



**US Department of the Interior
Bureau of Land Management
Black Rock Field Office
Winnemucca District, Nevada**

Burning Man Event Special Recreation Permit
Environmental Impact Statement



**PUBLIC SCOPING REPORT
AUGUST 2018**



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Appendix A Substantive Public Outreach and Scoping Comments

ACRONYMS AND ABBREVIATIONS

Full Phrase

BLM	Bureau of Land Management
BRC	Black Rock City LLC
CARA	comment analysis and response application
EIS	environmental impact statement
NEPA	National Environmental Policy Act
NOI	Notice of Intent
SRP	special recreation permit

Chapter I

Introduction

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CHAPTER I

INTRODUCTION

This report documents the results of the public outreach and scoping process for the Burning Man Event Special Recreation Permit (SRP) Environmental Impact Statement (EIS). Public outreach and scoping is a collaborative public involvement process conducted at the beginning of the National Environmental Policy Act (NEPA) analysis to identify and refine issues to be addressed in the EIS. Public involvement is a vital part of the NEPA process.

I.1 DESCRIPTION OF THE PUBLIC INVOLVEMENT PROCESS

In accordance with 40 CFR 1510.7, the BLM must document public involvement and determine the scope of issues to be addressed for identifying significant issues related to a proposed action. The BLM solicits comments from relevant agencies and the public; then it organizes and analyzes all comments received. The agency evaluates the substance of each comment and extracts the overarching issues that will be addressed during the planning process. These issues help define the scope of analysis for EISs and are used to develop the project alternatives.

I.2 PUBLIC INFORMATION MEETINGS

In November 2017, the BLM issued a press release to the public for a series of public outreach meetings with the goal of soliciting early public input on the proposed renewal of the SRP for 2019 through 2028. The press release provided a description of the purpose and need for the plan, public scoping information, and information on how to get involved in the planning process.

The press release announced three public outreach meetings on December 4, 5, and 6, 2017, in Gerlach, Reno, and Lovelock, Nevada. The press release also solicited input on the issues, impacts, and potential alternatives. The public was encouraged to send comments to the project email at blm_nv_burningmaneis@blm.gov.

At these meetings, the BLM and Black Rock City LLC (BRC) staff presented information about the proposed action, the project’s purpose, potential management issues, and the planning timeline. After this presentation, BLM and BRC staff were available to discuss commenters’ issues and concerns. Commenters also had the opportunity to write their concerns on comment forms, which were added to the public comments.

Comment letters were accepted at each meeting, and substantive comments were entered into the comment analysis and response application (CARA) system for analysis. A total of 73 individuals attended the public outreach meetings: 25 at the Gerlach meeting, 30 at the Reno meeting, and 18 at the Lovelock meeting.

I.3 NOTICE OF INTENT

The BLM published a notice of intent (NOI) in the *Federal Register* on June 20, 2018, announcing the beginning of the 45-day scoping period to solicit more public comments and to identify additional issues for the Burning Man SRP/EIS.

I.4 PUBLIC SCOPING MEETINGS

Two public scoping meetings were held in northern Nevada in July 2018. The dates and locations of the meeting are outlined in **Table I-1**. These scoping meetings encouraged participants to discuss concerns and questions with the BLM, BRC, and other agency representatives. The meetings began with a PowerPoint presentation describing the purpose of the Burning Man SRP/EIS, the project approach, and opportunities for public involvement.

Following the presentation, the meetings transitioned into an open house format, where the public could view project materials and maps and discuss the project with BLM and BRC staff. Copies of scoping information and blank scoping comment forms were available at the meetings.

A total of 56 individuals attended¹ the public scoping meetings: 20 at the Fernley meeting and 36 at the Lovelock meeting.

**Table I-1
Scoping Open Houses in 2018**

Location	Date	Venue
Fernley	July 9	Council Chambers in Fernley City Hall 595 Silverlace Blvd. Fernley, Nevada 89408
Lovelock	July 10	Pershing County Community Center 820 6th St. Lovelock, Nevada 89419

¹ Number of attendees are estimated based on participants who signed in to each meeting.

I.5 NATURE OF COMMENTS RECEIVED AND THE COMMENT ANALYSIS PROCESS

A total of 77 comment submissions were received during the public outreach period in fall of 2017 and a total of 327 comment submissions were received during the public scoping period during the summer of 2018. Most of the comments during both of these comment periods were related to public health and safety, conflicting uses, social values and economics, and travel and transportation.

Comment analysis is a process used to compile and combine similar public comments into a format that decision-makers and the Burning Man SRP/EIS team can use. Comment analysis assists the team in organizing, clarifying, and addressing technical information, in accordance with NEPA regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components, as follows:

- Developing a coding structure
- Using a comment database for comment management
- Reading and coding public comments
- Interpreting and analyzing the comments to identify issues and themes
- Preparing issue statements

The BLM developed a coding structure to help sort comments into logical groups by topics and issues. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The BLM CARA database was used to manage the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondence and comments received, sorting and reporting of comments by a topic or issue, and demographic information regarding the sources of the comments.

To analyze the public comments, the BLM assigned codes to statements made by the public. All comments were read and analyzed, including those of a technical nature; those expressing opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature.

I.6 METHODOLOGY

During the public outreach period, 77 comment letters were received for analysis and during the public scoping period, 327 comment letters were received. A total of 550 substantive comments were derived from all comment

letters received during the public outreach and public scoping period (see **Appendix A**).

Each comment was given a code to identify the general content of a comment and to group similar comments together.

All comments were considered and will be used to help create the alternatives and ultimately the Burning Man SRP/EIS; however, only those determined to be substantive were analyzed for issue statements, as described below.

Substantive comments received during public outreach and scoping do one or more of the following:

- Raise issues the BLM has not considered; reinforce issues the BLM has already identified
- Present information that can be used when developing alternatives
- Present reasonable alternatives
- Present information that can be used when the BLM considers impacts of alternatives
- Raise concerns, with reasoning, regarding public land resources in the project area
- Raise concerns, with reasoning, regarding uses of public lands in the project area
- Recommend specific changes to the management actions
- Question, with reasonable basis, the accuracy of information in an existing report

Substantive comments raise, debate, or question a point of fact or policy. Comments that merely support or oppose a proposal or that merely agree or disagree with BLM policy are not considered substantive.

Under each code, all substantive comments were grouped by similar issue topics, and those groups were summarized with issue statements.

Chapter 2

Public Comment Summary

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CHAPTER 2

PUBLIC COMMENT SUMMARY

Most correspondence was received via email; other correspondence types were hardcopy letters, comment forms from public meetings, and online comments submitted through the ePlanning website during the public outreach and scoping periods.

The distribution of comments by issue categories are summarized in **Table 2-1**. These issues are outlined further in Section 2.1, which identifies issue statements based on the substantive comments included in Appendix A.

Table 2-1
Number of Individual Comments by Issue Category Received During Public Outreach and the Scoping Period

Issue Category	Number of Individual Comments*	Percentage of Total
Alternatives	7	1.3
Mitigation and Monitoring	6	1.1
Resources and Resource Uses	396	72
<i>Air quality</i>	18	3.3
<i>Cultural resources (including National Historic Trails)</i>	1	<1
<i>Environmental Justice¹</i>	0	0
<i>Invasive, nonnative species¹</i>	0	0
<i>Migratory birds¹</i>	0	0
<i>National Conservation Area</i>	11	2
<i>Native American religious concerns</i>	4	<1
<i>Noise</i>	2	<1
<i>Paleontology¹</i>	0	0
<i>Public health and safety (including law enforcement)</i>	89	16.2
<i>Recreation</i>	14	2.5
<i>Social values and economics</i>	105	19.1

Issue Category	Number of Individual Comments*	Percentage of Total
<i>Soils/playa resources</i>	24	4.4
<i>Special status species[†]</i>	0	0
<i>Threatened and endangered species[†]</i>	0	0
<i>Transportation and traffic (including access)</i>	60	10.9
<i>Visual resources (including night skies)</i>	2	<1
<i>Wastes (hazardous or solid)</i>	51	9.3
<i>Water quality and supply (surface water and groundwater)</i>	7	
<i>Wetlands and riparian areas</i>	1	
<i>Wilderness[†]</i>	0	0
<i>Wilderness study areas[†]</i>	0	0
<i>Wildlife</i>	7	1.3
Scope of Burning Man Event	131	23.8
<i>Conflicting uses</i>	42	7.6
<i>Event duration and timing</i>	30	5.5
<i>Event location</i>	17	3.1
<i>Event size</i>	42	7.6
Other Public Comments	10	1.8
<i>Public Outreach</i>	6	1.1
<i>Regulations/laws/policies</i>	4	<1
Total	550	100

*All numbers are approximate

[†]Issue identified during internal scoping

< = less than

2.1 ISSUE STATEMENTS

Identifying resource categories and capturing issues is one of the primary benefits of scoping. Defining significant issues early in the scoping process allows for more effective communication between the public and the decision-makers.

A resource issue is a concern, disagreement, debate, or dispute over potential project impacts on the environment. Such issues tend to be associated with areas near the project location, although impact areas may vary, depending on the specific resource.

The purpose of the issue statements is to highlight the key issues identified through the scoping process. The BLM will use the issue statements, planning criteria, and other information collected in the early project planning and scoping phases of the EIS process to help formulate a reasonable range of alternatives for the Burning Man SRP/EIS.

2.1.1 Alternatives

- How will the maximum population of attendees during the Burning Man event vary in the range of alternatives?
- Will an alternative be analyzed that reduces the maximum population of attendees during the Burning Man event?
- Will an alternative be considered in which the event occurs every other year or some other frequency other than annually?
- Will an alternative be considered for other modes of traffic to address congestion and air quality?
- Will an alternative be analyzed for another event location?

2.1.2 Mitigation and Monitoring

- What type of preventive mitigation measures could be implemented before and during the Burning Man event to avoid the need for mitigation after the event?
- Will monitoring be implemented to measure desired restoration goals after the Burning Man event each year?

2.1.3 Resources and Resource Uses

Air Quality

- How does airborne dust and other emissions on the playa affect other visitors of nearby public lands during the Burning Man event?
- What are the total greenhouse gas emissions from attendees using electric generators on the playa and traveling to and from the Burning Man event?

Cultural Resources

- How are cultural resources on and near the playa being affected by the Burning Man event?

National Conservation Area

- How does the Burning Man event affect the values of the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area?
- Could the event be moved to occur outside the boundaries of the National Conservation Area?

Native American Religious Concerns

- What are the emotional, economic, and water availability impacts on tribal entities that live near routes typically taken to get to the Burning Man event?

Noise

- How are noise levels from attendees traveling to and participating in the Burning Man event affecting other recreationists on the playa, in nearby communities, and in wilderness areas?

Public Health and Safety (including Law Enforcement)

- How are the construction and burning of materials during the Burning Man event being regulated and monitored, are separate permits required for these uses?
- How will sanitation (handwashing stations, toilets, and trash removal) be adjusted to accommodate increased participants of the Burning man event?
- Can Black Rock City implement new rules and policies to make it easier to obtain fuel, preferably by delivery, to increase event safety and reduce fire hazards from storage of fuels in camps?
- What is the emergency evacuation plan in the event of a catastrophic disaster during the Burning Man event?
- How can criminal activity on the playa be reduced before, during, and after the Burning Man event?
- Will more law enforcement officers be needed if the Burning Man event is expanded and is the level of law enforcement officers adequate for the current number of attendees?
- Will BLM analyze an age limit for event participants?
- How will human health concerns such as the spread of infectious diseases (e.g., valley fever) be analyzed for an increase in the number of attendees of the event?

Recreation

- How is permitting being processed for uses during the Burning Man event, such as construction? Also, would fireworks be allowed during the event with the existing special recreation permit?
- Does the event increase recreation in and around the playa and National Conservation Area throughout the rest of the year, and how can that be measured?
- How is the use of electronic bicycles (e-bikes) during the event affecting other participants and resources?
- How does the event and restrictions affect other recreational uses on and near the playa such as land sailing and hunting?

Social Values and Economics

- What are the economic impacts of current event populations and increasing the number of attendees during the Burning Man event on local communities and nearby counties and tribal entities?
- What are the financial impacts on local counties from increasing the Burning Man event's participant size due to an increase in law enforcement, including processing criminal cases?
- How are local, state, and federal agencies being compensated for resources used to process permits and attending the annual event?

Soils/Playa Resources

- How does the Burning Man event affect the playa's permeability?
- Will soil samples be taken and analyzed to determine what impact the Burning Man event is having on the playa?

Transportation and Traffic (Including Access)

- Could additional entrance gates to the Burning Man event be added that encourage travel through Lovelock via Nevada State Route 399?
- How will the increased traffic be managed on Nevada State Route 447 and County road 34 near the Burning Man event?
- How will BLM ensure access for ranchers and hunters and other users along Nevada State Route 447 and County Road 34?
- Can formal parking areas on the outskirts of the Burning Man event be provided for attendees, with transportation to and from the camps?
- What is the energy consumption used to transport attendees to, during, and from the Burning Man event?
- How will possible road improvements, expansions, and cost of maintaining routes to and from the Burning Man event be analyzed?
- How will BLM ensure access to the playa throughout the season for all public land users and stakeholders (e.g., ranchers and rocketeers)?
- What are the estimates for the increased number of aircraft expected to be for additional attendees of the Burning Man event and how does this impact transportation and traffic?
- Are additional methods of transportation such as using a nearby railroad viable for event attendees to use for getting to and from the event?

Visual Resources and Night Skies

- What are the visual impacts from soil compaction of the playa's surface?
- How would an increase in attendees of the Burning Man event change the impact to night skies?

Wastes (Hazardous or Solid)

- How does vehicle use on the playa contribute to contamination by lead exhaust or other emissions?
- What is the impact on air quality and soils from burning structures at the Burning Man event from materials other than wood in art displays, such as metal fasteners and paint?
- How are roads and local communities to and from the Burning Man event affected by travelers legally or illegally disposing of waste such as camp site trash from the event, abandoned bicycles, vehicles, and camp trailers?
- How is the playa and surrounding area affected by trash and other waste matter?

Water Quality and Supply (Surface Water and Groundwater)

- What are the impacts on soil and groundwater from the Burning Man event?
- What are the sources of water used for the Burning Man event?
- Is the Burning Man event drawing down the aquifer below the playa?
- How is the Burning Man event affecting water supplies in communities near the Black Rock Desert?
- How are changes in water supply on and near the playa affecting invertebrate species?

Wetlands and Riparian Areas

- What are the Burning Man event's impacts on nearby aquatic species?

Wildlife

- What are the current and proposed impacts of the Burning Man event on wildlife (e.g., foxes, horses, deer, or sheep)?

2.1.4 Scope of Burning Man Event

Conflicting Uses

- Rocketry activities for research, education, and recreation take place on the playa annually. Launch points are constrained by the Federal Aviation Administration and Department of Defense to a

few launch points in the middle of the playa. How will the expansion of the Burning Man event affect this and other dispersed recreational uses?

- How will BLM provide for other uses of the playa during optimal time periods?

Event Duration and Timing

- How will use of and access to the playa by others be affected, considering the Burning Man event occurs over an 8-day period with 35 days being proposed for setup and an additional 35 days for post-event cleanup?
- Could the event be held at a different time of the year or a frequency other than annually (e.g., every other year?)

Event Location

- To avoid conflicts with other recreation uses, could the Burning Man event be moved to another area of the playa?
- To reduce the impacts on one area in one county, could the location of the Burning Man event be moved to other areas in Nevada or the United States?
- How will expansion of the fenced area impact other users?

Event Size

- How are the total number of attendees and staff of the Burning Man event being counted?
- What are the environmental impacts of increasing the number of participants allowed to attend the Burning Man event?

2.1.5 Other Public Comments

In addition to the above issue statements identified during the scoping comment period, the following comments were submitted to the BLM:

- Additional public meetings should be held, with adequate time for the public to review any additional information regarding the Burning Man SRP/EIS.
- Additional Burning Man event rules and restrictions should be considered during the EIS process.
- The BLM should review the permit fee for the Burning Man event and consider if it accurately reflects the time and resources used for coordination and support for the event.
- The BLM should compile a list of baseline data and scientific information for resources being analyzed in the EIS.
- Requests to be added or removed from the project mailing list.

These preliminary issue statements are not intended to be comprehensive or exhaustive. The BLM will continue to work with other government agencies, tribal governments, and private and public stakeholders to refine issues and alternatives through the course of the EIS process.

Chapter 3

Future Steps and Contact Information

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CHAPTER 3

FUTURE STEPS AND CONTACT INFORMATION

Using the information and comments collected during the public outreach period and public scoping period, the BLM will prepare the Draft Burning Man SRP/EIS. The agency will comply with NEPA, the Council on Environmental Quality regulations, and its own planning regulations and guidance.

All publications, including this report, newsletters, notices of availability, and other subsequent documents, will be published on the project website. In addition, pertinent dates regarding public review periods of any documents and solicitation of public comments will be published on the project ePlanning website at <https://go.usa.gov/xnBTu>.

Chelsea Mckinney, Project Manager, is the primary public contact for the EIS and leads the interdisciplinary team that is developing the EIS.

Mark Hall is the Field Manager for the Black Rock Field Office, he is the Authorized Officer for this EIS.

Kyle Hendrix is the Public Affairs Specialist for this NEPA analysis.

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Appendix A

Substantive Public Outreach And Scoping Comments

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Appendix A. Substantive Public Outreach and Scoping Comments

Letter #	Comment Number	Comment Text	Comment Code Name
53	3	I suggest the following alternatives: 1. Usage of commercial buses to ferry people back-and-forth to Reno. 2. Adding passenger cars to the Western Pacific Railroad which conveniently goes through Gerlach. 3. Constructing a railroad spur from Wadsworth to Gerlach and providing safe parking areas in the Wadsworth area so that participants can catch the train to the festival. 4. Offering discount tickets, or rebates at the entrance, to those driving electric vehicles. An adequate electric vehicle charging station should be installed in Gerlach, or Empire, to enable EV's to make the trip.	Alternatives
176	1	It is already extremely difficult and taxing on both BLM and the Pershing County Sheriff's Office to find qualified Law Enforcement Officers to provide for adequate law enforcement at the Festival. I believe more research on a viable alternative of either capping the population at the current stage, or having less of a population than BRC currently has needs to be performed. What about a proposal to only allow the Festival to happen biennially (every two years), and giving the playa every other year to rest and recover?	Alternatives
300	8	The document "Burning Man Event Special Recreation Permit Environmental Impact Statement Preliminary Alternatives" states the No Action alternative as "80K bodies on the playa". This should be clarified to have an attendee total and a total for other such as law enforcement, volunteers, etc. Since the Proposed Action alternative includes an increase to 100K, we strongly recommend another alternative be developed to comprise all the applicant's suggestions EXCEPT the increase to 100K. In other words, let's look at keeping the status quo on attendance combined with all the other elements of their proposal as an alternative. The increase in itself exacerbates nearly all issues which must be addressed in the Proposed Action.	Alternatives
319	3	It is also the responsibility of BRC to assess its own resources in being able to implement the ROD selected alternative. Since its inception, the BME has almost entirely relied on volunteers to build and remove the city infrastructure (including the perimeter fence and the Man), operate the Gate, provide Perimeter patrols, provide mediation and patrol by the Black Rock Rangers, operate the ice distribution stations, pick up litter within the Closure Area post-event, and perform many other functions that keep the event in compliance with the SRPs and operating plans. Other volunteers associated with the significant art pieces and theme camps create those but are not part of the BRC contingent.	Alternatives

Appendix A. Substantive Public Outreach and Scoping Comments

Letter #	Comment Number	Comment Text	Comment Code Name
319	6	<p>For the scoping meetings, BRC provided a brief description of their Proposed Action that was presented also in the June 20, 2018 NOI. Their PA description relies heavily on an assumption that everything under the 2012 EA for annual operations and SRPs went without any issues and that the future of the BME could easily continue through 2028 with the increase in participant population. However, those assumptions may, or may not be valid depending on the results of the reporting on the changes in magnitude of effects from 1990-2011 under the 2012 EA. There appeared to be a clear assumption that certain minor changes to existing operations could offset the increase in effects from an additional 20,000 participants (which may also include an additional number of volunteers for various departments). In my experience, a description of the action sponsor's proposed action for scoping and initial review under an NOI can be brief and not specific as to the details of how the items listed would be implemented.</p> <p>However, the draft EIS needs more specifics on the action and its facets for implementation to make its assessments of environmental impacts.</p>	Alternatives
319	1	<p>There is some discrepancy between the information presented by BRC on their website from last November (when they provided initial information for the EIS effort) stating in response to comments from "Burners" that they had not made any decision to implement the increased population option for the BME in 2019 onward. In the NOI from BLM dated June 20, 2018, BRC submitted their proposed action for the EIS as the increased population option. I understand that under BLM requirements, it may be appropriate to request the applicant provide their "preferred" option; however, under NEPA, the final decision on a preferred alternative is made by BLM. I suggest that for the draft EIS, there be no designated preferred alternative and that the results of the analysis of the effects with mitigation proven to be effective (via the past years' reporting results) be one of the two factors used in the Record of Decision that identifies the alternative to be implemented.</p>	Alternatives
319	5	<p>One final thought on alternatives is one that would take the permitted numbers of participants (to also include volunteers and staff of BRC) back to pre-2012 levels. This alternative, while difficult for BRC to contemplate, would enable an examination of the extent of effects due to the 2012 EA increase in numbers (to 80,000 total participants and BRC volunteers and staff) and determine if the mitigation in the 2012 EA was sufficient to address these additional effects. It may be possible to address the sufficiency issue in Section 3 under Affected Environment; however, without another option for the BME except the status quo and expansion, the analyses for the EIS may not be able to provide an option other than No Event.</p>	Alternatives
40	2	<p>Mitigation of environmental damage after it occurs is the last resort, not the de facto norm for operations. I see no mitigation proposals to the environmental impact inside the event perimeter other than providing the Burner Express Bus.</p>	Mitigation and Monitoring
40	4	<p>As to the proposed expansion of the permitted area, expanding the use area to limit and mitigate the impact of human activities on the playa is pure folly. The solution to reducing the environmental impact to the playa is forward projected mitigation actions at their inception.</p>	Mitigation and Monitoring

Appendix A. Substantive Public Outreach and Scoping Comments

Letter #	Comment Number	Comment Text	Comment Code Name
40	3	The proposal is lacking any incentive to incorporate methods and activities that reduce the impact to the environment during the Burning Man event, and instead requests additional time to repair the damage after it occurs.	Mitigation and Monitoring
96	3	Restoration- Intentional activity that initiates or accelerates the recovery of a degraded, damaged, destroyed ecosystem with respect to its health, integrity, services and sustainability. Monitoring is needed to insure the desired goals are actually achieved.	Mitigation and Monitoring
300	13	Burning Man, Inc. must take some responsibility for increased use of the playa and surroundings before and after the event. The pollution from so many visitors such as around Trego Hot Springs must be managed. There needs to be fencing to protect vegetation. Porta-potties and trash bins are definitely needed in the weeks around the event to control human pollution offsite. Burning Man, Inc. should pick up the costs for some of these additional impacts and mitigation.	Mitigation and Monitoring
319	2	The second factor is the ability of BRC to successfully implement the selected alternative through their annual operating plan. BLM must consider if the operations and achievable mitigation (again, as documented for the 70,000 participant reports for 2012-2017 as required by the 2012 EA) required of BRC will sufficiently address the adverse effects identified in the EIS for all the alternatives under consideration.	Mitigation and Monitoring
Resources and Resource Uses			
15	1	Pollution to the air and the playa, at this event are evident Danger to the public has become key problems.	Air Quality and Climate
17	3	We have had to eat the foot deep powered dust they make during "clean up" for years because of being down wind from their site.	Air Quality and Climate
64	1	I believe that the EIS should require the yearly reporting of greenhouse gas emissions connected to the event. That would include: 1. Creating an individual participant calculation model open to all burners which would include local travel to airports, air travel, shopping travel, travel to the event, generator use, ultimately material use, and all the above to return home. 2. Yearly reporting of participant emissions based on census and outside services-derived models along with Org activities. 3. Year over year reporting with a program to reduce greenhouse gas emissions.	Air Quality and Climate
7	1	Dust storms will get stronger with climate change and more foot traffic on the playa. Recommended for all large theme camps applying for space (especially those on the Esplanade) to incorporate environmental training, submit the master plan with their application, and have a process to confirm that all of their campmates have completed environmental training online.	Air Quality and Climate

Appendix A. Substantive Public Outreach and Scoping Comments

Letter #	Comment Number	Comment Text	Comment Code Name
11	3	BRC's criteria air pollutants and greenhouse gas emissions from electric generators should be reduced. It has been my experience that many parts of BRC smells awful day and night from generator emissions and I assume exposure to the air pollution is unhealthy. BLM should require BM to develop strategies that will replace fossil fuel powered electric generators with solar and wind power electric generation with battery storage capacity. A large field of temporary solar and wind power generators and storage batteries could be located on the south side of the city and underground cables run into the city that would replace the large fossil fuel powered generators. Portable solar and wind power units with battery storage could be made available to camps through a program BM operates via vendors, non-profits, cooperators, partners, and stakeholders - whatever.	Air Quality and Climate
21	2	Public lands are supposed to be available to all people, but for many years now, our event which takes place about a month after Burning man has been pushed farther away from our preferred site as well as having to drive way out of the way to stay off their site to get to ours. They are in the "clean up and restore" mode when we are there and along with our relocation problems, we are down wind from them and I can assure you that breathing the powder they stir up is not pleasant and probably harmful. The airborne pollution must also be impacting others even much farther away. It has to be a disruption to plants and animals along with any people impacted by it.	Air Quality and Climate
66	2	We all know that the air quality has been monitored and it was off the scale. Why not initiate a time from 3 am. To 6 am, where no vehicles or art cars are permitted to drive. There needs to be some action taken.	Air Quality and Climate
129	3	I would also like to note that the air borne material mainly originates from the event site and event roadways, and not from the surrounding surface areas of the playa, even during very strong wind events.	Air Quality and Climate
207	2	A comprehensive carbon emissions public reporting program for the event should be put in place. It would include visitor transportation to the event from their home residence by air, personal/rental vehicle and buses; energy consumption on playa; and burned at the event items. Over time it could include the energy content of one time use supplies. It should be subdivided into categories that can be actionable to reduce by organizers, participants and service groups like the BLM and ESD.	Air Quality and Climate
212	1	My issue is that the event itself is wasteful. People buy all kinds of 'stuff; many of which are single use and discarded. Lots of fuel is used to get to the event, and so much more is wasted by burning it; namely propane. Burning other structures than 'the Man' always bothered me. This adds to air pollution and wasted resources; mainly lumber. I wish there could be a moratorium on burning things.	Air Quality and Climate

