

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

**Determination of NEPA
Adequacy (DNA)**

DOI-BLM-B020-2016-0019-DNA

Cave Spring Data Recovery

PREPARING OFFICE

U.S. Department of the Interior
Bureau of Land Management
Tonopah Field Office, Nevada



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Table of Contents

<i>1. Determination of NEPA Adequacy (DNA)</i>	1
Worksheet	1
Description of Proposed Action and any applicable mitigation measures.....	1
NEPA Adequacy Criteria.....	2
Persons/Agencies/BLM Staff Consulted	3
Conclusion	3

1. Determination of NEPA Adequacy (DNA)

Worksheet

U.S. Department of the Interior

Bureau of Land Management

OFFICE: Tonopah Field Office

TRACKING NUMBER: DOI-BLM-B020-2016-0019-DNA

CASEFILE/PROJECT NUMBER:

PROPOSED ACTION TITLE/TYPE: Cave Spring Data Recovery

LOCATION/LEGAL DESCRIPTION: T. 2S. R. 37E., Sec. 2 Mt. Diablo Meridian, Esmeralda County, Nevada

Description of Proposed Action and any applicable mitigation measures

The Proposed Action constitutes an activity plan for limited data recovery and collection from the Cave Spring rock shelter site. The BLM plans to work cooperatively with the Great Basin Institute (GBI) with assistance from the University of California, Davis (UCD) and California State University, Sacramento (CSUS) to conduct archaeological testing, data recovery, and documentation at the prehistoric component of the Cave Spring site. A detailed Archaeological Implementation Plan is on file at the Tonopah Field Office and is included as part of the Memorandum of Agreement with the Nevada State Historic Preservation Office referenced below.

Land Use Plan Conformance

Land Use Plan: Tonopah Resource Management Plan (RMP). approved October 1997

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:

Tonopah RMP Cultural Resources determinations (p. 16-17) include "Manage for Conservation" which lists types of sites including "Rock shelters with datable deposits" (2.c).

RMP Appendix 11 Cultural Resources Management Guidelines: The guidelines for "Manage for Conservation" (p. A-27) include "Activity plans may provide for... limited data recovery/collection" and provide a list of areas for which activity plans will be developed which includes Cave Spring (p. A-28). The Proposed Action constitutes an activity plan for limited data recovery and collection from the Cave Spring rock shelter site.

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?

Yes. The Tonopah RMP provided for limited data recovery and collection at rock shelter sites including the Cave Spring site as part of the “Manage for Conservation” determination (see part B above).

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?

Yes. Methods of data recovery to be used have not changed substantially since the RMP was approved in 1997; nor has there been a change in environmental concerns, interests and resource values relevant to the Proposed Action, except that it has become increasingly urgent due to ongoing damage to the site.

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?

Yes. A review of the Proposed Action by an interdisciplinary team (IDT) of BLM resource specialists did not identify new resource concerns related to the 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?

Yes. Direct, indirect and cumulative effects are expected to be similar to those analyzed in the Tonopah RMP Environmental Impact Statement (EIS), published October 1994. The EIS analyzed the likely impacts of managing each resource in terms of its effects on other resources. Most impacts of cultural resource management did not involve Cave Spring because they were specific to certain other cultural resource sites at which the RMP specifically restricted other uses (such as withdrawal from mineral entry). The only exception was a minimal effect of cultural resources management in general on livestock grazing management (p. 4–12).

The EIS also analyzed the effects of cultural resource management upon cultural resources themselves. These effects were generally positive. However, the EIS noted that “comprehensive research protocols and data recovery programs” would be developed for certain prehistoric districts under the RMP determination “Manage for Data Recovery,” and that this comprehensive data recovery, while benefiting the scientific community, would result in partial destruction of the sites through controlled excavation (p. 4–16). This would implicitly apply to a lesser degree to the Cave Spring site and any other site undergoing “limited data recovery” as allowed under the more protective RMP determination “Manage for Conservation” (see Part B, above). The EIS also acknowledged the cumulative negative effect of data gathering activities on cultural resources (p. 4–38).

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

Yes, together with recent coordination. The EIS process used for developing the RMP included extensive public involvement and interagency review. We are not aware of any issues associated with the Proposed Action of concern to other individuals or organizations who would not have had an opportunity to be involved at that time. The BLM conducted further coordination specific to the Proposed Action in 2016. On June 1 2016 the BLM Tonopah Field Office entered into a Memorandum of Agreement with the Nevada State Historic Preservation Office, with Great Basin Institute as an Invited Signatory and Timbisha Shoshone Tribe as a Concurring party.

Persons/Agencies/BLM Staff Consulted

Note

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

Cooperating Agencies

Nevada State Historic Preservation Office

Great Basin Institute

Timbisha Shoshone Tribe

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 of Project Lead



Signature of NEPA Coordinator



Signature of the Responsible Official



Date 6/16/16

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.