, NE ¼. section 29, NW ¼. section 30, NE ¼. section 30, SW ¼. section 31, NW ¼. section 31, SW ¼.
29	Access Route 2	Washoe	2,774	T. 23 N., R 20 E., section 27, SE ¼. section 34, NE ¼. section 34, NW ¼.

Route Number	Proposed Route Name	County	Length (in feet)	Township, Range, Section and Aliquot Part
30	Access Route 3	Washoe	7,231	T. 23 N., R 20 E., section 27, SE ¼. section 34, NE ¼. section 34, NW ¼. section 34, SW ¼.
31	Access Route 4 (Antelope Valley Rd/Bedell Flat Rd/Dixie Lane Transit Route)	Washoe	61,188	T. 22 N., R 19 E., section 1, NW ¼. section 1, SW ¼. section 2, SE ¼.
				T. 23 N., R 19 E., section 5, SW ¼. section 6, NE ¼. section 8, NE ¼. section 9, NW ¼. section 9, SE ¼. section 9, SW ¼. section 15, NW ¼. section 15, SW ¼. section 16, NE ¼. section 22, NW ¼. section 22, SW ¼. section 26, SE ¼. section 26, SW ¼. section 27, NW ¼. section 27, SE ¼. section 36, NW ¼. section 36, SW ¼.
				T. 24 N., R 18 E., section 25, SE ¼. section 36, NE ¼.
				T. 24 N., R 19 E., section 6, SW ¼. section 7, NW ¼. section 7, SW ¼. section 18, NW ¼. section 30, NW ¼. section 30, SW ¼. section 31, SE ¼. section 31, SW ¼.
32	Access Route 5	Washoe	791	T. 23 N., R 20 E., section 21, SW ¼.
33	Access Route 6	Washoe	934	T. 23 N., R 20 E., section 21, SW ¼.
34	Access Route 7	Washoe	987	T. 23 N., R 20 E., section 21, NE ¼. section 21, NW ¼.
35	Access Route 8	Washoe	548	T. 23 N., R 20 E., section 21, NE ¼.
36	Access Route 9	Washoe	2,435	T. 23 N., R 20 E., section 27, SE ¼. section 27, SW ¼.

Route Number	Proposed Route Name	County	Length (in feet)	Township, Range, Section and Aliquot Part
37	Access Route 10	Churchill	4,357	T. 18 N., R 33 E., section 20, SW ¼. section 29, NW ¼. section 29, SE ¼.
38	Access Route 11	Churchill	906	T. 18 N., R 33 E., section 29, NW ¼.
39	Access Route 12	Washoe	33,466	T. 23 N., R 20 E., section 4, NE ¼. section 4, SE ¼.
				T. 24 N., R 19 E., section 13, SW ¼. section 14, NE ¼. section 24, NE ¼.
				T. 24 N., R 20 E., section 19, NW ¼. section 19, SW ¼. section 29, NW ¼. section 29, SE ¼. section 29, SW ¼. section 30, NE ¼. section 30, NW ¼. section 32, NE ¼. section 33, NW ¼. section 33, SE ¼. section 33, SW ¼.
N/A	NMC Fallon Gravel Quarry	Churchill	N/A	T. 24 N., R 30 E., section 14

2.1.2 Existing Land Use Authorizations

Many of the proposed training routes follow existing dirt roads, but most are not associated with established ROWs. The ROWs that have been granted by the BLM on the public lands along the Project routes are listed in Table 2.1-2.

Table 2.1-2: Existing Land Use Authorizations

Holder	ROW/Activity	Case File No.	Township/Range/Section
BLM	Span Flat Fence 6437	NVN 55031	section 13, T25N, R18E; sections 18-20, 28, 29, 33, and 34, T25N, R19E
BLM	Cottonwood Stock Trail Road	NVN 004360; NVN 050161; NVN 053739; NVN 053740	section 22, T26N, R19E

2.1.3 Staging Areas

The proposed training venues include six staging/assembly areas. The locations of the staging areas are shown below in Table 2.1-3 and on Figures 1 through 3 and 5. During instruction, up to two travel trailers and up to two safety/medical vehicles would be parked at the staging areas. All staging areas have been previously disturbed and are void of vegetation. The routes without

identified staging areas serve as instructional routes only, with classroom instruction provided prior to the training session in a facility located in Stead, Nevada. If instruction is necessary on the training routes, then the vehicles would stop momentarily in-line on the routes, causing no additional disturbance outside of the training route.

Table 2.1-3: Staging Area Locations

Staging Areas	Township/ Range	Legal Description (Section Number & Aliquot Part)
HVRA Assembly Area	T23N, R20E	section 27, SE ¼.
Precision Maneuver Course (PMC)	T23N, R20E	section 34, SW ¼.
Bedell Flat Road Staging Area	T23N, R20E	section 30, NE ¼.
Moon Rocks Staging Area	T23N, R20E	section 21, NE ¼.
Mullen Pass Staging Area	T23N, R21E	section 17, NE ¼.
Sand Mountain Staging Area	T17N, R32E	section 33, NW ¼.

Note: Training activities at the HVRA Assembly Area and Moon Rocks Staging Area would not occur between Friday afternoon through Sunday or other periods of peak visitation in order to maintain the safety of BPT’s clients and the public.

2.1.4 Facility Usage

2.1.4.1 Equipment and Vehicles

During training activities, the following vehicle types would be used:

- Non-standard commercial vehicles (NSCV) (Toyota Tacoma/Toyota HiLux) (up to 9,000 pounds with armor);
- High Mobility Multipurpose Wheeled Vehicles (HMMWV) (up to 12,000 pounds with armor);
- Mine Resistant Ambush Protected (MRAP) vehicles (up to 33,000 pounds) (only to be used at the NMC Fallon Gravel Quarry training location);
- MRAP – All Terrain Vehicles (M-ATV) (up to 28,000 pounds);
- Utility Terrain Vehicles (UTVs) (up to 1,500 pounds);
- Light-duty four-wheel drive (4WD) pick-up trucks (up to 12,500 pounds);
- Medium-duty 4WD service trucks (up to 25,000 pounds); and
- Other similar rubber-tired vehicle types.

See Appendix B for examples of these vehicles.

Additional equipment and vehicles that would be used include the following:

- Traffic cones;
- Instructor vehicles;
- A customer-provided maintenance vehicle;
- Vehicle-associated equipment (recovery gear and repair items); and
- A customer-provided emergency medical vehicle, as required.