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300	17	The increased number of attendees in the Proposed Action likely presents non-linear increases in fossil-fuel GHG emissions due to slower pace of traffic all the way from I-80 to the event site. The applicant must provide a mitigation offset in the way of convenient and attractive mass transit to the event site for those traveling in ordinary vehicles. RV and motorhome attendees remain a problem though in that they wish to drive all the way to the event site. Also, many large transport vehicles are allowed to bring in materials for constructing ephemeral art or for constructing various "camps" for certain attendees. Given that all these large vehicles have higher impact, the EIS should fully take that into account. The Proposed Action should address how to encourage a reduction in the growing use of these vehicles and in the sheer volume of material brought to the event.	Air Quality and Climate
319	12	The Black Rock Desert Playa is part of Pleistocene Lake Lahontan and is composed of a variety of materials that when disturbed are easily blown by the prevailing winds. These events vary in the amount of material moved, the size and structure of that material, and the path/location within the Closure Area. The BME participants are used to the periodic dust storms that in some years are more extensive than in others. Additional vehicle traffic (including that from participant vehicles, the BXB, BLM and other LE groups, BRC operations, vendor operations (food supplies for the support encampments including that for BRC, water deliveries for dust abatement and vendor operations including that for BRC, ice deliveries, wastewater/sanitary operations, fuel deliveries etc.) patrol operations by BRC, BLM and other LE, mutant vehicle operations and other actions that stir up dust) that contributes to the direct vehicle-related dust entering the air is part of the air quality issue.	Air Quality and Climate
319	13	The current road watering protocol does not address the larger issue of dust emanations from normal operations. The entry road is not watered during the periods of highest use (which is not feasible due to the number of vehicles but does contribute to fugitive dust, the buffer areas on either side of that road used by BRC, BLM, BXB and other vehicles is not watered. Patrols along the perimeter fence kick up dust. The speed limits required of participants (and aggressively enforced by BLM and local LE on site) are not seemingly required of any other vehicles. The need for speed during emergency situations is appropriate, however, I have watched many official (BLM or BRC) vehicles speeding along, the official ones without their lights flashing so not going to some emergency. Mutant vehicles are also at fault.	Air Quality and Climate
319	14	If there is to be an effort to reduce the amount of fugitive dust, then all on-playa vehicles should adhere to speed limits. Also, mapping of normal non-participant (BLM, vendors, etc) travel routes and setting preferred routes for use and subsequent watering would assist with limiting disturbance of the playa surface that can lead to dust formation. The EIS should utilize the reports of air quality generated during the previous EA period, examine the protocols for all drivers on the playa related to speed and use of previously disturbed areas rather than cross-country travel, and the need for additional water use to reduce fugitive dust.	Air Quality and Climate

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13	6	I suggest that a type of open burning permit from NDEP be required as well as a building permit be required from the BLM in the overall Burning Man Event Special Recreation Permit for 2019- 2028.	Air Quality and Climate
252	1	Although each vehicle travelling to and back to the playa might use up a tank of fuel doing so, most of these vehicles are switched off for the entire event and car sharing is common. Meanwhile in the desert, efficiency is part of the culture. I suspect that the net carbon emissions and fuel from these vehicles / shelters per person is no higher than an average person's ordinary utilisation. Due to the remoteness of where this is held, winds and local landscapes... and that many people rent recent vehicles to drive there featuring the latest in exhaust filtration and fuel economy, I imagine the pollution due to traffic is not significant. The combined influence and care surrounding this event is a hard to quantify benefit for the whole area... however, this is likely to lead to favourable economic, political and social sentiment toward Nevada.	Air Quality and Climate
129	2	It is very common that during wind events, a large quantity of "playa soil" becomes airborne and is displaced by the wind. This happens both during the event, as well as post event .. through the fall and early winter until winter moisture stabilizes the surface.	Air Quality and Climate
13	3	This open burning has been allowed for several years and plans based upon this permit request suggest that the burning will continue for several more years. With this regularity of burning I am concerned that no air quality or soil sampling has been completed to determine if there is a regular release of toxics into the air or residual in the soil and what potential affects this may have on the surrounding vegetation, animal population, and finally the human population.	Air Quality and Climate
206	5	-Impacts that would include the event site is the protection of cultural and natural resources by the BurningMan attendees.	Cultural Resources (including National Historic Trails)
8	3	I recognize that that management plan allows for permitted special recreation events. There had certainly been some sizable events of short duration on the playa, such as the speed trails. At that date, the Burning Man event was by FAR and away the very largest ever held. At this date it has almost quadrupled in size, as has the duration of time certain routes and a huge portion of the playa is closed for any other persons/purposes.	National Conservation Area

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8	1	A primary reason that I supported the creation of the NCA was that Burning Man was already a large (for the time) event, with news about it circulating the world-wide web. I envisioned this fragile, little visited area receiving increasing visitation over time and in need of staff and resources to minimize impacts, to resist: development, over-signage, upgrades, and to basically try to keep it the way it was -- a place of rare solitude.	National Conservation Area
8	2	I am opposed to any portion of the event being within NCA boundaries as the event is not at all in keeping with the enabling language of the designation: care, conservation and preservation of the historic trail, archeological, paleontological, geological, natural and wildlife resources.	National Conservation Area
8	5	I find much to admire in the event and the management of the Corporation that holds it, but I do not believe it is appropriate to be held in an NCA of any kind, let alone on public land. The size and attendant impacts of long-term closure (10 weeks?) to all other public land owners would indicate the appropriate place would be on private land.	National Conservation Area
36	1	That does not fairly, or properly, describe where the event is held - nowhere in this letter does it identify that this commercial hedonistic carnival is held within the Federally designated National Conservation Area of the Black Rock Desert. A Conservation Area designation ought to imply respect for public lands - many attendees regrettably are not "Stewards of Public Lands" - abandonment of bicycles being just one example - not packing out what you packed in. The event is simply inconsistent with an NCA designation which ought to evoke solitude and respect. Further, the areas has significant historical value with emigrant trails nearby.	National Conservation Area
38	1	I am opposed to the Burning Man's use of the Black Rock. The Black Rock is a National Conservation Area, and feel this use is both inappropriate and inconsistent with it's designation, and believe this huge event is compacting the area where the event is held - with unknown consequences. The attendees are not conservationists - the amount of trash they leave is also consequential - even if removed from the immediate area. I understand the financial aspects of the event for the counties, but think the greater public would be better served if it was removed from public lands to private.	National Conservation Area
66	4	So many things the org ask for are not consistent with the NCA policies.	National Conservation Area
100	1	The NCA should not be used as a commodity. Preserving and protecting for future generations should be the primary goal.	National Conservation Area

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272	1	I first want to write about how important the Black Rock Desert NCA is to the American West. The lands, the sky, the wildlife. All benefit the people of Northern Nevada and make this place so special for its residence and visitors alike. The Friends or Black Rock High Rock are a central partner with BLM to care for the area and have been great partners to Burning Man as well. The historical importance of the area is also evident with the emigrant trails and the history of mining and Native American vultures as well. This place is one of co-existence between diverse user groups and one in which I should be celebrated.	National Conservation Area
287	1	FBRHR fully supports the Burning Man event, the Burning Man Project and work that staff and volunteers do to protect the NCA. They are not only good stewards of the land before, during and after the event, they are committed to the the Black Rock Desert year around. We are always very impressed with the amount of planning that goes into protecting the playa and the surrounding environment each year. FBRHR exists to ensure access, safety and respect for the NCA and Burning Man is an incredibly important partner in our efforts.	National Conservation Area
300	2	The greatest impact on the NCA has become the annual Burning Man festival. But this is now more than a week-long impact, and arguably the impact of Burning Man stretches over the entire year. Burning Man has indeed changed the character of the NCA. It is a world-wide recognized event that far overshadows the simple beauty of the Black Rock Desert, whose natural and historical resources were the driving impetus for the designation of the NCA. It is true that Burning Man has overwhelmed these simple and enduring resources. Therefore, we strongly feel that Burning Man needs to fully recognize its role in changing the character of the NCA and take full responsibility for its year-round impact. It should also take a "good-citizen" approach towards the nurture and care of the resources for which the NCA was originally designated.	National Conservation Area
206	1	Examine the preparedness of tribal communities and BM attendees in the event of an emergency or a disaster.	Native American Religious Concerns
206	3	Examine the hardship and emotional impact of the BMon the reservation community -Examine the increase risks to public safety due to the increased traffic, drug use, sex trafficking, and potentially other criminal elements brought to/through the reservation by BM traffic. -Examine ways to mitigate traffic impacts on the reservation. -Examine ways to mitigate traffic impacts in communities and school zones. -Examine ways to assist the Tribe and Tribal Communities. Examine the noise impact to the reservation communities as vehicle traffic continues continuously for the duration of the event. Monitor- quality of visitors patronizing tribal stores and loitering onsite, are they stopping for restrooms, purchasing, or get there and get out of there attitudes.	Native American Religious Concerns

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206	2	Examine the economic impact and costs to the Tribe, its programs, and community members due that are not included in the annual BM agreement with the Tribe. -Examine the inadequacy of the funds BM provides to the Tribe in its annual agreement to cover the actual impact period (5 weeks) and man hours required to address the impact of the event. -Examine the failure of the BMto consider Indirect Cost (IDC) as an addition to the expense budgets of impacted programs. -Examine the economic impact of the BM event on the region, and comparatively examine the economic impact of the BM event on the Tribal reservation economy.	Native American Religious Concerns
269	3	Tapped out with water system with current residents. Large groups with high water needs puts the Pyramid Lake Paiute tribe in a difficult situation.	Native American Religious Concerns
66	3	It is not in the best interest of the attendants nor the surroundings to increase the number of art cars. Why would it even be suggested? More noise would also be an issue. Why not circle the art cars the way the emigrants did.	Noise
300	15	Table 4.15-1 in the 2012 EA shows some disturbing figures. Increases above normal (No Action Alternative) of noise levels at wilderness boundaries and in the town of Gerlach were estimated to be approximately 22 dB, to 51 dB and 66 dB respectively, in both cases for the "70,000 Participants" proposed alternative. This number of participants has, of course, been met by 2017. For closer areas on the playa itself, the increases must be such as to discourage any users from camping or doing other activities. Although the EPA says that frequent and prolonged exposure to 85 dB or higher is likely to cause hearing loss, 51 dB can detract from the wilderness experience and certainly 66 dB is likely to be annoying to Gerlach residents on a continuous basis. The EIS needs to update this table for the 100,000K proposed alternative. Ideally, a noise map should be prepared and displayed alongside other materials relevant to the NCA for the benefit of those trying to enjoy the playa and its surroundings in other ways.	Noise
2	1	I resent that my tax dollars are needlessly spent on law enforcement at the event.	Public Health and Safety (Including Law Enforcement)
3	3	Burning Man should be a "21 and older" event. Those of us who live here are proud of our county; it is bad enough to be known as the county that "allows" a free-for-all drug and sex party, worse still to do it in the presence of innocent children! Despite what the "official" word is from Burning Man, anyone capable of a Google search will easily find that illegal drugs and nudity abound. Those doing searches at the gates are either untrained, uncaring, or paid off, as copious amounts of drugs and even some firearms are confiscated yearly at the event. I personally have a friend who told me they take their gun to Burning Man with them every year!	Public Health and Safety (Including Law Enforcement)

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5	1	I personally feel that there is a heavy cost placed on the participants - many of whom are artists and don't make a lot of money - by the amount of law enforcement that is required to be there and that the participants have to pay for. I would hope that this could be lessened to make the cost lower to people that want to go.	Public Health and Safety (Including Law Enforcement)
7	3	All large theme camps should have someone certified in CPR/medical first response and a first aid area.	Public Health and Safety (Including Law Enforcement)
7	4	All large theme camps should have previous rapid prototyping of emergency procedures to secure their structures in case of strong wind storms, and additional supplied (i.e. fence posts and a point of contact with DPW/Earth Guardians/Burners Without Borders).	Public Health and Safety (Including Law Enforcement)
7	5	All large theme camps should have an open comms channel via radio with BM/DPW for emergency notifications and response and a point of contact/s.	Public Health and Safety (Including Law Enforcement)
9	1	I think Burning Man should be elsewhere. Pershing County's Sheriff spends half of his time dealing with BM stuff which takes away from Pershing county business. Pershing County also has to hire another assistant attorney to handle cases related to BM. This is an additional added expense to the county. Pershing county gets no benefit from BM. We house people detained at our expense. BM is a burden to the county.	Public Health and Safety (Including Law Enforcement)
13	5	What materials and or solutions are being used to ignite these structures? Are soil samples being done to ensure no burn residue is being left in or on the impacted soil areas? I believe that human safety in many regards is not being adequately addressed with regards to all of the activities that make up the Annual Burning Man event.	Public Health and Safety (Including Law Enforcement)
13	1	I am deeply concerned about the apparent unregulated construction and burning of materials during the Annual "Burning Man Event" held in the Black Rock Desert.	Public Health and Safety (Including Law Enforcement)

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13	1	We are people of color and our experience with law enforcement has been heavily strained with the recent issues in this country between the police and people of color. I would request for law enforcement to back down and for there to be less heavily and unnecessary policing at gate.	Public Health and Safety (Including Law Enforcement)
14	1	Safety is an important issue at Burning Man. Over the years occupancy has increased to a point where camps are on top of each other.I believe space is very important, as to not cause havoc: ie.fire from camp to camp. The issue of cramming camps together in the same space every year can produce dire effects. I would suggest increasing space from street to street A to L. I'm sure this has been brought up before many times,but has become worse since i first came to BM in 2008.	Public Health and Safety (Including Law Enforcement)
35	1	I believe that, like nearly all other festivals, they should be allowed to hire a private security firm of their choosing to handle the health and safety during the event until they've shown themselves incapable of doing so effectively. The amount of time, energy and money that goes into policing that particular event is vastly beyond what is sufficient and reasonable, and actually increases gridlock on an already overcrowded road. It is a massive waste of government resources and funding that could be used more appropriately.	Public Health and Safety (Including Law Enforcement)
36	1	Toilets and hand washing <ul style="list-style-type: none"> o The hand washing and sanitizing at the portable toilets are wholly inadequate and the overall number of toilets too low. o Hand washing facilities are only provided at select portable toilets notably near staff camping areas. o Hand sanitizer stations run out quickly and are not refilled often enough. o Portable toilet capacity is exceeded when the city hits peak population. There needs to be more toilets that are serviced more often. 	Public Health and Safety (Including Law Enforcement)
36	7	Ice <ul style="list-style-type: none"> o While the ability to get ice is not a problem during the week of the event, it is a problem before the event opens to participants o In the before the event, when there are now several thousands people on site, ice is not available for sale. It is only available to certain staff with ice privileges and to art projects with 'honorarium' status. o The inability to get ice for several days while working 16+ hours days in the desert is a major health and safety concern. o The Burning Man org should either provide (free) ice to anyone on site who needs or begin selling ice much earlier than they currently do. 	Public Health and Safety (Including Law Enforcement)
36	3	Medevac <ul style="list-style-type: none"> o While the Burning Man org does encourage participants to buy insurance, there is no guarantee that the provisions or providers of that private insurance will have their policies followed for coverage. Needless to say the injured participant will not be able to advise. o The Burning Man org should engage a medevac provider for service covering all event participants at no additional costs. 	Public Health and Safety (Including Law Enforcement)

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36	5	Fueling o As the event has grown the on-site fueling by delivery and now at "Hell Station" has become increasingly important. o However there are significant rules and hurdles for fuel delivery and going to "Hell Station" is an onerous process that can easily take 1/2 a day. o The storage of fuels in camps in a significant safety hazard, but without easy access to fuel more and more fuel will continue to be stored in camp due to the current issues with delivery and "Hell Station" o The Burning Man org should implement new rules and policies to make it very easy to obtain fuel, preferably by delivery, to increase event safety and reduce fire hazards.	Public Health and Safety (Including Law Enforcement)
41	2	Reimbursement for Law Enforcement is inadequate as pre and post event in reality stretches to 3 to 4 months, not just the "event" days plus a few days of pre and post event activities. Also cost of courts, prosecutions, etc. extend many months after event	Public Health and Safety (Including Law Enforcement)
41	3	Based on nature and character of some participants and activities, I think event should be limited to adults only (18+)	Public Health and Safety (Including Law Enforcement)
56	1	Do the BLM and event sponsors have an emergency evacuation plan, in the event of minor or major catastrophic disasters? The remote site, far from emergency and medical services, requires planning for responses to such disasters as wind-whipped fires through the "city," an attack by terrorists or mentally deranged people similar to the attack last year on the country music festival in Las Vegas, an outbreak of food-poisoning, the possible extreme weather event - torrential rains, flooding, heat, earthquakes, or tornado-like windstorms and closure of roads which access the site, etc. Responses to such disasters at Burning Man could also have significant impacts on surrounding communities, counties and the State of Nevada, along with the federal government agencies. Does BLM require a bond from Burning Man to cover these kinds of potentially huge costs?	Public Health and Safety (Including Law Enforcement)
60	1	The BLM needs to make rules clear with regards to participants entering with weapons for personal security.	Public Health and Safety (Including Law Enforcement)
62	2	Preventing entry of drugs would help with the overload on the Pershing County jail and court.	Public Health and Safety (Including Law Enforcement)

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68	14	* Since BLM has offered BRC the option to significantly reduce its cost with direct contracts with required vendors will BRC continue its efforts to decrease its costs by passing on or withholding services to the PCSO, available only on the "playa" through BRC? As it did with (60) radios for PCSO contact Law Enforcement Officers? * Will BRC, contrary to common sense, refuse to utilize the "Blue Pit" as a LE lodging area within * Pershing County, and continue to have those lodgings available ONLY outside the County? At BRC owed property in Gerlach, Washoe County * Has BRC ever attended a Pershing County Local Emergency Planning Committee (LEPC) Meeting? o Provided any Emergency Plans to the Pershing County LEPC?	Public Health and Safety (Including Law Enforcement)
68	4	BRC refers to it as "year-round" equipment for the PCSO Deputies though it clearly is required ONLY f the Event by contract LEO's. You no doubt are aware of the decrease in BLM Law Enforcement Officers (LEO's) since 2013 and the budget limitations to the PCSO. It seems to be forgotten t PCSO has 13 sworn Law Enforcement Officers (LEO's), when fully staffed, for a county of about 6,000 sq miles, with a population about 1 per sq mile. Then PSCO has to support an Event of 80,000 participants, as BRC referred to them, packed into 7 sq miles for \$240,000, funded as less than 69,999 for 8 days, over a longer duration.	Public Health and Safety (Including Law Enforcement)
68	1	Unlike other large festivals that I've attended, Burning Man does an extraordinary job of internally managing the well being of festival attendees	Public Health and Safety (Including Law Enforcement)
68	8	What effort is BRC making to decrease Burning Man crime pre, post, & event and its impact on Pershing County?	Public Health and Safety (Including Law Enforcement)
68	10	Why has BRC insisted that PCSO (patrol) staffing, though comparable to Carson City (CCSO) for a smaller population than the Playa population at Burning Man, is excessive? Carson City 55,274	Public Health and Safety (Including Law Enforcement)
68	2	All of my interactions with law enforcement have been pleasant but I often feel that the extent (and I imagine cost) of law enforcement at the festival is excessive.	Public Health and Safety (Including Law Enforcement)

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68	11	What size is the available pool of Nevada POST LEOs that would be able and willing to work the expanded Event, if increased population and length is approved?	Public Health and Safety (Including Law Enforcement)
70	1	Its participants create a city of cooperating individuals who create far fewer problems for law enforcement than any community of comparable size that I know.	Public Health and Safety (Including Law Enforcement)
71	1	BRC says its CRIME is less than "Urban crime", rather than saying what Burning Man isn't shouldn't it be noted what Burning Man is? Obviously it's not as low as Rural Crime. Here are Unified Crime Reports that show what Burning Man is. Carson City (CCSO) and Pershing County (PCSO) 2016 July - Oct, 2018 Pershing County January - October 2018 will see the implementation of Nevada's Body Camera legislation effective July 1st with the Pershing County Sheriff's Office (PCSO) requirement to supply Body Cameras to its Burning Man contract Law Enforcement Officers (LEO'S). This could be an expense in excess of \$60,000 for cameras alone, not including the 15 day storage mandate. (See attached graph)	Public Health and Safety (Including Law Enforcement)
71	1	From my perspective I have found most of law enforcement at Burning Man to live up to the "protect and serve" mantra... About being helpful, looking out for people rather than being about "demonize, catch and incarcerate". I have found that the officers are generally not "out to get" folks or to meet some sort of fundraising (ticketing) goal... In short helping relax the blue line so people think of them more as pillars of the community vs "the enemy" to be avoided.	Public Health and Safety (Including Law Enforcement)
73	1	But after reviewing BLM's discussion of Burning Man's EIS and the permit process, I am concerned that BLM will use the additional population size under consideration in the new permit as a basis to increase law enforcement staffing and activities at the Event. There are already too many law enforcement rangers at the Event, and the rangers fill their time on selfdirected enforcement activities which are unnecessary and disproportionate to real law enforcement/public safety needs of the Event.	Public Health and Safety (Including Law Enforcement)
73	2	To conclude, I support Burning Man's new permitapplication, and I urge BLM to allow Burning Man to increase its Event population. But at the same time, I urge BLM to reduce the number of law enforcement officers at the Event and to restrict their actions to addressing genuine law enforcement priorities. BLM's past law enforcement practices reveal the profound hypocrisy of demanding more and more law enforcement staffing when the rangers spend their time on self-directed enforcement activities which bear no relationship to real law enforcement and public safety priorities at the Event.	Public Health and Safety (Including Law Enforcement)

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73	11	PCSO is required by statute (NRS) to maintain the Jail, and by Pershing County Code; 24 hours per day, 7 days a week. There are no more than thirteen sworn Deputies including the Sheriff and Undersheriff. Jail staff can be Category 3, Patrol must be Category 1 and all must be POST certified. This provides a County population about 1 Officer per 1,000 residents. PCC 5.16.090A requires 1 per 500	Public Health and Safety (Including Law Enforcement)
73	15	BLM Law Enforcement Officers are not required to be Nevada POST certified. http://burners.me/2014/08/24/official-blm-arrest-statistics-2010-2013/ See attachment for table - Burning Man Event Law Enforcement Activity Summary (2010-2013)	Public Health and Safety (Including Law Enforcement)
73	12	Typical Law Enforcement staffing for a Festival Event is more likely to be at least 1 Officer for 500 participants and the Events are for more limited time/hours and days. The Burning Man Event is 24 hours a day and over a week in duration. This doesn't include early access, late exit.	Public Health and Safety (Including Law Enforcement)
73	20	Black Rock Rangers: 700 BLM LEOs: 84 (citations: 600) PCSO: 31 (citations: 141) (Ratio of LEO to population in Western cities of 50K to 99K was 1.8 per 1,000)(PCC 5.16.090A) 1 per 500 9/2015 RGJ Kane: The number of people arrested this year at Burning Man increased six fold from last year. From Aug. 26, when early-access participants began entering, to Sept. 9, two days after the event's conclusion, deputies arrested 41 people... Kidnapping, failing to register as a sex offender, assault with a deadly weapon and battery on a public officer were among the charges. Pershing County receives funding from Burning Man to prosecute cases that result from criminal activity by participants at Burning Man...	Public Health and Safety (Including Law Enforcement)
73	14	According to WCSO Public Information Officer Bob Harmon, WCSO staffs a minimum of 10 deputies and one sergeant for the event and their primary mission is to protect the safety of the public along the main roads leading into the event within Washoe County's jurisdiction, including the towns of Gerlach and Empire.	Public Health and Safety (Including Law Enforcement)
73	23	BLM has increased its Law Enforcement Officer (LEO) ratio to Participants supported by the increase in revenue because of the Adjusted Gross percentage of 3%. As ticket prices (revenue) rise, so does their fee. Even BRC has increased its Black Rock Rangers, which were required to undergo eight (8) hours of "training", from 500 in 2012 to 800 in 2016.	Public Health and Safety (Including Law Enforcement)

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75	3	Too much police presence and a visible oppression from many law enforcement agencies that do not seem justifiable by the level of violence observed in the community.	Public Health and Safety (Including Law Enforcement)
85	4	The Police Department has also reported that people who go to Burning Man are stranded in Reno after the event because they don't have the funding to get them back home. These people create law enforcement issues and also can tax the City's social services.	Public Health and Safety (Including Law Enforcement)
86	1	FEMA recommends one Law Enforcement Officer per one thousand citizens. Going back to these levels would be cost effective and man power effective. Further, I'd like to see less law enforcement personnel in the event proper, both Federal and County LE personal, they should be stationed at the LE facility and called in when needed.	Public Health and Safety (Including Law Enforcement)
87	1	I do not think that Burning Man requires additional LE presence, and here is why. I invite you to consider Burning Man the way it is viewed by the majority of its participants - as a family. A large village family, in which its constituent members all function at a higher than average level of self-governance and, yes, self-policing. I go out of my way to remark when I see dangerous, uncharacteristic, or questionable behavior --- but the opportunities to do so are rare.	Public Health and Safety (Including Law Enforcement)
88	1	The combination of ESD medical and fire personnel, the contracted medical transport, field clinic (Rampart), and fire suppression support are more than adequate to make the event as safe as possible.	Public Health and Safety (Including Law Enforcement)
88	2	It becomes obvious which officers won't be friendly to anyone, including uniformed ESD personnel (those officers dressed in full BDUs and carrying ARs). Having these officers stay hidden (just in case) would clearly improve the appearance of LE on playa. I see officers dressed casually, with only a sidearm interacting in a much more positive manner, while still effectively doing their jobs.	Public Health and Safety (Including Law Enforcement)
90	1	I feel the law enforcement presence is a bit heavy and not trustworthy due to the use of entrapment tactics. As a woman of colour I would feel much safer turning to a Ranger for help if I ever needed it.	Public Health and Safety (Including Law Enforcement)

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93	I	I would mention, however, that the use of drug dogs out at the event is foolish in the extreme. The Black Rock desert is a terrible environment for dogs, whose natural panting response to the heat results in a tongue covered in playa rather quickly, and whose sense of smell (which they heavily rely on for most interactions) is compromised by that same playa. At the end of the day, drug dogs are security that harms the animals, and they mostly just have to go with signals from their handlers anyway out there.	Public Health and Safety (Including Law Enforcement)
95	I	In environments like Burning Man, I think that having an excessive LE presence at low-acuity scenes can often lead to escalation in-and-of itself, simply by "police fear" in bystanders and those involved. This effect is certainly heightened by the milieu and [counter]culture of the event, as opposed to "real-world" emergencies.	Public Health and Safety (Including Law Enforcement)
97	I	I feel that there are too many officers present considering the generally peaceful nature of the participants attending the event.	Public Health and Safety (Including Law Enforcement)
105	I	Law enforcement has a place in society, but their nasty, aggressive, and targeted tactics are wasteful and judgemental. It is time to stop overpaying for unnecessary police at an event which is overwhelmingly peaceful, cooperative, and self-regulating.	Public Health and Safety (Including Law Enforcement)
114	I	I love that ESD is a great representative of the LNT principal. We do our best with the resources we have. I feel that all units work well together to uphold the principals of burning man.	Public Health and Safety (Including Law Enforcement)
118	I	I have had limited contact with law enforcement. For the few times that I have needed assistance, the Black Rock Rangers were close by and able to resolve the issue. I have had a couple very positive interactions with Bureau of Land Management employees. Their focus on keeping the Black Rock Desert pristine is both welcome and appreciated.	Public Health and Safety (Including Law Enforcement)
127	I	When my youngest was sick, I became aware of how little Burning Man was prepared to treat e kids. The equipment was not sized to bodies. Medicine not available for their sizes . Personel not trained in care for kids. No place available to separate treatment of kids. My kiddo saw way tooo much in the Burning Man ER. This was not known by me prior to need. It is not advertised that kids can't be taken care of medically at Burning Man.	Public Health and Safety (Including Law Enforcement)

