

# U.S. DEPARTMENT OF THE INTERIOR

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## Bureau of Land Management

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Environmental Assessment  
DOI-BLM-NV-L050-2020-0001-EA  
June 2020

### Mount Irish Cultural Resource Protection and Visitor Improvements



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# Mount Irish Cultural Resource Protection and Visitor Improvements Environmental Assessment

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### List of Acronyms and Abbreviations

**ACECs** – Areas of Critical Environmental Concern  
**AUM**- Animal Unit Month  
**BLM** - Bureau of Land Management  
**CFR** - Code of Federal Regulations  
**DR** – Decision Record  
**EA** - Environmental Assessment  
**EO** - Executive Order  
**FLPMA** - Federal Land Policy and Management Act of 1976  
**FONSI** - Finding of No Significant Impact  
**HFRA** – Healthy Forests Restoration Act  
**LWC** – Lands with Wilderness Characteristics  
**NDOW** - Nevada Department of Wildlife  
**NEPA** - National Environmental Policy Act of 1969  
**NNHP** - Nevada Natural Heritage Program  
**Project** – Mount Irish Recreation Site  
**RMP** - Record of Decision and Approved Resource Management Plan  
**ROW** - right-of-way  
**SR** - State Route  
**USFWS** - United States Fish and Wildlife Service

# 1 INTRODUCTION

## 1.1 Introduction

This Environmental Assessment (EA) analyzes the environmental consequences of the proposed development of the Mount Irish Recreation Site. This EA includes the analysis of one alternative and the No Action Alternative.

The EA is a site-specific analysis of potential impacts that could result with the implementation of a proposed action or alternative to that proposed action. This document is in conformance with, and incorporates by reference, the *Ely District Record of Decision and Approved Resource Management Plan* (ROD/RMP) (Bureau of Land Management [BLM] 2008a) and the Presidential Proclamation *Establishment of the Basin and Range National Monument* (July 10, 2015). This EA assists the BLM in project planning and ensuring the agency actions comply with the National Environmental Policy Act of 1969 (NEPA). Should a determination be made that implementation of the Proposed Action or alternative would result in “significant” environmental impacts (effects) as defined in Chapter 40 of the Code of Federal Regulations (CFR) §1508.27 and not already analyzed in the 2008 Ely District RMP, an Environmental Impact Statement would be prepared. Should a determination be made that implementation of the Proposed Action or alternatives would not result in significant environmental impacts, a Finding of No Significant Impact (FONSI) would be prepared documenting that determination, and a Decision Record (DR) would be issued providing the rationale for approving the chosen alternative.

## 1.2 Identifying Information

### 1.2.1 **Title, Environmental Assessment Number, and Type of Project**

Title: Mount Irish Cultural Resource Protection and Visitor Improvements

EA Number: DOI-BLM-NV-L050-2020-0001-EA

Type of Project: Public Use Site Plan

### 1.2.2 **Location of Proposed Action**

The proposed project is located on public lands administered by the BLM Ely District, Basin and Range National Monument.

Mt. Irish is located west of U.S. Highway 318 in the Pahranaagat Valley, approximately 110 miles north of Las Vegas. The site is approximately eight miles west of Hiko, Nevada. The legal description is Mount Diablo Meridian (21), Township 4 South, Range 59 East, Section 9.

