



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
Anchorage Field Office
4700 BLM Road
Anchorage, Alaska 99507-2591
<http://www.blm.gov/ak>

DETERMINATION OF NEPA ADEQUACY (DNA) WORKSHEET

Proposed Action Title/Type: Nome Kennel Club, Issuance of a Special Recreation Permit

NEPA Register Number: DOI-BLM-AK-A010-2016-0011-DNA

Case File Number: AA-94186

Location / Legal Description: T. 9 S., R. 25 W., Sections 20, 21, 22, 23, 24 (within), along the contemporary Iditarod Trail

Applicant (if any): Nome Kennel Club

A. DESCRIPTION OF THE PROPOSED ACTION

The Nome Kennel Club's has submitted an application for a special recreation permit (SRP) for a competitive dog sled race on BLM managed lands. The race route would run from Nome to Council (Bear Creek) and return along the contemporary Iditarod Trail. The term of the permit would be one year with the right to renew for an additional 10 year period.

B. LAND USE PLAN CONFORMANCE

The proposed action is in conformance with the applicable land use plan, the Kobuk-Seward Peninsula Approved Resource Management Plan and Record of Decision (RMP and ROD), September 2008. Specifically, the proposed action is in conformance with the following land use plan recreation management decision:

M-3: Management Actions

2. Outside SRMAs, applications for SRPs (for commercial use) will be handled on a case-by-case basis within identified ROS guidelines in areas of concern (Table B-1 in Appendix B). The geographic area surrounding the Proposed Action was reviewed to ensure it is not located in an area of concern.

C. IDENTIFY APPLICABLE NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTS AND OTHER RELATED DOCUMENTS THAT COVER THE PROPOSED ACTION.

The BLM Anchorage Field Office prepared an Environmental Assessment (EA) for snowmobile races and other activities along the Iditarod Trail in 2008. This EA, AK-010-08-EA-012, and accompanying Decision Record and FONSI were reviewed for this proposed action. The 2008 EA will be provided as an attachment to this DNA worksheet.

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 current Proposed Action is identical to the selected alternative, Alternative A, analyzed in 2008 EA. The 2008 EA analyzed the effects of up to 100 participants in the Iditarod Dog Sled Race on an annual basis across BLM managed lands associated with the Iditarod Trail (p.30). The applicant has proposed a range of participants, less than 10 per year, which in combination with other anticipated or scheduled events would not exceed the threshold number (100) of dog teams on the Iditarod Trail analyzed in the 2008 EA.

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

The range of alternatives analyzed in the 2008 EA is appropriate given current environmental concerns, interests, and resource values. The EA addressed the environmental impacts of competitive dog team racing in relation to air quality (p. 81), water quality (p.86), soils (p. 91), and vegetation (p. 92).

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?

The existing analysis is still valid and no new information or circumstances would change the analysis. No rangeland health standard assessment, recent endangered species listing, or updated lists of BLM-sensitive species are known or affected by the proposed Nome to Council dog sled race.

The dog sled race stipulation requiring straw or vegetative matter used for dog bedding or other purposes supporting the event must be certified weed free to prevent the introduction of non-native invasive species(NNIS) will be added to this SRP. Although NNIS standards have gained

strength in years subsequent to the 2008 analysis, this inclusion does not substantially change the analysis of the analysis of the new proposed action.

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?*

The direct, indirect, and cumulative effects resulting from implementation of the Proposed Action are substantially similar to, if not identical, to those that were identified in the 2008 EA.

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

Given that negligible information or circumstance changes are present in the proposed action, with the inclusion of a stipulation for certified weed free straw or vegetative matter, previous public involvement and interagency review associated with the existing NEPA document is considered to be adequate for the current proposed action.

E. PERSONS, AGENCIES, AND BLM STAFF CONSULTED

Jenny Blanchard	Archaeologist, AFO
Bruce Seppi	Subsistence Resources and Wildlife Biologist (T&E Species), AFO
Tom Sparks	Lands and Realty, AFO
Laurie Thorpe	Ecologist, AFO
April Rabuck	Planning and Environmental Specialist, ADO

F. CONCLUSION

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

Anchorage Field Manager

/s/ Alan Bittner

3/4/2016

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 § 4 and the program-specific regulations.

Attachments

- 1) Environmental Assessment, AK-010-08-EA-012
- 2) Stipulations for Special Recreation Permit AA-94186, Nome Kennel Club

**Nome Kennel Club AA-94186
Special Recreation Permit (SRP) Stipulations**

This SRP authorizes the Nome Kennel Club to conduct a competitive dog team event on BLM administered lands between Nome and Council for one day per year.

Issuance of this permit requires the Permittee to accept and comply with the General Terms and Stipulations that are a part of the issued SRP. In addition to the general terms included on the SRP, Form 2930-002 (General Terms a-m), the following stipulations are applicable and a part of this permit.