2.1.4.2 Group Size and Duration of Training

The Project would allow eight individuals as a minimum group size and 32 individuals as a maximum group size, including BPT trainers. The student to vehicle ratio is usually two to one, but may go as high as four to one. The staff to student ratio is at a minimum of one to three, to a maximum of one to twelve, depending on the type of training conducted. The duration of each training program may last up to eight days alternating between different routes, with up to 36 sessions held annually. Table 2.1-4 shows the duration of training activities on each training route per training session, the vehicle types used on each route, and whether the training activities occur during the day, during the night, or both. The vehicle types and usage of access routes are not included in the table as the length of time on each access route would be between approximately ten to 30 minutes. Each training session would have a maximum of 16 vehicles on one route at one time.

Table 2.1-4: Vehicle Types and Duration of Use on Training Routes

Route Number	Proposed Route Name	Approximate Duration of Use During Training Activities	Time of Training (Day/Night/Both)	Vehicle Types Used
1	Sand Mountain Drill 1	2 hours	Day	A, B, C, D, H
2	Sand Mountain Drill 2	2 hours	Day	A, B, C, D, H
3	Sand Mountain Culmination	2 hours	Day	A, B, C, D, H
4	HMMWV Culmination – Fallon	2 hours	Both	A, B, C, D, H
5	MATV Culmination – Fallon	2 hours	Both	E, H
6	VC Recovery Training Area 2	6 hours	Day	A, B, C, D, E, H
7	Intro to Rocks	2 hours	Day	A, B, C, D, H
8	MATV Intro to Rocks	2 hours	Day	E, H
9	Side Slopes	2 hours	Day	A, B, C, D, E, F, H
10	MATV Ascents/Descents	2 hours	Day	E, H
11	NVG Practical	4 hours	Both	A, B, C, D, E, H
12	Thundercat Trail	2 hours	Day	A, B, C, D, H
13	MATV Open Trail 1	2 hours	Day	A, B, C, D, E, H
14	HMMWV Martini 1	2 hours	Day	A, C, H
15	HMMWV Martini 2	2 hours	Day	A, C, H
16	Intro to Unbalanced Obstacles	2 hours	Day	A, B, C, D, E, F, H
17	MATV ADV Trail 2	2 hours	Day	A, B, C, D, E, H
18	Side Slopes Practical	2 hours	Day	A, B, C, D, H
19	Mullen Pass West Training Area	4 hours	Both	A, B, C, D, E, H
20	Mullen Pass East Training Area	4 hours	Both	A, B, C, D, E, H
21	Hilux Open Trail – Practical V2	4 hours	Day	A, B, H
22	MATV Practical	2 hours	Day	A, B, C, D, E, F, H
23	ADV Open Trail North	2 hours	Day	A, B, C, D, H
24	ADV Open Trail South	2 hours	Day	A, B, C, D, E, F, H

Notes: A = UTV; B = NSCV; C = HMMWV; D = Light-duty 4WD; E = M-ATV; F = Medium-duty 4WD; G = MRAP; H = Other

2.1.5 Environmental Protection Measures

BPT anticipates no conflicts with resources or public health and safety during and after all proposed training activities. BPT proposes the following general environmental protection measures:

- Public safety would be maintained throughout the life of the Project. All equipment and other facilities would be maintained in a safe and orderly manner;
- A speed limit of 20 mph, or posted speed limits, would be used by Project-related equipment on roads within the Project Area to reduce the potential for collisions with people, grazing animals, and wildlife, and to reduce dust emissions from Project roadways;
- BPT would avoid utilizing any routes during high visitation periods, such as weekends and major holidays, when practicable, to maintain the safety of their clients and the general public.
- BPT would avoid all cultural resources and culturally sensitive areas as identified by the BLM. Any survey monuments, witness corners, or reference monuments would not be disturbed;
- In the event that any existing roads are severely damaged as a result of Project activities, BPT would return the roads to conditions in compliance with the BLM Roads Design Handbook (H-9113-1) (BLM 2011);
- Smoking would only be permitted in paved or cleared areas. All cigarettes would be thoroughly extinguished and disposed of in a trash receptacle. Project personnel would be required to follow applicable BLM regulations regarding smoking;
- All off-highway equipment would be cleaned (power or high-pressure cleaning) of all mud, dirt, and plant parts prior to initially moving equipment onto public land.
- All Project vehicles would be outfitted with spill kits, and absorbent diapers would be placed under leaking equipment immediately to prevent ground contamination. All vehicles would be refueled off site.
- Spilled materials of any type would be cleaned up immediately. A shovel and spill kit would be maintained on all training vehicles at all times to respond to spills;
- All trash and litter collected during training activities would be removed and disposed of at the Stead Training Center receptacles or other authorized solid waste disposal sites. No trash would be stored at any of the training areas. BPT would follow the “Leave No Trace” and “Tread Lightly!” principles, which include the proper disposal of waste.
- All sanitary wastes would be collected in WAG BAGs (zip-close human waste bags) and disposed of at appropriate collection facilities.

- All Project vehicles would be equipped with applicable exhaust spark arresters;
- All Project vehicles would be equipped with a shovel and appropriate fire extinguishers;
- All Project vehicles would stay on authorized roads and park in designated staging or paved areas;
- BPT would have the appropriate notification numbers including the BLM Fire Dispatch and the BLM Project Representative readily available on site for all trainees in case of fire;
- Private land owners would be notified of potential training activities that are scheduled to occur on the route adjacent to Virginia City (Figure 4);
- Grazing permittees on the Flanigan, Winnemucca Ranch, Antelope Valley, Paiute, Hardscrabble, and Pah Rah allotments would be notified of proposed training activities occurring in the allotments as soon as any training event is scheduled. The notification would include a list of all Environmental Protection Measures listed in the EA, and a contact number for BPT to resolve any issues that may arise during training activities.
- BPT would notify the BLM military liaison as soon as any training event is scheduled to ensure that the proposed route is available and does not coincide with other BLM-authorized events;
- Pursuant to 43 CFR 10.4(g), BPT would notify the BLM authorized officer, by telephone, and with written confirmation, immediately upon the discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony (as defined in 43 CFR 10.2). Further pursuant to 43 CFR 10.4 (c) and (d), the operator would immediately stop all activities in the vicinity of the discovery, make a reasonable effort to protect the discovered objects, and not commence again until notified to proceed by the BLM authorized officer; and
- BPT would notify the BLM authorized officer, by telephone, and with written confirmation, immediately upon the discovery of paleontological resources that are discovered as the result of training activities, the item(s) or condition(s) would be left intact and immediately brought to the attention of the BLM. Further pursuant to 43 CFR 10.4 (c) and (d), the operator would immediately stop all activities in the vicinity of the discovery and not commence again for 30 days of when notified to proceed by the BLM authorized officer. If significant paleontological resources are found, avoidance, recordation, and data recovery would be required.

