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

OFFICE: Winnemucca District Office

TRACKING NUMBER: DOI-BLM-NV-W010-2014-0033-DNA

CASEFILE/PROJECT NUMBER: N-093007

PROPOSED ACTION TITLE/TYPE: Selenite Repeater

LOCATION/LEGAL DESCRIPTION: Selenite Mountain, Pershing County, NV; T.32 N., R.24 E., sec. 28.

APPLICANT (if any): BLM

A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures.

Purpose and Need

The purpose of this federal action is to allow the Bureau of Land Management (BLM) access to establish a repeater communication site to improve the communication network within the Winnemucca District and improve staff and public safety. The need for the action is established by BLM's responsibility under the Federal Land Policy and Management Act of 1976 (FLPMA) (Section 501(5)), and BLM regulations at 43 Code of Federal (CFR) 2800, to process ROW applications. FLPMA Section 507 allows rights-of-way to be provided to any department or agency of the United States.

Proposed Action

The BLM requests a right-of-way for the establishment of a communications tower on public lands within T.32 N., R.24 E., sec. 28 within the county of Pershing, Nevada. The proposed action would be located at N40°36'21.86; W119°15'58.96" on Selenite Peak within the Selenite Mountains Wilderness Study Area and would occur within a 40 x 40 ft. area within the parcel in public ownership described above (Figure 1).