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165	1	I feel safer knowing BLM is on patrol, in my experience as a fireman hazmat specialist, my interaction with BLM folks have been remarkable about their professionalism.	Public Health and Safety (Including Law Enforcement)
168	1	Like in any city, a tempered police presence of "protecting and serving" is appreciated. A low-level police presence frees up those people to create their art or to participate in artistic appreciation.	Public Health and Safety (Including Law Enforcement)
171	1	The vast majority of this law presence does not make the attendees or anyone else safer. They dramatically drive up the cost of the event and are not in any way justified. We just don't need that many officers from so many different groups.	Public Health and Safety (Including Law Enforcement)
176	3	As a portion of this EIS, under public health and safety, someone should attempt to contact all of the NV POST certified agencies within NV. The agency administrator should be asked the following questions: 1. Are you aware of the Burning Man Festival? 2. Are you aware of what the Burning Man Festival entails? 3. Do you know where the Burning Man Festival is held? 4. If you were asked to assist would you have the staffing to assist? a. If you have the staffing, would you be willing to provide certified and qualified Category I officers to assist with the Law Enforcement mission at this Festival? b. If you were willing to provide Cat I LEO's, how many would you be able to release for this mission? c. What would the cost be, if you were able to provide LEO's? Both for those going to work the Festival and the cost of those who will have to cover the shifts of the Officers' working the Festival. d. If you were able to provide officer(s), could you provide other equipment as well? i. Patrol vehicles ii. K9 iii. Detectives iv. Etc. e. Would your agency suffer if the Officers you allowed to work the Festival had to return to Lovelock for court hearings/proceedings? i. What would that cost be? 5. Do you think there are enough LEO's at the Festival to provide for adequate Officer safety in the event of civil unrest?	Public Health and Safety (Including Law Enforcement)
176	2	Having worked the Festival for several years, it is my opinion this event is currently beyond the Law Enforcement resources of Northern Nevada. Approximately 12 years ago, conversations were had and proposals were brought forward where BRC advised their Festival would never get 'larger than 50,000 people'. Now they have proposed double that population. The population is currently near or over 80,000 people when all of BRC's staff and the vendors as well as the children are added to the paid participants reported.	Public Health and Safety (Including Law Enforcement)

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184	1	While I sincerely believe health and safety at the event are critical, I also believe that excessive law enforcement is an expensive waste of taxpayer money. Considering the event's history of relatively little crime (measured per-capita), it seems like law enforcement could be significantly reduced without risk.	Public Health and Safety (Including Law Enforcement)
194	8	Concern over safety of temporary structures built on the playa for occupancy.	Public Health and Safety (Including Law Enforcement)
195	2	The internal combustion fumes that the ticket checkers are subjected to is truly disgusting and a health hazard.	Public Health and Safety (Including Law Enforcement)
204	8	In previous years, due to the adult nature of many of the activities that occur at the event, it was suggested that the BLM restrict the age of participants at the event to 18 or 21 years old. The BLM has viewed this issue as a decision best left to the parents or guardians of minors, while event organizers have assured the public that the event is zoned to protect or shield minors from illegal and sexualized activities. Please include within the Draft EIS a study concerning Black Rock City's zoning efforts in that regard. How is the zoning enforced? How does Burning Man or the BLM ensure that minors at the event are there with the permission of their parents or guardians?	Public Health and Safety (Including Law Enforcement)
204	14	Each year the Sheriff's Office must recruit 30-35 peace officers in Nevada to patrol the event. Most, if not all, of these peace officers attend the event while using annual leave from their assigned jurisdictions. These deputies have to be housed in temporary structures, kept cool, showered, provided sanitation, transported, and fed. In the three weeks (21 days) leading up to the event, 5 of the 11 Pershing County deputies work 12 hours a day -on the playa and driving back and forth from the playa to Lovelock- making the necessary arrangements for the 35 deputies to stay at the event. This consumes an enormous amount of man hours and gas, and stains the remaining 6 deputies to the breaking point. Decreasing the event will reduce the costs for temporary infrastructure at the event; save wear and tear and vehicles and other equipment; and reduce the strain on the Sheriff's Office to a more manageable level.	Public Health and Safety (Including Law Enforcement)

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204	15	Another important consideration is that every year the number of officers willing to use annual leave to work the event shrinks and recruiting becomes more difficult. Compounding this problem is that other state agencies are becoming less willing to allow their peace officers to work the event because those officers eventually have to leave the assigned duties of their offices testify in cases from the event. Apparently, this is a major inconvenience to those agencies. The Sheriff is already hard pressed to staff the event at its current population. Reducing the event's population to 50,000 will decrease the number of deputies the Sheriff will have to recruit, which will reduce the strain on local law enforcement and other agencies state wide. In addition, the volume of crimes (hundreds of misdemeanors and dozens of felonies), coupled with the impermanent infrastructure, short duration of the event, and transitory nature of most of the state law enforcement officers, renders report writing, record keeping, and evidence intake a monumental task. This process strains law enforcement and prosecution resources for months after the event.	Public Health and Safety (Including Law Enforcement)
204	2	In terms of increasing the event's size, it is doubtful that the Burning Man event can grow to 100,000 participants without increasing the number of federal and state law enforcement officers. To ensure the safety of participants and law enforcement personnel, the Draft EIS should analyze the appropriate levels of staffing for federal and state law enforcement and the associated financial burden to these agencies. As a practical matter, the analysis should include whether the Department of Interior is capable of staffing enough BLM Rangers at the event should it increase to 100,000 participants. Similarly, the Draft EIS should evaluate whether state law enforcement agencies, specifically the Pershing County Sheriff's Office, can recruit a sufficient number of officers/deputies within Nevada to staff the event at 100,000 participants.	Public Health and Safety (Including Law Enforcement)
204	5	Additionally, the event should include a detailed analysis of sexual assault rates at the event in each year from the last SRP EIS to the current year. In 2017, twenty-one sexual assaults were reported during the event. How does that number compare to previous years? How does that number compare to similarly populated cities or events during an 8 day period? Is the rate of sexual assault at the event increasing? Is there a direct relationship between population at the event and sexual assault rates (and other crime)? What is the projected rate for sexual assault at the event with a population of 100,000 participants?	Public Health and Safety (Including Law Enforcement)
204	13	Prior to the event, the Sheriff, Undersheriff, and a sergeant spend untold hours traveling to and attending meetings related to the Burning Man event (illogically, most of these meetings are held outside Pershing County -where the event occurs). Increasing the number of persons at the event will likely add to the complexity of planning for the event which will require more of the Sheriff's time in planning for the event. This, in turn, will pull the Sheriff, undersheriff, and sergeant away from their responsibilities to the people of Pershing County. Decreasing the event's size to a more easily managed number will free up local law enforcement from planning for the event and allow them to spend their time doing law enforcement, not stuck in and traveling to meetings.	Public Health and Safety (Including Law Enforcement)

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204	4	<p>Any serious analysis of whether to increase the population of the event should attempt to project what impact the increase might have on crime rates at the event. To this end, the Draft EIS ought to evaluate the crime rates at the Burning Man event and determine how these rates compare with comparable populations in similarly sized cities or events on private or public land. An estimate should be made, based upon population numbers at the event and crime rates, of what the expected crime rate might be if the population of the event were to increase to 100,000 people. This analysis would include the variety, number, and severity of crimes reported at the event, along with whether crimes are accurately reported at the event. This last consideration is of paramount importance to ensure that current law enforcement tactics are effective at preventing crime and protecting event participants. Unfortunately, it appears that crime rates at the event may have been under reported for an unspecified period of time. Anecdotal information from state and federal law enforcement officers suggests that the BRR encourages event participants to avoid reporting incidents to law enforcement in favor of resolving matters "in house" with the BRRs assistance. Such stories from law enforcement seem to be credible because the 2018 Black Rock Ranger (BRR) Manual contains instructions to BRRs to "filter" what is reported to law enforcement (see pages 31, 71). Equally troubling is the legally inadequate definition of "consent" for encounters (i.e., sexual encounters) found within the BRR Manual (see pages 71-72). This woeful advice to the BRR suggests the ugly possibility that crimes at the event, including sexual assault, have been under reported to law enforcement officers in previous years. In light of the possibility that crimes have gone unreported to law enforcement, the Draft EIS should evaluate what measures can be taken to ensure that crimes are accurately reported to law enforcement.</p>	Public Health and Safety (Including Law Enforcement)
204	7	<p>Please include within the Draft EIS an evaluation of the screening process at the event entrance. Is the current screening process adequate to prevent prohibited items (drugs, firearms, glitter, confetti, etc...) from entering the event? To say nothing of the copious amounts of controlled substances at the event, within the last two or three years, law enforcement officers have located firearms at the event. In one egregious case, officers discovered one AR-15 and one .9mm handgun, along with thousands of rounds of ammunition for those weapons. In an effort to better protect participants, a more thorough screening process of vehicles and individuals should occur prior to entry.</p>	Public Health and Safety (Including Law Enforcement)
207	3	<p>To BLM enforcement; study should be given to stopping citing participants for urination on the playa at the event. We encourage participants to avoid life-threatening dehydration by consuming fluids. Urine is sterile. It is completely different than feces which we do not want on the playa! Are citations for urination Victorian era reasoning? The results of such a study could inform enforcement on all federal public lands,</p>	Public Health and Safety (Including Law Enforcement)

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207	4	To life safety; a study should be undertaken on technical methods to rapidly detect wildfires in Black Rock City. Detection, dispatch of emergency services and evacuation needs to be included. Sensors and satellite services are available for sensing. Real time satellite systems will be available. Burning Man prototyping can be considered for national deployment.	Public Health and Safety (Including Law Enforcement)
218	1	I believe the number of law enforcement officers the BLM has on staff during the Burning Man event is excessive and a waste of resources. This is especially true given the event's excellent record on health and safety, and community support systems (including the Black Rock Rangers and medical teams). The extreme increase over the last 8 years in law enforcement costs requested by the BLM is insulting and has increased at a much greater rate than Black Rock City's population. I believe the BLM's resources should be allocated to other public lands in Nevada.	Public Health and Safety (Including Law Enforcement)
221	1	If there were an area I'd like to see improved, it would be a more consistent "face" from law enforcement. Simply put, there has been in my experience a real disconnect between those officers who appreciate the freedom and artistry of the event and focus on the safety of the participants from assault, sexual assault and burglary; and those who focus on hunting for narcotics users.	Public Health and Safety (Including Law Enforcement)
244	1	I also wanted to write to express frustration with law enforcement at the event. There are some law enforcement officers who work at the event who are positive to interact with, and that has been absolutely delightful. What is frustrating are the BLM and the Pershing County Sherrif's office trying to get more money for the event for increased policing. It already feels like there is a heavy police presence and that doesn't need to be increased, nor do they need fancy compounds to be constructed for use during the event.	Public Health and Safety (Including Law Enforcement)
274	2	As a property owner here in Gerlach we are constantly have problems with trespassing. Any thing from people using our yard as a bathroom to taking water from facets. At one point even trying to break locks off our facets that we now have to do every year.	Public Health and Safety (Including Law Enforcement)

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277	1	we should have the right to organize and field an internal / community police/security force (we may decide not to, but that's a separate question). Black Rock Rangers are almost this force today - Black Rock Rangers should be the FIRST responders / group called for any situations that arise in BRC. If they discover they need LEO support, they should be the ones to make that determination and then ask for what they need - BRC overall should be able to ask for other / outside LEO support if and when needed, and in numbers we request, not numbers that are forced upon us - outside LEO should treat BRC citizens with respect and an attitude of service, not that we are enemies to be surveilled, cited and controlled (which is the overwhelming attitude I have felt now for a number of years)	Public Health and Safety (Including Law Enforcement)
279	1	At Burning Man I have been particularly impressed with most all of the law enforcement personnel I have had to privilege to work with. Although some attendees are critical of the law enforcement presence I have found them to be helpful, respectful and professional.	Public Health and Safety (Including Law Enforcement)
288	1	Another aspect of permitting which I have been following is the question of policing the Playa. While law enforcement agencies may suggest that Burning Man is under-policed; I believe that is taking too parochial a view of policing. While statistics may indicate law enforcement ratios at 3 to 4 personnel per 1,000 of population, that is inclusive of both sworn and unsworn personnel. It includes personnel dedicated to dispatching, records, school resources and community services. Most statistics hover at some number of 1.5 sworn officers per 1,000; Burning Man's sworn police resource is right on target. It is important to recognize that in many ways, Burning Man augments the sworn law enforcement agency presence.	Public Health and Safety (Including Law Enforcement)
289	5	Past law enforcement for this event has been excessive with large numbers of officers and excessive costs for equipment, radios, and support services. Law enforcement for this particular event could be accomplished and effective with half the numbers of past years. The Black Rock Rangers adequately manage the vast majority of issues and conflicts that occur and keep them in check before any law enforcement is required.	Public Health and Safety (Including Law Enforcement)
298	3	What negative impacts (if any) have you observed from the Burning Man event in local area communities/counties? Negative press towards PC Sheriff's office & the county from Burning Man & it's attendees. Constant negotiations/meetings/dickering back and forth, w/ Pershing County often not receiving the support of the region so that we can do what's morally right for our county, region, & B.M. attendees.	Public Health and Safety (Including Law Enforcement)

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300	14	<p>The existence of up to 100K people in a relatively small area of the Black Rock playa presents significant potential for accidents that can cause injury and death. Vehicle traffic and aircraft takeoff and landing are obvious concerns and must be addressed in the EIS. Subtler concerns arise over the enormous amount of explosive or flammable materials brought to the site by individuals. More concerns arise over the structures, some mobile or having moving parts, brought to, or assembled on, the event site. These are not built to any codes and can present safety hazards to multiple people at one time. Can emergency response deal with accidents to multiple individuals? Do the BLM and event sponsors have an emergency evacuation plan, in the event of major disasters? The remote site, far from ample emergency and medical services, requires planning for responses to such disasters as wind-whipped fires through the event site, an attack by terrorists or mentally deranged people similar to the attack last year on the country music festival in Las Vegas, an outbreak of food-poisoning, the possible extreme weather event such as torrential rains, flooding, prolonged heat, earthquakes, or tornado-like windstorms. Offsite, one must consider the possible effects of natural disasters on roads which access the site. Responses to such situations or disasters at Burning Man could also have significant impacts on surrounding communities, counties and the State of Nevada, along with the federal government agencies. Will these considerations be treated in the EIS? Does BLM require a bond from Burning Man to cover these kinds of potentially huge costs?</p>	Public Health and Safety (Including Law Enforcement)
243	1	<p>Valley Fever is a life threatening disease that has been located in Washo county. Six cases have been reported thus far at the Washo reservation. Washo county Borders BRC. According to the CDC most cases go unreported and or under reported and misdiagnosed... precautions should be taken serious, but the burning man health org seems to be ignoring this... This should be factored into all future planning</p>	Public Health and Safety (Including Law Enforcement)

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319	4	<p>The number of BRC volunteers needed to operate BME has likely increased as the participant population increased to 70,000. If the numbers of volunteers did not increase in proportion, then heavier burdens of "work" hours likely resulted. While volunteers do get some benefits (some meals and other access to services) the hot and difficult conditions to build in, patrol, or stand at Gate or other stations does take a toll on the individuals. Concerns for health and safety clearly exist, and BRC does have a Workman's Compensation program for those who are "official" volunteers. However, there becomes a point where this reliance becomes unsupportable due to the numbers and workload and the effects to actual operational needs to provide safe conditions for everyone. As a participant since 2003, I have experienced the significant growth of the population of BME and the results thereof in terms of entry wait times, gate/road closures due to weather, distant traffic incidents, law enforcement issues, obtaining ice, and visibility of major events due to large crowds including large mutant vehicles that block access to participants on foot. Clearly, these are issues that the BRC must consider against their 10 Principles and the overall experience. Further, while the history of the BME is entwined with this volunteer ethos for a most of the departments, it may be time for BRC to evaluate their future needs in conjunction with the development of this EIS. I identify the ingress Gate management protocol as one area for revision and include specific comments under Transportation and Traffic. The need for a paid staff to take over more of what volunteers presently accomplish should be a consideration for BRC in proposing their preference for the future.</p>	Public Health and Safety (Including Law Enforcement)
319	25	<p>The 2012 operating plan (Appendix 2 of the EA) provides considerable detail on how the BME organizers and BLM/other officials will respond and their priority for supplies and services. Clearly, the response teams and associated members must have the materials needed to address the situation. However, the assumptions for participants meeting their needs do not seem to be reasonable. For example, unless there were additional ice trucks staged at the 3 distribution centers in advance of a rain forecast, the suggestion to "restock on ice" is likely to be impossible and could result in participant unrest due to long lines and insufficient supply. I have not been able to locate a copy of a more recent (except 2013, which was much the same as 2012) operation plan to see if any changes were made that more carefully address the participant side of the equation. The BME has been very lucky in that nothing truly serious has happened to date. There have been closures of the Gate due to rain, but not to the extent that services on playa were significantly affected. The provisions for addressing emergencies in 2012 still lacked provision for participants, and that assumed no more than 70,000. An increase of 20,000 makes the situation less tenable, particularly if a Level 2 designation is made. I strongly suggest that the effects on health and safety for participants, and the potential for unrest due to emergency situations be carefully evaluated in the EIS and be an essential part of the decision process. I have been on-playa when it rains and the Gate is closed; people do get concerned, particularly if they feel they are trapped.</p>	Public Health and Safety (Including Law Enforcement)

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319	24	Evacuation of participants from the event site in the event of an emergency was, when the event was much smaller, less of a significant issue than it was even in 2011. With the increase to 70,000 in the 2012 EA, the text for that section was not particularly robust. In 3.16, the only information is that the two existing roads, 447 and 34 would be used for evacuation. A "plan" by BRC is mentioned as part of the annual operating plan, but no details are provided.	Public Health and Safety (Including Law Enforcement)
319	31	The BME is an amazing experience and relies on many people to make it work. BLM and other partners are a part of this and this EIS should evaluate the costs and effort (including the temporary reassignments for LE and other personnel) needed to monitor the event. The BRC has also done amazing things relying on a small paid staff and thousands of volunteers to make the event possible. My fear is that that pool of volunteers is now overworked and without additional personnel who have expressed interest but not been used (which can be documented through annual records) the event will not be sustainable under the current platform.	Public Health and Safety (Including Law Enforcement)
322	1	While I appreciate police presence may be necessary at Burning Man to protect the playa and crowd safety, my personal opinion is there is simply way too much heavy handed police actions going	Public Health and Safety (Including Law Enforcement)
13	4	Are building permits being included in the overall permit? These structures that are erected are large enough to allow several persons to be inside at any given time for various activities.	Public Health and Safety (Including Law Enforcement)
132	2	Second is that the project should not lock down and close the gate to exiting traffic when there is a lost child. Especially if this is an older teenager. We saw a gate closure two years ago that lasted over 8 hours because a 17 year old didn't show up to camp for dinner. This left thousands of people held captive on the gate road with no way to either drive out the gate or return to camp. Increasing the event size also increases the size of the traffic backed up with no way to go anyplace. In any case, some other plan needs to be implemented. Even a quick look inside vehicles then waving them through would be an improvement.	Public Health and Safety (Including Law Enforcement)
5	1	I wished to express my support and that of my entire family, for the BLM to renew Burning Man's approval to conduct their annual festival on the Black Rock Desert.	Recreation
8	10	2. Have comparisons with the baseline for all resources been made at time of each subsequent permit renewal? 3. If so, how have those cumulative effects, if any, factored into previous permit renewals?	Recreation
11	1	I fully support the application of the Burning Man Organization in their request to continue to hold Burning Man in the Black Rock Desert. It is a life-changing experience for many thousands of people and is always left in great condition.	Recreation

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27	7	Clear and consistent messaging in regards to accessing portions of the playa and NCA outside of the closure area. Mixed messaging and inaccurate information has caused more confusion in recent years. In 2017, we received a notable increase in inquiries from previous years in regards to access to the playa during the closure order.	Recreation
35	1	I think BLM probably has the best record on any large gathering BLM permits for environmental care and operation of an event. I would vote for their permit to be extended for 10 years based on their past history of care for the environment. I have seen the event grow from hundreds to thousands and now tens of thousands.	Recreation
36	4	Fireworks o The Burning Man org should be allowed to engage professional pyrotechnic operators to use I.3G Fireworks or Display Fireworks o The special recreation permit provides plenty of room to setup and discharge these fireworks in a safe manner	Recreation
47	1	Burningman org has proved their responsibility with this large festival. Let it grow! Grant the permit indefinitely!	Recreation
50	1	I sincerely hope you extend the permit for another 10 years so that this outlet for artistic and creative expression may continue to exist covered in a healthy sheath of Black Rock City playa dust. Leaving No Trace is a huge priority for the Burning Man community and the passion and vigilance by which cleaning up MOOP (Matter Out of Place) was made a priority was practiced and preached.	Recreation
59	1	Burning man is a wonderful event and we work really hard to protect and care for the land. I hope you will be able to grant their 10 year permit based on the upcoming EIS.	Recreation
78	3	There is also at least some level of impact on Nevada Sportsman and the associated private property owner at Squaw Reservoir as that reservoir often serves as a local bathing facility with a considerable use by Burning Man staff and event participants for weeks before and after the event.	Recreation
98	3	E-bikes should only be permitted with the folks with special needs.	Recreation
102	1	E-bikes should not be at the event.	Recreation
125	2	Also, now that the Black Rock Desert has become more well-known, there are also other events taking place (large scale camping, "raves," etc.) that bring parties to the desert without the safety nets required of Burning Man and these additional events even further damage the sensitive desert environment.	Recreation
300	4	The EIS needs to address the year-round impact of visitors who come to the Black Rock because they have heard or participated in Burning Man This responsibility requires year-round monitoring of the environment and the eventually providing for those needs via restrooms and fencing of sensitive lands. For instance, the Trego Springs overuse is not just a few weeks before and after Burning Man; rather it is becoming a year-round problem.	Recreation

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319	10	BRC includes additional interactive (= theme) camps and large-scale art pieces (some of the big art is supported by BR monetary grants). In my experience, theme camps that provide opportunities for the citizens of the city to interact in events and experiences with their fellow citizens range from the Villages of associated camps, to large and small individual camps that are open to participants. I think most of these camps are self-funded and operate to meet their own needs and what they gift to others. Whether or not the expansion of the BME would result in more participant-interactive theme camps is highly uncertain due to the individual costs of creating the camp. In recent years the "sponsored" camp (otherwise known as plug-and-play where the members have access to all the rest of the city but are closed to non-members) has occasionally offered a musical venue for participant access during certain periods. There is considerable debate within the BM participant community on those camps and their place within the 10 Principles.	Social Values and Economics
3	1	The Burning Man Event is a drain on the resources of Pershing County. Our law enforcement is out there dealing with issues far more than the "8 days" claimed by Burning Man; everyone knows the gates are open at least 10 days, plus there is set up, clean up, and the cases our deputies are working months after the event. Those assigned to Burning Man also have to attend meetings and take calls year round. If the event is to continue, their permitted days should NOT be extended without more (and FAIR!!) compensation to Pershing County.	Social Values and Economics
2	2	Case in point, the doubling of the parking fee in just a few years. It should be known that until 2017, paying for parking was virtually unheard of in Nevada; with most parking, especially in parking structures being free. Now BRC makes millions of dollars just on participants parking in the desert. Needless to say, even with the assistance of BRC, Pershing County is not able to supply the requirements of a Festival of this size, (Law Enforcement, Emergency Medical, Emergency evacuation, etc.) let alone to provide for any large-scale emergency contingencies that may arise, with the minuscule amount of funding allowed for the Festival.	Social Values and Economics
2	1	During the early years, Burning Man appeared, outwardly, to be a friend of Pershing County. They have provided our local Elementary School, Hospital and Community center with solar arrays. They used to provide separate funding to the library and Fair and Rec board for arts and community events. However, those solar arrays are now aged and some are in need of repair/replacement. This will be a cost that the County and separate entities will have to cover independently.	Social Values and Economics
2	3	BRC provides approximately \$50 million of economic benefit to Northern Nevada through tourism, groceries and supply needs the Festival brings, as well as the taxes associated with those purchases. The vast majority, I would venture a guess of 95%+, of this revenue is brought in to the Washoe County/Reno area. Pershing County misses out on these funds as there is not a need to come into any of the communities of Pershing County, in which income could be gained, in order to gain access to the Black Rock Desert. BRC wants to increase the population to 100,000+ persons.	Social Values and Economics

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8	6	I am further concerned that, while highly beneficial, the amount of money the event generates and thus contributes to local economies, not only in NV, but communities along the paths to the event, has the potential to lead a public agency to make a decision for a reasons beyond the public and NCA resources long term benefit. Fear of a political and/or local community "backlash" is easily imaginable.	Social Values and Economics
14	1	As a Pershing County resident I'd like to lend my support to the event. I hear all of the time about how the event costs the County a significant amount of money (true) and that we don't see the benefits that Lyon and Washoe Counties do from increased sales tax revenue (also true).	Social Values and Economics
16	1	While the size of the event does have an impact on resources (e.g. costs for administering the permit and providing law enforcement), the positive economic impact upon the Northern Nevada and NE California region should be taken into consideration.	Social Values and Economics
18	1	There are benefits for Northern Nevada and the citizens nearby	Social Values and Economics
20	1	On a broader basis the money spent in Nevada for gas, food, hotel rooms coming and going, and air fares amounts to millions of dollars.	Social Values and Economics
32	1	Burning Man has also had positive economic impact on Northern Nevada communities all the way to Reno.	Social Values and Economics
39	1	As Burning Man provides NO economic benefit to Pershing County, to the contrary if Burning Man/BRC LLC, a for profit California based corporation, left Pershing County and went elsewhere for the Burning Man Event there would then be an economic benefit due to cost reduction. There are multiple locations the Event can be held on either public or private lands outside of Pershing County.	Social Values and Economics
39	4	BRC seeks for 10 years to increase the Playa population from 80,000 - 100,000, not the "paid population" referenced in the Settlement Agreement. Well beyond Pershing County's ability to provide services, even the current population and length of the Event is unsustainable for Pershing County. This could mean BRC pays Pershing County for all services: \$240,000 for 69,999 "paid participants" while increasing volunteer and paid workers upward to 30,000, as it did in 2014 to 8,396.	Social Values and Economics
39	1	They are doing a great job and provide lots of business and income for the local Nevada communities.	Social Values and Economics

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39	5	Additionally, businesses seeking to possibly locate in Pershing County view the demographics and the crime stats do not accurately reflect our community. Instead they see we have high crime in drugs and sexual deviancy due to the high amount of arrests during the time frame of Burning Man. Our demographics are skewed and there is no mechanism to fix that and let businesses know we are actually a very low crime county.	Social Values and Economics
39	2	The Event costs Pershing County revenue, and services at Taxpayers expense; Resources are stretched and exceeded; have been for many years, especially as the Event has increased in size, length/duration, with negative impact on this small (Nevada's 11th in size County) community, that BRC has no connection with except the Events location. BRC originally provided necessary services in order to decrease its cost, now wants to be paid, as a monopoly, for those required services only available in the remote location needed just to provide support to the Burning Man Event, Services that wouldn't be required if Burning Man went elsewhere. Another increase in expense to the Taxpayer is either unfunded mandates or limited funding requiring local residents make up the difference.	Social Values and Economics
39	3	BRC does however attract many to the Event with no previous criminal record though they leave with one, prosecuted at some expense to BRC. The exponential increase in crime rate for Pershing County, as reflected in its Unified Crime Report (UCR) statistics, publicly available, adversely interferes with attracting viable economic development and growth. There is also the cost for County provided indigent services and lodging during the "paid Participants", paid workers, and volunteer's lengthy incarceration prior to conviction or trial. BRC, has steadily increased its revenue with tickets, fees, and passed on taxes to its ticket purchasers, has stated publicly acknowledging the increased cost of the Event. BRC has in fact reduced payment, to Pershing County, by \$35,000 since 2014 due to peak population being "paid participants" instead of actual Playa population, which consistently exceeded 70,000 since 2014, and has increased the Event beyond 8 days. Since 2014 the base year BRC has annually paid Pershing County only \$240,000 plus CPI (Consumer Price Index) since 2016.	Social Values and Economics
41	1	Almost no participant money is spent in Pershing County as people go to or from event.	Social Values and Economics
47	1	Look at BLM sharing money with Pershing county as we are not allowed to collect an event tax (or similar fees) - BLM sharing money with Pershing and Humbolt counties to aid in rural road improvements for viable alternate routes to the playa	Social Values and Economics
49	1	Please consider the intangible long term social costs	Social Values and Economics
52	2	Current stats for the rate of growth and the projected rate of growth for for children attending Burning Man	Social Values and Economics