2.2 ALTERNATIVES

2.2.1 No Action Alternative

In accordance with BLM NEPA guidelines H-1790-1, Chapter V (BLM 2008a), this EA evaluates the No Action Alternative, which is a reasonable alternative to the Proposed Action. The objective of the No Action Alternative is to describe the environmental consequences that would result if the Proposed Action were not implemented. The No Action Alternative forms the baseline from which the impacts of the Proposed Action can be measured. Under the No Action Alternative, the BLM would not approve the land use permit, and BPT would not be allowed to utilize the existing roads and primitive roads on BLM-administered land for the proposed training activities. BPT would be able to continue training activities on federal land administered by the Department of Defense (DOD).

2.2.2 Alternatives Considered but Eliminated From Detailed Analysis

2.2.2.1 Reduced Routes Alternative

The Reduced Routes Alternative would eliminate the proposed routes in Churchill and Storey Counties, and would only allow the proposed routes in Washoe County to be used for Project activities. This alternative would result in fewer locations for BPT to hold training activities, which would concentrate all the potential impacts to migratory birds, special status species, and wildlife into one county. However, since the scope of this alternative would be similar in design and effects as the Proposed Action, this alternative was eliminated from detailed analysis.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.1 SUPPLEMENTAL AUTHORITIES

Appendix 1 of BLM's NEPA Handbook (H-1790-1) identifies Supplemental Authorities that are subject to requirements specified by statute or executive order and must be considered in all BLM environmental documents. The table below lists the Supplemental Authorities and their status in the Project Area. Supplemental Authorities that may be affected by the Proposed Action are further described in this EA.

Table 3.2-1: Supplemental Authorities

Resource	Present Yes/No	Affected Yes/No	Rationale
Air Quality	Yes	No	There would be a temporary increase in particulate matter resulting from Project activities primarily from vehicle and dust emissions. Portions of the Project Area located in Churchill and Storey counties are not within areas of non-attainment or areas where total suspended particulates or other criteria pollutants exceed the National Ambient Air Quality Standards or the Nevada State Ambient Air Quality Standards. Portions of the Project Area located in northern Washoe County are located in an area of non-attainment, but Project activities would not impact the existing pollutant levels. Direct, indirect, and cumulative impacts would not exceed Ambient Air Quality Standards or approach a level of significance. Therefore, no further analysis is required for this resource.
Areas of Critical Environmental Concern (ACEC)	Yes	No	Portions of the Project pass through and are adjacent to the Carson Wandering Skipper ACEC. However, the Proposed Action does not include any ground disturbing activities and the fugitive dust associated with vehicle emissions would not be at levels above the existing levels created by traffic in the area and would therefore not impact the ACEC. No further analysis is required.
Cultural Resources	Yes	No	All proposed training activities including staging areas would remain within the disturbed area of existing roads and primitive roads. Based on a Class I review of the cultural resources information and the Project route maps, the Project would not affect historic properties. This analysis is summarized in the BLM cultural resources report CRR 3-2672 on file at the BLM Carson City District Office. Therefore, no further analysis is required for cultural resources.
Environmental Justice	No	No	Proposed Project activities would not adversely or disproportionately affect low-income or minority populations. No further analysis is required.
Farm Lands (prime or unique)	No	No	This resource is not present in the Project Area.

Resource	Present Yes/No	Affected Yes/No	Rationale
Floodplains	No	No	This resource is not present in the Project Area.
Invasive, Nonnative Species	Yes	No	All proposed training activities, including staging areas, would remain within the disturbed area of existing roads and primitive roads and are not anticipated to contain invasive, nonnative species. An environmental protection measure is included as part of the Proposed Action which would require the washing of all vehicles prior to entering BLM-administered land. No further analysis is required.
Migratory Birds	Yes	Yes	See Section 3.3.1.
Native American Religious Concerns	Yes	TBD	Project information was provided to the Tribes on 9/05/2013. To date, no information has been provided to the BLM regarding concerns about traditional use or religious concerns. The Project would not change access to or distribution of trees or plants available for traditional uses.
Threatened or Endangered Species (animals)	Yes	No	See Section 3.3.2.
Threatened or Endangered Species (plants)	No	No	This resource is not present in the Project Area.
Wastes, Hazardous or Solid	Yes	No	Only small quantities of hazardous and/or solid wastes would be used or generated by Project activities. All hazardous materials would be transported, used, and stored following best management practices and in accordance with federal, state, and local regulations. All solid wastes would be disposed of off site at an authorized facility. Any spills of hazardous materials would be handled according to federal, state, and local regulations. Environmental protection measures have been incorporated into the Proposed Action (Section 2.1.5) that help reduce impacts from hazardous and solid wastes. Therefore, no further analysis is required for this resource.

Resource	Present Yes/No	Affected Yes/No	Rationale
Water Quality (Surface/Ground)	No	No	All proposed training activities including staging areas would remain within the disturbed area of existing roads and primitive roads so are not anticipated to impact surface or ground water quality. No further analysis is required.
Wetlands/Riparian Zones	No	No	All proposed training activities including staging areas would remain within the disturbed area of existing roads and primitive roads so are not anticipated to impact wetlands or riparian zones. No further analysis is required.
Wild and Scenic Rivers	No	No	This resource is not present in the Project Area.
Wilderness/WSA	No	No	This resource is not present in the Project Area.

3.2 RESOURCES OR USES OTHER THAN SUPPLEMENTAL AUTHORITIES

The following resources or uses, which are not Supplemental Authorities as defined by BLM's Handbook H-1790-1, may be present in the area. BLM specialists have evaluated the potential impact of the Proposed Action on these resources and documented their findings in the table below. Resources or uses that may be affected by the Proposed Action are further described in this EA.

Table 3.2-2: Resources or Uses Other Than Supplemental Authorities

Resource or Issue**	Present Yes/No	Affected Yes/No	Rationale
BLM Sensitive Species (animals)	Yes	Yes	See Section 3.3.2.
BLM Sensitive Species (plants)	Yes	No	All proposed training activities including staging areas would remain within the disturbed area of existing roads and primitive roads so are not anticipated to impact special status plant species. No further analysis is required.