**Figure 1.2.1: Project Location and Access**

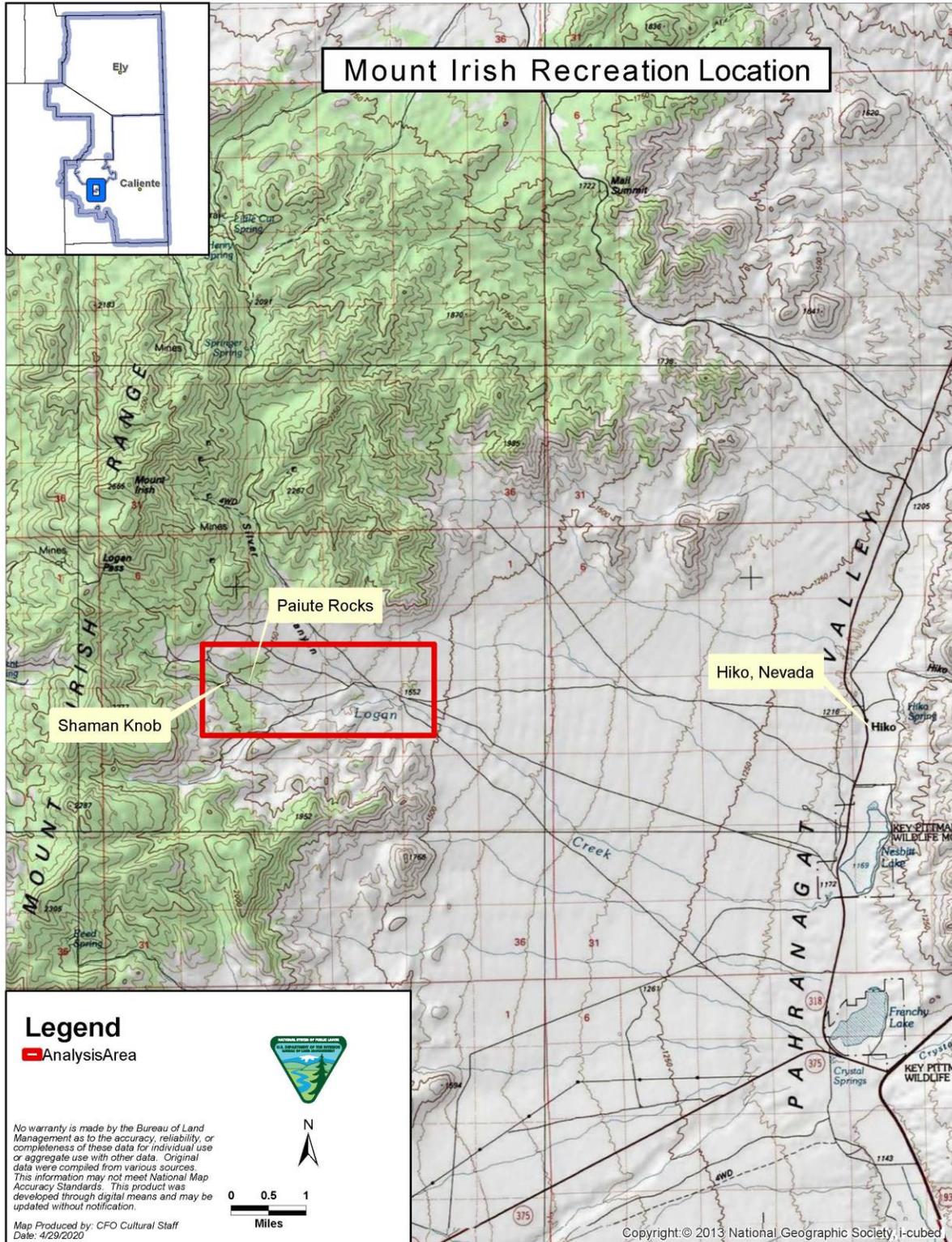
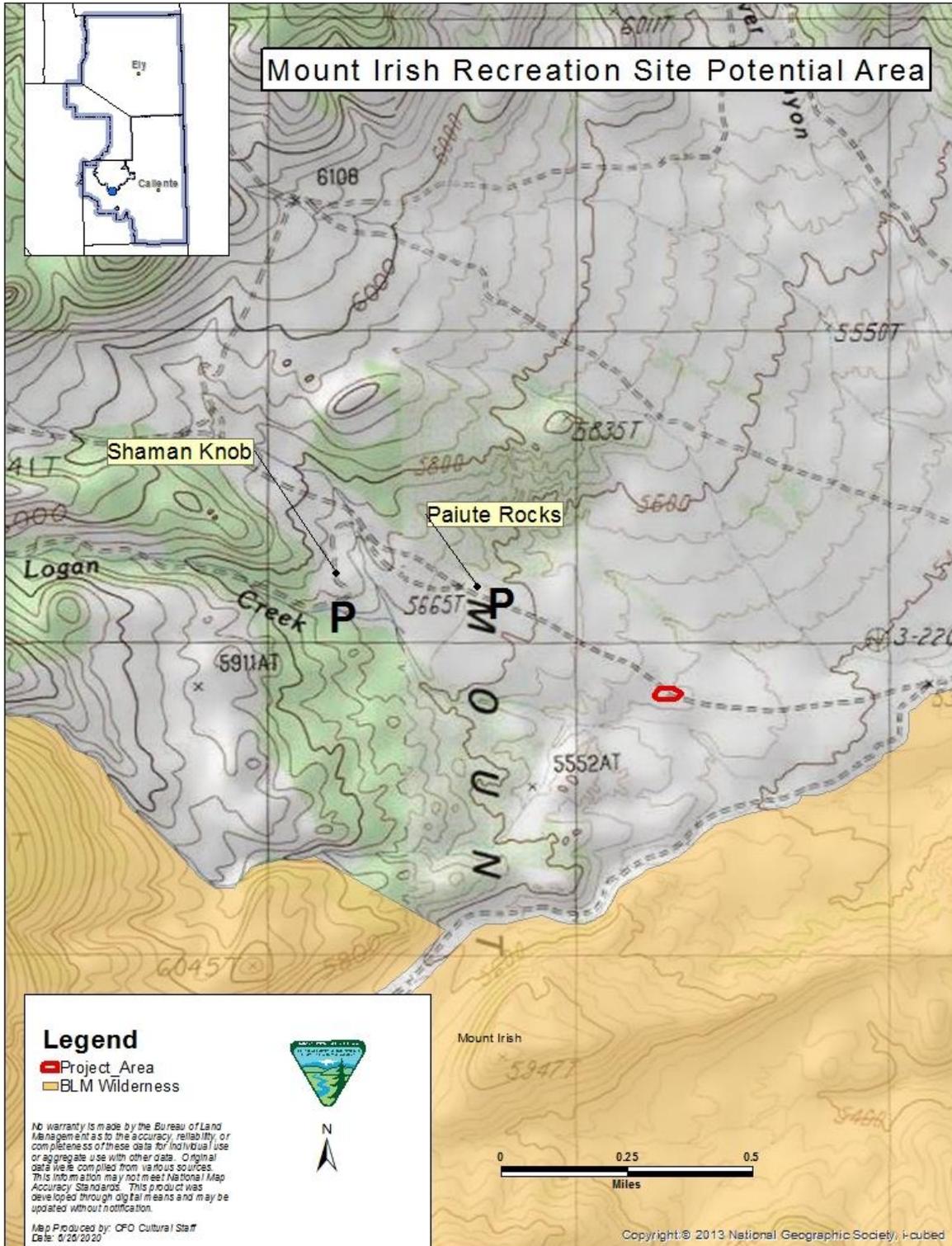


Figure 1.2.2: Project Area



### **1.2.3 Name and Location of Preparing Office**

U.S. Department of the Interior Bureau of Land Management  
Ely District, Basin and Range National Monument  
1400 South Front Street  
Caliente, Nevada 89008

### **1.3 Background Information**

The Mt. Irish site is within the Mount Irish Area of Critical Environmental Concern (ACEC), which was designated for its cultural resource values. Mt. Irish is a unique collection of cultural resources that have drawn visitors to the area for many years. Due to the mild climate, the site remains relatively accessible throughout the year. Sometime between 1970 and 1990, a wooden pit toilet was installed at Shaman Knob. BLM removed the old pit toilet in February 2014 to comply with Environmental Protection Agency (EPA) rules.

In 2002, a visitor register was placed at Paiute Rocks, part of the recreation area, where one of the original wood signs is located. From 2002 to 2006, records from this register indicate that an average of 100 people per year visited the site. Between 2005 and 2006, BLM developed a new interpretive program, which resulted in the creation of three trails. These trails consist of small steel trail markers in the ground with numbers on them to guide visitors along the trail using an associated trail guide. In Fiscal Year 2018, 889 visitors were counted visiting the Mt. Irish Recreation Site. The increased visitation and lack of visitor amenities such as camp sites and a pit toilet has resulted in damage to the petroglyph panels and proliferation of human waste near the rock art.