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55	1	I also submit that what ever negative environmental impacts result from holding the Burning Man event, are offset in the greater world by their promoting the leave-no-trace culture, and the Rs (rethink, respect, recycle, reuse, repurpose...) I know this is hard to measure in terms of site impacts, but it should be taken into consideration as a non-quantative factor.	Social Values and Economics
61	2	The rational for charging impact fees is based on the premise that users should pay the additional cost associated with increased use and growth. The existing community should only bear the cost of maintaining existing services. An impact fee of \$1.00 added to the cost of the ticket, that would graciously go to Gerlach, would be much appreciated. We support impact fees for the counties involved.	Social Values and Economics
61	1	Impact fees to finance growth and increased activities related to additional cost for the counties. What are the current or potential impaccts on water, sewer, highways, public safety, etc. The consequences of not intituting impact fees to offset the cost of providing adequate services for increased BUrning Man growth could be far reaching. Often the full effects of growth are not felt or recognized by the community for many years.	Social Values and Economics
64	1	BM might consider helping the Gerlach school with a donation as good neighbor doing mega business in the area	Social Values and Economics
68	3	BL has accommodated BRC's ongoing population increases with an expansion in the duration of the Event that has and will continue to have a detrimental effect on the taxpayers of Pershing Co The Pershing County Sheriff's Office (PCSO) bears the burden, at taxpayers' expense, to support a larger and longer Event than funded by BRC to Pershing County. This includes the added passed on by BRC for required equipment needed by contract LEO's to staff the Event.	Social Values and Economics
68	9	Why does BRC feel that a comparison between the 7th largest State (Nevada) for a year vs. a 7 square mile "city" for "eight days" is valid? (Nevada 2015 UCR vs. Burning Man arrest statistics)	Social Values and Economics
68	12	* What contribution does BRC make to the health and welfare of Pershing County? * What donations does BRC make to Pershing County now?	Social Values and Economics
68	13	o How much did BRC donate prior to the Settlement Agreement? (\$395,600 per BRC) o How much was prior to the Settlement Agreement "in lieu of fees"? * Does BRC provide any benefit to the taxpayers of Pershing County? o How? o In the last 5 years? o In the next 5 years? o During the proposed Population increase greater than the current population of the City of Sparks?	Social Values and Economics

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69	2	The Event costs Pershing County revenue, and services at Taxpayers expense; Resources are stretched and exceeded; have been for many years, especially as the Event has increased in size, length/duration, with negative impact on this small (Nevada's 11th in size County) community, that BRC has no connection with except the Events location. BRC originally provided necessary services in order to decrease its cost, now wants to be paid, as a monopoly, for those required services only available in the remote location needed just to provide support to the Burning Man Event, Services that wouldn't be required if Burning Man went elsewhere. Another increase in expense to the Taxpayer is either unfunded mandates or limited funding requiring local residents make up the difference.	Social Values and Economics
69	5	BRC seeks for 10 years to increase the Playa population from 80,000 - 100,000, not the "paid population" referenced in the Settlement Agreement. well beyond Pershing County's ability to provide services, even the current population and length of the Event is unsustainable for Pershing County. This could mean BRC pays Pershing County for all services: \$240,000 for 69,999 "paid participants" while increasing volunteer and paid workers upward to 30,000, as it did in 2014 to 8,396.	Social Values and Economics
69	3	BRC does however attract many to the Event with no previous criminal record though they leave with one, prosecuted at some expense to BRC. The exponential increase in crime rate for Pershing County, as reflected in its Unified Crime Report (UCR) statistics, publicly available, adversely interferes with attracting viable economic development and growth. There is also the cost for County provided indigent services and lodging during the "paid Participants", paid workers, and volunteer's lengthy incarceration prior to conviction or trial.	Social Values and Economics
69	4	BRC, has steadily increased its revenue with tickets, fees, and passed on taxes to its ticket purchasers, has stated publicly acknowledging the increased cost of the Event. BRC has in fact reduced payment, to Pershing County, by \$35,000 since 2014 due to peak population being "paid participants" instead of actual Playa population, which consistently exceeded 70,000 since 2014, and has increased the Event beyond 8 days. Since 2014 the base year BRC has annually paid Pershing County only \$240,000 plus CPI (Consumer Price Index) since 2016.	Social Values and Economics
71	2	this movement is really about ordinary people discovering their "inner artist"... Its a big conversation but with entire industries being outmoded by outsourcing and tech innovations, I believe participatory artforms for ordinary people will become, increasingly, a major pastime to give people meaning in the future	Social Values and Economics
72	1	Please seriously look at the economic impact to the State of Nevada, the city of Reno and the small towns of Empire, Nixon and Gerlach and their citizens.	Social Values and Economics

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73	4	Burning Man 2012: 8 day Event, Paid participants 56,149, tickets price \$360, salary/payroll \$7,787,787 August 2012 - the organizers of Burning Man filed a lawsuit against Pershing County over "Fee Increases Violate Federal Law" "These fees are arbitrary and capricious," Harvey said. "It is wrong for the county to bully us in an attempt to balance its books." BRC has additionally contributed a total of \$395,600 to Pershing County and local charitable organizations that serve its residents.	Social Values and Economics
73	16	Burning Man Data (estimated) for historic trends with graphs update 2017 Burning Man 2015: 9+ day Event, Paid participants 67,562, tickets price \$390, \$990, \$1,200, and vehicle fee of \$80 (up 100% since 2013) Pershing County per Settlement Agreement \$240,000 2014 & 2015. https://burners.me/2016/11/25/analysis-burning-man-project-2015-financials/ Statistical highlights: Additional supplemental information from other sources added County Population, per 2010 census: Pershing 6,753, Carson City 55,274 NDOC Lovelock Correctional Center (LCC) population 1,600 (adjusted Pershing Population 5,153) (Estimated) Black Rock City Workers, Volunteers, Paid Staff (9,180) (BRC lists 7,500 +951=8,451) (Estimated) Pershing County Population during Burning Man 83,000+ (adjusted from 86,529) (Estimated) Population density of Black Rock City: 11,603 (persons per sq mile) (Pre-event media storm June RGJ ChocoTacoGate * (A Burning Man spokesman estimated the compound would cost the event more than \$1 million, bringing its 2015 permit fees to about \$5 million.) 9 Day Event August 30th - September 7th early access August 26th/late exit until September 9th Early access population for 2014 was 13,545 (Closure Order 8/10 - 9/21) Setup/Clean up July 24th - October 7th Pre-sale \$800 for 4,000 (12%), Regular \$390 for 61,000 (86%), Low Income \$190 for 4,000 (3%) Vehicle Passes \$50 for 27,000 totaling \$1.35M Estimated Ticket Sales for 69,000 as \$27.75M See attached for table - Vehicle Pass Revenues	Social Values and Economics
73	21	For Pershing County to provide Law Enforcement at the Event they must contract for POST certified Category I Officers from out of the County. There is a limit to the availability of this very specialized group. (This seems to have been reached) As there are no accommodations in Pershing County where the Event is held, RV's (lodging) must be utilized. There might be RV spaces made available with hook-ups in Gerlach. This is a costly way for the County to be forced to provide this service with limited resources. There is no benefit to the taxpayers nor is there a way to control the costs year to year. The payment is static and the cost dynamic for Pershing County. This is not true for BRC which continues to increase its revenue while holding their payment static to Pershing County, as has been shown, below our actual costs. The Event has grown past Pershing County's ability to provide service cost effectively. There is no revenue generated for Pershing County, we are only reimbursed for some of our cost and still have to deal with unfunded mandates. See attached for articles and postings.	Social Values and Economics

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73	1	The Bureau of Land Management (BLM) has charged 3% of Adjusted Gross Receipts: Tickets, Donations, and Coffee & Ice sales. Pershing County hasn't collected sales tax on tickets it has however; waived a Festival fee, has been required to provide receipts for charges, and accepted donations in lieu of fees.	Social Values and Economics
73	2	Provides, as if a contractor, mandated Law Enforcement services "at cost" with receipts, for an event population that exceeds the census population for Nevada counties much larger than Pershing (11th) until it has consistently been larger than the county of Carson City (3rd). Burning Man has increased ticket price consistently and in 2014 added a vehicle fee of \$40 to a limit of 35,000 vehicles (\$1.4M). 2015 the vehicle fee was increased by 25% for a potential total of \$1.35M though only for 27,000 vehicles, which in 2016 rose to \$80 (50%).	Social Values and Economics
73	9	Pershing County has been sued repeatedly in Federal Court, with Black Rock City LLC (BRC), and by BRC. Legal fees have exceeded \$100,000 as a very conservative estimate. Though the Settlement Agreement was to resolve past issues and end the BRC Lawsuit, BRC has appealed the decision which was in Favor of Pershing County. Litigation continues in the 9th Circuit Court of Appeals. Note: The Federal Judge STRONGLY disagreed with the legality of the Settlement Agreement.	Social Values and Economics
73	10	Northern Nevada, the counties of Washoe and Lyon, have benefited from sales taxes. Reno Tahoe Airport benefits from the massive influx of visitors.	Social Values and Economics
73	17	Integrated Command \$240,000 (2013 Settlement Agreement) for eight (8) day Event (\$30K per day) Permit approved August 4th, PCSO Event Budget (\$196K) approved later in August (Cost per ticket, for 8 day event using maximum population of 67,564, per paid participant \$3.55) Black Rock City Paying Participants: 67,564 Volunteers: 7,500 (2014- 7,500) Paid Staff: 951 (Paying Participants + Volunteers + Paid Staff) 76,015 Children 442 (.65%) BRC Workers (Sherpa's?) 729 Total Revenue: \$36,901,409 Financial surplus (profit): \$1,057,173 (2014: \$2,350,498) Cash in bank: \$7,054,089 Net assets: \$10,680,108 Burning Man event revenue: \$34,707,734 Spectrum (Catering): \$1,634,009 United Site Services (Sanitation): \$1,137,839 (\$16.84 per paid participant) Crystal (Ice): \$756,741 Remember when the money from the ice used to go to local charities? There's no sign of anything like that anymore. Ice sales will break \$1 million soon. CrowdRX (Medical): \$736,050 (HGH: 2014 - \$502,760, 2013 - \$455,024) Aggreko (Equipment Rental): \$517,258 Lobbying: \$1,000,000 Grassroots Lobbying: \$250,000 Permits \$3,805,004 (* See ChocoTacoGate above)	Social Values and Economics
73	26	The fundamental questions are: * Since the "Paid Population" of the Event has since 2012 has exceeded the population of Nevada's 3rd largest County Carson City. What benefit is there to Pershing County to have an event that exceeds our population by over 10 times? * Can Pershing County continue to take the risk of providing Services below cost and clearly fails to either provide or address required infrastructure? See attached for various charts and graphs displaying ticket and population estimates.	Social Values and Economics

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73	3	Though the 2013 Settlement Agreement sets the base fee to Peak Population with only an inflationary adjustment based on the CPI, it does allow an increase in fees only if there is a population increase for the event. The BLM caps the event, at 70,000 which has been reached and remains through 2016. There are two fee structures in the Settlement Agreement: Integrated- Sheriff's Office integrated infrastructure with BLM Law Enforcement (LE) and Separate- as in previous years the PCSO alone. Per the Integrated fee structure it is approximately 0.82% of ticket sales, or \$3.43 per "paid participant".	Social Values and Economics
73	6	Burning Man reports the organization donated more than \$585,000 from ice sales to charities and organizations in Northern Nevada, including nearly \$66,000 in 2012 to Pershing County charities, including Pershing General Hospital, Marzen House Museum, Lovelock Food Bank, Safe Haven Rescue Zoo and the Chamber of Commerce. (Was this their largest and last donation in lieu of fees?) The event is held in Pershing County.	Social Values and Economics
73	19	Reno Airport: 17,000 people from 30 countries Playa Airport: 2,330 passengers, 30% up on 2014 Burner Express (Bus): 3884 in, 3334 out [550 people hooked up with someone in an RV] Theme camps: 1150 Greeters: 850 Lamplighters: 210, 319 lamp spires with 792 lanterns, 917 lit lanterns Visitors to V-Spot (Volunteer Center) 2,299 794 joined departments, 155 helped Theme Camps, 158 got engaged on art projects.	Social Values and Economics
73	22	An easy conclusion could be reached; that as the Burning Man population grows so does the payment to Pershing County, thus avoiding addressing the inequity and accepting the burdens to Pershing County. There is also the liability of litigation due to the foreseeable consequences caused by the effects of funding limitation imposed by BRC.	Social Values and Economics
73	24	Per the settlement Agreement the less than \$1/4 Million (Integrated) paid to Pershing County is also less than 1% of actual ticket sales revenue. That will only increase by the CPI, as the population cap has been reached. (Is the CPI zero?) Rather than the contract specified eight (8) Days, in 2015 it will be nine (9) Days.	Social Values and Economics
73	5	Burning Man (claims to have) paid \$2,483,836 to the Federal and local agencies. BLM \$1,868,033 leaving \$615,803 for other agencies: PCSO (\$180,000), NHP, WCSO, other Agencies that could be involved- Pyramid Lake Paiute Tribal Police, and Nevada DPBH and DPS.	Social Values and Economics
73	7	Pershing County Law Enforcement cost: \$349,621. (In 2014 for a population of 65,992 BRC was to pay Pershing County \$240,000 under the 2013 Settlement Agreement for an increase of population of almost 10,000 people and a decrease of over \$100,000 in payment, compared to the cost in 2012) Note: per the Settlement agreement and Burning Man population of fewer than 69,999 since 2014 the PAYMENT to Pershing County remains at the \$240K threshold.	Social Values and Economics

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73	8	Lyon County- ...Fernley Mayor LeRoy Goodman said that throughout the years, Fernley has watched Burning Man grow from a few thousand to 60,000 people and with it a major economic spike in the community's restaurants and stores two weeks before and after.	Social Values and Economics
74	1	In the last few years the influx of art and culture directly derived from the Burning Man event have significantly affected the local communities for the better. We now have events for all ages to attend that foster a sense of community and creativity.	Social Values and Economics
75	5	How do you believe the Burning Man event benefits your local area communities/counties? It brings money in the form of water sale, hotel stays, food sales. I know for a fact that the local water district would have to raise water rates if it were not for the money earned because of Burning Man.	Social Values and Economics
75	1	Creative and interesting people deserve to participate, even if they don't have lots of money, so anything you can do to help ensure that Burning Man is accessible to a broad spectrum of people would be appreciated. I do what I can by buying the high priced tickets, but the BMOrg is like a business, and they might feel a financial pinch from time to time that would cause them to continue raising prices, which would be a shame. The normal priced tickets are already very expensive and incur significant NV state taxes.	Social Values and Economics
75	6	c. What negative impacts (if any) have you observed from the Burning Man event in local area communities/counties? Problems caused by entrepreneurs trying to make a buck on Burningman's population (including law enforcement). Traffic generated by participants, traffic caused by vendors. Problems in town caused by out of town vendors.	Social Values and Economics
76	3	b. How do you believe the Burning Man event benefits your local area communities/counties? Gerlach's busiest time of year. c. What negative impacts (if any) have you observed from the Burning Man event in local area communities/counties? Finances should be more spread in the town of Gerlach.	Social Values and Economics
77	5	What are the impacts of the 70,000 to 100,000 size festival on local communities and counties, including medical, law enforcement, court, ambulance, etc. costs?	Social Values and Economics
81	1	I truly feel privileged to have been able to attend four times and feel that the experiences have been life changing in a very positive way. I'd like to thank the BLM for their continued support and efforts, recognizing the multiple positive results that a festival like Burning Man brings to the participants and to northern Nevada as well.	Social Values and Economics
84	1	During 2010 and 2011 I became involved with a large theme camp based in Reno/Sparks. I was personally witness to the economic impacts on the Sparks community. Our camp paid rent to local ranchs to store equipment and provide working space year around, and our members provided tens of thousands of dollars to local equipment suppliers each year.	Social Values and Economics
85	1	Burning Man has been essential to Reno's success in rebranding ourselves to an arts and culture destination. Overall Burning Man has contributed greatly to Reno's quality of life and identity.	Social Values and Economics

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92	1	In economic terms the local community benefits greatly from the event. I and several friends made a separate trip to Reno from out of state this year to maintain our camp supplies, each spending hundreds of dollars on gas, lodging and food - this in addition to the hundreds we spend before and after the event.	Social Values and Economics
94	1	I respectfully request that you include in your evaluation, the impact Burning Man has on Nevada, tourism and the annual revenue the state receives through visitor spending and event expenditures.	Social Values and Economics
126	1	This money oriented overtone feels further aggravated by the ever increasing cost of federal permits and even the hefty new 'nevada entertainment tax' that comes with a ticket price. I am a senior and have witnessed the glorification of amassing money that is eating away at our country. Burning Man has set a social example of generosity which I wish could be expanded on.	Social Values and Economics
128	1	As I see it Black Rock City and its residents provide a significant income to the gov't, the rental companies, retail companies, lumber companies, and local economy than proly any other event in northern nevada for the length of time they are there.	Social Values and Economics
134	1	I feel that Burning Man plays a huge role in Reno becoming known more for arts and technology and less for casinos and gaming. I appreciate seeing the installations that the city of Reno has purchased spread out through the city.	Social Values and Economics
136	1	Where an event such as Burning Man triggers additional costs, those incremental costs should be recovered via the event. We do not have current information, but trust that fair costs are being covered at this time.	Social Values and Economics
136	2	The amount of money that is spent in Nevada by vendors and participants of Burning Man is staggering. I have seen reports that it is the most heavily travelled air service at the Reno-Tahoe International Airport, even more than Christmas and Thanksgiving. One only needs to visit Whole Foods, Sierra Trading Post, Scheels, Cabelas, any Walmart, or any gas station prior to the event to see the large amount of sales, and corresponding tax revenue. The event has spawned new businesses, RV rentals, camp support services, charter aircraft services, etc. Add to that the pre and after-event lodging and restaurant sales. The economic impact is a huge plus.	Social Values and Economics
151	1	Over 300 registered art installations are planned for Black Rock City in 2018. Hundreds more will be created throughout the city. As Burning Man grows, I would like to see the event maintain its cultural experience within its traditionally well-organized and safe framework.	Social Values and Economics
178	1	As a legislator from Northern Nevada, I recognize the important economic benefit Burning Man brings to the region. Further, they have always proven to be true community partners and take their responsibilities seriously when it comes to protecting and preserving the Black Rock desert.	Social Values and Economics

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179	1	Every year, Burning Man makes donations to our school and our town. I served on the Gerlach General Improvement District board as a trustee for 7 years, and we received an annual donation to support our town's water resource management. Also, as a school, we receive generous donations from Burning Man, Recycle Camp, and a wide array of participants (ranging from money to school supplies and even the occasional guest speak/ lesson leader).	Social Values and Economics
191	1	The Burning Man community provides exceptional support for our local arts programs not only through Artown, but also through various local art activities (from art exhibits in the park to special events to education programs) that would not be possible without the contributions from individual Burners who are excited to be a contributing part of our arts community.	Social Values and Economics
194	7	Pershing County receives no economic benefit from Burning Man. We want to encourage burners to utilize Pershing County services (gas, motels, food, etc).	Social Values and Economics
200	1	Accredited by GFAS, the Global Federation of Animal Sanctuaries, Safe Haven Wildlife Sanctuary provides lifelong care to abandoned, surrendered and confiscated exotics victim of the exotic pet trade. Burning Man's support has also provided additional recognition regarding Safe Haven's mission and advocacy.	Social Values and Economics
208	1	While examining their application, please consider the past compliance of Burning Man along with the organization's annual spending and contributions to the state as a whole.	Social Values and Economics
215	1	While we all feel the influx of people traveling into the area each year, it is impressive how quickly the attendees arrive but then pass through town. As you evaluate this Impact Statement, please study the positive cultural and economic benefits from Burning Man as well as the cleanup after the event. As the largest "Leave No Trace" event anywhere that I am aware of, I'm proud that Burning Man has maintained an excellent track record of environmental conscientiousness, even as the attendance has grown.	Social Values and Economics
222	1	Moreover, the economic stimulus is not as short-term as one might imagine. Restoration crews from Burning Man remain on site for months after the event (and build crews for months beforehand) and continue to interact with these communities in substantial ways.	Social Values and Economics
224	1	In our high security environment, where we have our own specially trained police and security force, some people might assume we have had issues with Burners. But in the past 14 years, we have not had a serious issue involving anyone from Burning Man. We strongly encourage the BLM to grant Burning Man the 10-year permit extension they are seeking. They leave more than just dust in our airport and community. They leave art, economic impact and a unique spirit that reminds us that our airport brings the world to Reno-Tahoe and Reno-Tahoe to the world.	Social Values and Economics

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226	1	As you consider how best to approach creating your Draft EIS, I would like to encourage the BLM to consider how renewing the application of the event while possibly growing the population of Black Rock City will act as an economic driver on both the micro and macro levels. I specifically ask that the Bureau please consider how an additional 10,000 to 20,000 people could act as a boon for businesses, communities and agencies not just in the immediate communities of Gerlach, Lovelock, and Fernely, but also of the Reno-Carson Metropolitan Area, the entire state of Nevada and the Interstate 80 corridor from San Francisco, CA to Salt Lake City, UT. Because the Bureau is itself a federal agency, there are benefits to understanding how this "experiment in the desert," as some describe it, could have economic benefits at all levels (local, state, and national) if it is allowed to slowly grow in the future.	Social Values and Economics
227	1	I am curious how an event where you literally cannot tell it was even held costs some \$3,800,000 for a permit. Take Yosemite, a seven day vehicle pass is \$30 (and there are often more than one person in a vehicle), for 80,000 people that would be \$2,400,000. But Yosemite park provides roads, bathrooms, interactive displays, the list goes on and on. Burning Man requires none of this support, it is all provided by the Burning Man organization, and yet the permit is some \$1,400,000 more. This seems out-of-balance and unfair.	Social Values and Economics
231	1	I think you should move Burning Man to Washoe County. They benefit from the event and can better absorb the costs of the event. Pershing County can not afford this event.	Social Values and Economics
231	2	We are a county of 6,000 people of which almost 2,000 are prisoners at the State prison, leaving 4,000 residents. Our County Sheriff Dept is not staffed to handle the increase of people during Burning Man. Although the extra law enforcement that is hired for the event is paid for by Burning Man, our Sheriff has to spend countless hours working on Burning Man "stuff". He is not compensated extra and his time working on Burning Man takes away from Pershing County. Our Sheriff, that Pershing County pays a full time salary of approximately \$120,000.00 to can only dedicate half of his time to Pershing County. There is no extra reimbursement to Pershing County for that. Our County Jail has to house, feed and guard prisoners that are arrested during Burning Man. An extra expense for our 4000 residents. Pershing County has had to hire another Assistant District Attorney to work on Burning Man cases. A high paying job funded by Pershing County. With salary and benefits that's almost \$120,000.00 that Pershing County pays. The reimbursement from Burning Man is approximately \$300,000.00 so deduct the ADA salary and half of the Sheriff's salary that leaves a total payment of \$120,000.00 for hosting the event. Our court and jail costs are to be paid from that \$120,000.00. It is not near the \$55 million (2013 estimate) that Washoe County sees in economic impact.	Social Values and Economics
231	3	Another burden or unintended consequence of Burning Man is that it skews our demographics. It adds to our crime statistics, for a small population that is not absorbed. For a community that is trying to attract business it does not reflect well on us. This can be a deciding factor where a business comes to Pershing County. It can also be a factor whether a family or retiree wants to come here.	Social Values and Economics

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232	1	We are not equipped to handle the thousands of people that come with Burning Man. Burning Man should go to Washoe County, Reno and Fernley profit in the tune of millions from Burning Man. They are a burden not a boom to us. There is no gain to Pershing County. The few solar panels that were donated to Pershing County does not offset the cost to the tax payers.	Social Values and Economics
255	1	Federal costs for administering the permit. The Event In The Desert should be enticed, rewarded and/or paid for the socio-economical benefits they have brought and shared with Nevada. TEITD could easily be the poster child for how our precious lands should be used and cared for into the future. Similar to states giving enticements to lure entertainment dollars to their states, Nevada and BLM should do all they can to keep this event in place.	Social Values and Economics
266	2	The event is known around the world for its many contributions to the arts. Currently, the Smithsonian is dedicating an entire building to an exhibition on the art of Burning Man. It would be devastating to the global art community to bring this event to an end.	Social Values and Economics
269	4	I also want to touch on the fact that more outside businesses are coming to sell around Burningman. So while local businesses are at their peak there is also an influx of traveling businesses that capitalize on the tourism and further impact these issues.	Social Values and Economics
284	1	I also have first hand experience of the impact on Reno and smaller communities - the art scene and the environmental community in Reno has grown exponentially since the event's inception.	Social Values and Economics
286	1	Being part of an original camp helped me understand the intended culture of the event. It was encouraging to see strangers come together to endow the land with infinite care. To live in BRC for a brief period, connecting, resolving conflicts, and working together to survive the elements. We didn't know each other, but we were in this together.	Social Values and Economics
289	3	The event has widespread positive economic impacts to the region as well as locally from Reno to Gerlach. Gerlach has gained some permanent population from this event which is also positive and may eventually attract and sustain new business. County road 34 from Gerlach to the event is a substandard paved road and will not be able to sustain increased heavy traffic. Perhaps the state of NV could be persuaded to upgrade the road or provide federal funding for upgrades.	Social Values and Economics
292	1	Burning Man has indirectly led to a major influx of money into the surrounding communities through both direct contributions from the organizers and the spending of its many participants. Many businesses including stores, restaurants, and motels en route to the playa seem to rely on the revenue from Burning Man participants, and some new businesses have even been started by former participants.	Social Values and Economics
295	1	I see great value in the event for the participants as well as the local communities that benefit form the income brought in as well as active solar and bike donations as well as other active local community support the this event has made a primary interest.	Social Values and Economics
298	1	Pershing County suffers under an agreement that ties our hands from becoming financially sound, or "even," due to the costs of law enforcement, courts	Social Values and Economics

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298	2	I value our low crime, and safe neighborhoods. Burning Man crime skews our data and potentially harms Pershing County's business acquisitions and new families moving here.	Social Values and Economics
300	18	Over the years Burning Man has touted contributions to the state and local communities via art projects, grants and gifts, economic buying power as well as its ability to pay costs associated with the event. Burning Man and the BLM have never covered the negative real costs of the event such as law enforcement (including NHP, Tribal, BLM and local sheriff), fire safety, multiple aspects of trash recovery (MOOP), court costs for traffic and law enforcement citations, emergency medicine, medical transport, indigent health care at any local hospitals, cost to maintain roads that access the general site, and other costs not mentioned. How much of these expenses do the taxpayer in Pershing and Washoe Counties bear? The dollar amounts should be public information.	Social Values and Economics
300	20	How does Burning Man's participation in local political decisions affect outcomes considering that many of its Board members or participants have purchased property in the areas surrounding the event? The Board members serve on other boards, on commissions, etc. in order to seek positive public opinion on issues related to the Burning Man event. Such other groups are Friends of Black Rock/High Rock, BLM RAC's (when they are operational), Gerlach GID, and more. This has both possible good and bad influences and outcomes. What are they?	Social Values and Economics
302	1	I am concerned that the Unified Crime Report reflects Burning Man crime into Pershing County stats. this is detrimental to the county attracting new businesses due to the perceived high crime in the county.	Social Values and Economics
304	1	Moreover, my research has shown that drug policy liberalization has beneficial effects on help-seeking behavior of people with problematic drug use. Thus, it is likely that people who overdose or face other health problems following the use of illegal drugs would sooner seek help if the law enforcement would take a more liberal position. This is not about encouraging of or agreeing with the use of illegal drugs at the festival but acknowledging that harm from drug use can be reduced by starting to have more open conversations about drug use onsite. Finally, increasing harm reduction at the festival could have a positive impact on reducing stigma related to drug use in the U.S. overall, making it more likely that people who develop problematic substance use patterns seek treatment early on.	Social Values and Economics
309	1	I've also been dismayed by the rising cost of permitting the event during recent years. While the population of Black Rock City has remained relatively steady for the past 5 years (no significant growth), the fees levied by the BLM seem to grow unchecked. That said, I am optimistic about the ability for the BLM and Burning Man to work together to make the next ten years even better than what has come before.	Social Values and Economics
310	1	In addition to the economic benefit that the event brings to the local communities, this makes establish all kinds of commercial relationships and help with the locals, but also creates a great economic benefit in the northern area of Nevada	Social Values and Economics