Resource or Issue**	Present Yes/No	Affected Yes/No	Rationale
Fire Management	No	No	All proposed training activities including staging areas would remain within the disturbed area of existing roads and primitive roads so are not anticipated to impact fire management. In addition, environmental protection measures have been incorporated into the Proposed Action (Section 2.1.5) that help reduce impacts from fires. Therefore, no further analysis is required.
Forest Resources	Yes	No	All proposed training activities including staging areas would remain within the disturbed area of existing roads and primitive roads so are not anticipated to impact forest resources. No further analysis is required.
General Wildlife	Yes	Yes	See Section 3.3.3.
Land Use Authorization	Yes	No	Project activities include OHV training activities on existing roads and primitive roads. The Project would be required to adhere to the stipulations set forth in the land use permit. No adverse affects are anticipated. No further analysis is required.
Lands with Wilderness Characteristics	No	No	This resource is not present in the Project Area.
Livestock Grazing	Yes	No	Portions of the Project pass by areas where livestock watering troughs are located. However, Project activities would only last approximately 12 hours and would only result in one ingress/egress past the troughs. In addition, an alternate access route has been added that bypasses the troughs. Any impacts to livestock would be temporary and considered negligible. No further analysis is required.

Resource or Issue**	Present Yes/No	Affected Yes/No	Rationale
Minerals	Yes	No	Navy Munitions Command [NMC] Fallon Gravel Quarry users would continue to have unrestricted access and use of the mineral materials during training periods and activities. BPT would not interfere with the public usage of the community gravel pit. No further analysis is required.
Paleontological	No	No	This resource is not known to occur in the Project Area.
Recreation	Yes	No	Proposed training activities would occur on BLM-administered lands open to the public. BPT would not close any roads or primitive roads or deny public access during training activities. Therefore, Project activities are not anticipated to affect recreation. No further analysis is required.
Socioeconomics	Yes	No	Project activities would not contribute to any population growth or reduction nor would it create any new jobs or tax base to the local communities. Therefore, Project activities are not anticipated to have an impact on socioeconomics. No further analysis is required.
Soils	Yes	No	All proposed training activities including staging areas would remain within the disturbed area of existing roads and primitive roads so are not anticipated to impact soils. No further analysis is required.
Travel Management	Yes	No	Proposed training activities would occur on BLM-administered lands open to the public. BPT would not close any roads or primitive roads or deny public access during training activities. In addition, MRAP vehicles would be confined for use at the NMC Fallon Gravel Quarry. The public would not be denied use of the gravel quarry during Project activities. Therefore, Project activities are not anticipated to affect travel management. No further analysis is required.

Resource or Issue**	Present Yes/No	Affected Yes/No	Rationale
Vegetation	Yes	No	All proposed training activities including staging areas would remain within the disturbed area of existing roads and primitive roads so are not anticipated to impact vegetation. No further analysis is required.
Visual Resources	Yes	No	All proposed training activities including staging areas would remain within the disturbed area of existing roads and primitive roads so are not anticipated to impact visual resources. In addition, Project activities would not cause any permanent changes to the landscape. Therefore, no further analysis is required for this resource.
Wild Horses and Burros	Yes	No	All proposed training activities including staging areas would remain within the disturbed area of existing roads and primitive roads and conducted at low speeds so are not anticipated to impact wild horses. In addition, none of the proposed training or access routes pass through an HMA. No further analysis is required.
Global Climate Change	Yes	No	There is a public and scientific debate about human-caused contributions to global climate change. No methodology currently exists to correlate greenhouse gas emissions (GHG) and to what extent these contributions would contribute to such climate change.
Greenhouse Gas Emissions	Yes	No	There would be a negligible contribution of GHG (methane) emissions. No methodology currently exists to correlate GHG emissions from motorized vehicle use to any specific resource impact within the Project Area.

3.3 RESOURCES PRESENT AND BROUGHT FORWARD FOR ANALYSIS

The following resources are present in the Project Area and may be affected by the Proposed Action:

- Migratory Birds;
- Special Status Species (Animals); and
- Wildlife (General).

3.3.1 Migratory Birds

3.3.1.1 Affected Environment

"Migratory bird" means any bird listed in 50 CFR 10.13. All native birds commonly found in the U.S., with the exception of native resident game birds, are protected under the Migratory Bird Treaty Act of 1918 (MBTA). The MBTA prohibits the taking of migratory birds, their parts, nests, eggs, and nestlings without a permit. Executive Order 13186, signed January 10, 2001, directs federal agencies to protect migratory birds by integrating bird conservation principles, measures, and practices.

A general habitat assessment was performed by Enviroscientists, Inc. (Enviroscientists) within a 0.25-mile buffer of all the proposed training routes (Area of Influence [AOI]). The habitat types in the Churchill County portion of the Project Area include Salt Desert Scrub, Greasewood, and Sand Dunes. The habitat types in the Storey County portion of the Project Area include Sagebrush/Perennial Grass and Urban. The habitat types in the Washoe County portion of the Project Area include: Sagebrush; Sagebrush/Perennial Grass; Salt Desert Scrub; and Agriculture.

The NDOW identified the rufous hummingbird (*Selasphorus rufus*) as having been directly observed within Churchill County; however, based on the habitat assessment, the habitat does not support the presence of this species within the AOI of the proposed routes in Churchill County. The NDOW did not identify any raptor nests within one mile of the proposed routes within the Churchill County portion of the Project Area.

Within Storey County, NDOW identified the following non-special status migratory birds as having been directly observed: American kestrel (*Falco sparverius*); Cooper's hawk (*Accipiter cooperii*); northern saw-whet owl (*Aegolius acadicus*); red-tailed hawk (*Buteo jamaicensis*); turkey vulture (*Cathartes aura*); black-chinned hummingbird (*Archilochus alexandri*); and Virginia's warbler (*Oreothlypis virginiae*). Based on the habitat assessment performed, the habitat does not support the presence of Cooper's hawk, northern saw-whet owl, black-chinned hummingbird, and Virginia's warbler within the AOI of the proposed route in Storey County. The NDOW identified three raptor nests (two with the genus *Accipiter* or *Buteo* and one falcon) located within one mile of a proposed route in Section 27, T17N, R21E. Those nests are located within one mile of the proposed VC Recovery Training Area 2 (route #6 in Table 2.1-1), and are located within the Piñon vegetation community, but are not within the AOI of the VC Recovery Training Area 2 route.