### **1.4 Purpose and Need for Action**

Recreation has increased substantially in the United States on BLM-administered public land. With the influx of visitation to public lands into Lincoln County, more and more people are becoming aware of the beauty and uniqueness of Mt. Irish. Negative impacts on cultural and natural resources occur by visitors building campfires close to rock art, depositing trash and human waste around the archaeological sites. Improvements at the recreation site are necessary to minimize the impact of the increased visitation. Installation of a vault toilet would protect the environment from the impacts of human waste and would improve the visitors' recreation experience. These improvements are necessary for protecting the cultural site per Ely RMP, BLM 2008, as amended 2015 page 50. The Mt. Irish visitor improvement project is being proposed to proactively guide visitors to the area, protect cultural resources through education, and provide an improved recreation experience.

### **1.5 Decision to be Made**

The decision the BLM would make is whether to approve the Project as proposed, approve the Project with modifications, or to not approve the Project.

### **1.6 Conformance, Permits, and Approvals**

#### **1.6.1 Permits and Approvals**

A permit would be issued by the State of Nevada Division of Environmental Protection, prior to installation of a vault toilet at the site.

A FONSI and DR would need to be signed prior to implementing any of the proposed site improvements.

### **1.6.2 BLM Land Use Plan**

The proposed action is in conformance with the goals and objectives of the Ely District Record of Decision and Approved Resource Management Plan (Ely RMP, BLM 2008, as amended 2015), which follow:

#### **Cultural**

##### ***Cultural Resources (page 49)***

*Management of cultural resources is directed primarily by two laws: the National Historic Preservation Act of 1966, as amended, and the Archaeological Resources Protection Act of 1979. The National Historic Preservation Act requires management and enhancement of significant historic properties and the Archaeological Resources Protection Act requires protection of archaeological resources (sites and objects of 100 years or more in age). The Federal Land Policy and Management Act direct the BLM to manage public lands on the basis of multiple use and to “protect the quality of historical resources and archaeological values.” This act provides for the periodic inventory of public lands and resources.*

##### ***Goals – Cultural Resources (page 49-50)***

*Seek to reduce imminent threats and resolve potential conflicts from natural or human-caused deterioration, or potential conflict with other resource uses (Federal Land Policy and Management Act, Section 103(c), National Historic Preservation Act, Section 106, 110[a][2]) by ensuring that all authorizations for land use and resource use would comply with the National Historic Preservation Act, Section 106.*

##### ***Objectives – Cultural Resources (page 50)***

*To protect and maintain cultural resources on BLM-administered land in stable condition. Appropriate management actions would be determined after evaluation and allocation of cultural resource use categories through cultural resource project plans.*

##### ***Management Actions – Cultural Resources (page 50)***

#### ***General Cultural Resources Management***

##### ***Parameter – Cultural Resource Use Allocation: Rock Art Sites***

###### ***Management:***

*Limit livestock and human contact with rock art panels through physical barriers (fences or natural barriers such as plantings or boulder placement).*

###### ***Public Use:***

*Post informational signs on rock site etiquette and the Archaeological Resources Protection Act of 1979 at all Public Use sites.*

*Consider installing at least one interpretative trail/footpath at each rock art site allocated to Public Use.*

*Allocate and manage all National Register eligible rock art sites for Scientific, Conservation, and/or Public Use, and continue to develop interpretative sites with priority placed on maintaining and improving existing interpretative facilities.*

### **Recreation**

#### **Goals – Recreation** (page 79)

*Provide quality settings for developed and undeveloped recreation experiences and opportunities while protecting resources.*

#### **Objectives – Recreation** (page 79)

*To provide a wide variety of recreation opportunities to satisfy a growing demand by a public seeking the open, undeveloped spaces that is characteristic of the planning area.*

*To provide visitor information to familiarize people with recreational opportunities throughout the planning area and encourage minimum impact or “Leave No Trace” and “Tread Lightly” recreational skills and ethics for recreational activities.*

#### **Management Actions – Recreation** (page 79-81)

#### **Parameter – Special Recreation Management Areas**

**REC-3:** *Develop recreation sites, as appropriate, to proactively manage for tourism and recreation experiences.*

**REC-6:** *Manage for recreation facilities and services such as trails, trailheads, staging areas, and associated structures in extensive recreation management areas following activity-level plans and NEPA analysis for the management of designated wilderness, ACECs, the Silver State Off-highway Vehicle Trail, backcountry byways, and where appropriate, for management of recreational impacts to natural and cultural resources.*

**REC-9:** *Continue to provide visitor orientation information, interpretive activities, signage, safety programs, and other visitor outreach activities. Familiarize the public with recreational opportunities throughout the planning area and encourage minimum impact or “Leave No Trace” behavior for recreational activities.*

### **1.6.3 Relationships to Statutes, Regulations, or Other Plans**

This Proposed Action is also in conformance with the following Acts and land use plans:

Federal Land Policy and Management Act of 1976

- The FLPMA was enacted in 1976 for the purposes of establishing a unified, comprehensive, and systematic approach to managing and preserving public lands. Section 302(a) of the FLPMA states that “public lands are to be managed under the principles of multiple use and sustained yield except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it will be managed in accordance with such law.”

#### Migratory Bird Treaty Act of 1918

- The Migratory Bird Treaty Act (16 United States Code §§ 703 et seq.) establishes treaties to be followed by agreeing nations for the protection of migratory birds.

#### National Environmental Policy Act of 1969

- The NEPA, P.L. 91-190, assures that all branches of government give proper consideration to the environment prior to undertaking any major federal action that significantly affects the human environment.

#### Secretarial Order 3308 Management of the National Landscape Conservation System of 2010

- Section 4(a) directs the BLM to “ensure that the components of the NLCS are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values. If consistent with such protection, appropriate multiple uses may be allowed, consistent with the applicable law and the relevant designations under which the components were established.”

#### Presidential Proclamation Establishment of the Basin and Range National Monument of 2015

- The Proclamation assigns the BLM to manage the area as part of the National Landscape Conservation System for proper care and management of monument objects, which includes the Mount Irish Archaeological Area.

#### The 2009 Omnibus Public Land Management Act

- Congress established the National Conservation Lands, “...to conserve, protect and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.”