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311	2	By allowing Burning Man to self-manage more it will enable Burning Man to direct more funds into other areas of operations and invest more in art and cultural activities. That in turn will generate even more positive economic impact. And by allowing the city to grow in size the economic benefits will also grow for Reno, Nevada as a whole, and cities around the world where Burners gather to prepare and show their work after Burning Man.	Social Values and Economics
314	1	Burning Man is one of the major events bringing visitors back to our destination year after year. They spend money in our hotels, casinos, restaurants and retail stores, most importantly supporting air service with tens-of-thousands of additional seats coming in and out of Reno-Tahoe International Airport. The burners are embraced by the community, and we are proud of the reputation we have developed as the "Gateway to Burning Man." Washoe County's economy has long depended on tourism, and the visitation provided by Burning Man adds another element to our exceptional gaming, outdoor recreation, breweries, dining and art scene.	Social Values and Economics
315	1	The community brings in tens of millions of dollars every single year to local towns and cities, particularly through Reno, Wadsworth, Nixon, Empire, and Gerlach. These areas also greatly benefit from the art impact of the event, such as the gorgeous work found at Riverwalk District as just one example. Additionally, the event financially supports a multitude of vendor and contract organizations who do business in Nevada	Social Values and Economics
316	1	In 2018, a "Doing It Right" campaign is being implemented in which stickers and positive 'citations' are being given out to participants caught in the act of following the Ten Principles of Burning Man. The level of tolerance that occurs at Burning Man is a social model that welcomes and celebrates all ways of life. As global populations rise and mobility rates increase, those skills will become ever more critical social lubricants.	Social Values and Economics
324	1	We have hosted guests from 42 different countries, and helped expose them to both Burning Man culture and the city of Reno. The Morris Burner Hostel has earned half a million dollars in those five years. We have additionally, in our non-Burning Man season, functioned as a short-term housing solution with our current affordable housing crisis, to Tesla workers until they can establish in the area.	Social Values and Economics
7	4	Did the playa improve with the previous years flooding? Why was the playa suitable for the land speed record in 1997 and not now. When did the change occur? The area occupied for the event is no longer suitable for land sailing. As of 01-14-18 there are many ridges that were not removed during restoration. Perhaps better equipment can be used by Burning Man to address these ridges and the deterioration of the surface.	Soils/Playa
8	11	4. Has there been an effect on permeability of the playa, or lack of? 5. What evidence/causality of sand waves and impacts if so?	Soils/Playa
27	2	o Effects of increased number of streets, dust abatement, vehicular and heavy machinery traffic, and number of burn pads for art on aquatic life, soil compaction, soil erosion, playa dunes, etc.	Soils/Playa

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27	3	o How is the SRP going to be responsive and adaptive for years of drought in terms of ability for the playa to heal and rejuvenate between events?	Soils/Playa
63	1	It seems the extensive traffic over that space has apparently caused the desert grit to become powdered; waiting for a wind to blow it up and away. It was obvious that the city's layout, plus the access road, were the primary source of "whiteout conditions" that I could see. I even drove around some and looked, but only BRC produced sight-restricting dust.	Soils/Playa
77	2	Impacts of the Festival on the flat level surface of the playa, including loss of opportunity to use the playa for conducting world rocket car speed records and on land sailers.	Soils/Playa
21	1	I'd like to again take the opportunity to voice some real concerns regarding the use of the dry lake playa at Black Rock. Having attended an annual event on that dry lake since before Burning man came, I can see just how destructive to the environment and how much that event has dominated the use of the playa over the years.	Soils/Playa
27	1	I wish artists were able to dig shallow trenches to bury supporting bases, like steel I-beams, for certain art pieces. Has a study been conducted to determine if a shallow trench, filled in after the event, causes harm to the playa?	Soils/Playa
50	2	Plus, trucks, cranes etc...are driven to the site and drive on the fragile sand damaging the wildlife and the flora ecosystem.	Soils/Playa
54	1	though we seek to do our best to clean up our mess, the festival is turning the lake bed into dust.	Soils/Playa
57	5	Are soil samples being done to ensure no burn residue is being left in or on the impacted soil areas?	Soils/Playa
62	1	Is the playa a resilient ecosystem? Does it hvae the natural capacity for self-maintenance and self-regeneration, after the impact of 80,000 bodies and an undetermined amount of vehicles.	Soils/Playa
62	2	The El Mirage, BLM, has a SOW-Scope of work plan for their playa. I have attached it. I would ask that the BLM make a grid of the playa, in order to identifythe areas that are more stressed by increased activity. No matter what the activity is that caused the damage. Some of the area would need no action at all. There is much that can be addressed at the BM site. Cables ripped out of the ground and no remedial action is taken. If it is necessary to do the restoration with boots on the ground, we had better get started. Hopefully a similar type of maintenance that is done on a beach could be used on the playa. Maintenance/restoration should be an ongoing function, to yet be determined.	Soils/Playa
96	1	Is the playa a resilient ecosystem? Does it have the natural capacity for self maintenance and self-regeneration, after the impact of 80,000 bodies and an undetermined amount of vehicles.	Soils/Playa
96	2	There is much that can be addressed at the BM site. Cables ripped out of the ground and no remedial action is taken. If it is necessary to do the restoration with boots on the ground, we had better get started. Hopefully a similar type of maintenance that is done on a beach could be used on the playa.	Soils/Playa

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100	2	What is the BLMs monitoring protocol with regards to the playa surface. I advise visitors not to use 8 mile because of the risk from debris, causing tire damage.	Soils/Playa
129	1	It is my recommendation that the SRP require the event organizers to provide much more effective stabilization of the playa surface, both during the event as well as following the event.	Soils/Playa
129	4	I feel it would be prudent to include in the EIS study, a very accurate elevation and compaction survey of the playa surface, both on the event site and non-event surrounding areas. This would allow verification of the long term impact of the event on the site, as far as erosion of the surface.... mainly due to wind, or compaction due to the increased use and activity of the specific site location.	Soils/Playa
193	1	The large art installations that are secured to the playa need to be analyzed. The space whale was anchored into the playa over 5 feet with large bolts and braces. It was anchored to support 70 thousand pounds. It weighed around 40 thousand pounds. The previous EA only analyzed holes dug by campers and smaller installations limiting their depth to inches. The biota may or may not be impacted but needs to be analyzed or mitigated.	Soils/Playa
193	2	RDI has done surveys to monitor the impacts on fairy shrimp and other organisms living in the playa soil. The report of several studies showed negative impacts to these organisms and needs to be further studied. Once negatively impacted, their decline can be detrimental to the species and further protection measures will have to be taken costing the federal government unnecessary dollars.	Soils/Playa
194	4	Concern for the amount of playa dust that is leaving the playa and its impact on the playa and surrounding areas.	Soils/Playa
289	2	An increase of 20,000 people over the current population of nearly 80,000 may cause an increase in micro trash left on the playa. It is impossible to pick up every bit of trash from the playa surface, however the burning man organization is better at cleaning up after the event than any other large event in the world. What might be the cumulative impact to the playa?	Soils/Playa
289	4	Black Rock Playa dynamic studies should be continued by the Desert Research Institute to establish baseline data and help monitor changes to the playa from human uses.	Soils/Playa

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319	26	The proposed Closure Area is largely the same as the existing one, with a small increase within the perimeter fence where the city and most of the participants are. The general area for the city has moved to some extent within the Closure Area boundaries, but the options to make any significant changes to this high-impact area are very limited. The 2012 EA contained some good baseline information on the conditions pre-and post-event on the soils and sediments, particularly on the results of monitoring of fugitive dust that piles up into dunes and other surface features left behind after the event. Residual dunes and other areas of loose material documented since 2012 should be discussed, since changes to wind and rain patterns prior to the next BME may allow some of this dust may remain. As well, the compaction of roads for the event (both inside and outside of the perimeter fence) may persist over time without sufficient rainfall to loosen the sediments. The EIS should look at the information available from the 2012-2017 monitoring to assess the potential for long-term impacts to the playa surface from the increase to 70,000 participants as well as the effects from the support stations for vendors and LE outside the fence but within the closure. If the playa surface recovery is dominated by fall to spring rainfall events, then the effects of climate change on rain patterns may be a relevant item for discussion. Granted, the amount of land within the Closure Area vis a vis the entire playa is small (4.2%), but if this is to be a sacrifice area for Class IV events, this should be disclosed.	Soils/Playa
30	2	The BLM needs to realize that the Black Rock Desert is for the use of all Americans, and not just those willing to pay the most money. It appears that the Burning Man organization wants to take over the site for their exclusive use limiting access to anyone else that isn't part of their gran plans.	Transportation and Traffic (including access)
37	1	A business to block access to public lands for commercial purposes, as Burning Man is, is unfair to all. Allowing an access choke point to exist where access to public land is denied, for a commercial event, is an issue best solved by modifying the event, restricting the growth of, or permeanat cancellation of the event.	Transportation and Traffic (including access)
40	5	Subject to variations in the weather, the playa is really only accessible from June though perhaps mid- October; approximately 140 days. To offer a recreational permit for the proposed 78 days that includes restrictions to access by the general public for over half of the accessible season is egregious. The Black Rock playa is a special place for everyone, not just those with money and power. I urge you to revise the permit to maximize the availability of the playa to all, and to protect this special place from commercialization and abuse.	Transportation and Traffic (including access)
43	7	The BRC is restricting access to roads and the Playa roadways to FAA Airspace provided to TRA and hampering range playa access required for successful launch operations. BLM has worked with TRA in the past to provide access; however, we are concerned this may become more cumbersome with the new 35-day pre/post event coordination for Burning man.	Transportation and Traffic (including access)

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57	1	Please allow access to the Black Rock Playa for all of us, without restrictions, by not ruling in favor of the Burning Man event. This is the world's premier site for rocketry and the Burning Man enterprise has no right to restrict access.	Transportation and Traffic (including access)
78	5	I have also heard a great deal from Sportsmen - the difficulty accessing the area or putting up with the nightmare traffic between Reno and Gerlach as well as accessing the Granite Range or other hunt units to hunt antelope etc. With Jaksick selling the Fly Geyser to Burning Man, I am also concerned that the impact to sportsmen during this time frame will only increase since the property recently purchased by Burning Man is directly east of the Granite Range and is right off to the side of the main Hwy 34 access that sportsmen use to access both the Granites and to go north to other WA Co hunt units. With this new expansion the issues of congestion and difficulty by our sportsmen to access these areas is only getting worse and worse this has been an issue for the past few years but with the new expansion it is going to get ugly out there. If they stay on the playa it will remain a problem as it has been the past few years (worse because of the increase to 100,000 People) but if they move events or people/camping/events even further north to the Fly Geyser property then it will get much worse because it is right next to a major hunting access and or area	Transportation and Traffic (including access)
176	5	Additionally, as I brought up during public comment, there needs to be a better more viable solution for the farmers/ranchers/outdoor enthusiasts who use the playa as a thoroughfare. BRC is proposing to shut down a large portion of the crossable area of the playa for approximately 3 months, or the vast majority of the time when the playa is passable. Most solutions to the issue of the local people crossing the playa either through the closure area or in close proximity of the Festival, have been for the locals' to have to affix something to their vehicle for recognition. It should be the responsibility of BRC to find a way to recognize their personnel and leave the locals alone. It should be the responsibility of BRC to have their participants and employees modify their property so as not to be confused with the locals who use the playa more often than the Festival goes do for their livelihood.	Transportation and Traffic (including access)
194	2	Easy access for the ranchers and other property owners who have to get to the other side of the Burning Man playa area. Currently they are "hassled" and followed by BM Ranchers when crossing the playa. This was discussed at the last Lovelock EIS meeting and Dr. Mark Hall with BLM assured everyone that a system would be developed to provide the access needed to ranchers, etc.	Transportation and Traffic (including access)

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204	9	Many ranchers and property owners near the Burning Man Event have expressed concerns that proposed road closures will deprive them of access to areas essential to their day-to-day business operations. These individuals also report that, in previous years, when they have driven in close proximity to the borders of the event, they have been "hassled" by Black Rock Rangers and followed. It has been suggested that one way to resolve these issues is to provide land owners and ranchers with readily visible vehicle placards which would identify them as being authorized to travel through road closures in order to access allotments or other areas essential to their livelihoods.	Transportation and Traffic (including access)
302	2	I am concerned that access for ranchers, outfitters, guides & other entities conducting business in the Black Rock, is curtailed by road closures & fences thereby making business entities travel circuitous routes to access their lands when doing business.	Transportation and Traffic (including access)
7	1	I have attached a photo taken on 01-14-15 on Gate Road. I was going to fly kites & noticed trash on the Road. In an hour and a half 2 people picked up all that is in the photo, just by driving down Gate Road. This included a staple gun, shoe, bicycle basket, flags and other misc. items. When highway 447 & 34 were constructed were they built for the degree of traffic that BM brings.	Transportation and Traffic (including access)
7	2	Why more art cars? In 2004 the emphasis was being placed on more bicycles. What happened to that idea, along the way.	Transportation and Traffic (including access)
11	1	I think the BLM, local law enforcement and county and state governments have been concerned about event entrance traffic stopping and backing up on access roads leading to the playa for many years. I recommend the BLM not allow an increase in the BRC population until the Burning Man organization (BM) develops a plan that will more efficiently moves vehicles off the roads and onto the playa and into BRC far more rapidly. I think this may require larger, organized, and safer on playa staging areas that are managed by BM, in cooperation with law enforcement to make sure the operation is conducted safely, and that are lit at night. In addition, BM should be required to significantly expand the entrance gate operation's capacity in order move vehicles into the city far more rapidly. The BLM should consider requiring multiple staging areas, gates and access points into BRC if doing so would eliminate traffic jams and blocked county and state roads.	Transportation and Traffic (including access)
14	2	I'd like to suggest that the event open another entrance gate, one that would be accessed via NV-399, wherein the event-goers would have to travel through Lovelock to get there. If the road were improved/paved the County could see a dramatic increase in sales of supplies to Burners. Another benefit would be that local law enforcement would have an easier and faster way to respond to calls at the event.	Transportation and Traffic (including access)

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20	10	Trying to manage this increased traffic is not possible. Highways SR447 and SR34 are at max capacity during the event, cars and trailers abandoned on the roads and causing damage and trash throughout one of the most precious areas in the Northwest.	Transportation and Traffic (including access)
20	7	It should also be noted that 12 mile is the only service access road to BRC for trucks either doing service (water sewer trash supplies and equipment delivery) or large equipment vehicles - it is not a main entrance that needs to be exclusively used by the Burning Man participants. The traffic even during the event is low enough that the BRC Rangers could handle checking to make sure unauthorized traffic isn't heading to the city. The public should have full use of the 12 mile during the entire permit and that boundary should be pushed back 200-300' from the entrance to allow public access onto the playa and give the truck traffic a safe place to exit and stage while being checked through. By BRC putting the additional effort to watch the road leading in to BRC, unauthorized traffic may be regulated and better traffic conditions may be established.	Transportation and Traffic (including access)
20	8	The BRC is restricting access to roads and the Playa roadways to FAA Airspace provided to TRA and hampering range playa access required for successful launch operations. BLM has worked with TRA in the past to provide access; however, we are concerned this may become more cumbersome with the new 35-day pre/post event coordination for Burning man.	Transportation and Traffic (including access)
20	3	Burning Man is scheduled for Labor Day 2018 (Monday, September 3); the event would occur from Monday, September 3rd through Tuesday September 11th. Setup and Teardown proposed 35 days before and after implies that from Monday July 30th through Sunday October 16th access to the playa would be severely limited.	Transportation and Traffic (including access)
23	1	I attended the meeting in Gerlach and among all the comments from people there, I strongly agree that ingress/egress through main Gate is of primary importance. Obviously, this is a difficult problem to solve and I'm looking forward to this discussion.	Transportation and Traffic (including access)
27	10	One alternative proposed at the Gerlach public outreach meeting suggested using the 3 mile playa access point to redirect traffic off of Highway 34. if that were to be considered, we would want to ensure the following items were also addressed: <ul style="list-style-type: none"> o Greater surface impacts - aquatic life, soil compaction, etc. o Impact on the Nobles National Historic Trail o Effect of a larger closure area arid open access of the playa and NCA to the general public 	Transportation and Traffic (including access)
27	6	Traffic impacts on local roads and playa compared to the rest of the year <ul style="list-style-type: none"> o Highways 447 & 34 and all access points onto the playa o Not only study the impacts of increased traffic surrounding the event, but how that compares to traffic throughout the rest of the year. Does the event cause an increase in recreation in and around the playa and NCA throughout the rest of the year, and how can that be measured? o Also, what provisions may be implemented to mitigate congestion for north and southbound through-traffic on Highway 34 during the event? 	Transportation and Traffic (including access)

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27	4	Baseline data and measurement of the effects of traffic, and increased traffic with population increases, on the "roads" of Black Rock City (including gate road and point I access) throughout the year. How will these impacts be mitigated over multi-year droughts?	Transportation and Traffic (including access)
29	1	I think the BLM, local law enforcement and county and state governments have been concerned about event entrance traffic stopping and backing up on access roads leading to the playa for many years. I recommend the BLM not allow an increase in the BRC population until the Burning Man organization (BM) develops a plan that will more efficiently move vehicles off the roads and onto the playa and into BRC far more rapidly. I think this may require larger, organized, and safer on playa staging areas that are managed by BM, in cooperation with law enforcement to make sure the operation is conducted safely and that are lit at night. In addition, BM should be required to significantly expand the entrance gate operation's capacity in order move vehicles into the city far more rapidly. The BLM should consider requiring multiple staging areas, gates and access points into BRC if doing so would eliminate traffic jams and blocked county and state roads.	Transportation and Traffic (including access)
36	6	<p>Parking</p> <ul style="list-style-type: none"> o Even though there has been a limit on the number of vehicles at the event due to the use of "vehicle permits" in recent years, the camp areas of the city still largely resemble parking lots. o The Burning Man org should establish formal parking areas on the outskirts of the city, provide transportation from the lots to camps, and encourage the use of these parking areas. 	Transportation and Traffic (including access)
37	1	I am against adding anymore tickets to this event. The roads are impassable with the number of tickets they sell and all the extra ones they give away. The surrounding homes from Fernley to all areas north to the event site are under seige for the number of people that are parked on the roadway from Interstate 80 to the site. I have a trucking company that can not get commerce moved while the roads are clogged.	Transportation and Traffic (including access)
43	9	Trying to manage this increased traffic is not possible. Highways SR447 and SR34 are at max capacity during the event, cars and trailers abandoned on the roads and causing damage and trash throughout one of the most precious areas in the Northwest. However, the environmental impact of this amount and type of driving has the individual being asked to bury their tracks while weeks prior there were hundreds of vehicles all unregulated and running over people [8] unchecked while weeks are spent for clean-up.	Transportation and Traffic (including access)

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43	2	During the Event, the 8-Mile entrance to the playa would be closed to the non-participant public, but the 3-Mile entrance, 12-Mile entrance, East Playa Highway and West Playa Highway (to the north and south of the perimeter fence) would remain open. BRC would conduct Leave No Trace on site during and at the conclusion of the Event, and would return to the Black Rock Desert in the spring to conduct additional environmental mitigation as needed. The wording hides the true impact of the BRC proposal: the first issue is timing; the second issue is selection of their venue location and restrictions imposed, and finally the environmental impact thereof.	Transportation and Traffic (including access)
43	6	It should also be noted that 12 mile is the only service access road to BRC for trucks either doing service (water sewer trash supplies and equipment delivery) or large equipment vehicles - it is not a main entrance that needs to be exclusively used by the Burning Man participants. The traffic even during the event is low enough that the BRC Rangers could handle checking to make sure unauthorized traffic isn't heading to the city. The public should have full use of the 12 mile during the entire permit and that boundary should be pushed back 200-300' from the entrance to allow public access onto the playa and give the truck traffic a safe place to exit and stage while being checked through. By BRC putting the additional effort to watch the road leading in to BRC, unauthorized traffic may be regulated and better traffic conditions may be established.	Transportation and Traffic (including access)
45	2	I do not believe that BRC should do the licensing of vehicles or for ADA transportation. I feel that these vehicles should be licensed under the DMV.	Transportation and Traffic (including access)
53	1	Burning Man festival attracts people from all over the US and around the world. The energy consumption for this festival, for transportation alone, is enormous. When viewed along with the traffic congestion associated with the festival, it begs for some analysis and proposed solutions.	Transportation and Traffic (including access)
53	2	I advocate that the EIS study: 1. The overall fuel use in transportation of participants to and from the site. This includes plane travel as well as vehicle travel. In this analysis, the fractions of different vehicles should be taken into account. RV's, for instance, consume far greater fuel quantities than passenger cars. 2. The fuel use based on miles needs to be augmented by idling times typical for participants approaching or leaving the festival site. 3. Fuel use by generators at the site over the week of the festival needs to be estimated as part of the overall fuel usage. 4. Lastly, the fuel usage of non-participants, for instance, law enforcement, delivery, first responders, etc., needs to be taken into account.	Transportation and Traffic (including access)

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64	2	I believe the EIS should consider road improvements. 1. Widening Route 34 to 3 lanes between the event entrance and the 442 N split should be studied. 2. Emergency evacuation is an EIS value related to life safety. 3. Expanded lanes would allow faster evacuation from the event in an emergency where the road lanes could be used for staging vehicles. 4. Expanded lanes could be flexed by number of lanes inbound and outbound using cones. 5. Expansion of lanes through and South of Gerlach should be studied for emergency staging. 6. 442 South from Gerlach is congested. 442 North from the split is not. Widening 34 from event entrance to Gerlach increases the exodus and staging value of 442 North	Transportation and Traffic (including access)
77	1	Hwy. 447, the Pyramid Lake Highway, impacts due to extensive Festival traffic during the week of the Festival. It is almost impossible for travelers and residents to use this highway before and after the Festival. Also, traffic impacts on the costs of highway maintenance and law enforcement.	Transportation and Traffic (including access)
78	4	The only other area of consideration that I can see that we may choose to voice at some point during the process is to request that a reasonable number of public access routes near the event are left open for Nevada Sportsman. There is a fair amount of use of the Jungo and Soldier Meadows access roads which are both county maintained roads that Nevada hunters use a fair amount that time of year and I would assume they would be left open during the event. The 12 mile Playa access road is also used a fair amount by Nevada Sportsman that time of year and it appears in the attached documents that there is an intent to keep that road open as well during the event.	Transportation and Traffic (including access)
78	2	While I am confident that there is little we can do about it, the true impact associated with the Burning Man event from a wildlife standpoint is the traffic and congestion issues experienced by our Nevada Sportsman trying to accessing portions of Humboldt, Pershing and Washoe hunt units and reservoirs near Gerlach with a number of big game seasons open around Labor Day weekend. An expansion of the Burning Man event population will only compound this traffic and congestion problem.	Transportation and Traffic (including access)
82	1	The only thing I wish was possible was that there was a separate gate for theme camp's big vehicles, MV, and transportation vehicles so that they are not in line with those traveling in with cars and RVs. Our vehicles are old and tend to heat up easily standing still. Even if they were able to go through the same gate as distributors would be awesome.	Transportation and Traffic (including access)
91	1	With the next level of growth of the event, we would like to see, if possible, turnouts for slower moving vehicles or a safe place for a vehicle experiencing mechanical problems. Without proper turnouts, vehicles more often are partially off the road and partially on the road. Again creating a hazard. Not to mention some are buried in the soft shoulder, which require the aid of the tow truck. Placement of these turnouts could be located where there is less elevational change from road level to terrain next the road. As with everything it requires funds and to best utilize the funds for the most effective safe solution.	Transportation and Traffic (including access)

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91	2	Given the volume of traffic, if it were to be possible to have a larger time window to transport at an earlier date to the staging area of the event. Vice versa, at the close of the event to have more time to move equipment off the playa as there is extremely heavy participate traffic coming from the event.	Transportation and Traffic (including access)
130	2	The drivers drive too fast on the roads in front of Natchez Elementary School, even when school is in session. Accidents hold up traffic for hours. I cringe when i have to drive out of my town during Burning Man and sometimes i purposely stay home so i don't have to deal with the traffic.	Transportation and Traffic (including access)
132	1	One is this event should not be allowed to expand until the gate and gate road traffic as well as the congestion on the local area highways are improved. Solutions to that would be widening highway's 447 and 34 from I-80 to the playa to 4 lanes. Or adding long passing lanes. The other option is paving Hwy 49-Jungo Road to Winnemucca and possibly operating a second public gate from Jungo road. Paving Jungo road would also benefit the local area year round by offering a well needed shortcut to Winnemucca and I-80 East. The real problem is the current traffic and hours long backups on the playa gate roads during exodus and arrival. Along with that is the increased generation of dust by hundreds or thousands more vehicles entering and leaving the event along with the increase in support vehicles. Presently the road watering is very minimal on the gate and permitieter roads. Until all this can be dealt with, and in a realistic time frame the event should not be allowed to expend its population.	Transportation and Traffic (including access)
133	2	From a transportation perspective expanding the alternative transportation options to the festival site through additional buses and a larger airport will not do enough to mitigate the traffic impacts to the communities of Fernley, Wadsworth, Nixon, Empire, and Gerlach. There are far too many vehicles on the roads going in and out of the festival and the transportation situation causes a significant disproportional and adverse public safety and quality of life issue for these communities.	Transportation and Traffic (including access)
194	1	Pershing County Road impact due to Burning Man Event - Jungo Road as well as other Roads leading into the Playa on the Pershing County side. There is currently no compensation to repair or maintain these roads. Should there need to be a major evacuation during the Burning Man event these roads would need to be utilized and would increase the demand on the Road Department. I thought that there was a portion of a paved road that is in Pershing County and concern expressed over who would pay to have that repaired in time (I don't know if that is true or not). Also working with BLM to obtain a portion of the BLM cost recovery monies to repair/upgrade Jungo Road.	Transportation and Traffic (including access)
195	3	I would like to see further discussion of traffic mitigation efforts so that local area residents such as myself and others are not denied reasonable travel access on our own area roads.	Transportation and Traffic (including access)