The NDOW has also observed the following non-special status migratory bird species within Washoe County: barn owl (*Tyto alba*); Cooper's hawk; prairie falcon (*Falco mexicanus*); red-tailed hawk; rough-legged hawk (*Buteo lagopus*); sharp-shinned hawk (*Accipiter striatus*); short-eared owl (*Asio flammeus*); turkey vulture; western screech-owl (*Megascops kennicottii*); American white pelican (*Pelecanus erythrorhynchos*); ancient murrelet (*Synthliboramphus antiquus*); Clark's grebe (*Aechmophorus clarkii*); common tern (*Sterna hirundo*); gull (unknown); Lewis's woodpecker (*Melanerpes lewis*); Nashville warbler (*Vermivora ruficapilla*); red-necked grebe (*Podiceps grisegena*); varied thrush (*Ixoreus naevius*); western bluebird (*Sialia mexicana*); white-headed woodpecker (*Picoides albolarvatus*); greater scaup (*Aythya marila*); and olive-sided flycatcher (*Contopus cooperi*) (NDOW 2013). Based on the habitat assessment performed, the habitat does not support the presence of the following species within the AOI of

the proposed routes in Washoe County: Cooper's hawk; sharp-shinned hawk; short-eared owl; western screech-owl; American white pelican; ancient murrelet; Clark's grebe; common tern; gull (unknown); Lewis's woodpecker; Nashville warbler; red-necked grebe; varied thrush; white-headed woodpecker; greater scaup; and olive-sided flycatcher. The NDOW identified one falcon nest within one mile of a proposed route in Section 17, T23N, R21E. This nest is located within one mile of the proposed Mullen Pass East and Mullen Pass West routes (route #s 19 and 20 in Table 2.1-1). Although the primary vegetation type in this area is salt desert scrub, there is a small rock outcrop present that may be suitable for a falcon to nest; however, the nest is not located within the AOI of the proposed Mullen Pass East or Mullen Pass West routes. The other two falcon nests identified were located in sagebrush and salt desert scrub habitat types, which do not support the presence of falcons.

3.4.1.2 Environmental Consequences

Proposed Action

Although Project activities include OHV training activities on existing roads and primitive roads, individual nesting birds could be impacted by vehicle noise and result in displacement from the nests. However, training activities would be of short duration, and most birds would be expected to return to a nest site if displaced. In addition, Project activities would not result in a regional population change to migratory bird species. Therefore, impacts to migratory birds as a result of the Proposed Action are considered minimal.

No Action Alternative

Under the No Action Alternative, the BLM would not approve the land use permit, and BPT would not be allowed to utilize the existing roads and primitive roads on BLM-administered land for the proposed training activities. There would be no impacts to migratory birds on BLM-administered land, as BPT would not utilize the existing and primitive roads on BLM-administered land for training activities.

3.3.2 Special Status Species

3.3.2.1 Affected Environment

BLM policy for the management of special status species is described in BLM Manual 6840 (BLM 2008b). Special status species include the following:

- Federally Threatened or Endangered Species: Any species that the USFWS has listed as an endangered or threatened under the Endangered Species Act of 1973, as amended (ESA), throughout all or a significant portion of its range;
- Proposed Threatened or Endangered Species: Any species that the USFWS has proposed for listing as federally endangered or threatened under the ESA;
- Candidate Species: Plant and animal taxa that are under consideration for possible listing as threatened or endangered under the ESA;

- Delisted Species: Any species in the five years following their delisting;
- BLM Sensitive Species: Native species found on BLM-administered lands for which the BLM has the capability to significantly affect the conservation status of the species through management, and either: 1) there is information that a species has undergone, is undergoing, or is predicted to undergo a downward trend such that the viability of the species or a distinct population segment of the species is at risk across all or a significant portion of the species range; or 2) the species depends on ecological refugia or specialized unique habitats on BLM-administered lands, and there is evidence that such areas are threatened with alteration such that the continued viability of the species in that area would be at risk (BLM 2008b); and
- State of Nevada Listed Species: State-protected animals that have been determined to meet BLM's Manual 6840 policy definition.

BLM sensitive species are taxa that are not already included as BLM special status species under the following: 1) federally listed, proposed, or candidate species; or 2) State of Nevada listed species. BLM policy is to provide these species with the same level of protection as is provided to candidate species as described in BLM Manual Section 6840.06C.

The NDOW and Nevada Natural Heritage Program (NNHP) were contacted to obtain information on sensitive species that have the potential to occur in the Project Area (NDOW 2013; NNHP 2013). The USFWS Information, Planning, and Conservation (IPAC) System was queried to identify threatened and endangered species in the Project Area. In addition, the BLM Carson City District Special Status Species List was evaluated for species with the potential to occur within the Project Area.

As discussed in Section 3.3.1, a general habitat assessment was performed by Enviroscientists within the AOI of all the proposed training routes in each county.

Threatened and Endangered Species

Fish

The USFWS IPAC query, as well as the NDOW data response letter, identified the cui-ui (*Chasmistes cujus*), an endangered species, as occurring in the Project Area (USFWS 2013; NDOW 2013). The query also identified the threatened Lahontan cutthroat trout (*Oncorhynchus clarkia* ssp. *henshawi*) as occurring in the Project Area (USFWS 2013). However, based on the habitat assessment performed, the habitat does not support the presence of these species within the AOI of all the proposed training routes.

Insects

The USFWS IPAC query, as well as the NNHP data response letter, identified the endangered Carson wandering skipper (*Pseudocopa eunus obscures*) as occurring in the Project Area (USFWS 2013; NNHP 2013). The BLM conducted informal consultation with the USFWS

based on the listing status of the Carson wandering skipper by preparing and submitting a Biological Assessment (BLM 2013).

The Carson wandering skipper was federally listed as endangered on November 29, 2001. There were only two known extant populations at the time of listing, with one population occurring in Washoe County, Nevada and another occurring in Lassen County, California. Since the 2001 listing, a third population was confirmed in Washoe County, Nevada, and another population was found in Douglas County, Nevada (USFWS 2007).

Lowland grassland habitats on alkaline substrates characterize Carson wandering skipper habitat. More specifically, common variables of occupied habitat include elevations below 5,000 feet above mean sea level, the existence of saltgrass (*Distichlis spicata*) and nectar sources in open areas near springs or water, geothermal areas, and the fact that all known populations occur east of the Sierra Nevada mountain range (USFWS 2007).

Adult Carson wandering skippers require nectar for food; therefore, suitable habitat areas must have an appropriate nectar source that is in bloom during the flight season (late May – mid July). Plant species known to be used by the Carson wandering skipper for nectar include the following: racemose golden-weed (*Pyrrocoma racemosa*); tumble mustard (*Sisymbrium altissimum*); Canada thistle (*Cirsium arvense*); bull thistle (*Cirsium vulgare*); and slender cleomella (*Cleomella parviflora*). If alkaline-tolerant plant species are not present, but there is a fresh water source to support alkaline-intolerant nectar sources adjacent to the larval host plant, the area may provide suitable habitat (USFWS 2007).

Carson wandering skipper females lay their eggs on saltgrass (Hickman 1993), which is the larval host plant for the subspecies (Garth and Tilden 1986; Scott 1986).

There are various threats to the Carson wandering skipper. Due to the fact that there are only four known populations, the species is highly vulnerable to extinction from chance environmental or demographic events. Specific documented threats to the species include habitat degradation, destruction, and fragmentation from development, wetland habitat modification, agricultural practices, excessive livestock grazing and trampling, water exportation projects, and recreation (USFWS 2007).