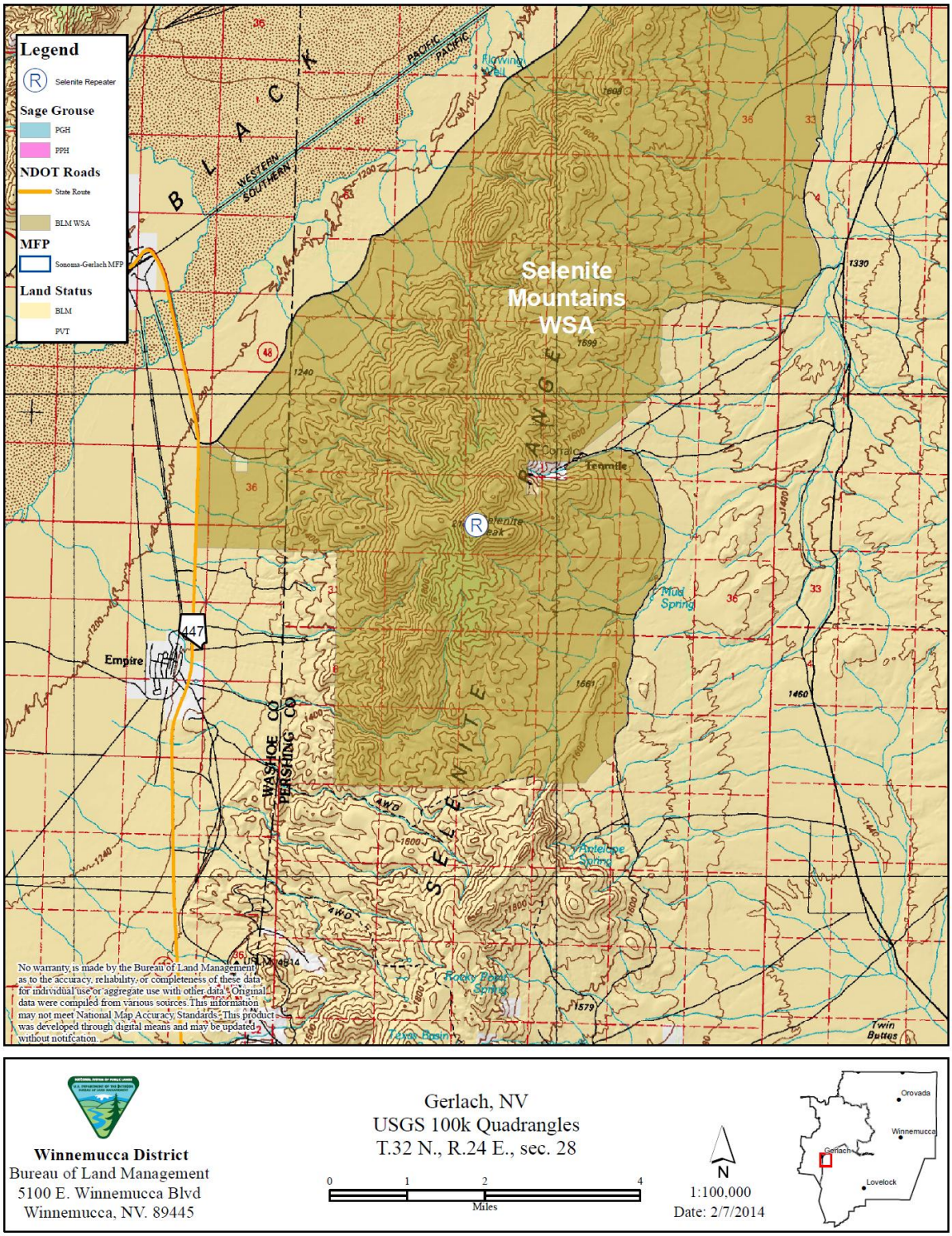

Figure 1. Selenite Repeater proposed location.

At present two other communication towers are located within the Gerlach area: The Black Rock Repeater and the Granite Peak Repeater. The primary purpose and capacity of the Black Rock Repeater is to provide year round communication support for permitted events on the Black Rock playa including emergency services within the area.

The Black Rock Repeater services are more event-focused and limited in area than the Granite Peak Repeater communication site. The Selenite Repeater would replace the coverage area currently under the responsibility of the Granite Peak Repeater, including the Gerlach area, Black Rock Desert playa, and would provide more complete coverage of the Soldier Meadows and surrounding area, which at present has limited radio coverage. This would not only dramatically improve communication in the District, but also staff and public safety.

The requirement of the new repeater is that it must provide communication to both the Black Rock Station and Winnemucca Mountain and tie into the Central Nevada Interagency Dispatch Center (CNIDC). Communication site studies (i.e., propagation studies) were conducted on all of the mountain tops around the Black Rock Desert area and Selenite Peak was the only site that met this requirement.

Past incidents under the current radio coverage have caused safety and logistical concerns. Along the route from Fernley, NV to Gerlach, NV (NV-447) vehicle accidents, search and rescue, and wildfire incidents have occurred in which BLM employees did not have radio coverage. Future emergency incidents that occur along this route would require consistent, reliable radio coverage which is presently not available, to allow for the best possible emergency response. The annual Burning Man event on the Black Rock Desert playa demands a large law enforcement staff that requires regular communication with CNIDC for logistics and emergency responses. The Selenite Repeater would provide the radio services necessary to improve overall communications for emergency incidents, non-emergency radio connectivity, and logistical purposes.

The repeater structure is a Pepro cabinet – a freestanding, solar powered, self-contained apparatus that does not require intentional ground disturbance (Figure 2). It weighs approximately 650 lbs. with dimensions 38” W x 45” D x 67” H. It would be anchored by four concrete base pads that rest on the ground, weighted in place; no excavation would be necessary. The cabinet and base pads are removable and no permanent structures would be installed. The antenna tower is a 20-foot monopole that extends directly from the cabinet. The cabinet would be flown in by helicopter; jacks would be used to remove, level, and orient the structure.

Figure 2. Pepro cabinet.

The repeater would be placed between the months of June - September, 2014. Maintenance would occur 0-2 times/years, as necessary, and would consist of a 2-4 person crew. Access for maintenance would be by helicopter, as there are no access roads in the area, nor would any access roads be constructed.

