

# Determination of NEPA Adequacy (DNA) Worksheet

U.S. Department of the Interior  
Bureau of Land Management

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STILLWATER FIELD OFFICE:: , LLNVC01000

TRACKING NUMBER: DOI-BLM-NV-C010-2015-0024

CASEFILE/PROJECT NUMBER: SRP-NVC01-15-01-01

PROPOSED ACTION TITLE/TYPE: Off-Highway Vehicle Race

LOCATION/LEGAL DESCRIPTION:

The race course falls within the following Township, Range and Sections on public lands near Hawthorne, Nevada:

T8N, R31E, Sec.: 1

T8N, R32E, Sec.: 6, 7, 8, 9, 13, 14, 15, 16

T8N, R33E, Sec.: 2, 9, 10, 11, 16, 17, 18

T9N, R30E, Sec.: 1, 11, 12, 13, 14, 23, 25, 26, 36

T9N, R31E, Sec.: 27, 28, 29, 30, 34, 35

T9N, R32E, Sec.: 1

T9N, R33E, Sec.: 4, 5, 6, 9, 15, 16, 21, 22, 27, 34, 35

T10N, R30E, Sec.: 24, 25, 36

T10N, R31E, Sec.: 8, 9, 10, 11, 13, 14, 18, 19, 23, 24

T10N, R 32E, Sec.: 16, 17, 18, 21, 22, 27, 35, 36

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

## **A. Description of Proposed Action and any applicable mitigation measures**

Valley Off Road Racing Association (VORRA) has submitted a Special Recreation Permit application to conduct a competitive off road vehicle race (OHV) in Mineral, County, Nevada. The course is located on public lands managed by the BLM in the Gillis Range area north of the Hawthorne Army Depot and east of Walker Lake. The race will be held on September 4-6, with the race day occurring Sunday, September 5th. The race will start at 8 A.M. and run until 6:30 P.M. Race vehicles will include a truck/buggy class and a Utility Terrain Vehicle (UTV) class. Participants will begin arriving at the Start/Finish area on September 5th for vehicle preparation, race on September 5th, and leave on the 5th or 6th. Participants will be able to preview the course, but pre-racing at high speeds will not be allowed by the event organizer. Overnight camping will occur at the Start/Finish area in a highly disturbed area along an old rail line where portable toilets and dumpsters will be provided by VORRA. Participants will also stay at local motels or RV campgrounds in Hawthorne. This event has been authorized annually

since 1993 and NEPA analysis was completed through an Environmental Assessment in 2003 (DOI-BLM-NV-030-03-34-EA).

The OHV race will be conducted on established dirt roads in the southern portion of the Gillis Range in the Ryan Canyon area. Approximately 30 to 40 trucks and buggies and 5 UTV's are estimated to participate. Spectatorship at the VORRA events is typically low with majority of the personnel in attendance of the event consisting of family members and pit crews. Racers in the UTV Class will complete two or three laps while racers in the truck/buggy Class will complete four laps on a loop course approximately 52 miles in length within a specified time-frame. Twenty-six miles of the course are also utilized by the Vegas to Reno race annually in August. There will be three check points at various intervals along the course and the start/finish pit located in the old townsite of Thorne in areas previously inventoried for cultural resources. This start/finish site would allow access for crew assistance, emergency response, and restrict public access to the course for public health and safety concerns. The width of the race route would vary from eight (8') feet to more than twenty (20') feet depending on topography. The course will be marked with markers on the right-hand side of the route except where double-marked in areas to restrict passing, speed or travel. Activities from the race are not anticipated to impact the operations or facilities from the Hawthorne Army Depot.

Mitigation for the potential impacts from the event is provided for in the stipulations in Attachment A of the Special Recreation Permit.

## **B. Land Use Plan Conformance**

LUP Name	<u>Carson City Field</u>	Date Approved:	<u>May 9, 2001</u>
	<i>Office Consolidated Resource Management Plan</i>		

**The proposed action is in conformance with the LUP, 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.**

**List by name and date all applicable NEPA documents that cover the proposed action.**

Hawthorne Off-Highway Vehicle Race, DOI-BLM-NV-030-03-34-EA, 8/21/03

Best in the Desert (BITD) – Vegas to Reno OHV Race, NV-030-08-026 (EA), 7/30/2008

Hawthorne Off-Highway Race, 2009, DOI-BLM-NVC01000-2009-32-CX, 5/5/09

**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).**

Cultural Resource Inventory Needs Assessment, VORRA Hawthorne, 2010

**D. NEPA Adequacy Criteria**

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

The proposed event is located within the area analyzed in the 2003 EA, and several subsequent DNA's or CX's and includes the same course route, start and end locations, checkpoints, camping areas and estimated number of participants. The BLM continues to monitor for permit stipulation compliance, resource protection and public safety through pre, post and event monitoring. There are no changes proposed for the conduct of the event. Therefore the current proposed action and the action previously analyzed in the 2003 EA are substantially the same.