#### Policy Manuals 6100 and 6220

- Both manuals set minimum standards for how BLM should manage the National Conservation Lands and National Monuments more specifically. These policies were established to ensure BLM is meeting their obligation as stewards of a conservation system.

### **1.7 Scoping and Issues**

Scoping was conducted by an interdisciplinary team on January 7, 2020, that considered the potential consequences of the Proposed Action. Resource concerns were identified in Scoping Form B (Chapter 3, Table 1). Only those resources identified as Present and Affected have been carried forward for detailed analysis in Chapter 3.

## **1.8 Summary of Public Participation**

A 15-day public comment period for this project concluded June 16, 2020. During that time, the BLM received nine individual letters resulting in 17 unique comments. Section 1.2.2, Section 1.6.3, Section 2.2, and Section 2.4 have been updated because of the comments received. Appendix B contains a complete summary of the comments and the BLM's responses.

## **2 PROPOSED ACTION AND ALTERNATIVE**

### **2.1 Introduction**

The previous chapter presented the purpose and need of the proposed Project. To meet the purpose and need of the proposed Project the proposed action and a no action alternative are analyzed. The potential environmental impacts, or consequences, resulting from the implementation of the alternative is analyzed in Chapter 3 for each of the identified issues.

### **2.2 Description of the Proposed Action**

The BLM would improve the existing recreation site within the Mount Irish area. The BLM would install an EPA-approved vault toilet in a suitable location. The project would also construct 4 campsites: each with a parking area, picnic table, and fire ring. One of the campground locations will have a concrete pad for activities like star-gazing. A kiosk would be placed at the existing Paiute Rock parking area. The existing interpretive trails at Paiute Rocks would be improved to provide a trailhead with a desired trail route. A walking trail would be delineated using trail markers along the existing wash that connects the campground with Paiute Rocks and Shaman Knob. Vehicle barrier bollards would also be installed in strategic spots to stop vehicle traffic in areas where resource damage has occurred. The vault toilet and campground location would be in an area that minimizes resource damage and can be constructed effectively. The visual elements of blending into the environment would be used for the size and location of the vault toilet and campground. The existing road into Mount Irish Archaeological District would be improved to allow for the installation of a vault toilet. This would still be considered a primitive access area and large recreation vehicles would not be recommended. The BLM would issue a ROW for continued access and road maintenance to the area from State Route 318.

### **2.3 No Action Alternative**

In accordance with BLM NEPA guidelines H-1790-1, Chapter V (BLM 2008b), this EA evaluates the No Action Alternative, which is a reasonable alternative to the Proposed Action. The objective of the No Action Alternative is to describe the environmental consequences that would result if the Proposed Action were not implemented. The No Action Alternative forms the baseline from which the impacts of the Proposed Action can be measured. Under the No Action Alternative, the Proposed Action would not be approved by the BLM and the area would remain available in its current condition for casual use.

### **2.4 Alternatives Considered but Not Analyzed in Detail**

The BLM considered an alternative that made the visitor improvements outside the Mt Irish Petroglyph Area. The proposed site would improve vehicle access. The site would not address the main need for action, protection of cultural resources. The vault toilet would be too far to ensure human waste would be deposited in a safe manner. This alternative was not analyzed in detail.

### **2.5 Project Design Features**

The BLM would adhere to the following Project design features to prevent unnecessary or undue degradation during construction of the Project.

- Construction would not occur during the migratory bird nesting period, from April 15 to July 15. If construction is necessary during that period, a survey of the construction area would be completed by a wildlife biologist prior to construction in order to identify active nests so that they may be avoided.

### **3       AFFECTED ENVIRONMENT AND ENVIRONMENTAL EFFECTS**

#### **3.1       Introduction**

This chapter presents the existing environment (i.e., the physical, biological, and social) of the impact area, the issues analyzed, the impacts to the analyzed resources, and mitigation that could be applied that would reduce those impacts. Mitigation proposed in this section could be included in the FONSI to prevent potentially significant impacts. Application of the mitigation measures to the Proposed Action would then be carried forward into the DR as a condition of approval of the proposal.

While many potential issues may arise during scoping, not all of them warrant analysis. Issues raised through scoping are analyzed if:

- Analysis of the issue is necessary to make a reasoned choice between alternatives.
- The issue is significant (an issue associated with a significant impact, such as a potential violation of a law imposed to protect the environment).
- Analysis of the issue is necessary to determine if the direct or indirect impacts are themselves significant, or if it would add a measurable incremental impact to past, present and reasonably foreseeable actions that could have a cumulatively significant impact.

Potential impacts to the following resources/concerns were evaluated in accordance with criteria listed above to determine if detailed analysis was required. Consideration of some of these items is to ensure compliance with laws, statutes or Executive Orders (EOs) that impose certain requirements upon all federal actions. Other items are relevant to the management of public lands and to the Ely District BLM in particular.

Many times, a project will have some degree of effect upon a resource or concern, but that effect doesn't approach any threshold of significance, nor does it increase cumulative impacts by a measurable increment. Such effects are described as "negligible" in the rationale for dismissal from analysis.

Scoping was conducted by an interdisciplinary team on January 7, 2020, that analyzed the potential consequences of the Proposed Action. The following table documents the issues brought forward for or dismissed from analysis.

**Table 3.1-1: Resources**

Resource/Concern	Present and Affected	Present and Not Affected	Not Present	Rationale for Dismissal from Detailed Analysis or Issue(s) Requiring Detailed Analysis
<b>Air Resources</b>				
Air Quality		X		Construction activities associated with implementation of the Proposed Action may produce fugitive dust, but the resulting air quality would be temporary and negligible. In addition, disturbance associated with the Project is under the threshold for obtaining a Surface Area Disturbance Permit with the Bureau of Air Pollution Control. This resource is not analyzed further in this EA.
<b>Water/Soil Resources</b>				
Water Quality: Surface and Ground		X		Logan Creek/Wash is identified as an intermittent stream that runs south of the Project Area. Impacts to water quality are not anticipated with the usage of appropriate best management practices. This resource is not analyzed further in this EA.
Water Resources (Water Rights, etc.)		X		Logan Creek/Wash is identified as an intermittent stream that runs south of the Project Area. Impacts from flooding are not anticipated. In addition, Project activities would not result in impacts to water resources. There are also no active water rights in the Project Area. This resource is not analyzed further in this EA.
Farm Lands (Prime or Unique)			X	This resource is not present in the Project Area.