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204	10	Additionally, it is likely that an increase in the number of Burning Man participants will have a direct impact on County roads by increasing travel and wear and tear on roads leading to the event, in particularly Jungo Road. Please include within the Draft EIS a study of the impact that an increased number of event participants may have on Pershing County roads leading to the event and how the impact (infrastructure and maintenance) on these roads can be mitigated with cost recovery funds, traffic signage and control, or otherwise.	Transportation and Traffic (including access)
206	6	-Examine ways to mitigate traffic violations and to insure compliance with tribal law in tribal court, including for out-of-state and international violators.	Transportation and Traffic (including access)
207	1	To life safety; NV35 North of the 447 Y should be widened to 3 paved lanes at the expense of the event. Consideration should be given to adding graveled shoulders. The expansion should extend to the 8 Mile playa entrance. The purpose is to provide a staging area for participant vehicles in the event of an emergency evacuation. In normal operations, entrance and exodus include vehicles using 447 to Cedarville and points beyond. They can be cleared irrespective of congestion between the 35-447 Y and I-80 which is 2 lanes. The cost would be very small in comparison to expanded lanes South of the 447-35 Y on to I-80. It would be a local road project employing local Gerlach neighbors. It's seasonal use makes it a good investment compared to ongoing lane maintenance of 447 which carries heavy transport trucks.	Transportation and Traffic (including access)
211	1	I believe the max number of people should be capped at 70000. The transportation infrastructure can not handle more than this.	Transportation and Traffic (including access)
229	1	Expanding the population cap for the event must be contingent on improving transportation resources, including highway improvements and mass transit. This is especially important to reduce the impact of the event on local citizens challenged with sharing their vital highways with thousands of participants arriving during a short window of operations. Perhaps expanding the existing highway to 3 "flex" lanes that could be 2 lanes inbound, then switch over to 2 lanes outbound at the end of the event by merely moving traffic cones or delineators.	Transportation and Traffic (including access)
262	1	Burning man removes the access for others citizens to the area for a increasing longer and longer period of time. Roads are clogged, blocked, noise is present, planes disturb the quiet and the peace and quite of the area is lost.	Transportation and Traffic (including access)

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269	2	Completely changes daily patterns to extreme while Tribal patrol is trying to keep Public normal life. The increase of traffic from last year made safety difficult to manage.	Transportation and Traffic (including access)
274	1	First and foremost, the infrastructure can not handle the event at the size it is. The roadways both State and County roads were never build to with stand the amount of traffic this event brings. Not to mention the over loaded vehicles.	Transportation and Traffic (including access)
274	3	The aircraft that flies in and out of the event comes in or flies out extremely low. At point I was able to see the pilots face. I have a video of it and have considered sending it the FAA. The highways because of the traffic have increasing gotten more dangerous to drive. Head-ons, vehicle fires, rollovers are becoming to common this time of year. Already there has been two vehicles accidents this year.	Transportation and Traffic (including access)
289	1	Increasing the population to 100,000 is not without its challenges. Transportation is the issue that may be very difficult to mitigate. With only a 2 lane highway for nearly 80 miles from the south, it will be difficult to keep the highway at capacity without serious mitigation such as increased air and bus transportation to help eliminate the number of vehicles on the highway at one time.	Transportation and Traffic (including access)
300	9	Since the previous EA was done in 2012, the number of aircraft using the permitted runway has increased significantly. Moreover, the EA only permitted small aircraft, as stated in Section 2.1.8: "The airport runway use would be limited to small general aviation." The FAA defines "small" as 12,500 pounds or less (devoid of fuel, crew, and passengers). The EIS must take an even closer look than the EA into the safety issues of having an even larger number of aircraft and having many of those aircraft being no longer "small general aviation". Using available airport safety statistics, what is the probability of an accident, given the expected number of takeoffs and landings, that would affect an area beyond the runway itself and possibly even inside the event perimeter? Another aspect of the runway & aircraft issue is the compaction of the playa due to larger and more numerous aircraft landing on the runway. Prior studies when aircraft numbers and weights were less need to be updated. The top of the FAA "small" category will exceed 6 tons (12,500 lbs.), and have we gone beyond "small"? Compare that to motorhomes which may go to 13 tons (26,000 lbs) fully loaded. But then it is reasonable to assume that the landing impact of an aircraft will cause more compaction than the rolling weight of a motorhome. Has it been verified recently (2017-2018) that no significant compaction is taking place and that the runway does in fact recover its natural state before the next annual event?	Transportation and Traffic (including access)
316	2	I would also like to see a finite number of vehicle passes offered to non-staff participants. Burners are resourceful. If they are told that they must find another way, they will. This would reduce the traffic problems, as well as minimize the wear and tear to local rural roads and highways.	Transportation and Traffic (including access)

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319	11	<p>The expansion of the Burner Express Bus (BxB) and Burner Express Air (BxA) to address the up to 20,000 persons accessing the event site is, as I read it, proposed as a significant mitigation to reduce ingress and egress traffic to the event. Information from BRC indicated that in 2016, 13,873 "trips" were made by the BxB with 18,193 in 2017. Considering that each person must travel to and from the event, this equates to ~7,000 and 9,000 persons respectively. The BRC presentation assumed 15-34,000 "trips" under the proposed action; thus 7,500 to 17,000 persons. The airport is not likely to contribute a significant reduction in the number of participants driving into the event due to the size of planes and the expense. The most likely expansion there is from those with pre-arranged camps with those who drove in, or as plug-and-play. From a participant point of view, the BxB drops everyone off at a station on the western end of the city, and they must then walk, with their limited amount of carry-on gear (and any water they may have arranged for) across the city to where their camp is (assuming that they are part of a camp that drove in with the large amount of supplies and infrastructure needed to survive the week). The number of participants arriving via BxB may be limited due to the logistics of supplies. The EIS should carefully evaluate any projections made by BRC on this matter due to the need for all participants to bring everything they need on the bus (they are limited to two bags). Further, the rationale and result of requiring vehicle passes (at additional cost above the ticket) on the number of vehicles accessing the event should be documented for their value to reducing traffic.</p>	Transportation and Traffic (including access)
319	27	<p>The 2012 EA and the Proposed Action from BRC both focus on the traffic concerns with departures from BME on the Sunday and Monday at the end of the event and less with the issues of ingress on the Sunday-Monday at the start of the event. Participants arriving do have more options to consider when arriving, but a large percentage do seek to enter on Sunday and Monday, leading to large traffic backups outside the perimeter fence in the stand-by lot and, at worst, on Hwy 34 or on SR 447 into Gerlach and Empire. The largest backups are certainly the result of something that has closed the Gate or limited its capacity to move participants into the event. Weather (rain) related closures for either ingress or egress do occur and cause issues for those waiting on either side, but these closures are needed to protect the playa surface and not result in vehicles stuck in the mud over extensive areas.</p>	Transportation and Traffic (including access)

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319	29	<p>As a participant since 2003, I am very aware of the complexities of getting us onto and off the playa. The effects of the increasing numbers since I first attended are clear to me in the length of time to reach and pass through the Gate, and to accomplish Exodus. The pulsing for Exodus has improved that situation since vehicles can be turned off and visiting with the other folks in your section of the line is very enjoyable. Ingress is less enjoyable since line movement (there may be up to 12 lines) is erratic and not consistent between lines (the latter is due to the Gate protocols for examination of vehicles and other factors). I have been fortunate to not be stuck in the line when the Gate has closed due to rain (although there are shorter closures such as that at shift changes), or other causes where traffic backs up to the paved road. The addition of additional participants will only exacerbate this situation during the peak entry days. Also, Gate closures for LE purposes (generally for missing minors) and because of more distant road closures (we waited 9 hours to exit one year because I-80 was closed beyond Fernley and it was decided that since many people leaving were headed to San Francisco and the closure of I-80 would put them all into Fernley, that no one was leaving the site whether they were headed east or west since once in the Exodus line, you are stuck).</p>	Transportation and Traffic (including access)
319	28	<p>The 2012 EA states that NDOW views a LOS rating of D as a significant concern for overuse of a roadway. At least two of the "D" rated segments are very close to the "E" level and indicate that traffic volumes are approaching levels of higher concern. An "F" level LOS indicates that the traffic is so dense that movement of vehicles is limited. Fortunately, the normal BME traffic has not reached that. However, during a stoppage of ingress due to Gate closure or just very heavy traffic that overwhelms the capacity of the Gate could result in an "F" rating on CR34 and possibly SR447 through Gerlach and Empire. The figures in the table are estimates from the 2012 EA and the actual data from annual reports of BME since 2012 will be critical to evaluating the actual change in LOS and provide a baseline to examine the effects of any increase in participants.</p>	Transportation and Traffic (including access)

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319	30	<p>My suggestions for analysis in the EIS for Transportation and Traffic are: -The information on daily (and perhaps hourly) ingress for both the build week and the event week be compiled and examined to determine where bottlenecks occur and identify additional resources needed to address. -A protocol to determine when Gate closures are required due to LE or off-site traffic concerns be developed. Included in that should be vehicle searches (for missing minors) that still allow egress at some level. For off-site traffic closures, perhaps notification via BMIR for participants who are not affected could help when it included designation of one or two exit lanes for that traffic. -The BME has several components that are part of its history and culture that have operated well under smaller population sizes but may be stretched thin under the existing levels. The Gate Crews are amazing people who work unbelievably hard to get participants into the event regardless of dust, heat, or other difficult working conditions. I am amazed every time we come in by their focus and friendliness while they do their job. But, I am also mindful of the stress on them from hours upon hours of manning the Gate. I do not know how they keep up, and how any expansion of the numbers arriving will be accommodated by existing or new personnel. The process of entry has changed over the last few years with electronic readers and such for tickets, but it still takes upwards of 10 minutes per vehicle to move through the line. As I said, the crew are working as fast and hard as they can, and the time it takes is not their fault. I strongly suggest that as part of the analysis of traffic ingress, that BRC evaluate the current system of Gate entry to streamline it for the Crew and participants. One area to evaluate is the need for the vehicle searches. Rationale for that continuing should document how many times something (or someone) is found during the search.</p>	Transportation and Traffic (including access)
7	5	<p>Calling the event a Leave No Trace event when at the best it is Tread Lightly. My photo demonstrates this. The impaction of the surface is very obvious and the outline of the city is still very visible, when driving around. I would hope that the BLM will consider future environmental impacts that may occur with growth of BM, and I am only asking for "good faith efforts." Is the Burning Man event recreation or just "human occupancy?" I will need to send the photo separately. The internet is very poor here.</p>	Visual Resources Including Night Skies
300	16	<p>Dark skies is a valuable natural resource of the high desert of Nevada. The Burning Man event is the prime abuser of that resource for a week or more of the year. The 2012 EA documented substantial visual night impacts at 8 miles and more. It stated in Section 4.23.1 that "An increase in illumination would be expected by the increase in numbers of event participants, a larger residential area, and additional art installations on the open playa." This was under Alternative I which considered an increase to up to 70K participants. All those numbers are again expected to increase in the applicant's proposal. The methodology of that analysis should be repeated in the EIS and it should be specifically done for the proposed maximum of 100K people on the playa. Specific mitigation measures should be discussed.</p>	Visual Resources Including Night Skies

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20	11	Black Rock City LLC ("BRC") acknowledges that over 5,000 bikes were left abandoned and although as you might have already known, the majority of "Burners", how the attendees call themselves, use bikes to get about the "Playa", which is the huge space in the vast Black Rock Desert where the venue is set. However, due to such a massive amount of people crammed into one place, not everybody seems to get the "leave no trace" memo.	Wastes, Hazardous or Solid
27	8	Leave No Trace standards that ensure other users' experiences on the playa remain unchanged during other weeks of the year when Burning Man is not taking place. o Are the current standards doing enough to mitigate impacts? o Is compliance with the current standards possible with increased population?	Wastes, Hazardous or Solid
36	2	Trash o Considerable event trash is both intentionally and accidentally dumped roadside. o Participants transporting trash in overloaded personal vehicles is unsanitary o While the early Burning Man events was small having participants deal with trash individually made sense, but an event of 80,000 or more people should be providing trash service to their participants.	Wastes, Hazardous or Solid
2	2	Trash is an embarrassing issue and you should make burning man Org. do the cleanup.	Wastes, Hazardous or Solid
3	1	While trash along the highway is still a problem, the fact that so many people are able to create such an incredible experience without leaving trash everywhere (unlike every other event I've ever heard of or seen), the people who attend Burning Man are dedicated to making things better each year, and that includes educating people about Leaving No Trace.	Wastes, Hazardous or Solid
6	1	However, there are exceptions and in terms of trash and this does impact the highway and the communities who already contend with thousands of our vehicles during the Burn. Some of this roadside trash comes off of improperly secured loads and the owners may not even be aware they lost the items until the get to the Gate.	Wastes, Hazardous or Solid
7	6	All large theme camps should provide a post Burn strike plan that includes logistics, labor responsibility and transport of all people, gear and trash to be taken off the playa. Burners should not have the attitude that BMorg volunteers will take care of things in the months following the Burn.	Wastes, Hazardous or Solid
7	2	Limit Plug and Play camps to minimize risk of injury and negative environmental impact. I once visited Red Lightning and saw three people sorting through the trash of some Google folks who felt entitled to leave that for someone else to do. That is not Radical Self Reliance. Some trash left outside, an uncovered rebar top, urinating on the playa...among other things, can cause physical harm (objects fly during storms) and infections (people going to the bathroom on the playa causes that to be picked up during the storms and thrown on people- there has been a significant increase in skin infections during the past few years).	Wastes, Hazardous or Solid

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8	13	7. Do the numbers of vehicles contribute to contamination such as by lead from exhaust or other?	Wastes, Hazardous or Solid
9	1	I imagine long entrance and exit times are a part of the reason for most of the traffic and waste along the road, significant changes should be made to how people are let in and how the event is concluded.	Wastes, Hazardous or Solid
10	1	1) All theme camp kitchens should have a plan for self containment, temperature regulation (maybe adding additional shade structures over the top of the kitchen area), trash containment plans, recycling plans, and MOOP (Matter Out Of Place) patrol. 2) Recommended that theme camps providing food for large groups of people have lead kitchen staff with Food Handler's Certification. 3) Recommended that theme camp kitchens submit lists of food they are mass purchasing and taking into Burning Man (limit foods that can cause sickness when prepared or stored outside recommended temperatures- i.e. fish, chicken, milk/dairy). 4) Recommended that theme camps have proper compartments for cleaning and shift to less trash production by limiting disposable plates/utensils and adopting one plate/cut, chopsticks/utensils /person for the use of the entire Burn and have people be responsible for storing/carrying and cleaning their own kitchenware. 5) Recommended that all theme camp kitchens reduce the amount of plastic and/or products containing plastic packaging prior to entering Burning Man.	Wastes, Hazardous or Solid
11	2	During exodus from the event, the amounts of trash and wreckage strewn along the county roads and state highways caused by irresponsible "Burners" is a disgrace. I know that BM is required to clean-up the mess but it would be more efficient if the BLM also required BM to do a better job mitigating the causes that contribute to the trash and wreckage strewn along the roadways. BLM should require BM to assign staff to inspect vehicles in the exodus exit lanes for proper trash security and safe vehicle loading before the vehicles get on to the roadways.	Wastes, Hazardous or Solid
13	2	I contend that the structures erected for the Burning Man event are being burned in a "salvage operation". These structures would have to be dismantled and removed for the area at the end of the event. The burning of the structure is a means to avoid the dismantling and removal of construction debris from the site. The burning of the structures also includes items that are not wood which would include all the metal fasteners used during the construction of the structure, all of the paint and other art supplies used to decorate the structures, and various adhesives used in the plywood sheeting used to cover the structures. I realize this is a NDEP issue but I contend it should be specifically required as a deliverable to validate the permit each year.	Wastes, Hazardous or Solid

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21	5	Along with the probably unsustainability on the Black Rock playa, the people attending leave broken down vehicles, trailers and junk along the roads leading to Gerlach.	Wastes, Hazardous or Solid
25	1	I am sure there is a way the organization can find a solution to people leaving trash outside the event or local communities could benefit, such as charging for waste dumping and making a little money from it.	Wastes, Hazardous or Solid
29	2	During exodus from the event, the amounts of trash and wreckage strewn along the county roads and state highways caused by irresponsible "Burners" is a disgrace. I know that BM is required to clean-up the mess but it would be more efficient if the BLM required BM to do a better job mitigating the causes that contribute to the trash and wreckage strewn along the roadways. BLM should require BM to assign staff to inspect vehicles in the exodus exit lanes for proper trash security and safe vehicle loading before the vehicles get on to the roadways.	Wastes, Hazardous or Solid
50	1	Last year, thousands of bikes were abandoned by Burning man participants. Burning man participants generate a huge amount of human waste which is not properly collected. Also, thousands and thousands of pounds of garbage are illegally dumped in in the area once the festival is over.	Wastes, Hazardous or Solid
52	1	Some sort of punishment for those that do not comply with the leave no trace agenda. Mainly for the exodious along the highways. Either an extra substantial monetary amount, or ticket refusal for future year/years depending on the number of offenses.	Wastes, Hazardous or Solid
57	4	Are building permits being included in the overall permit? These structures that are erected are large enough to allow several persons to be inside at any given time for various activities. What materials and or solutions are being used to ignite these structures?	Wastes, Hazardous or Solid

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Letter #	Comment Number	Comment Text	Comment Code Name
57	3	I contend that the structures erected for the Burning Man event are being burned in a “salvage operation”. These structures would have to be dismantled and removed for the area at the end of the event. The burning of the structure is a means to avoid the dismantling and removal of construction debris from the site. The burning of the structures also includes items that are not wood which would include all the metal fasteners used during the construction of the structure, all of the paint and other art supplies used to decorate the structures, and various adhesives used in the plywood sheeting used to cover the structures. I realize this is a NDEP issue but I contend it should be specifically required as a deliverable to validate the permit each year. This open burning has been allowed for several years and plans based upon this permit request suggest that the burning will continue for several more years. With this regularity of burning I am concerned that no air quality or soil sampling has been completed to determine if there is a regular release of toxics into the air or residual in the soil and what potential affects this may have on the surrounding vegetation, animal population, and finally the human population.	Wastes, Hazardous or Solid
59	1	The dirt and dust is dragged back into town clogging many car washes and drains. They litter and illegally dump the junk vehicles and items from the event in unused areas.	Wastes, Hazardous or Solid
85	2	The City has been seeing a trend of trailers, RVs and motorhomes being illegally disposed of by potential Burning Man attendees. However, the City doesn't have hard number connecting these to Burning Man because typically they are not registered but we do notice the influx of these complaints after Labor Day weekend. These trailers then become illegal homes or fire hazards. Average cost to move vehicle is \$1,000 and the City has towed 30 since September 2017.	Wastes, Hazardous or Solid
85	3	The City also gets complaints by constituents about trash being dumped in unsanctioned dumpsters. The City doesn't own the dumpsters however these calls/emails create additional casework for Code Enforcement.	Wastes, Hazardous or Solid
86	2	Trash accumulates on the highways throughout the summer and after the BM event. We have a skilled and dedicated road side cleanup team that collects and disposes all this trash after the event. It takes about 2 weeks to cover all the roads leading in and out of Black Rock City. After this cleanup the roads are cleaner then before the event started. Further, we have been very proactive in keeping the local communities clean of trash. When we become aware of a problem we dispatch a team to take care of it.	Wastes, Hazardous or Solid
100	4	I believe a group of citizen volunteers should be formed to independently monitor the playa as site stewards, making visits 4 times a year and documenting what they observe and removing litter.	Wastes, Hazardous or Solid

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103	1	Usually, we take our garbage back to the Bay Area when we leave, but I like the idea of communities along the route providing drop-off points. We do all of our can recycling on-playa.	Wastes, Hazardous or Solid
115	1	In particular, I want to draw attention to Burning Man's Leave No Trace principal. There is no other event in the world in which thousands upon thousands of people get together to create an entire city, then leave with so little evidence that they were ever there. It is the only environment where citizens are trained to pick up other people's trash, and to be accountable for what they consume and waste.	Wastes, Hazardous or Solid
119	1	Everyone there is absolutely committed to the mission of "Leave No Trace" and is actually extremely inspiring for cleaning up and taking care of your environment beyond the event.	Wastes, Hazardous or Solid
125	3	I do not believe that the entrance fee to Burning Man is high enough to offset these damages to the surrounding environments and further actions and fees should be required to provide year-round protection of the desert and year-round clean-up crews to handle the large quantities of garbage created from this event.	Wastes, Hazardous or Solid
126	2	Burning Man, both in Nevada and across the world has made a powerful contribution to a Leave No Trace ethic. This is essential for our ever smaller and populated world. We Burners are proud of this contribution to the world. In addition the Burning Man Organization has continually acted to empower and help the local communities when it can as that is also part of our goal and creed.	Wastes, Hazardous or Solid
172	1	The LLC that operates the event is the 'gold standard' of event management. The 'Leave No Trace' ethos as a foundation of the event principals and production is a positive contributor by showing all the participants what can be accomplished with collaboration and purpose.	Wastes, Hazardous or Solid
189	1	Respecting the land is one of the core principles at Burning Man - the principle of Leave No Trace is honored by the majority of participants, and as new participants visit Black Rock City, we strive to teach them to clean up after themselves - completely. This ethic of Leave No Trace has spread outside of Burning Man, to other festivals and year-round cultures.	Wastes, Hazardous or Solid
201	1	A standout of the event is how it acts as a model for events around the world in terms of environmental stewardship, referred to as leave no trace. While this may have originated in the hiking and outdoors community, the scale with which leave no trace is executed at Burning Man is unmatched.	Wastes, Hazardous or Solid
206	4	-Examine ways to insure BM addresses and removes any and all trash, litter, and abandoned items including vehicles from the reservation, in a timely manner. -Examine ways to mitigate the impact of increased waste disposal, including hazardous waste disposal, on the reservation.	Wastes, Hazardous or Solid

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259	1	The largest "Leave No Trace" event in the world, 70,000 people enjoy the beautiful natural ecosystem and leave a more minimal imprint than a much smaller group would leave at any other event.	Wastes, Hazardous or Solid
264	1	Furthermore, its ethos including "leave no trace" inspires people far beyond those attending the event and encourages responsible actions throughout the year.	Wastes, Hazardous or Solid
266	1	As the world's largest Leave No Trace event, Burning Man has taken place for decades with minimal environmental impact to the area. I serve as the Leave No Trace lead for my village at the event, and can testify to the fact that environmental protection and proper waste management are integral to the event. Not so much as a single thread or sequin is left behind at our camp each year.	Wastes, Hazardous or Solid
269	1	People are just leaving their trash. When the festival has finished every can is filled between Gerlach to Sparks. Burningman is not paying for trash everywhere.	Wastes, Hazardous or Solid
280	1	I am well versed in preparation of Environmental Assessments and Environmental Impact Statements for FHWA projects. In all of the projects that I've helped to document and clear, I have yet to argue that year-round litter, abandoned vehicles, etc constitute "No Adverse Effect". How the heck can BLM environmental staff justify such a conclusion? I assume that those employees are aware that cumulative effects must be taken into account. Thus, every year that the travesty is allowed to continue, the amount of damage multiplies.	Wastes, Hazardous or Solid
300	3	The EIS and the subsequent agreement need to reflect full impacts beyond the event itself and the full effects of the use of public space. While the Leave No Trace program only applies to the event itself, some analysis in the EIS needs to analyze a full Leave No Trace policy which would encompass much larger spatial and temporal windows than for the event itself.	Wastes, Hazardous or Solid
300	10	Burning Man practices a Leave No Trace set of principles - see REC-21 of Section 1.3 of the 2012 EA. The 2012 EA addressed both onsite and offsite cleanup in Section 2.1.10, under Pro-posed Action, in less than 2 pages. This is insufficient for an event of this size and must be ex-panded in the EIS. While the EA in its Proposed Action called for a residual onsite trash limit of 1.0 sq. ft./acre, much anecdotal messaging indicates this to be exceeded in many spots, especially when surfaces are scraped to reveal hidden trash. The EA Proposed Action called for offsite trash cleanup on and beside roads, but this does not include the Black Rock playa itself (see Section 3.10 of EA). The applicant must be made re-sponsible for cleanup of "fugitive" trash across a much larger area within, and adjacent to, the playa; such trash is usually caught in plants at the perimeter of the playa. "Offsite" should also encompass the playa roadway into the Burning Man site itself.	Wastes, Hazardous or Solid

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300	11	Although the emission of vehicle wastes such as oil, A/C fluid, and other fluids are controlled by driving restrictions at the event itself, the sheer number and size of vehicles coming to the event leads to more idling. This may be a condition that grows non-linearly with the number of vehicles due to increased wait times per vehicle. Waste fluid volume increases with idle time. This must be accounted for in the EIS analysis of impacts of an increased attendance limit.	Wastes, Hazardous or Solid
300	12	The EIS must look closely at the human waste component of the event. Are the facilities adequate? Are they available without prolonged waits? How many porta-potties, sani-huts or other sanitation facilities are imported for the event? How is the waste disposed? Where is it disposed? How many trips by vehicles/trucks are planned to keep the sanitation in compliance? Is this yet another cost to highway maintenance and sanitation disposal that becomes an undis-closed public cost? We have recently been alerted to "deep playa" impromptu events (https://www.rgj.com/story/life/arts/burning-man/2018/07/18/burning-man-ravers-stop-pooing-playa/792541002/). These impromptu events seem to be mostly uncontrolled and present additional challenges to human waste control when conducted sufficiently far from the closed area of the event. The permit applicants must either address banning such events or address how they intend to control human, and other, waste in conjunction with them.	Wastes, Hazardous or Solid
308	1	Leave no trace is truly a thing the community is passionate about. I have been amazed to read about the efforts before, during, and after the event. It was very interesting to learn and participate in eco-friendly ways to dispose of grey water and clean water and ways to keep the unique environment pristine.	Wastes, Hazardous or Solid
319	18	The number of portapotties and trucks to empty them is already very high. The current participant population requires almost constant emptying of the potties to maintain sanitary conditions. I believe that the vendor, United Site Services, has pulled equipment and personnel from a large area in order to have the ability to keep up with the waste. Whether they can provide additional facilities for 20,000 more people should be considered.	Wastes, Hazardous or Solid

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319	17	<p>Release of grey or black water onto the surface of the playa is prohibited but does occur. The extent of this across the city is going to vary due to several factors. For black water (urine or fecal material), the individual "going" on the playa is likely very dispersed except at large group gatherings where portapotties may not be proximal. For BRC large burn events (particularly the Man and the Temple, both of which attract crowds that stay in the area for a few hours), ensuring that sufficient potties are available can work to reduce this and should be part of operational plans with the concept included in the action. Theme camps with large events should provide additional potties during the event. This may also need to include some of the larger and more popular private art burns. In the larger group camps (theme or not), there may be some provision for in-camp facilities to address this (and camp potties can be rented from the vendor). Patrols around the theme camps are also likely to notice (if the residents have not) any leaks from RVs that need attention and that does require additional volunteer presence (probably from the BR Rangers who are moving through the city) to see and discuss with the camp. One other thing that is not currently allowed is the disposal of private camp potties into the large ones provided for the event. This does not lead to small camps being able to dispose of their black water wastes and may lead to illegal dumping. The community portapotties should be able to accommodate these inputs as they are appropriate wastes.</p>	Wastes, Hazardous or Solid
319	16	<p>Loose objects blown by the wind or dropped accidentally (or unthinkingly) by participants while traveling across the event site. The BRC attempts to address the source of this detritus in its participant information material, which may be the best way to address this problem.</p>	Wastes, Hazardous or Solid
319	15	<p>Detritus from planned burns of major installations (such as the Man and the Temple) or of events at theme camps that attract large numbers of participants for several hours which also includes remains of fireworks, the trash (cups, paper, cigarette butts, cans, etc). left behind by spectators to those events, and sanitary concerns of urination or defecation when participants do not choose to go to the portapotties.</p>	Wastes, Hazardous or Solid