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

A reasonable range of alternatives were analyzed in the 2003 document including a No Action Alternative. Internal BLM review and public response to notification letters sent out to solicit comments on the 2003 EA did not identify new issues, new impacts, new information or errors in the previous analysis that would require the creation and analysis of additional alternatives. Since the proposed action is the same, the range of alternatives analyzed in the 2003 EA is deemed adequate.

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

There has been no significant change in circumstances or significant new information relevant to the proposed action since 2003. The existing environmental conditions have not changed from those previously analyzed and the EA addressed biological, physical, social and economic resources and issues in the event area. The course does not fall within the Bi-State Sage Grouse habitat. Analysis presented determined no significant impacts to wildlife, livestock, vegetation,

soils, cultural resources or socio-economics would result from implementation of the proposed action. A nesting raptor (Redtail Hawk) was located on an old power-line approximately one-half mile from the south-east corner of the course but this is an acceptable distance from the site.

Economically, the event provides a moderate financial infusion into the local communities. BLM review of the proposed action has not revealed any new issues or information that would require additional analysis. All use continues to be on the existing, previously analyzed course. There have been no new discoveries of T & E plants or animals, cultural resources or additional issues that would change the existing analysis. Thus it is logical to conclude that continuation of the proposed off highway vehicle race in this area is unlikely to result in significant impacts to the human environment.

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

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

Since the course is identical to the course analyzed in the 2003 EA, the direct and indirect impacts of the proposed action are not significantly different from those identified in the existing documents. Post event monitoring of the course confirms the finding of no significant impacts. The current proposed action is the same as the actions analyzed in the 2003 EA. No new issues or information regarding the proposed action have been revealed. Previous analysis was subject to BLM and public review so it is logical to conclude that the direct and indirect impacts of the current proposed action will remain unchanged. This methodology and approach remains appropriate for the current proposed action.

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

Public involvement in the 2003 EA analyses provided appropriate coverage of the proposed action. The EA followed approved BLM scoping and review processes. This process included internal BLM and public scoping processes followed by internal BLM and public review of the EA. Notification of Fallon area Tribes, Nevada State Historic Preservation Officer and local County Commissioners are documented. Based on the analysis in the EA and few comments submitted during the scoping and review process the BLM authorized officer rendered a decision in regards to the proposed action. The County Commissioners, other permittees, right-of-way holders and the general public are advised by letter or phone of proposed events each year. This provides an opportunity for re-evaluation of existing information and consideration of new information and issues prior to the event. This on-going process is considered adequate public involvement for the current proposed action.

**E. Persons/Agencies/BLM Staff Consulted**

**Table 1. List of Preparers**

Name	Title	Signature
Ken Vicencio	Range Technician / Wrecks	<i>[Signature]</i> 5/11/15
Chelsy Simerson	Range Management Specialist	<i>[Signature]</i> 5/11/15
Joel Hartman/Ken Depaoli	Geologist	<i>[Signature]</i> 5-11-15
Chris Kula	Wildlife Biologist	<i>[Signature]</i> 5/11/15
Angelica Rose	Planning and Environmental Coordinator	<i>[Signature]</i> 5/11/15
Dave Schroeder	Environmental Protection Specialist	<i>[Signature]</i> 5-11-15
Matt Simons	Realty Specialist	<i>[Signature]</i> 5/11/15
Michelle Stropky	Hydrologist	MMS 05/11/2015
Dan Westermeyer	Outdoor Recreation Specialist	<i>[Signature]</i> 5/11/15
Jason Wright	Archaeologist	<i>[Signature]</i> 5/13/15

**Note**

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

**Conclusion**

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

*[Signature]*  
 \_\_\_\_\_  
 Signature of Project Lead

*[Signature]*  
 \_\_\_\_\_  
 Signature of NEPA Coordinator

*[Signature]* Acting Stillwater FM 5-11-15  
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 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 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.



**Map 1. VORRA Hawthorne Course Map**