Resource/Concern	Present and Affected	Present and Not Affected	Not Present	Rationale for Dismissal from Detailed Analysis or Issue(s) Requiring Detailed Analysis
<b>Vegetation Resources</b>				
Forests Health (Healthy Forests Restoration Act [HFRA] projects only)			X	This Project does not meet the requirements to qualify as an HFRA project; therefore, this resource is not analyzed in this EA.
Rangeland Standards and Guidelines		X		Project activities would occur in primarily pre-disturbed areas; therefore, impacts to rangeland health are not anticipated. There would be no anticipated net loss in grazing AUMs. Best management practices are used for monitoring rangeland health. This resource is not analyzed further in this EA.
Wetlands and Riparian Zones			X	This resource is not present in the Project Area.
<b>Fish and Wildlife</b>				
Fish and Non-Avian Wildlife		X		Temporary displacement of individuals may occur during construction activities; however, long-term population level impacts are not anticipated. There is no fish habitat in or near the Project Area. This resource is not analyzed further in this EA.
Migratory Birds and Sensitive Avian Species (except for Sage Grouse)		X		Temporary displacement of individual migratory birds may occur during construction activities; however, long-term population level impacts are not anticipated. In addition, compliance with the migratory bird Project design feature in Section 2.6 would minimize any potential impacts. This resource is not analyzed further in this EA.
<b>Special Status Species</b>				
USFWS Listed Species or critical habitat. Also, Areas of Critical Environmental Concern (ACECs) designated to protect habitat of listed species			X	This resource is not present in the Project Area.
Sage Grouse and non-Avian Animal Sensitive Species			X	This resource is not present in the Project Area.

<b>Resource/Concern</b>	<b>Present and Affected</b>	<b>Present and Not Affected</b>	<b>Not Present</b>	<b>Rationale for Dismissal from Detailed Analysis or Issue(s) Requiring Detailed Analysis</b>
Sensitive Plant Species. Also, ACECs designated to protect special status plant species		X		Potential habitat occurs for ten BLM sensitive plant species in the Project Area Sheep fleabane, Torrey's Milkvetch, Banana yucca, Utah century plant, (Eastern) Joshua Tree, Hair-spine prickly pear, Kaibab spiny star, King-cup cactus, Golden cholla, Saints cactus; however, no sensitive plant species were observed during a June 2016 botanical survey.
<b>Wild Horses</b>				
Wild Horses		X		The project area is outside of Herd Management Areas and Herd Areas. The project would not affect wild horses.
<b>Cultural Resources</b>				
Cultural Resources		X		Project design would not impact the eligibility of sites. This resource is not further analyzed in this EA.
Native American Religious Concerns			X	This resource is not present in the Project Area.
<b>Paleontological Resources</b>				
Paleontological Resources			X	This resource is not present in the Project Area.
<b>Visual Resources</b>				

Resource/Concern	Present and Affected	Present and Not Affected	Not Present	Rationale for Dismissal from Detailed Analysis or Issue(s) Requiring Detailed Analysis
Visual Resources		X		<p>The project area currently falls within VRM Class II as described in the Ely RMP (2008). VRM Class II objectives should be followed during and after construction, activities cease. Class II Objective: The objective of this class is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape. New projects can be approved if they blend in with the existing surroundings and don't attract attention (i.e., small-scale picnic area or primitive campground in valley shielded from view that blends with natural appearance). No long-term impacts to visual resources would result from the Proposed Action. Temporary impacts to visual resources in Class II would be associated with construction of the trail.</p>

Resource/Concern	Present and Affected	Present and Not Affected	Not Present	Rationale for Dismissal from Detailed Analysis or Issue(s) Requiring Detailed Analysis
<b>Lands and Realty/Renewable Energy</b>				
Land Uses (existing/pending ROWs); disposal areas; land status, etc.)			X	The Project would not impact any ROWs or disposal areas. The Project is located entirely on BLM-administered land.
<b>Travel Management</b>				
Travel Transportation Management (access; Travel Management Plan)		X		There is currently no Travel and Transportation management planning designation that encompasses the Project Area. Access to the Project Area would be provided through an existing County-maintained Road. This resource is not analyzed further in this EA.

Resource/Concern	Present and Affected	Present and Not Affected	Not Present	Rationale for Dismissal from Detailed Analysis or Issue(s) Requiring Detailed Analysis
<b>Livestock Grazing</b>				
Livestock Grazing		X		The Project Area is in the Irish Mountain and Wildhorse Grazing Allotments. Project activities would occur in primarily pre-disturbed areas; therefore, impacts to grazing and forage are not anticipated. Irish Mt and Wild Horse allotments cattle generally do use the project area. This resource is not analyzed further in this EA.
<b>Forest/Woodland Products</b>				
Vegetative Resources (forest and seed products)		X		Fuel wood harvesting activities may occur in the area; however, no impacts to this activity from the Project are anticipated and no impacts from this activity to the Project are anticipated. This resource is not analyzed further in this EA.
<b>Geology and Mineral Extraction</b>				
Mineral Resources			X	No current mining operations or active claims occur in the Project Area. The closest mining operation is over eight miles to the northeast. This resource is not analyzed in this EA.
<b>Watershed</b>				
Watershed Management (soil and vegetation conditions)		X		No watershed-level impacts to soils and vegetation are anticipated from construction activities associated with implementation of the Proposed Action. Soil alteration and vegetative community alteration would be minimized through proper facility design and placement.
Floodplains			X	This resource is not present in the Project Area.
<b>Fire</b>				

Resource/Concern	Present and Affected	Present and Not Affected	Not Present	Rationale for Dismissal from Detailed Analysis or Issue(s) Requiring Detailed Analysis
Fire Fuels		X		Wildland fires have historically occurred in the Project Area and may continue to occur. The addition of facilities in the Project Area may result in changes in priorities to fire suppression; however, these changes are considered negligible. This resource is not further analyzed in this EA.
Emergency Stabilization and Restoration Management			X	This resource is not applicable to the Project.
<b>Noxious and Invasive Weeds</b>				
Non-native Invasive and Noxious Species		X		Field surveys were conducted in June 2016 for noxious weeds and invasive, non-native species. There were no noxious weeds identified in the Project Area during the survey. Six invasive, non-native species were observed. The Project would be required to implement measures to mitigate the spread of noxious weeds. This resource is not further analyzed in this EA.
<b>Special Designation Management</b>				
National Monument		X		The project occurs within a national monument and would be compatible with proper care and management of objects within the monument. Providing specific areas for camping and a toilet would minimize damage to monument objects, which includes the Mt. Irish Archaeological Area.
Wilderness/Wilderness Study Areas			X	No Wilderness or Wilderness Study Areas are present. The Mt. Irish site is near the Mt. Irish Wilderness but not within the boundary therefore not affected.
Wild and Scenic Rivers			X	This resource is not present in the Project Area.