Non-Impairment Standard

The Selenite Range is a 32,041-acre designated Wilderness Study Area (WSA) in the BLM Winnemucca District. All uses or facilities proposed on public lands within WSAs are subject to the review requirements of BLM Manual 6330 – Management of BLM Wilderness Study Areas (hereafter WSA Handbook). This includes an evaluation of whether the use or facility will meet the non-impairment standard (section 1.6.C.1), i.e., it is temporary and non-surface disturbing.

The use or facility is temporary: The Selenite Repeater would be a temporary fixture by the WSA Handbook definition in that it "…is needed for a defined time period to respond to a temporary need, and would be terminated and removed prior to or upon wilderness designation." The time period of the Selenite Repeater would be from the year 2014 until the Selenite WSA is designated as Wilderness by Congress, an act which is not guaranteed. WSAs may also be released for uses other than Wilderness. Nevertheless, the repeater could be easily transferred or removed; it is not a permanent structure by design. The temporary need would be to provide improved radio communication and improved staff and public safety for the Gerlach area, Black Rock Desert playa, and the Soldier Meadows area.

The use or facility will not create new surface disturbance: The Selenite Repeater structure is a Pepro cabinet that uses self-leveling, weighted supports to anchor it to the

ground. No excavation or permanent structures would be required. No vegetative trampling would occur, as the proposed location is primarily bedrock with some loose rock and soil.

In addition to meeting the Non-Impairment Standard criteria, the Winnemucca District Nevada Wilderness Study Area Notebook (2001) Recommendation and Rationale for the Selenite Mountains WSA states, "The recommendation for this WSA is to release all 32,041 acres for uses other than Wilderness. While the Wilderness values met the criteria for wilderness study, the WSA was recommended for uses other than Wilderness due to potentially moderate (25% of WSA) to high (25% of WSA) geothermal values, moderate mineral values (40% of WSA) and significant outside sights and sounds."

B. Land Use Plan (LUP) Conformance

LUP Name: Sonoma – Gerlach Management Framework Plan, Date Approved: 7/9/1982

The proposed action in is conformance with the LUP, even though it is not specifically provided for, because it is consistent with the following LUP decisions (objective, terms, and conditions):

> OBJECTIVE: District Manager's Decision L. 4.2 – Develop new communication sites only when environmental or technical problems on an existing site are incompatible with new applications. New site development and road construction will be permitted only when no feasible alternative can be used on the following mountain ranges: Selenite Range, (11 other ranges listed in MFP).

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

List by name, number and date (DR/FONSI or ROD) all applicable NEPA documents that cover the proposed action.

EA #: DOI-BLM-NV-W030-2012-0013-EA
Title: Black Rock Repeater
Decision Date: August 10, 2012

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

None.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(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?

Yes, the new proposed action is essentially similar to the proposed action in the Black Rock Repeater EA (DOI-BLM-NV-W030-2012-0013-EA).

The proposed action is within a different analysis area; however, the resource conditions are sufficiently similar to those analyzed in the Black Rock Repeater EA. Although the environmental conditions are similar, the Black Rock Repeater EA does not analyze the impacts of a repeater within a WSA. However, BLM contends the placement of the repeater is temporary and non-surface disturbing, thereby meeting the non-impairment standard.

Native American Consultation

Native American Consultation letters were sent to the Fallon Paiute and Shoshone Tribe and the Pyramid Lake Paiute Tribe. No comments or response was received.

Cultural and Paleontology

A Class I needs assessment was done. A Class III inventory was conducted; the results were negative. The report is under preparation for SHPO and SHPO concurs with the negative findings and expects the report to be submitted by June 30,2014. There are no issues or concerns.

Soils and Vegetation

Soils information is extracted from the Soils Survey of Pershing County, Nevada, West Part I. The proposal is located on a rock outcrop atop Selenite Peak. Rock outcrops severely limit the extent of perennial vegetation. Soil characteristics as far as wind and water erosion potential would be literally none to minimal, essentially similar to those analyzed in the Sonoma Peak Repeater Site EA, 2007. Vegetation impacts would be minimal, essentially the same as analyzed in the Sonoma Peak Repeater Site EA, 2007.