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319	20	<p>The problem of solid waste being left behind on playa may be a result of the changing demographics of the event due to the 2012 increase in population. BRC clearly needs to examine this in terms of how they mean to progress forward. None the less, the existing level of bagged solid waste that shows up along Hwy 34, SR 447, and in the communities along the way to Reno via I-80 is a continuing issue that would only get bigger with more people. BRC providing trash pick-up on playa is not a viable option; at large events other than BME where I have participated, this has only partially ameliorated the trash issue. In part, the types and volume of things Burners dispose of outside of the normal paper/plastic/metal would confound any attempt to set up large disposal bins. The current burn platform restrictions are for scrap wood only. Most camps do not have that kind of wood until they take apart any structures they do not intend to reuse. There was (I am not sure it continued because like most everything else at BME it required volunteers to run it) an effort to salvage usable lumber beginning late in the event (when camps were taking things down) to use in the future or donate. Again, the volume of usable or non-usable lumber would increase under the 100,000 person cap, and the current recycling or disposal of this is not optimal. A program to address recyclable wood and other materials should be considered to address the problem of it being left on playa.</p>	Wastes, Hazardous or Solid
319	21	<p>The latest issue for solid waste is the number of bicycles and other gear abandoned when participants leave. This was not a large issue with the earlier smaller population; whether or not it is a result of participants lacking the ethos of BME and simply not caring about their impact once they have enjoyed the experience, or some other factor of human expression does not negate the problem (and cost to BRC) of removing these objects. The EIS should look at the progression of left-behind items in camps (both theme camps and in areas of open camping) since 2012 to be able to assess the likelihood of this becoming more of a problem in the future. While some of the materials (particularly bicycles) can be donated to charities, their transport and the arrangements will require additional effort from BRC.</p>	Wastes, Hazardous or Solid
319	22	<p>Many BME participants keep their food and drinks in ice chests and obtain ice from the established vendors. There is some confusion among participants as to what type of ice chest water is considered grey water (containing food or soap residues), and that where the ice chest only contains bottled or canned drinks and the melted ice generally is water and playa dust. The EIS should discuss the different means of disposal needed for each type, with a requirement that BRC include that in the participant information.</p>	Wastes, Hazardous or Solid
8	12	<p>6. What evidence of soil/groundwater contamination over-time and/or impact to invertebrates from such?</p>	Water Quality and Supply (Surface and Ground)

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8	15	9. Does the massive drawdown of water from Fly Ranch for the event have any effect on the groundwater basin of the surrounding valley and/or beyond? How is that being measured monitored?	Water Quality and Supply (Surface and Ground)
27	5	Impacts at area hot springs. o How effective have current tactics been at mitigating impacts? Do they need to be updated? o Will those same tactics be viable with increased population?	Water Quality and Supply (Surface and Ground)
27	9	Effects increased population size would have on potable water levels for Gerlach. Increased population numbers, accompanied with the current increased usage in Outside Site Services, could have a negative impact on potable water for Gerlach. Will water usage be adaptive to years of drought when the spring filling the potable water tanks has low output?	Water Quality and Supply (Surface and Ground)
77	3	How much water is needed for 70,000 to 100,000 visitors to Burning Man, both for the week of the festival and for the weeks of preparation and for cleanup afterwards? What are the sources of the water for the Festival? What impacts are Festival water demands having on water supplies at Gerlach and on springs around the Black Rock Desert?	Water Quality and Supply (Surface and Ground)
22	1	The project may be subject to BWPC permitting. Permits are required for discharges to surface waters and groundwaters of the State (Nevada Administrative Code NAC 445A.228). BWPC permits include, but are not limited to, the following: * Stormwater Industrial General Permit * De Minimis Discharge General Permit * Pesticide General Permit * Drainage Well General Permit * Temporary Permit for Discharges to Groundwater's of the State * Working in Waters Permit * Wastewater Discharge Permits * Underground Injection Control Permits * Onsite Sewage Disposal System Permits * Holding Tank Permits Please note that discharge permits must be issued from this Division before construction of any treatment works (Nevada Revised Statute 445A.585). For more information on BWPC Permitting, please visit our website at: https://ndep.nv.gov/water/water-pollution-control/permitting . If further questions, call (775) 687-9418, and ask to speak with the Permits Branch. Additionally, the applicant is responsible for all other permits that may be required, which may include, but may not be limited to: * Dam Safety Permits - Division of Water Resources * Well Permits - Division of Water Resources * 401 Water Quality Certification - NDEP * 404 Permits - U.S. Army Corps of Engineers * Air Permits - NDEP * Health Permits - Local Health or State Health Division * Local Permits - Local Government	Water Quality and Supply (Surface and Ground)

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45	4	is the water being used from Fly ranch purchased? What if there is a significant drought and 16,500 million gallons cannot be provided without endangering the water reserves of Fly Ranch. In Nevada we have seen droughts last over 7 years, and to allocate 16,500 million gallons of water no mater what is extremely reckless.	Water Quality and Supply (Surface and Ground)
27	1	o Long-term ongoing study of aquatic life	Wetlands and Riparian Areas
8	14	8. What has been impact if any to the foxes and other wildlife that live in and/or use the dunes?	Wildlife
45	3	so far the native plants as well as native artifacts have not been disturbed. That would change if BRC is allowed to expand beyond 70,000. We need to be very careful of the historic sites, the wildlife and all things that are unique only to the playa.	Wildlife
77	4	What are the impacts of the current size Festival on wildlife an wildlife habitat?	Wildlife

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258	I	<p>There is only one extant study examining the relationship between the activities of the Burning Man event and their impacts on branchiopods. Sada and Adams in 2006-2007 conducted a study on the impacts of various Black Rock Playa recreational activities on the persistence and viability of branchiopod eggs and ephippia. Their results showed a 50% decline in fairy shrimp egg/ephippia abundance in the Burning Man camping areas, and a 30% decline in such abundance in the Burning Man "road" areas. This difference was attributed to two reasons: first, the "road" was almost exclusively traveled by foot and bicycle traffic, not vehicles; and second, the periodic spraying by water trucks for dust control which "appeared to strengthen playa substrates."⁷ It should be noted that Sada and Adams also conducted studies outside of the Burning Man event boundaries, and reached several paradoxical conclusions. One experimental study found no relationship between repeated vehicular traffic and branchiopod egg abundance; while another observational study found a stronger relationship. Indeed, the study raised more questions than provided answers. Some of the questions raised by Sada, et al., and suggestions they provide for future research, include:</p> <ul style="list-style-type: none"> · What is the relationship between spatial distribution of playa substrate matrix and egg abundance? · What are the wind dispersal dynamics of branchiopod eggs? · How much dust control water will provide benefits to playa substrate stability, and how much is too much such that it will soften and potentially fracture branchiopod eggs? · "Sampling a greater proportion of the playa to quantify spatial variability in egg density... will provide better insight into the influence of playa use on long-term viability in branchiopod abundance." · A multi-year study across different hydrologic conditions (wet years, dry years) and across undisturbed and disturbed habitats would help researchers understand what the background level of branchiopod disturbance is on the playa, versus anthropogenic disturbance. · What is the effect on the egg bank of annual, repeated disturbance? <p>5 Belk, D. 1998. "Global status and trends in ephemeral pool invertebrate conservation: implications for Californian fairy shrimp." in Witham, C. W., Bauder, E. T., Belk, D., Fennen Jr., W. R., and R. Ornduff, (Eds.), Ecology, Conservation, and Management of Vernal Pool Ecosystems-Proceedings from a 1996 Conference. California Native Plant Society, Sacramento, California. pp147-150. 6 Plissner, J.H., Haig, S.M., Oring, L.W. 2000. "Postbreeding Movements of American AVECETS and Implications for Wetland Connectivity in the Western Great Basin." The Auk 117(2) pp. 290-298. 7 Sada, et al., 2013. p. 290.</p>	Wildlife

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258	2	<p>While the study has interesting findings, it must be kept in context. Burning Man utilizes around 3% of the overall Black Rock Playa for its activities, so as the study points out, "The strong reproductive capacity and potentially large size of playa populations also suggests that egg loss from disturbance of small portions of a playa may moderately affect adult abundance."⁸ In other words, it's not likely that Burning Man's activities at the time of the study were causing significant population-level effects on branchiopods and their predators. Nonetheless, the study points to potential impacts to local and migratory fauna. It is important to remember that this study was conducted over ten years ago, when Burning Man was an event roughly one half of the size it is today, and thus approximately 40% of the proposed size under a new ten year permit. Additionally, there was little if any vehicular use of the Burning Man site at that time, whereas the proposal for the new ten year permit includes up to 1,000 vehicles being utilized on-site.</p> <p>Unfortunately, one thing that becomes clear from the study is just how little is known about both the impacts of recreational use on the playa to branchiopods, and potential mitigation techniques. It would present a challenge for us to suggest specific mitigation techniques in this comment letter, and it would be foolhardy to lock into specific mitigation techniques for branchiopods without a scientifically rigorous backing. As a result, we are recommending that BLM and the project proponent include the following items in an alternative in the Draft Environmental Impact Statement:</p> <ul style="list-style-type: none"> · The project proponent and BLM should fund a multi-year study which examines: <ul style="list-style-type: none"> o branchiopod dynamics on "virgin" or unimpacted playa; o impacts to branchiopods from the activities of the Burning Man event; o possible mitigation techniques to minimize disturbance to branchiopods. · The Draft EIS should establish a mechanism whereby the project proponent could then incorporate the most successful mitigation practices into ongoing operations through adaptive management. ⁸ Id., p. 291. This would present an opportunity not just to minimize the impacts of the Burning Man event, but also to contribute to the global knowledge of mitigating the impacts of recreational use on branchiopod populations, about which little is known at this time. 	Wildlife
262	2	I didn't find a environmental impact statement that shows any credible study into the long term effects on the black rock desert and the wide life, especially the mustangs, deer and sheep, from the tens of thousands of vehicle trips, generators, and planes. For two months every summer the quiet of the desert is lost to these animals which has an effect.	Wildlife
321	1	Referencing the Desert Research Institute report from March 2013. It states the impact the event is having on the B.Mackini. The impact the festival has on intact egg abundance may be biologically important & influence the abundance of adult B Mackini, I subsequent years. Statistical differences between B. Mackini egg density before and after the festival were highly significant in camp areas. Preserve & protect the fairy shrimp for future generations.	Wildlife

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Scope of Burning Man Event			
I	2	Last year there was some confusion leading up to ARLISS/XPRS as to who was allowed on the playa and what entrances were open during BM clean-up operations. We had a large number of students and out of "state" fliers not knowing if the playa was going to be open or how and where to gain access to the playa. Better communications to all users of the playa is a must!	Conflicting uses during Event
I	I	During my years flying out at BR it seems like each year Burning Man keeps getting bigger. Every few years, we Rocketeers, have been asked to make accommodations for Burning Man. Aero-Pac has held the same launch dates (x# weekend in June, August and September) Our September launch is a 'combination' launch consisting of ARLISS and XPRS. ARLISS is a launch that involves 55 plus universities teams launching payloads and flying their own rockets. The dates at which ARLISS is held is because it is when airline tickets are at a low cost. To move this date would be a financial burden to the students and Universities.	Conflicting uses during Event
4	I	I have been launching rockets at the Black Rock Desert site since 1991. This site is the premier launch site for hobby rocketry in the US.	Conflicting uses during Event
4	2	Examples of how important this site is including: * The FAA has given Special Use Airspace designation to the airspace over the Black Rock launch area. It has designated the airspace to be an official Amateur Rocketry Launch Site. * Educational rocketry activities occur every year at the Black Rock Rocketry Launch Site. This includes University teams both national as well as international competing in competitive engineering rocketry related challenges. Some of today's US Astronauts have participated in these activities at the Black Rock Rocketry Launch Site. * The Tripoli Rocketry Association, an international organization, hold their annual Research launch at the Black Rock Rocketry Launch Site. Tripoli has had wonderful relationships with the BLM, acting as the sole group for organizing BLM permits for the use of the Black Rock Rocketry Launch Site. * The attendees of the rocket launches at Black Rock Rocketry Launch Site are good stewards of the Playa. They take care to follow effective "leave no trace" protocols.	Conflicting uses during Event
6	I	ARLISS began the world wide program of science oriented student rocketry payloads in 1999 based on successful amateur rocketry activities on the playa that date back to the early 1980s. Over two thousand young scientists from the United States and around the world have participated in the program - and are now responsible for over 100 satellites placed in Earth orbit and contribute every day to building products and services that improve our lives on Earth - and in space. The proposed extensions in time and extent of Burning Man threaten the very existence of this program and hence damage our ability to train young scientists and engineers.	Conflicting uses during Event

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10	2	I believe that restricting access to public land even more in the future than has been allowed in the past, for a commercial activity, is unfair to us who have been effected by this activity for so many years already. We, as a group, used to fly rockets on the Labor day weekend before Burning Man moved onto the Playa. This weekend is as desirable to us as it is to anybody who desire to have a long weekend event. As Burning man attendance grew, we were being blamed for trash being left by their participants. Our solution was to move our activities to the following weekend. In time, the growth of burning man required extra weeks to clean the Playa. Employees of the burning man organization are still on the Playa into October, cleaning up. Our rocket activities have been pushed to the last two weekends of September even while Burning man is still cleaning the Playa.	Conflicting uses during Event
10	3	I feel, as others do, that expansion of the Burning Man Festival may not only increase the area of their activity but also extend the cleanup time for them, which in turn may block free access to our launch sight in our most favorable time of the year.	Conflicting uses during Event
10	1	The Blackrock Playa has been found to be the location that best suits our activities with respect to airborne and ground activity. September is the month with the clearest and calmest weather both at ground level and at high altitudes.	Conflicting uses during Event
16	1	Weather and conditions at the Black Rock Desert are always a challenge, and it is clear from my reading that September is the month for activities there. I would consider it most unfair if a private, commercial event were allowed to block access to this unique and special public land. It would be particular unfair if the educational and research activities that have been using the land since before Burning Man existed were pushed off the land.	Conflicting uses during Event
17	1	It is of course federal land and should be open to all of us to use in ways that respect the area and mother nature, but not taken over by one group who is seeking to get almost exclusive "ownership" of the area for their own use.	Conflicting uses during Event
17	2	The long extended time period they want to lock up the access to the playa is in fact becoming a monopoly use of the area now, and they have been making a larger presence on the dry lake each year since they first showed up there.	Conflicting uses during Event
20	1	Black Rock City LLC ("BRC") has requested a 10 year permit (from 2018 - 2028) which outlines their plan for use of BLM managed land - the "Black Rock Desert", "Black Rock" or "The Playa" for Burning Man (BM). Their plan will limit access to the lands and restrict citizens from accessing one of the most precious resources we have in the northwest and is in violation of its own 10 principles [1]. Furthermore the proposal will terminate access to the only FAA recognized and designated formal airspace above the Black Rock Desert for High Altitude Experimental Rocketry.	Conflicting uses during Event
20	6	In 2017 TRA members were granted restricted access to the Playa due to the Burning Man event, an outline of the access areas is provided below. The AeroPAC, BALLS, and FAA Center location (LLC319050) were inaccessible to TRA members without a special badge to be shown to BLM personnel. BRC built a city out of the Playa.	Conflicting uses during Event

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20	14	Access to 12mi playa should not be blocked by their event throughout the summer months and access to BLM land and the Black Rock Desert should never be limited to one group or one organization. It is imperative that any future land use or permitting plan made by Black Rock City, LLC or the Burning Man Project include language and provisions that will allow other organizations to have access to their scheduled events through the Burning Man closed zones, on playa roadways, during the Burning Man setup, event, and cleanup process.	Conflicting uses during Event
21	1	The airspace above the Black Rock Desert has been recognized by the FAA as the formal High Altitude Rocket Launch area in the country, so there are no alternative sites for high altitude rocket flights. Burning Man currently restricts access to the Playa for its three week run, plus the set up and cleanup times. We have coexisted with Burning Man at its current size, but allowing Burning Man to expand, ultimately to 100,000 people, will severely limit anyone else's access to the Playa, and would likely cause serious ecological damage to the area. Please do not allow expansion of a private business to restrict access to our public lands. Thank you for providing this opportunity to comment on this problem.	Conflicting uses during Event
22	1	Under the current conditions, I believe that we could continue to co-exist on the playa, however, the conditions requested in the BRC SRP permit will severely limit Amateur Rocketry's access to the playa and may in fact eliminate the event that I have attended for the past 20 years. Specifically, the 70-day setup/cleanup period added to the event time of 9 days means that 79 days of prime late summer conditions will be removed from the available flying time. That span of time covers two major rocketry launches. Many years, such as 2017, the playa does not completely dry up until late May, and the northern reaches are often permanently moist and soft throughout the summer. By extending the perimeter fence to 10 miles, there will be practically no available playa for High Altitude Rocketry.	Conflicting uses during Event
22	2	High Altitude rocketry should be given priority over BRC's expansion plans because we operate both on the playa and within controlled airspaces and are currently constrained by the FAA and DoD to a few launch points in the central portion of the playa. We cannot move further north without incurring further additional negotiations with two more government agencies (FAA and DoD) as well as the BLM. This is an undue burden to satisfy BRC LCC's expansion. It bears repeating the conditions on the northern end of the playa are unsuitable for rocketry activities due to surface conditions.	Conflicting uses during Event

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24	1	I sincerely hope that you will not take this opportunity away from us and other families as well. Burning Man is what it is and I have total respect for that, but that shouldn't mean that nobody else gets to use the public land just because their event happened a few weeks earlier. We launch in a completely separate area of the playa, and frankly I think they cause much more disruption to us (by all of the dust they generate) than we do to them. So I don't understand why they're even concerned about our presence, this past year was the first time we had to display any permits (which we did even though nobody ever questioned us), other than the fee we pay to be on the playa at the launch.	Conflicting uses during Event
26	1	The terms of Burning Man's request(s) disturb me. The playa is usable for recreation roughly 6 months a year. This will restrict the playa from every other user for HALF that time. Great effort was made to transform the playa into a National CONSERVATION Area; now, it is turning into exclusive use for a revenue event. Sadly, Burning Man is too large already by an order of magnitude. We've been enjoying the desert since 1982. Burning Man has transformed the quiet solitude and desert beauty into a slice of the Bay Area.	Conflicting uses during Event
29	1	In recent years I have seen Burning Man growing in size and now I fear that the economic juggernaut that they have become will be restricting the rocketry community access during the short period of time when lake bed conditions are the best for our activities. I believe that the Black Rock Desert is large enough for both groups.	Conflicting uses during Event
30	1	America, nor the BLM, should put roadblocks in the way of anything that concerns the STEM fields. I have advanced my technical knowledge trying to design a high performance rocket that can only be flown at the Black Rock launch site. Many Universities also use this site as it is the only one in North America that can be used for high altitude rocket flights without paying a large fee. As a Director of Engineering for a large communications company, I can tell you it pains me that we have to hire non-Americans for some of our highly technical jobs due to no Americans being available with those talents. We all need to encourage anything that can get more Americans into the STEM fields.	Conflicting uses during Event
32	1	I am writing on behalf of the National Association of Rocketry to advocate a continuation of the status quo of many of the provisions for the Burning Man special use permit. The National Association of Rocketry supports the shared use of the playa throughout the portion of the year in which it is dry enough to support uses such as high-altitude rocketry.	Conflicting uses during Event
33	1	Use of Black Rock playa has been one of the most important factors in the fulfillment of our mission. The playa provides a unique area, both isolated and yet nearby to settled infrastructure, that allows testing of these very unique projects while maintaining a controlled and safe environment. We, the UHCC, would not be able to continue doing what we do if the playa were not available for this event! There is no other location capable of holding an event like ARLISS that we could travel to within our budget constraints. And at that time of year.	Conflicting uses during Event

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34	1	I am writing you to ask that you not favor the recent request by Burning Man to restrict access to the Black Rock Desert Playa. I drive from Austin Texas every year to enjoy this beautiful area with my family and friends. In my opinion, this playa is a special place and should not be reserved for any one entity, especially a commercial type adventure like Burning Man.	Conflicting uses during Event
37	2	One hundred thousand people will certainly cause significant ecological damage to the playa. Remember, this is the same playa where we (rocket fliers) are required by the BLM to fill in tire tracks in case of rain and all remaining trash picked up after our launches must not overflow an area of about 1 square yard. To accommodate the significantly larger Burning Man event the Burning Man setup and clean-up times will be extended by weeks, both before and afterwards. As it stands now, access to the playa is badly restricted during some of our prime flying time of the summer. Any substantial increase in the Burning Man restrictions could effectively wipe out our flying season, even though the FAA recognizes and has designated the airspace above the Black Rock Desert as the formal High-Altitude Rocket Launch area in the country.	Conflicting uses during Event
37	3	Please consider that all weekends in September are used by a variety of rocketry groups. Groups who perform many research and educational events which need access to the Playa. I hope that BLM can come up with an equitable solution to continue to allow all public access of public lands for our launch events that, by the way, predate the Burning Man event.	Conflicting uses during Event
38	2	The FAA has designated the airspace above the Black Rock Desert as the only High Altitude Rocket Launch area in the country. The Black Rock Desert is the only spot in the United States where the best and the brightest rocket engineers can fully test their mettle. For this reason, full access to the Black Rock is crucial to the development of the next generation of space explorers. Space science provides a much more compelling public interest than any commercial use ever could.	Conflicting uses during Event
40	1	I would like to express my opposition the proposed Burning Man Special Recreation Permit as it is currently drafted. As a recreational user of the Black Rock Playa for over the past two decades, I have personally witnessed the elevated effects of the ever-larger Burning Man events; the extensive environmental impact which result in increased mitigation efforts after the event.	Conflicting uses during Event
42	1	There are many good people who attend, but the group as a whole feeds in to a selfish mindset of entitlement that takes away from the general public and usefulness of this supposedly open land. I know offroaders, hikers, land sailers, and rocketeers all love to make use of this land. So why does burning man think they own it? How can they preach sharing and openness when they are in the midst of inserting their people into the Gerlach town board and making every other move they can to take over? How can they preach loving the earth when they leave so much trash, bicycles, and indeed even abandoned trailers behind?	Conflicting uses during Event
43	5	In 2017 TRA members were granted restricted access to the Playa due to the Burning Man event, an outline of the access areas is provided below. The AeroPAC, BALLS, and FAA Center location (LLC319050) were inaccessible to TRA members without a special badge to be shown to BLM personnel. BRC built a city out of the Playa.	Conflicting uses during Event

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45	1	I am very concerned by the commercial enterprise known as Black Rock City LLC, requesting to encompass a larger portion of the playa and thereby restricting access to responsible, non-profit organizations. By granting Black Rock City LLC their request, playa access will be restricted for a longer period of prime-time and severely impact the use by others that have responsibly used the playa for many years. Some of the current organizations which will be impacted represent academic programs. This may also eliminate the only high altitude rocket launch area in the USA.	Conflicting uses during Event
46	1	I'm writing to register my opposition to expanding Black Rock City's (BRC) area of (and time of) control on the Black Rock Playa (BRP). I fly rockets on the play during the summer months, with my club (AeroPac), and have done so for 15 years. If BRC is expanded from 5 to 10 miles in diameter, our launch and recovery area will be further decreased in size. Also, if they are given exclusive access to the playa for additional time, our launches would not be permitted, and that would be a loss to the rocketry community and rocket scientists in general.	Conflicting uses during Event
48	1	This email is being sent as I recently learned about the extended time period the Burning Man event will be taking in the coming years. This directly interferes with a wonderful event put on by the Tripoli Rocketry Association.	Conflicting uses during Event
54	4	There's no reason that our groups cannot coexist within the Black Rock Desert, but it requires that no single group be so dominant that it restricts the access of the others.	Conflicting uses during Event
54	5	The Tripoli Rocketry Association is very interested in working with all Black Rock Desert stakeholders to find a mutually acceptable solution.	Conflicting uses during Event
60	1	Please do not unduly restrict access to the Black Rock Desert by granting long-term, exclusive use permits to any one organization. I am writing this as a member of both the Tripoli Rocketry Association and the National Association of Rocketry who has attended several large rocket launches on the Black Rock Desert (BALLS).	Conflicting uses during Event
61	1	Granting a permit that restricts the use of the Black Rock Desert for a long period of time will prevent groups such as EWU Rocketry from testing their Engineering skills at rocket launches such as BALLS for at an affordable rate.	Conflicting uses during Event
66	1	As you're aware, the unique conditions of the Black Rock Playa combine to make an area unlike anywhere else in the world for the amateur rocketry hobby and student groups studying rocketry. Large open spaces on the ground, and a waiver for the airspace controlled by the FAA and Department of Defense are simply unavailable anywhere else.	Conflicting uses during Event
66	3	The BLM's purpose is to manage PUBLIC lands, which the Black Rock Playa is a part of. If BRC, LLC is allowed to expand to the scope that they are requesting, the general public will lose access to an even larger portion of this public land for a majority of the time that it is accessible every year.	Conflicting uses during Event

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66	2	The rocketry launches have predated Burning Man's use of the Playa, and since Burning Man came to the area their event has peacefully co-existed with ours. However, their request to move the perimeter of their event to the North will put an undue burden on our rocketry events, as we can't move any farther North due to existing launch points specified by the FAA and DoD.	Conflicting uses during Event
67	1	I respectfully ask you do nothing to preclude activities conducted through the Tripoli Rocketry Association on the dry lake bed also used by the Burning Man people.	Conflicting uses during Event
100	3	Because of the deterioration of the playa since 1997 when the land speed record occurred, the future generation will not probably ever be able to view a land speed record on the playa.	Conflicting uses during Event
2	7	To have the time frame extended to a total of 80 days is just ludicrous. This Festival, according to the 'Settlement Agreement' is only supposed to be an eight (8) day event. Due to challenges with the influx and egress of traffic, BLM has extended this to ten (10) days; this extension is monetarily detrimental to Pershing County. BRC has already shown they will refuse to cooperate with the Pershing County Sheriff's Office for any overages outside of the alleged eight days of the event. This is evidenced by their refusal to pay the invoice for overages from the 2016 Festival (These documents are public and can be provided if needed). Now they are asking for a total of 80 days? And in that time, the majority of the summer, to have the EIS come with a Temporary closure from BLM to keep the general public citizenry from using a vast portion of the usable space of the Black Rock Desert? How is this a benefit for the public who are supposed to be able to use the Public Lands?	Event Duration and Timing
2	8	For a Festival that proclaims to be a 'Temporary' city, BRC sure seems unconcerned with denying the Public access to Public Land. Would it not be more appropriate for BRC to stay within their current time frame or better yet, to lessen that time to a more Public friendly thirty (30) days total for build up, Festival and tear down? Wouldn't this fit more within the Burning Man mantra of Radicalism? After all, they employ well over 1,000 personnel, either paid or volunteer specifically for this Festival. That should be more than enough time to radically provide for the main effigy, the 'Man', since BRC expects all participants to be 'Radically Self-reliant'. The 'Man' is built long before it is installed at the Festival. 80 days also does not stay within the Burning Man principle of Immediacy. 80 days is almost a quarter of the calendar year, and is by no definition 'immediate'.	Event Duration and Timing
20	13	BLM should curtail the setup/teardown period to 1 week as has been done over the past 10 years to maintain minimal impact to the Environment and if BRC cannot accommodate this, then they should move their venue from the Blackrock Desert to a new location.	Event Duration and Timing
20	9	Given the amount of trash and debris that has been left on the Playa, rather than having 35 days before and after the event for clean-up, can't BRC restrict this to the previous 1 week prior and before? If BRC uses the power of social media as they have for their bike clean-up, there is no reason they need 35-days prior to the event for setup. If BRC is claiming they need 30 days to clean up their event then by their own admission it is severely impacting the playa.	Event Duration and Timing