Resource/Concern	Present and Affected	Present and Not Affected	Not Present	Rationale for Dismissal from Detailed Analysis or Issue(s) Requiring Detailed Analysis
Lands with Wilderness Characteristics (LWC)		X		The Project Area encompasses a previously disturbed area of less than 0.07 acre and is adjacent to a graded road. The Project Area is within a 34,845-acre LWC unit. The Project would not impact the naturalness of the LWC unit. Project design features to mitigate impacts on LWC have been incorporated into the Proposed Action. Improvements would be constructed using neutral colors and natural materials to make infrastructure less noticeable.
<b>Other Concerns</b>				
Public Safety		X		This project would not create any traffic hazards; signage at the entrance of the Site may improve visibility from SR 318 and make access safer.
Human Health and Safety (herbicide projects)			X	The Project does not include the use of herbicides; therefore, this resource is not present in the Project Area and is not analyzed further in this EA.
Wastes – Hazardous or Solid		X		Construction vehicles would be equipped with diesel fuel and motor oil for operational purposes. Any potential spills would be managed, and spill kits would be included on each vehicle. Human waste would be managed through the use of a vault toilet. The removal of other solid wastes from the site would be the responsibility of the visitor to the site. This resource is not analyzed further in this EA.
Native American Religious and Other Concerns		X		See Section 5.2.2.

Resource/Concern	Present and Affected	Present and Not Affected	Not Present	Rationale for Dismissal from Detailed Analysis or Issue(s) Requiring Detailed Analysis
Environmental Justice		X		This project would not restrict access from or favor access for any single demographic. The amenities proposed would be developed out of view of the cultural sites; Tribal coordination would ensure no adverse impacts to cultural or religious traditions.
Socioeconomics			X	The proposed action would develop a primitive campground and toilet in a remote part of the Basin and Range National Monument. The developments are not expected to lead to a substantial increase in visitation to the region; local socioeconomic impacts would be negligible.
<b>Resources Analyzed</b>				
Special Status Animal Species	X			See analysis below.
Recreation Uses	X			<p>The Proposed Action would provide non-motorized recreation opportunities and improve the experience in the project area surrounding the Mt. Irish Recreation Site. The project area is well-known, popular.</p> <p>Recreation within the area is dispersed and low. There are no developed recreation facilities or sites in the area.</p>
ACECs designated for important Historic and Cultural areas	X			<p>See below for detailed analysis.</p> <p>The Mt. Irish site is within the Mount Irish ACEC which was designated for its cultural resource values.</p>

## **3.2 General Setting**

The area contains primarily piñon /juniper woodland communities, Inter-Mountain Basin big sagebrush, Great Basin xeric, mixed sagebrush and occur approximately 6,020 feet to 6,100 feet in elevation. The areas are primarily used by recreationists for trail hiking, camping, rock art and wildlife viewing, and sight-seeing.

## **3.3 Resources Analyzed**

### **3.3.1 Special Status Species.**

#### ***Affected Environment***

Appendix A contains a list of wildlife and special status plant species with potential to occur within the project. The Mt. Irish project area potentially contains the following BLM sensitive animal species: golden eagle (*Aquila chrysaetos*), Brewer's sparrow (*Spizella breweri*), and desert bighorn sheep (*Ovis canadensis nelsoni*). The Mt. Irish site also potentially contains the BLM sensitive plant species sheep fleabane (*Erigeron ovinus*).

#### ***Environmental Consequences***

Golden eagle nest sites are in areas higher than would be potentially impacted by the proposed actions. Brewer's sparrows typically nest in shrubs or low trees. As such, there could potentially be impacts to this species. However, the minimization measures in the Proposed Action should minimize or avoid impacts to these two bird species.

Desert bighorn sheep could avoid and/or be displaced from the project area during construction and during use by humans for recreation. These effects are expected to generally be temporary in nature and not have population-level impacts.

As required in the Proposed Action, special status plant surveys would be undertaken prior to any new ground-disturbing activity. Any plants discovered during this survey would be avoided. Therefore, no effects are anticipated to sheep fleabane.

No population-level effects are anticipated from the Proposed Action with BLM sensitive species.

#### ***No Action Alternative***

The aforementioned effects would not occur under the No Action Alternative. However, impacts from more dispersed use at the site could be greater on sensitive species than by directing people to designated use areas.

### **3.3.2 Recreation Uses**

#### ***Affected Environment***

Current recreational uses in the project area include hunting, trapping, Off Highway Vehicle (OHV) use, heritage tourism, camping, hiking, bouldering and wildlife viewing.

Roads associated with the Proposed Action have traditionally been used for recreational purposes by hunters, trappers and some OHV enthusiasts.

### ***Environmental Consequences***

There would be an increased ease of public access for parking. Amenities for recreation offered by the Proposed Action could cause increased camping and use along the trail, proposed routes and proposed trailheads. The informational kiosk would improve visitor satisfaction by increasing knowledge of the multipurpose uses within the area.

### ***No Action Alternative***

If BLM implements the No Action alternative, public using the sites would continue to leave waste at the site if no restrooms are provided. This could pose an environmental threat to the public and to the environment. The No Action alternative would continue to encourage trail users to disperse around the trailheads and camp in existing primitive campsites or create their own new campsites.