Wildlife

Table 1 shows the breakdown of habitat types found within a 3.2 mile buffer of the proposed site. There is no Preliminary Priority Habitat (PPH) or Preliminary General Habitat (PGH) for Greater Sage-grouse. However, approximately 53% of the area is made up of habitat preferred by Sage-grouse including various sagebrush habitat types and riparian woodlands and shrublands (Table 1). NDOW classifies the area as year-round and crucial summer and winter habitat for mule deer and pronghorn. The area also

contains potential big horn sheep habitat and is within 10 miles of occupied habitat within the Granite range. The area also contains habitat for a variety of sensitive and non-sensitive migratory birds and raptors including golden eagles, northern goshawks, and prairie falcons. In addition, the area contains suitable bat foraging and roosting habitat and several abandon mines within 10 miles of the proposed site. Finally, the Nevada Natural Heritage Program (NNHP) database shows the possibility of BLM sensitive plant species in the area.

Table 1. Vegetation composition within 3.2 miles of the proposed site of the Selenite repeater.

Vegetation Type	Acreage	Proportion
Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland	11.12	0.05
Great Basin Pinyon-Juniper Woodland	2181.47	10.60
Great Basin Xeric Mixed Sagebrush Shrubland	2984.22	14.50
Inter-Mountain Basins Big Sagebrush Shrubland	7765.32	37.73
Inter-Mountain Basins Big Sagebrush Steppe	28.69	0.14
Inter-Mountain Basins Cliff and Canyon	283.62	1.38
Inter-Mountain Basins Greasewood Flat	26.28	0.13
Inter-Mountain Basins Mixed Salt Desert Scrub	6105.82	29.66
Inter-Mountain Basins Montane Sagebrush Steppe	86.95	0.42
Inter-Mountain Basins Semi-Desert Grassland	414.72	2.01
Inter-Mountain Basins Semi-Desert Shrub Steppe	216.25	1.05
Invasive Annual Grassland	470.08	2.28
Mojave Mid-Elevation Mixed Desert Scrub	9	0.04

Visual Resource Management

The proposed site is in a VRM Class I. The objective of this class is to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention (BLM Manual H-8410-1).

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

Yes. The alternatives analyzed in the existing documents are appropriate with respect to the current proposed action, as no new circumstances or concerns have been identified.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland 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?

At present there is no new information, nor new circumstances, that would change the analysis of the proposed action nor invalidate the conclusions reached in the existing NEPA documents.

Greater Sage-grouse - The proposed location is not within or adjacent to Preliminary Priority Habitat (PPH) or Preliminary General Habitat for Greater Sage-grouse and there are no leks within 3.2 miles. However, the areas is part of the Limbo Population Management Unit (PMU) and includes historic breeding, summer, and winter range habitat classified as R-0 and R-1 Sage-grouse habitat. Sage-grouse can move between seasonal habitat ranges and flights may exceed 75 km (Connely et al. 20000). Therefore, it is possible, though not likely, that this area may serve as a dispersal corridor between more suitable grouse habitat. However, installation activities do not require intentional ground disturbance and excavation is not necessary. Thus, given the nature of the project and the unlikely presence of grouse in the proposed are, impacts should be limited.

Migratory Birds and raptors - The area also contains habitat for a variety of sensitive migratory birds and raptors including golden eagles, northern goshawks, burrowing owls, and peregrine falcons. Several nests for these raptors have been documented within 10 miles of the proposed location. If disturbed at crucial times during the nesting season (e.g., during nest building and incubation), raptors are susceptible to nest abandonment (Call 1978, Steenhof and Kochert 1982, Watson 1993). In addition, the installation requirements may be detrimental to certain migratory birds through direct impacts such as trampling the eggs of ground nesters. Therefore, surveys should be conducted prior to installation and avoidance measures be considered during operations.