Stipulations:

1. The permit holder must not close trail access or prohibit the ability of other users to use or access trails, public lands, or water during the overland move.
2. All waste generated during move will be backhauled, to include any and all oil or hazardous substances spill residues.
3. An adequate supply of appropriate fuel spill response materials must be on site at all times. The permit holder will be responsible for prompt and complete cleanup of any & all spills of oil or hazardous substances.
4. Permit Holder is responsible to report all oil or hazardous substance spills to the Alaska Department of Environmental Conservation as required in 18 AAC 75.300, and also to the BLM Authorized Officer at 1-800-478-1263.
5. Any fuel stored on BLM administered lands shall be stored at least 150 feet from surface waters and any established cabins. Fuel and other petroleum products and hazardous materials shall be stored in containers designed to hold that product, identified with the owner's name, the contents and date of purchase (Nome Kennel Club, Gas, 2016). All fuel spills will be cleaned up immediately, taking precedence over all other matters, except the health and safety of personnel. Spills will be cleaned up utilizing absorbent pads or other Alaska State DEC approved methods. Fuel storage in excess of 55 gallons and/or fuel storage containers that are situated where a spill may reach a water body or watercourse requires secondary containment. Secondary containment is defined as a diked, impermeable impoundment capable of containing 110 percent of the volume of the largest independent container. As soon as possible, but not later than 24 hours, notice of any such discharge as defined in Alaska Statute Title 18, Chapter 75, Article 2, will be given to: The Authorized Officer at 1-800-478-1263. Such other Federal and State officials as are required by law to be given such notice including Alaska Department of Environmental Conservation at (907) 478-9300. Any stored fuels must be removed within 14 days of the event.
6. The holder shall comply with applicable State standards for public health and safety, environmental protection and siting, construction, operation and maintenance, if these State standards are more stringent than Federal standards for similar projects.
7. The holder shall comply with all applicable Federal laws and regulations existing or hereafter enacted or promulgated regarding toxic substances or hazardous materials. In any event, the holder shall comply with the Toxic Substances Control Act of 1976, as amended (15 U.S.C. 2601, et seq.) with regard to any toxic substances that are used, generated by or stored on the right-of-way or on facilities authorized under this right-of-way grant. (See 40 CFR, Part 702-799 and especially, provisions on polychlorinated biphenyls, 40 CFR 761.1-761.193.) Additionally, any

release of toxic substances (leaks, spills, etc.) in excess of the reportable quantity established by 40 CFR, Part 117 shall be reported as required by the Comprehensive Environmental Response, Compensation and Liability Act of 1980, section 102b. A copy of any report required or requested by any federal agency of state government as a result of a reportable release or spill of any toxic substances shall be furnished to the authorized officer concurrent with the filing of the reports to the involved Federal agency of State government.

8. All operations shall be conducted in such a manner as to avoid damage or disturbance to any prehistoric or historic sites or modern camp sites. The Archaeological Resource Protection Act prohibits the excavation, removal, damage, or disturbance of any archaeological resource located on public lands. Violation of this law could result in the imposition of both civil and criminal penalties of the violator. Should any historic or prehistoric site be located during the course of operations under this permit, the applicant shall immediately notify the BLM authorized officer.
9. The holder shall protect all survey monuments found within the permitted area. Survey monuments include, but are not limited to, General Land Office and Bureau of Land Management Cadastral Survey Corners, reference corners, witness points, U.S. Coastal and Geodetic benchmarks and triangulation stations, military control monuments, and recognizable civil (both public and private) survey monuments. In the event of obliteration or disturbance of any of the above, the holder shall immediately report the incident, in writing, to the authorized officer and the respective installing authority if known. Where General Land Office of Bureau of Land Management right-of-way monuments or references are obliterated during operations, the holder shall secure the services of a registered land surveyor or a Bureau cadastral surveyor to restore the disturbed monuments and references using surveying procedures found in the Manual of Surveying Instructions for the Survey of the Public Lands in the United States, latest edition. The holder shall record such survey in the appropriate county and send a copy to the authorized officer. If the Bureau cadastral surveyors or other Federal surveyors are used to restore the disturbed survey monument, the holder shall be responsible for the survey cost.
10. In order to prevent non-Native invasive plant spread, all vehicles, and equipment used in conjunction with the permit/lease must be thoroughly cleaned **prior to** moving equipment across or onto BLM managed lands. Washing and/or brushing equipment to remove material that can contain weed seeds or other propagates helps to insure equipment that is being transported across or onto BLM managed lands are weed and weed seed free. High pressure washing is recommended to treat the insides of bumpers, wheel wells, undercarriages, inside belly plates, excavating blades, buckets, tracks, rollers, drills, buckets, shovels, any digging tools, etc., to remove potential weeds, seeds, and soil carrying weed propagules, and vegetative material.
11. Straw or other vegetative matter used for dog bedding or other purposes supporting the event must be certified weed free to prevent the introduction of non-native invasive species. Certified weed free straw is identified by purple/yellow twine (orange twine is not a certified weed free product).
12. Snow or frost depth must be a minimum of one foot.
13. Event and support vehicles shall not exceed 1,000 Gross Vehicle Weight or 60 inches in width.