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21	4	the duration which includes their set up and so called clean up of the total event way out of proportion to equal opportunity for others to have access to that area.	Event Duration and Timing
32	2	The materials provided by the BLM that describe the new permit do not clearly articulate the exclusive use requirements that the Burning Man group is requesting. Specifically, is the permit going to grant exclusive use of the 10-mile radius area for 35 days prior, 8 days during, and 35 days post the Burning Man event? If so, then it will effectively eliminate a significant portion of our available flying season on the only place in the continental United States that provides high altitude airspace for hobby, educational, and amateur rocketry. If this is the case, then the National Association of Rocketry strongly opposes this modification to the permit. If not the case, then clarification is necessary to provide more detail on the exact footprint and dates associated with exclusive use of the playa.	Event Duration and Timing
43	8	Given the amount of trash and debris that has been left on the Playa, rather than having 35 days before and after the event for clean-up, can't BRC restrict this to the previous 1 week prior and before? If BRC uses the power of social media as they have for their bike clean-up, there is no reason they need 35-days prior to the event for setup. If BRC is claiming they need 30 days to clean up their event then by their own admission it is severely impacting the playa.	Event Duration and Timing
52	1	I am a visitor of the Black Rock Desert/Playa on a regular basis. I do not agree with allowing Burning Man and it's entitles to be the sole users or close to it thereof of the Black Rock playa for many years to come. If they need to control and spend that much time to prepare and clean up the environment they are occupying/using then maybe they are part of the problem. Giving them a week prior to and after should be more than enough time to take care of their business. I don't believe it's fair to restrict visitation and usage of the Playa to everyone that enjoys visiting our BLM land. They have taken something that was intended to "Make a Statement" and turned it into a business and disguised it as such. Please do not allow them control of OUR BLM land for their extended time request.	Event Duration and Timing
54	2	Tripoli takes great pride in leaving no trace when we depart the desert, but we are equally proud that we are careful to minimize damaging the desert in the first place. The population density of the Burning Man festival and the vast area it sprawls across necessarily damages the playa. That is why the cleanup period is so long, to attempt to restore the playa. But what about the desert floor flora and fauna? It's simply impossible to restore them within the time between annual Burning Man Festivals. When Burning Man cleanup is complete, hundreds of acres have been combed to remove human detritus, but along the way anything natural of the same size may also be removed.	Event Duration and Timing

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54	1	Although the Burning Man event lasts only eight days, preparation begins 35 days in advance and cleanup lasts for an additional 35 days after the end of the event, which happens on Labor Day. In other words, for 78 days, beginning in July and lasting until well into October, access to the desert playa for other activities will be significantly hampered for other users. As president of Tripoli Rocketry Association, my primary concern is how the restrictions that accompany such a 78 day period affect the use of the desert by all of the various other rocketry related groups, including schools, numerous Tripoli related clubs, and the people who rely upon Tripoli programs to learn Science, Technology, Engineering, and Math via rocketry. Our Black Rock Desert programs exist so that aspiring rocket scientists of all ages can learn science and engineering skills, test propulsion, explore composite material airframe designs, validate electronic payloads, and practice project management of large, complex rocketry projects designed to ascend above most of the atmosphere. In that role, the Black Rock Desert is completely unique. Nowhere else in the United States can amateur rockets fly so high with such a large safe area to descend within.	Event Duration and Timing
65	1	Extending the length of this event is irresponsible in too many areas to list, but that being said, Who is going to cover Security? EMT Response? Not to mention the restriction to the Public who's land it is to enjoy?	Event Duration and Timing
66	3	The BLM's purpose is to manage PUBLIC lands, which the Black Rock Playa is a part of. If BRC, LLC is allowed to expand to the scope that they are requesting, the general public will lose access to an even larger portion of this public land for a majority of the time that it is accessible every year.	Event Duration and Timing
66	4	I request that BRC, LLC's request to expand their boundary to the North be denied, so as to not impact the other users of the Playa. If BRC, LLC wishes to increase the capacity of their event, they should work to do this without expanding the substantial footprint that they already take on the Playa.	Event Duration and Timing
68	1	There has been and continues to be an effort to extend the "Event" for more than "eight days" by BRC despite their comments to the contrary. BRC has advertised the Event as a 10 Day Eve then backpedalled to a 9 Day Event, currently its being presented as "The Event would last eight days and culminate on Labor Day." Which acknowledges their efforts to expand it as NINE DAY EVENT.	Event Duration and Timing
68	2	The graphs, using BRC supplied data and terms, indicate BRC's OPERATION time frame as 13 days. Now BRC wants to add a "build week" as well.	Event Duration and Timing
68	7	Below are the UCR statistics for the time frame of Burning Man, August and September, rather than the State of Nevada for the year 2015. It required little effort and includes Pershing County before and after the Event (July and October) even though I was unable to compare the "8 day Event" that occurs in two different months, to only those eight days in Carson City. See attached for graph (BRC Staffing 2015-2017)	Event Duration and Timing

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194	5	With an increase in population would expect that the pre and post setup/dismantling would take longer than currently. Burning Man could easily need 2 plus months before and after rather than the five weeks before and after mentioned during the EIS meetings.	Event Duration and Timing
204	11	An increase in population would likely add significantly to the time needed to setup and dismantle the event. It seems that setting up and cleaning up after will take much longer than BRC's estimated time of five weeks. Please evaluate BRC's timeframe within the Draft EIS. Along these same lines, please detail how the temporary structures at the event will be erected to ensure their stability in light of the environmental and other physical conditions at the event.	Event Duration and Timing
319	9	There is already an opportunity for art installation and theme camp builders to arrive the week before opening of BME to allow for construction of the large art installations and theme camps and their infrastructure. This early arrival has been in effect for several years. In their presentation for the July scoping meetings, BRC's presentation The BRC action indicates that "as many as 30,000 staff and builders" would arrive in the week prior to the event. However, they also noted that 28,000 builders came in that pre-event week now, with 12,000 of those on the Saturday. The presentation stated that at a population of 100,000, the advance builder population would only increase to 30,000 with 15,000 arriving on the Saturday. So, of the projected increase of 20,000 participants/volunteers/staff, the change in numbers with early arrival in the week before the event is minimal and may have little effect on entry numbers beginning when the event opens on Sunday.	Event Duration and Timing
43	10	BLM should curtail the setup/teardown period to 1 week as has been done over the past 10 years to maintain minimal impact to the Environment and if BRC cannot accommodate this, then they should move their venue from the Blackrock Desert to a new location. Access to 12mi playa should not be blocked by their event throughout the summer months and access to BLM land and the Black Rock Desert should never be limited to one group or one organization. It is imperative that any future land use or permitting plan made by Black Rock City, LLC or the Burning Man Project include language and provisions that will allow other organizations to have access to their scheduled events through the Burning Man closed zones, on playa roadways, during the Burning Man setup, event, and cleanup process.	Event Duration and Timing
1	4	Can Burning Man grow (size wise) to the South. Each time they move more to the North it impacts the Rocket people more. I know they move BM around some, to study it's impact on the playa. It seems to always move to the North. Let's move them South and see how the playa to the North recovers.	Event Duration and Timing
1	5	Now it looks like Burning Man will "have" the playa for 35 days before, 8 days of BM and then 35 more days after. BM will "have" a large chunk of the playa for 78 days. Which also happens to be the best weather and best playa conditions. Which will make the 'other' user of BR to have to work around closed access points, coned off areas and 'operations' that are being conducted by BM personnel.	Event Duration and Timing

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6	2	August and September are unique moments on the Black Rock playa, where the world-wide unique characteristics of weather and the flat, dry playa surface combine to create the environment that allows ARLISS to exist. The remote location of the playa allows the FAA to create protected privileged airspace to protect the flight and recovery of the rockets and their payloads. Our student robots, after rocket deployment, usually parachute back to the playa and crawl back (with wheel or tracks) across kilometers of the dry playa to their target destination. There is nowhere else in the world with these unique properties for this activity - than Black Rock in September.	Event Duration and Timing
10	5	I propose that any activity, by and unique group, be restricted to two weeks total time allowed from setup to cleanup. I believe that this is fair and reasonable for everyone.	Event Duration and Timing
10	4	Perhaps restricting the total time that Burning Man occupies the Playa will allow other tax paying citizens to enjoy the Playa during the best weather of the year. Granted Burning man would in all likelihood need to speed up their cleanup time but this seems reasonable. They are a commercial activity, they need to step up and pay to have more people cleaning the Playa so that the clean up doesn't drag into October as it does now.	Event Duration and Timing
10	7	Another possibility may be to move Burning man to an earlier date, say August, or perhaps later in the year, say, October.	Event Duration and Timing
20	5	The only viable access times are those from June through September. Furthermore, due to global climate change, we're finding that this window is rapidly changing more towards July. The "Great Flood of 2017" rendered access to the entire Playa nearly impossible until late August. Even BRC spokesperson Jim Graham stated "It all depends on the month of July, when we could see rapid evaporation rates, leaving the Playa in its typical state." [5] The implication of this proposal is that access to the Blackrock Desert will only be for those who have paid for a Burning Man ticket. If rain does occur again, based on the above, no other events besides Burning Man will be possible on the Playa.	Event Duration and Timing
43	4	The only viable access times are those from June through September. Furthermore, due to global climate change, we're finding that this window is rapidly changing more towards July. The "Great Flood of 2017" rendered access to the entire Playa nearly impossible until late August.	Event Duration and Timing
43	3	Burning Man is scheduled for Labor Day 2018 (Monday, September 3); the event would occur from Monday, September 3rd through Tuesday September 11th. Setup and Teardown proposed 35 days before and after implies that from Monday July 30th through Sunday October 16th access to the playa would be severely limited.	Event Duration and Timing
49	2	The week after Labor day is the best time of year for the Japanese Teams to attend due to lower airline costs. The playa is normally dry at this time of year, and calm weather conditions also help the students stay focused on education.	Event Duration and Timing

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2	6	Another issues is any expansion of the city-to include fencing, streets, acreage, airport etc.-will create a hardship for the residents of Pershing County, as well as any other member(s) of the public who use the desert, when it is passable, to traverse between properties they own in Pershing County and adjacent property in Washoe County. In the past, several residents of Pershing County have been detained by both BLM Rangers and BRC personnel, (the latter whom have no authority to detain a person) for being outside of the perimeter fence. This is yet another issue that needs to be extremely specific in the EIS as to what can and cannot happen and come with penalties for violations. This will also need to be handled during the planning and discussion period for every years Festival.	Event Location
2	3	If the Org. was smart they would get off your land and move the event to private property.	Event Location
6	3	Thus ... expansion of Burning Man, particularly to the North or impacting access to that part of the playa, have the very clear potential to destroy this 20 year old program and thus damage our ability to train the desperately needed engineers and scientists of tomorrow.	Event Location
8	7	That said, if it cannot be refused and sent to private land, I would advocate for returning to the original numbers of the event (20,000 in my recollection) and the site pulled as far south as possible for a minimum overlap with the NCA boundary.	Event Location
10	6	Burning Man can move to the far north part of the Playa so that rocket activities can be located a little farther south but remain within a safe airspace.	Event Location
19	1	As this expands to 100K people it makes sense to move it to an area to better accommodate this population. Reno is already over populated, and people will have a hard time finding places to stay before and after BM. It's already VERY congested here. What happened to Utah?	Event Location
22	3	I suggest that BRC could compromise by limiting their footprint in the northern side of their planned space. Much of BRC's use of the north side of their current perimeter fence is unstructured, based on site maps and aerial photos of the 2017 event. Black Rock City could expand and completely fill their "circle" and remain within their current perimeter. The unstructured area could be expanded to the south. Additionally, restrictions could be placed on BRC LLC in their SRP to remove the northern part of their site and move the perimeter fence restoring access from the 8-mile entrance within two weeks (before and after) of the date of the event. This would allow the scheduling of rocketry activities around the event.	Event Location
29	2	If Burning Man needs to expand, perhaps it can expand more to the south and keep the northern and central areas open to the rocketry groups.	Event Location
46	2	Gosh why not let them move back to California, South of Owens Valley has plenty of Playa??	Event Location
46	1	Move Burning Man to a new playa, Mina or Luning.	Event Location

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49	1	The expansion of the BRC to the north would also impact this wonderful educational program as well. The ARLISS program draws students from around the world, who come to Black Rock and the ARLISS launch to fly CanSats on High Power amateur rockets.	Event Location
62	1	I feel that the BLM could help us by not issuing a 10 year permit. My suggestion is to rotate the location of the event so that it is in another county every other year or permanently. As much land as the BLM oversees I'm sure there are some other places for this event to take place, even if it is in another state. This event is set up and torn down every year so it should not be that big of a deal to rotate it around the state or the country.	Event Location
69	1	As Burning Man provides NO economic benefit to Pershing County, to the contrary if Burning Man/BRC LLC, a for profit California based corporation, left Pershing County and went elsewhere for the Burning Man Event there would then be an economic benefit due to cost reduction. There are multiple locations the Event can be held on either public or private lands outside of Pershing County.	Event Location
73	25	Washoe County, which has hosted Burning Man, could afford waiving a Festival fee, Pershing County can't. Moving the Event back to Washoe could be a viable solution.	Event Location
78	1	I appreciate the opportunity to comment. Without seeing a map of the planned expanded boundaries of the Burning Man event I am assuming that there are no clear arguments against the proposed expansion as the attached documents appear to indicate the expansion would likely be to the northeast and considering the event location for the last several years that expansion would still keep it well within the Playa where it shouldn't have much of an impact on wildlife directly.	Event Location
112	1	I can't imagine burning man any where else. The open lake bed is a perfect location for the art but also a perfect location to keep everyone aware of their surroundings. It is impossible to ignore what is in plain sight.	Event Location
301	1	Washoe receives the benefit and is better situated to host the event. With all of the empty BLM land in Nevada surely another location can be utilized that isn't in Pershing County.	Event Location
2	4	Based on our 'Settlement Agreement' Pershing County would need to have this population separated from participants and employees/contractors for BRC. This population has been an area of contention for quite some time between the Pershing County Sheriff's Office and BRC, as there is no independent mechanism to verify the population numbers that are provided by BRC. I have personally observed a lack of population count on several of the buses allowed to bring participants into the Festival. By not having a comprehensive way to verify the actual 'bodies on playa' number, population will continue to be an issue.	Event Size

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2	5	Over the past three years, several of the employees and contractors of BRC have required Law Enforcement contact. To leave these 'bodies' out of the population count gives an appearance the participant population is consuming all Law Enforcement resources. This portion of the EIS will need to be very specific to keep the population down to the number proposed by BRC and there should be some steep and severe penalties if they should go over the number, since it is in fact the number they are proposing to stay within. Any attempt by BRC to increase the population by any number whatsoever should trigger either a new EIS or whatever form of investigative mechanism available to the BLM at the time of the request for an increase, so as to make sure to find the ultimate impact to the environment and cooperating agencies. And again, there needs to be an independent person or company that can provide verification of actual numbers of 'bodies on playa' at any given time during the entirety of the closure order.	Event Size
7	3	Why the trend of constant growth? What is the appropriate amount? Doesn't everything become more problematic with growth? It would seem to make more sense for a 2 year hiatus to see if the playa conditions would improve or at the very least a reduction in population.	Event Size
8	4	This event has grown so far beyond any conceivable description of an "ordinary" SRP that I maintain it needs it's own category	Event Size
12	1	The impact on our area is already straining services and the environment, trash, debris, traffic, water, etc. Please consider a maximum hold on the 70,000 people.	Event Size
19	1	We've been informed the organizers would like to gain approval for 20,000 more participants. As a concerned Tribe, we would appreciate the non-profit lowering the number back down to 50,000. Even at 80,000 it's hard for our Biologist to access the Reservation to conduct their studies. With the dirt road so congested and the air pollution elevated, we keep our scientists here in Reno that week.	Event Size
21	3	The event has been allowed to grow much, much larger than the area can reasonably accommodate. Even if it were limited to 30,000 people there is a question about the environment being able to absorb the impact.	Event Size
25	1	I don't believe that you should give a permit for 100,0000 people. The impact on that area is already over the limit. To have that many people permitted, along with the "government officials, service vendors and volunteers, would be ridiculous. I was a " burner" and at 60,000, I witnessed the change in values and perspective for the event. It wasn't a positive change. It's a carnival with people who don't care about the environment and organizers that only value money. It's sad and sickening. If anything, it should be downsized.	Event Size

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28		I object to the proposal put forth by Burning Man to increase their event area by 561 acres and increase their participant level to 100,000. Public lands should be available to be used by the public and not closed for 77 days as Burning Man proposes. The Black Rock Desert is an environmentally sensitive area and no matter how much they try to clean it up after the event the impact of just the foot traffic on the desert floor from that many people is significant. I think that the BLM's goal should be to protect this treasure and not sell it to the highest bidder.	Event Size
31		Please do not increase the cap of the city. Every year more and more people who are not prepared come to the event and they do not share the same ethos as the general community. For example last year had a record amount of MOOP in the form of bicycles. The event can sustain a growth of well informed citizens; however the event cannot handle the growth of 30k people who do not give a crap about the event.	Event Size
31		I have attended thirteen BurningMan events starting in 1999 but have been unable to acquire tickets the last three years including this one. As you know they sell out within seconds. Clearly demand for this legitimate use of our lands is not nearly being met by BLM and it should be. It is appropriate at this time to remove the cap on the number of attendees or to at least increase and annually adjust it enough to fully meet public demand for this next period 2019-2028.	Event Size
40		It appears that a lot of the infrastructure & systems are overstressed, as it is. I would advocate a reduction not an increase in attendants, until these question are addressed and actions are taken. Charge more for the tickets rather than increase the population. One of the BMorgs replies has been in the past that they do not have enough volunteers. Not our problem.	Event Size
41		The B.M. event has gotten way to big. The highway system cannot sustain the traffic & neither can the desert.	Event Size
42		This place is over flowed with this many people.	Event Size
44		It appears that a lot of the infrastructure & systems are overstressed, as it is. I would advocate a reduction not an increase in attendants, until these question are addressed and actions are taken. Charge more for the tickets rather than increase the population. One of the BMorgs replies has been in the past that they do not have enough volunteers. Not our problem.	Event Size
45		what is the reason that 30,000 people need to be there a full week ahead of the event? I feel that this is an extremely large number just for setting up displays or stages.	Event Size
51		Burning Man also is very responsible in its stewardship of the environment. I whole hardly agree with allowing the event to grow in size.	Event Size
53		The massive size that this event has been allowed to grow to is destructive to not only the Black Rock playa, but to a great deal of the land on the perimeter of the dry lake as well. The size and duration of their domination of that location is not a fair distribution of use for the public lands we in the United States are all supposed to have access to and use of.	Event Size

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54	3	The steady growth of Burning Man is gradually squeezing out other stakeholders. Burning Man is now the ninth largest city in Nevada for a very short period of time and will soon exceed the population of Sparks.	Event Size
58	1	As a resident of Sparks I vote against increasing the participant size of burning man.	Event Size
63	1	The concern is: Can the event managers handle more attendants? Is growth of the event being calculated, measured & well planned for. It states in the BM survival guid that dealing with abandoned bikes stretches our already over-taxed resources. (pg 7)	Event Size
63	2	It appears that a lot of the infrastructure & systems are overstressed, as it is. I would advocate a reduction not an increase in attendants, until theses question are addressed and actions are taken. Charge more for the tickets rather than increase the population. One of the BMorgs replies has been in the past that they do not have enough volunteers. Not our problem.	Event Size
68	5	It should be noted the pre-Event population greatly exceeds the Pershing County population, and BRC seeks to expand both the pre-Event population as well as the Event duration and population significantly for a longer time.	Event Size
68	6	BLM has cooperated with BRC to achieve a lower payment to Pershing County for "all services" with a few simple words defining "peak population" as "paid participants" that deny Pershing County \$35,000 per year for each year the population exceeded 70,000. Which it has 2015-2017 a total loss, to date, of over \$105,000 not including the resulting effect to the CPI increase. Th possibly is an unanticipated consequence by BLM though clearly BRC has taken advantage of the situation.	Event Size
77	5	What are the impacts of the 70,000 to 100,000 size festival on local communities and counties, including medical, law enforcement, court, ambulance, etc. costs?	Event Size
98	1	Can the event managers handle more attendants? Is growth of the event being calculated, measured & well planned for. It states in the BM survival guide that dealing with abandoned bikes stretches our already over-taxed resources.	Event Size
108	1	Is the growth of the event being calculated, measured and well planned for. It appears that alot of the infrastucture and systems are overstressed, as it is. Adding another 30,000 attendants will not help the present situation.	Event Size
123	1	I am very concerned about the request for the increase in size of Burning Man from 70,000 to 100,000. This is so destructive to the playa as it is. No matter what they say they never remove all that they have brought in.	Event Size
125	1	I believe that Burning Man has already become too large to avoid not only negative impacts on the precious Black Rock Desert, but also to avoid the further impacts of "Burners" leaving tons of garbage around the area after the event.	Event Size
130	1	I think Burning Man should decrease it's population to 50K, it's getting to big for the small roads and towns leading to the event.	Event Size
131	1	Do not increase the number of attendees to the Burning man event. Already the public land, Blackrock, is experiencing negative environmental impact.	Event Size

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132	3	Third is increasing the size of the event also increases the size of the clueless tourist population and commercial entities operating camps and villages that cater to them and the wealthy elitists.	Event Size
133	1	Increasing the permitted size of the festival to 100,000 and expanding area of the festival site will have a devastating and irreversible impact to the environment.	Event Size
176	4	I think it would be beneficial for the public to know what may happen if BRC goes over their proposed action of 100,000 people on the playa? BRC has exceeded their population before and the BLM was not in a position to enforce much of any sanctions against BRC.	Event Size
194	6	We've been told that Peak Population will include all individuals on the playa not just ticket holders. We want to be sure that is not omitted or changed at some point.	Event Size
204	1	The maximum population for the Burning Man event should encompass all attendees, including paid participants, volunteers, service providers, vendors, contractors, and government personnel. All of these individuals stress natural and other resources on the playa and, therefore, ought to be accounted for when determining the direct and indirect impacts of the event.	Event Size
204	12	The BLM should consider the alternative of capping the event's population at 50,000 persons. The Burning Man event, at its current population, is a constant year-long stressor on local law enforcement, prosecutorial, and other agency resources in Pershing County. Preparing for the event and dealing with its aftermath is an endeavor that runs in a continuous annual loop for the Pershing County Sheriff's Office.	Event Size
219	1	I would suggest limiting the participation to 50,000 participants to decrease the stress on the Playa surface, the trash in surrounding areas, and the amount of waste generated by such an event.	Event Size
300	19	This event has become so large that it has become the tail wagging the dog for lack of a better phrasing. Have the BLM and Burning Man evaluated or advocated for other sites? The cumulative impacts keep growing with the increased number of participants at Burning Man should trigger a focused evaluation of cumulative impacts. The organizers are contemplating building a temporary city of 100,000 people. There is no real infrastructure, as occurs in real cities, in place to handle this many people. It is realistic to expect that the impacts to the Black Rock Desert and the NCA will accumulate and grow; i. e., cumulative impacts. What is the carrying capacity of the desert and surrounding environs, including roads and towns, to absorb the growth beyond what is current? Do the organizers contemplate a permanent cap on the number of attendees at any point in the future?	Event Size

Appendix A. Substantive Public Outreach and Scoping Comments

Letter #	Comment Number	Comment Text	Comment Code Name
319	7	Population Increase: In the current EA, the 70,000 maximum is for participants. BRC volunteers, staff, and contractors were not included in that figure. BRC would now include within the core numbers the volunteers and staff along with the participants. As of 2017, this was ~ 80,000 total. The number of vendors for sanitary, fuel, or ice services, BLM or other law enforcement/safety personnel, medical personnel or related fields was never stated in the 2012 EA, and their impact (via support areas outside of the fenced event site) was not discussed. The actual number of people within the Closure Area vis a vis participants/volunteer/staff is not mentioned. The external support areas within the Closure area must be analyzed in the EIS for their effects on the environment including any increase in numbers or extent of facilities. Finally, the actual potential increase of 20,000 people within the event site should be made clear and evaluated.	Event Size
319	8	Closure Area: This is connected to #1 in that it must be made clear how much of the total CA is subject to uses related to the event and support facilities. The effects of all the support activities on these lands, and the measures taken to prevent or mitigate those effects must be included in the analysis, as those effects are part of the proposed action. The need for the addition to the 561 acres to the northeast should be documented as also should be the infrastructure staging area (60x300 ft) and its purpose. Given the amount of material needed to construct the city, this staging area seems small, and without a location, how it would be used is unknown.	Event Size
319	32	The increase in participants over current levels raises many issues; particularly about their commitment to the event and their vision of what it is they are attending. Concerns about trash and bikes left behind at camps, loss of the focus on the 10 principles are at first part of the EIS evaluation, and secondly part of the decision process for BRC to determine their future path.	Event Size
Other Public Comments			
1	3	As an example, "the Rocketry people" did not hear about the public meetings (Dec 4-6th) until the 4th. It makes us feel as if our comments and concerns are not important to the BLM.	Public Outreach
43	1	The proposal was done quickly and without enough time for public comment - there were public meetings held on December 4, 5, and 6 (some of the busiest times of the year for people due to approaching Holidays), however, proper notification was not received until the day of the 4th. In the spirit of getting proper feedback and input from users of the Playa, request that this hearing be held a second time with earlier notification at least one month in advance.	Public Outreach
194	3	Concern that some of the BLM and Burning Man planning meetings need to be held in Pershing County to involve all players (Sheriff, Road Dept., etc.) especially since the event is in Pershing County.	Public Outreach

Appendix A. Substantive Public Outreach and Scoping Comments

Letter #	Comment Number	Comment Text	Comment Code Name
8	8	Please provide a list of baseline data science information: the dates data first collected, subsequent dates of collection, brief summary of information, summary of conclusions based on that cumulative data. By this I mean on resources such as water, soil, air, wildlife, reptiles, invertebrates, historic/archeo/paleo, dark skies, etc.	Public Outreach
20	2	The proposal was done quickly and without enough time for public comment - there were public meetings held on December 4, 5, and 6 (some of the busiest times of the year for people due to approaching Holidays), however, proper notification was not received until the day of the 4th. In the spirit of getting proper feedback and input from users of the Playa, request that this hearing be held a second time with earlier notification at least one month in advance.	Public Outreach
31	2	I notice you are only holding hearings in Fernley and Lovelock Nevada. This EIS addresses activities on National Public Land equally owned by all American citizens. The location origins of BurningMan attendees are readily available and I'm confident that information would justify holding hearings in the SF Bay Area at a minimum and probably the Portland, Reno and Las Vegas areas instead of or in addition to these relatively small communities. If the BLM is truly interested in receiving public comment on this EIS please hold additional hearings in those cities.	Public Outreach
2	9	there definitely need to be more stringent controls in this document that will allow for BRC to be more compliant with the terms of the EIS and any other documents from the inception of this EIS to the end of the term of the document.	Regulations/laws/policies
3	2	The contract the commissioners signed with Burning Man should be VOID. Again, Burning Man claims "8 days" and that is not true. Nor have they kept a true and accurate count of participants.	Regulations/laws/policies
300	7	Shouldn't Burning Man contribute to the overall health of the Black Rock? Now it is becoming an annually guaranteed space for which it does not pay an annual or even a temporary lease payment. Lease payments are required for various uses of public land such as oil and gas extraction; wind, solar, and geothermal development; and livestock grazing. Why not ask Burning Man, Inc., for a lease payment? Hasn't the event gone beyond the simple permit categorization? Does the permit fee for Burning Man accurately reflect the commitment of time and resources that the BLM must invest to support the event? The BLM needs to be reimbursed for any time spent on the project whether at the office or onsite. The ripple effects on the BLM of such a large permit effort are probably not fully accounted for. Does BLM need to add temporary staff or hire outside contractors just to do this accounting?	Regulations/laws/policies
311	1	I would like to encourage more support of the Burning Man event and year-round activities and urge you to reduce annual permit costs and law enforcement fees and staffing.	Regulations/laws/policies