The Carson wandering skipper population in Washoe County that could be impacted by the proposed Project currently exists within three parcels of land along Winnemucca Ranch Road (located approximately 25 miles north of the Reno-Sparks area) that are designated as an Area of Critical Environmental Concern (ACEC) for the skipper. Two of the parcels (one located in Section 15 and one in Section 22 of T23N, R20E, totaling approximately 243 acres, were officially designated as an ACEC for the Carson wandering skipper in 2001 as part of the Final Southern Washoe County Urban Interface Plan Amendment (BLM 2001b). In 2005, the BLM acquired an additional 80-acre parcel of land (Section 22, T23N, R20E) that is adjacent to the two other parcels of land that were designated as an ACEC in 2001, since the 80-acre parcel contained important skipper habitat. The 2001 Plan Amendment states that “any non-federal lands in the area, identified as habitat for the Carson wandering skipper, will be considered for acquisition and will be included in the ACEC designation;” therefore, the 80-acre parcel was

assimilated into the ACEC. The Carson Wandering Skipper ACEC totals approximately 323 acres.

Sensitive Species

Birds

In a letter dated May 29, 2013, the NDOW identified that the BLM sensitive peregrine falcon (*Falco peregrinus*) has been directly observed in Storey County. NDOW also identified one golden eagle nest within two miles of the proposed VC Recovery Training Area 2 route (route # 6 in Table 2.1-1) in Section 30, T17N, R21E. The following BLM sensitive bird species have been directly observed within Washoe County: bald eagle (*Haliaeetus leucocephalus*); ferruginous hawk (*Buteo regalis*); golden eagle (*Aquila chrysaetos*); northern goshawk (*Accipiter gentilis*); peregrine falcon; loggerhead shrike (*Lanius ludovicianus*); and southwestern willow flycatcher (*Empidonax traillii*). There were no nests identified for BLM sensitive bird species within two miles of a proposed route in Washoe County. There were no direct BLM sensitive bird observations in Churchill County (NDOW 2013). In a letter dated May 29, 2013, the NNHP also identified the BLM sensitive Western snowy plover (*Charadrius alexandrinus nivosus*) and western burrowing owl (*Athene cunicularia hypugaea*) as occurring in the Project Area (NNHP 2013). The BLM has also stated that the Brewer's sparrow (*Spizella breweri*) and sage thrasher (*Oreoscoptes montanus*) have been directly observed in the Project's AOI. Based on the habitat assessment performed, the habitat types located within the AOI of all the proposed routes do not support the presence of the bald eagle, northern goshawk, southwestern willow flycatcher, or Western snowy plover.

Game Birds

In a letter dated May 29, 2013, the NDOW identified greater sage-grouse (*Centrocercus urophasianus*) habitat in both Churchill and Washoe Counties. According to the greater sage-grouse habitat maps prepared by the BLM and USFWS, the habitat closest to the proposed training and access routes in Churchill County is classified primarily as Preliminary General Habitat (PGH). There are also no known lek sites within 3.2 miles of the Churchill County portion of the Project Area. The habitat surrounding the proposed training and access routes in the northern Washoe County portion of the Project Area is considered primarily as PGH. NDOW identified five known lek sites in the vicinity of the northern Washoe County portion of the Project Area, but there are no known active leks within 3.2 miles of the proposed training and access routes in Washoe County. NDOW has documented sage-grouse use (i.e., nesting and brood rearing) and much sign on the north end of the Dogskins in the PGH (approximately 1.5 miles away from Route 21 [Figure 1]). Based upon this documentation, a small lek may occur in the vicinity of Route 21; however, no leks have been documented. If a lek is found within 3.2 miles of a proposed training or access route, and it is determined by the BLM that the use of these routes could negatively impact greater sage-grouse lekking and/or nesting behavior, timing restrictions would be applied to future training activities. There was no sage grouse habitat identified within the Storey County portion of the Project Area, and there are also no known lek sites within 3.2 miles of the proposed training and access routes in Storey County.

Fish

In a letter dated May 29, 2013, the NDOW identified the following BLM sensitive fish species as having been directly observed in Washoe County: cui-ui and Lahontan cutthroat trout. However, based on the habitat assessment performed, the habitat does not support the presence of these species within the AOI of all the proposed training routes in Washoe County. There were no sensitive fish species directly observed in Churchill or Storey Counties.

Big Game

In a letter dated May 29, 2013, the NDOW identified bighorn sheep (*Ovis canadensis*) distribution associated with specific routes in the Washoe County portion of the Project Area. Bighorn sheep distribution occurs within the Washoe County portion of the Project Area. No bighorn sheep distribution occurs within the Churchill or Storey County portions of the Project Area.

Other Mammals

In a letter dated May 29, 2013, the NDOW identified the following BLM sensitive mammal species as having been directly observed in the Washoe County portion of the Project Area: dark kangaroo mouse (*Microdipodops megacephalus*) and pale kangaroo mouse (*Microdipodops pallidus*). Pale kangaroo mouse has also been directly observed in the Churchill County portion of the Project Area. There were no sensitive mammal species directly observed in the Storey County portion of the Project Area. In a letter dated May 29, 2013, the NNHP also identified the BLM sensitive mammals as occurring in the Project Area: pallid bat (*Antrozous pallidus*); Townsend's big-eared bat (*Corynorhinus townsendii*); California myotis (*Myotis californicus*); western small-footed myotis (*Myotis ciliolabrum*); long-legged myotis (*Myotis volans*); and western pipistrelle (*Parastrellus hesperus*).

3.3.2.2 Environmental Consequences

Proposed Action

Although Project activities include OHV training activities on existing roads and primitive roads, individual special status bird and mammal species could be impacted by vehicle noise and result in displacement from nests and foraging areas. In addition, direct mortality may occur, especially to small mammals, as a result of being run over by vehicles. However, training activities would be of short duration, and most special status birds or mammals would be expected to return to a nest site or foraging area if displaced. None of the proposed training routes traverse through greater sage-grouse PPH. Some portions of the routes traverse through PGH. In addition, there are no known active lek sites within 3.2 miles of a proposed training route. Project activities would not result in a regional population change to special status species. Therefore, impacts to special status as a result of the Proposed Action are considered minimal.

Carson Wandering Skipper

Many potential training and access routes in Washoe, Churchill, and Storey Counties were included as part of the Proposed Action, but the proposed access route (Winnemucca Ranch

Road) that traverses through, as well as runs adjacent to, the Carson Wandering Skipper ACEC is the route analyzed in detail in this section. There would be no direct loss of habitat since all activities associated with the Proposed Action would occur on the existing road. There would also be no widening of Winnemucca Ranch Road (BLM 2013).