### **3.3.3 Mt. Irish ACEC**

#### ***Affected Environment***

The Mount Irish ACEC was designated in 2008 in the Approved Resource Management Plan. This ACEC was designated to protect the unique Cultural Resource Values located in the area. These values include, but are not limited to, rock art sites such as Shaman Knob and Paiute Rocks, historic mining activity locations and prehistoric habitation sites. The BLM developed a new interpretive program for the petroglyph panels at Paiute Rocks and Shaman Knob between 2005 and 2006 which led to the creation of three trails in the area. Trail markers and small interpretive signs guide visitors through a tour of the petroglyph panels. An old wooden pit toilet was removed from the Shaman Knob petroglyph site in 2014 to comply with Environmental Protection Agency rules and regulations. Visitation to the Shaman Knob and Paiute Rocks within has increased over the years from 100 people/year between 2002 and 2006 to 889 in 2018. This increase in visitation has led to a proliferation of human waste in the ACEC and an increase in damage to the environment near the petroglyph panels (Figure 3.3.3).

**Figure 3.3.3 Campfire Damage at Shaman Knob Near Petroglyph Panel June 2, 2020**



### ***Environmental Consequences***

Increased ease of access and the additional amenities for recreation offered by the Proposed Action would cause increased use of the ACEC. The interpretive trail has been in place for several years at this location. Because interpretive materials are present vandalism has been avoided. It is not likely that the increased use at this site would result in any damage to the resources present.

The proposed trail maintenance in the Mt. Irish site would direct visitors in a way that provides a clear path that allows visitors to easily follow the routes identified in existing interpretive

materials. An improved trail would help guide the public away from wandering into sensitive areas. Also, at Paiute Rocks, the existing weathered sign would be augmented with an improved parking area kiosk. The new kiosk would enhance public education with trail maps and signs, resource information, rules, and ethics signs. Currently no toilet facilities are present at any of the four broad cultural resource loci at the Mt. Irish ACEC. The newly installed vault toilet at the campground area would be visually unobtrusive. By providing modern toilet facilities, visitors would be encouraged to perform their ablutions at a site designed for such purposes. Additionally, parking barrier boulders installed at the Shaman Knob area would prevent encroaching vehicular parking and discourage camping next to the sensitive rock art.

To further add to the protection at this site, BLM Staff and Nevada Site Steward Program volunteers monitor this site on a regular basis. If there are reports of increased impacts to resources BLM would be able to take necessary steps to ensure the resources are protected. Any impacts to the resources posed by the improvement of the trail are likely to be positive, as the trail has been specifically designed to avoid any sensitive cultural resources that may be subjected to negative impacts.

### *No Action Alternative*

There are somewhat delineated but deteriorating trails in all the sites and a weathered informational sign at the Paiute Rocks area. If no action is taken the current facilities would further weather, erode, and deteriorate over time due to environmental causes. Human generated deterioration is caused by undirected and less conscious visitors that are encroaching nearer to rock art at the Shaman Knob area. The encroachment would only be greater as the user created parking area grows. Also, when nature calls, the lack of toilet facilities encourages users to find private areas within the sites. Subsequent visitors can be dismayed, or less desirably, inspired to follow suit.

## **4 CUMULATIVE EFFECTS**

### **4.1 Introduction**

As required under the NEPA and the regulations implementing the NEPA, this section analyzes potential cumulative impacts from past, present, and reasonably foreseeable future actions (RFFAs), combined with the Proposed Action, specific to the resources for which cumulative impacts may be anticipated. A cumulative impact is defined as “the impact which results from the incremental impact of the action, decision, or project when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time” (40 CFR 1508.7).

### **4.2 Past, Present, and Reasonably Foreseeable Future Actions**

#### **4.2.1 Past and Present Actions**

Mt Irish has been a publicly known recreation area since the 1960’s. A vault toilet was at the Shaman Knob area until it was removed because it did not conform to EPA regulations. In the 1990’s an interpretive walking trail with rebar numbered signs was developed around the three main rock art sites. Three metal brochure boxes were installed and still exist today. In the 1980’s two signs, one at the entrance to the area and one at Paiute Rocks, were installed. Several carsonite signs exist around the rock art that stress cultural resource protection.

#### **4.2.2 Reasonably Foreseeable Future Actions**

The Basin and Range National Monument is a remote area with little human development. As a part of the National Conservation Lands the majority of the monument would stay wild and remote. This recreation site improvement would be the limit of what would be done in the area.

### **4.3 Resources**

#### **4.3.1 Beneficial Cumulative Impacts**

Increased visitation of the Site by recreational users and BLM maintenance staff would also have a beneficial impact to the Site. Specifically, the maintenance of the facilities by the BLM on a regular schedule would likely result in the identification of potential issues that could negatively affect wildlife, such as invasive species infestations, or habitat degradation. Early identification of problems could provide some benefit to these wildlife populations long term.

#### **4.3.2 Cumulative Effects of the No Action Alternative**

The No Action Alternative would result in no change to the existing project area. No ground disturbance would occur. No construction vehicles or equipment would be used on-site. No BLM signage would be installed informing the public of the sensitivity of resources in the area. Management of the area would continue as it has in the past.

The No Action Alternative is not without potential cumulative impacts. Cumulative impacts associated with the No Action Alternative would result from the incremental edge effects resulting from continued use of the secondary pullout and social trail. These incremental impacts would

contribute to edge effects associated with other human disturbance along trails and pullouts in the project area. However, these edge effects of this scope are challenging to quantify due to their incremental nature and lack of monitoring. Edge effects from continued use of the pullout and social trail are expected to be minimal and would not contribute significantly to an overall degradation of habitat when considered cumulatively with edge effects associated with other trails in the area. Further, by not addressing the sanitary needs of visitors to the site, the amount of human waste may continue to accumulate. The proposed action would address the waste resulting from increased visitation to the Mount Irish ACEC and the Basin and Range National Monument.

## **5 CONSULTATION AND COORDINATION**

### **5.1 Introduction**

The issue identification section of Chapter 1 provides the rationale for issues that were considered but not analyzed further and identifies those issues analyzed in detail in Chapter 3. The issues were identified through the public and agency involvement process described below.