Bats - Persistent and casual human disturbance at bat maternity or hibernacula sites are known to cause bat population declines through elevated mortality rates, poor recruitment, and colony abandonment (Martin et al. 2000). While there are several abandon mines within 10 miles of the proposed site, the proposed location is not likely to contain suitable maternity or hibernacula habitat. However, several sensitive bat species have been documented in the area including Townsend's big-eared bat (*Corynorhinus townsendii*), Western small-footed bat (*Myotis ciliolabrum*), and Silver-haired bat (*Lasionycteris noctivagans*) and there is suitable roosting (trees) and foraging habitat. The proposed action does not require removal of trees and there will be limited ground disturbance, so bats should not be impacted.

Sensitive Plants – Several BLM sensitive plant species may be encountered in the project area. Several of these species are associated with habitat found in the area such as steep slopes, barren soil terraces, roadsides and washes, high elevation dry and exposed areas, scree and talus slopes, and various rock types. These factors suggest that surveys be conducted prior to installation and avoidance measures be considered during operations.

General Wildlife - Some of the large mammal species that may be encountered would include mule deer (*Odocoileus hemionus*), pronghorn (*Antilocapra americana*), mountain lion (*Felis concolor)*, bobcat (*Lynx rufus)*, black-tailed jackrabbit (*Lepus californicus*),

coyote (*Canis latrans*), kit fox (*Vulpes macrotis*), and badger (*Taxidea taxus*). NDOW classifies the area as crucial summer and winter habitat for mule deer and pronghorn and potential big horn sheep habitat. The proposed action requires no new roads and is not expected to interfere with the life cycle requirements of mule deer, big horn sheep, or other general wildlife species.

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 approaches used in the existing documents are still appropriate to address any possible impacts from this proposed action. The proposed action would be similar and smaller in context and intensity than the proposed action analyzed in the Black Rock Repeater EA.

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

Yes. The public involvement and interagency review associated with the existing NEPA documents was adequate with regards to the complexity of the current proposed action. Each of the previously mentioned NEPA documents as identified in section C underwent both public scoping, tribal consultation and interagency review.

E. Persons/Agencies/BLM Staff Consulted

Name /Title	Resource/Agency Represented	Signature/Date	Comments (Attach if more room is needed)
Pat Haynal	Cultural Resources	S\Pat Haynal 6/4/14	
Pat Haynal	Cultural Resources	S\Pat Haynal 6/4/14	
Mark Hall	Native American Religious Concerns	S\Mark E. Hall 6/9/14	
V. Joey Carmosino	Visual Resource Management	S\Aron King for Joey Carmosino 6/5/14	
Debbie Dunham	Realty	S\Debbie Dunham 6/4/14	
Derek Messmer	Fire Management	S\Derek Messmer 6/3/14	
Eric Baxter	Invasive, Non-native species	S\Eric Baxter 6/4/14	
Rob Burton	Soils and Vegetation	S\Rob Burton 6/3/14	
Amanda Deforest	Threatened & Endangers species	S\Amanda DeForest 6/3/14	
Amanda Deforest	Special Status Species	S\Amanda DeForest 6/3/14	
Amanda Deforest	General Wildlife Habitat	S\Amanda DeForest 6/3/14	
Zwaantje Rorex	Lands with Wilderness Characteristics	S\Zwaantje Rorex 6/4/14	
Rob Bunkall	GIS	S\Rob Bunkall 6/6/14	

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.

[x] **Conclusion** *(If you found that one or more of these criteria is not met, you will not be able to check this box.)*

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' compliance with the requirements of the NEPA.

____S\Derek Messmer_____
Signature of Project Lead

_____ S\Mark E. Hall 6/16/14_____
Signature of NEPA Coordinator

_____S\Vic Lozano_____ _6/17/14___
Signature of the Responsible Official Date

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.