Carson wandering skipper mortality from vehicle-related activities associated with the Proposed Action is highly unlikely for the following reasons: 1) Winnemucca Ranch Road would only be used as an access route, and therefore, the overall time that vehicles would utilize the route would be minimal (approximately ten to 30 minutes); 2) the group size during a training session would be limited to a maximum of 16 vehicles; 3) all Project vehicles would adhere to all posted speed limits or not exceed 20 mph if there is no posted speed limit; and 4) the habitat within the Carson Wandering Skipper ACEC on the western side of Winnemucca Ranch Road does not function as high quality habitat, due to the lack of saltgrass and available nectar sources (BLM 2013).

There is the potential for Carson wandering skippers to be temporarily disturbed by vehicles traveling Winnemucca Ranch Road during the species' flight season if skippers are accessing nectar sources along the road. This is highly unlikely since the primary nectar sources are not located along the roadway. The impact, in this case, would be minimal due to the fact that the maximum training sessions that can occur in a year is 36, the maximum number of vehicles associated with a training exercise is 16, and the overall time on the access route would be brief (between ten and 30 minutes) (BLM 2013).

There is also the potential for activities described in the Proposed Action to create dust. There are no available data illustrating dust impacts on the Carson wandering skipper; however, the amount of dust created from the activities described in the Proposed Action would be minimal for the following reasons: 1) the proposed route through the Carson wandering skipper habitat is only identified as an access route and would not be used for any training activities. As described in the Proposed Action, access routes would only be used to access training routes, and therefore the duration of activities on these routes would be brief (approximately ten to 30 minutes); 2) the maximum number of vehicles involved with a training exercise would be 16; 3) all Project vehicles would adhere to all posted speed limits or not exceed 20 mph if there is no posted speed limit; and 4) the overall traffic generated on Winnemucca Ranch Road from the Proposed Action would be minimal compared to the traffic that currently exists on the road from people accessing recreational areas, housing, and other areas (BLM 2013).

The impacts stated above would be reanalyzed after three years, as the proponent's permit would only be valid for three years (BLM 2013).

The conclusion in the Biological Assessment prepared by the BLM, and concurred with by the USFWS, was that the Proposed Action "may affect, but is not likely to adversely affect the Carson wandering skipper or its habitat" (BLM 2013).

No Action Alternative

Under the No Action Alternative, the BLM would not approve the land use permit, and BPT would not be allowed to utilize the existing roads and primitive roads on BLM-administered land for the proposed training activities. There would be no impacts to special status species on

BLM-administered land, as BPT would not utilize the existing and primitive roads on BLM-administered land for training activities.

3.3.3 Wildlife (General)

3.3.3.1 Affected Environment

Table 3.3-1 lists the wildlife species NDOW has identified as having been directly observed within the vicinity of the Project Area (NDOW 2013).

Table 3.3-1: Wildlife Species Observed in the Vicinity of the Project Area

Common Name	Scientific Name
Bobcat	<i>Lynx rufus</i>
California ground squirrel	<i>Otospermophilus beecheyi</i>
Canyon deermouse	<i>Peromyscus crinitus</i>
Chisel-toothed kangaroo rat	<i>Dipodomys microps</i>
Coachwhip	<i>Masticophis flagellum</i>
Common side-blotched lizard	<i>Uta stansburiana</i>
Coyote	<i>Canis latrans</i>
Cutbow trout	<i>Oncorhynchus clarki x mykiss</i>
Desert banded gecko	<i>Coleonyx variegatus variegatus</i>
Desert cottontail	<i>Sylvilagus audubonii</i>
Desert horned lizard	<i>Phrynosoma platyrhinos</i>
Desert kangaroo rat	<i>Dipodomys deserti</i>
Desert nightsnake	<i>Hypsiglena torquata deserticola</i>
Desert woodrat	<i>Neotoma lepida</i>
Giant fairy shrimp	<i>Branchinecta gigas</i>
Gopher snake	<i>Pituophis catenifer sayi</i>
Gray fox	<i>Urocyon cinereoargenteus</i>
Great Basin collared lizard	<i>Crotaphytus bicinctores</i>
Great Basin fence lizard	<i>Sceloporus occidentalis longipes</i>
Great Basin gopher snake	<i>Pituophis catenifer deserticola</i>
Great Basin pocket mouse	<i>Perognathus parvus</i>
Great Basin rattlesnake	<i>Crotalus oreganus lutosus</i>
Great Basin whiptail	<i>Cnemidophorus tigris tigris</i>
Jumper titmouse	<i>Baeolophus ridgwayi</i>
Least chipmunk	<i>Neotamias minimus</i>
Little pocket mouse	<i>Perognathus longimembris</i>
Long-nosed leopard lizard	<i>Gambelia wislizenii</i>
Long-nosed snake	<i>Rhinocheilus lecontei</i>
Long-tailed pocket mouse	<i>Chaetodipus formosus</i>
Long-tailed vole	<i>Microtus longicaudus</i>
Mediterranean gecko	<i>Hemidactylus turcicus</i>
Merriam's kangaroo rat	<i>Dipodomys merriami</i>
Mohave patch-nosed snake	<i>Salvadora hexalepis Mojavensis</i>
Mountain cottontail	<i>Sylvilagus nuttallii</i>
Mountain lion	<i>Puma concolor</i>
Mountain quail	<i>Oreortyx pictus</i>
Nevada side-blotched lizard	<i>Uta stansburiana nevadensis</i>
North American deer mouse	<i>Peromyscus maniculatus</i>
Northern desert horned lizard	<i>Phrynosoma platyrhinos platyrhinos</i>

Common Name	Scientific Name
Northern grasshopper mouse	<i>Onychomys leucogaster</i>
Northern zebra-tailed lizard	<i>Callisaurus draconoides myurus</i>
Ord's kangaroo rat	<i>Dipodomys ordii</i>
Panamint kangaroo rat	<i>Dipodomys panamintinus</i>
Piñon deer mouse	<i>Peromyscus truei</i>
Raccoon	<i>Procyon lotor</i>
Sagebrush vole	<i>Lemmiscus curtalus</i>
Shrew [unknown]	
Snail [unknown]	
Striped whipsnake	<i>Masticophis taeniatus</i>
Southern grasshopper mouse	<i>Onychomys torridus</i>
Tadpole shrimp [unknown]	
Tiger whiptail	<i>Aspidoscelis tigris</i>
Variable groundsnake	<i>Sonora semiannulata</i>
Western fence lizard	<i>Sceloporus occidentalis</i>
Western gray squirrel	<i>Sciurus griseus</i>
Western harvest mouse	<i>Reithrodontomys megalotis</i>
Western long-tailed brush lizard	<i>Urosaurus graciosus</i>
Western rattlesnake	<i>Crotalus viridis</i>
Western spotted skunk	<i>Spilogale gracilis</i>
White-tailed antelope squirrel	<i>Ammospermophilus leucurus</i>
Yellow-backed spiny lizard	<i>Sceloporus uniformis</i>
Zebra-tailed lizard	<i>Callisaurus draconoides</i>

According to the habitat assessment performed, the habitat types do not support the presence of the following species: cutbow trout; giant fairy shrimp, gray fox; juniper titmouse; long-tailed vole; mountain quail; raccoon; tadpole shrimp; and western gray squirrel. The canyon deer mouse, the desert banded gecko, and the Mohave patch-nosed snake are primarily found in the Mojave Desert, but may be found in other desert scrub habitat communities.

Big game species

In a letter dated May 29, 2013, the NDOW identified that occupied pronghorn antelope (*Antilocapra americana*) distribution occurs throughout the entire Churchill County portion of the Project Area and throughout most of the Washoe County portion of the Project Area. According to the BLM, year-round habitat occurs in the Churchill County portion of the Project Area, and crucial summer and crucial winter habitat occurs in the Washoe County portion of the Project Area. There is no pronghorn antelope distribution identified in the Storey County portion of the Project Area. Mule deer (*Odocoileus hemionus*) distribution occurs throughout the majority of the Washoe County portion of the Project Area, but does not occur in either the Churchill or Storey County portions of the Project Area. According to the BLM, year-round, crucial summer, and crucial winter habitat occurs in the Washoe County portion of the Project Area.

3.4.3.2 Environmental Consequences

Proposed Action

Although Project activities include OHV training activities on existing roads and primitive roads, individual wildlife species could be impacted by vehicle noise and result in temporary displacement from foraging areas. In addition, direct mortality may occur, especially to small mammals, as a result of being run over by vehicles. However, training activities would be of short duration, and most wildlife species would be expected to return to the site if displaced. In addition, Project activities would not result in a regional population change to wildlife species. Therefore, impacts to wildlife species as a result of the Proposed Action are considered minimal.

No Action Alternative

Under the No Action Alternative, the BLM would not approve the land use permit, and BPT would not be allowed to utilize the existing roads and primitive roads on BLM-administered land for the proposed training activities. There would be no impacts to wildlife on BLM-administered land, as BPT would not utilize the existing and primitive roads on BLM-administered land for training activities.

4.0 CUMULATIVE EFFECTS

For the purposes of this EA, the cumulative impacts are the sum of all past, present (including proposed actions), and reasonably foreseeable future actions resulting primarily from recreational activities and other public land uses within areas of the Proposed Action. The purpose of the cumulative analysis in this EA is to evaluate the significance of the Proposed Action's contributions to the cumulative environment. A cumulative impact is defined under federal regulations as follows:

"...the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (40 CFR 1508.7).

4.1 PAST, PRESENT, AND REASONABLY FORESEEABLE FUTURE ACTIONS

The past, present, and reasonably foreseeable future actions applicable to the Proposed Action are identified in Table 4.1-1.

Table 4.1-1: Past, Present, and Reasonably Foreseeable Future Actions

Project Type	Status (X)		
	Past	Present	Future
Dispersed recreation	X	X	X
ROW construction and/or maintenance	X	X	X

Project Type	Status (X)		
	Past	Present	Future
Mineral exploration and mining	X	X	X
Livestock grazing	X	X	X
Range improvements	X	X	X
Fire management	X	X	X
Wildlife and game habitat management	X	X	X
Invasive weed inventory/treatments	X	X	X
Wild horse gathers	X	X	X
Wild horse management	X	X	X

All resources have been evaluated for cumulative incremental impacts when added to other past, present, and reasonably foreseeable future actions. Impacts from the Proposed Action would be temporary in nature and take place on existing roads, and staging areas are located within existing areas of disturbance. The impacts analyzed to resources and resource uses in Chapter 3 of this EA have very minimal impacts due to the temporary nature of the Project. Therefore, cumulative impacts are determined to be negligible as a result of the Proposed Action, and therefore, a further analysis is not necessary for this EA.

5.0 PERSONS, GROUPS, AND AGENCIES CONSULTED

5.1 LIST OF PREPARERS

5.1.1 Bureau of Land Management – Stillwater Field Office

Name	Title	Project Expertise
Angelica Rose	Planning/Environmental Coordinator	Socioeconomics; Environmental Justice
Matt Simons	Realty Specialist	BLM Project Lead; Land Use Authorization
Jason Wright	Archaeologist	ACEC; Cultural Resources; Native American Religious Concerns; Paleontological Resources
Chris Kula	Wildlife Biologist	Migratory Birds; Threatened or Endangered Species; BLM Sensitive Species; General Wildlife
Jill Devaurs	Rangeland Management Specialist	Invasive, Nonnative Species; Soils; Vegetation
David Schroeder	Natural Resource Specialist	Wastes, hazardous or solid
Dan Westermeyer	Outdoor Recreation Planner	Lands with Wilderness Characteristics; Recreation; Travel Management; Visual Resources
Ken Depaoli	Geologist	Minerals

5.1.2 Bureau of Land Management – Sierra Front Field Office

Name	Title	Project Expertise
Rachel Crews	Archaeologist	Cultural Resources; Native American Religious Concerns; Paleontological Resources
Coreen Francis	Nevada BLM Forester	Forest Resources
Dean Tonenna	Botanist	Invasive, Nonnative Species; Vegetation
Pilar Ziegler	Wildlife Biologist	ACEC; Migratory Birds; Threatened or Endangered Species; BLM Sensitive Species; General Wildlife
Arthur Callan	Outdoor Recreation Planner	Lands with Wilderness Characteristics; Recreation; Travel Management; Visual Resources
Ryan Leary	Range Management Specialist	Livestock Grazing
Niki Cutler	Hydrologist	Soils
John Axtell	Wild Horse/Burro Specialist	Wild Horses and Burros

5.1.3 Enviroscientists, Inc.

Name	Title	Project Expertise
Catherine Lee	Project Manager	Overall project management; Document preparation
Opal Adams	Project Principal	Technical Review; Editing
Jess Kohler	GIS Specialist	GIS Data Management; Figure Production

5.2 TRIBES, PERSONS, GROUPS, OR AGENCIES CONSULTED

Tribes

Reno-Sparks Indian Colony

Pyramid Lake Paiute Tribe

Washoe Tribe

Fallon-Paiute Shoshone Tribe

Agencies

Eric Miskow - Nevada Natural Heritage Program

Timothy Herrick - Nevada Department of Wildlife

Information, Planning, and Conservation System – United States Fish and Wildlife Service

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