### **5.2 Organizations and Tribes Consulted**

#### **5.2.1 Organizations**

- United States Fish and Wildlife Service (USFWS) – informal consultation occurred on April 11 and April 12, 2016 (USFWS 2016a and 2016b).
- Nevada Department of Wildlife (NDOW) – a data request form was submitted on April 12, 2016; a response was received the same day (NDOW 2016).
- Nevada Natural Heritage Program (NNHP) – a data request form was submitted on April 11, 2016; a response was received on April 14, 2016 (NNHP 2016).

#### **5.2.2 Tribes**

The BLM Ely District Office, Caliente Field Office, reached out to federally recognized tribes, in compliance with EO 13175 Consultation and Coordination with Indian Tribal Governments, by sending consultation letters seeking input on May 04, 2020. Each tribe maintains a general concern for protection of and access to these resources, as well as the welfare of plants, animals, air, landforms, and water. Topics of concern consistently identified by tribes include access to natural, medicinal, cultural, and sacred resources, traditional use areas, and sacred sites. The Duckwater Shoshone and Ely Shoshone were formally consulted on the proposed action with a visit to the project location on May 27, 2020. No specific concerns were raised for the Project. The consultation letters were sent to the following tribes:

- Duckwater Shoshone Tribe
- Ely Shoshone Tribe
- Yomba Shoshone Tribe
- Indian Peaks Band of Paiute Indians
- Paiute Indian Tribe of Utah
- Las Vegas Paiute Tribe
- Moapa Band of Paiute Indians

## 6 LIST OF PREPARERS

### 6.1.1 BLM

<b>Name</b>	<b>Title</b>	<b>Responsible for the Following Section(s) of this Document</b>
Jon Prescott	Planning and Environmental Coordinator	NEPA Compliance; Farmlands, Prime and Unique; Forest Health; Wetlands/Riparian Zones; Watershed Management; Floodplains; Public Safety, Environmental Justice, Socioeconomics
Robert Hickerson	Archaeologist	Cultural Resources; Areas of Critical Environmental Concern; Heritage Special Designations; Paleontological Resources
Andy Gault	Hydrologist	Water Quality, Drinking and Ground; Water Resources (Water Rights)
Cameron Boyce	Natural Resource Specialist	Rangeland Standards and Guidelines; Grazing Uses/Forage; Invasive, Non-native Species
Daniel Condie	Range Management Specialist	Rangeland Standards and Guidelines; Grazing Uses/Forage
Andre Delcalzo	Wildlife Biologist	Fish and Non-Avian Wildlife; Migratory Birds and Sensitive Avian Species; Listed Species or Critical Habitat; Sage-Grouse and non-Avian Animal Sensitive Species; Sensitive Plant Species
Maureen McDonald	Lands and Realty Specialist	Land Uses
Lisa Domina	Outdoor Recreation Planner	Travel Transportation Management; Recreation Uses
Kyle Teel	Fire Ecologist	Vegetative Resources; Fire Management
Chris McVicars	Natural Resource Specialist	ES&R
Randy Johnson	Aviation Manager	Wastes, Hazardous or Solid
Elizabeth Seymour	Native American Coordinator/Archaeologist	Native American Religious and Other Concerns; Tribal Consultation
Lisa Domina	Outdoor Recreation Planner	Visual Resources; Travel Transportation Management; Recreation Uses; Wilderness; Wilderness Study Areas; Lands with Wilderness Characteristics
Alicia Styles	Monument Manager	National Monument

## 7 REFERENCES

### 7.1 References Cited

Bureau of Land Management (BLM). 2008a. *Ely District Record of Decision and Approved Resource Management Plan*. Ely, Nevada.

\_\_\_\_\_. 2008b. *National Environmental Policy Act Handbook H-1790-1*. January 2008.

\_\_\_\_\_. 2016b. *List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project*. April 12, 2016.

## APPENDIX A

### Wildlife and Plants for Mt. Irish Recreation Site

Highlighted species are BLM Sensitive Species in Nevada.

#### *Mt. Irish Recreation Site*

From Ely RMP, NDOW Diversity, and NV Natural Heritage Data:

Mule deer (*Odocoileus hemionus*) general habitat

Desert bighorn sheep (*Ovis canadensis nelsoni*) occupied habitat

Sheep fleabane (*Erigeron ovinus*)

The project would be in NV Hunt Unit 133. Depending on time of year, there could be hunting in the area.

The following data reflect survey blocks and/or incidental sightings of bird species within the project boundaries from the Atlas of the Breeding Birds of Nevada (Floyd et al. 2007) and NDOW Diversity data. These data represent birds that were confirmed, probably, or possibly breeding within vegetation similar to the project area. These data are not comprehensive, and additional species not listed here may be present within the project area. No survey blocks occur within the project area.

Golden eagle (*Aquila chrysaetos*)

Barn swallow (*Hirundo rustica*)

Brewer's sparrow (*Spizella breweri*)

Black-throated sparrow (*Amphispiza bilineata*)

Cliff swallow (*Petrochelidon pyrrhonota*)

Common raven (*Corvus corax*)

Horned lark (*Eremophila alpestris*)

Northern mockingbird (*Mimus polyglottos*)

Sage sparrow (*Amphispiza belli*)

#### Works Cited

Floyd T, Elphick CS, Chisholm G, Mack K, Elston RG, Ammon EM, and Boone JD. 2007. Atlas of the Breeding Birds of Nevada. Reno: University of Nevada Press.

## APPENDIX B

Number	Comment	Commenter	Substantive	Response
1	<p>The Basin and Range National Monument is part of the National Conservation Lands. The scope of the EA must incorporate the following legal and regulatory authorities in order to limit any impacts to resources and balance conservation, protection, and enhancement:</p> <ul style="list-style-type: none"> <li>• <b>2009 Omnibus Public Land Management Act.</b> “Congress established the National Conservation Lands, “...to conserve, protect and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.”</li> <li>• <b>Secretarial Order 3308.</b> “BLM shall ensure that the components of the NCL are managed to protect the values for which they were designated, including where appropriate, prohibiting uses that are in conflict with those values.”</li> <li>• <b>Policy Manuals 6100 and 6220.</b> Both manuals set minimum standards for how BLM should manage the NCL and National Monuments more specifically. These policies were established to ensure BLM is meeting their obligation as stewards</li> </ul>	Conservation Lands Foundation and The Wilderness Society	Yes	Conformance with these regulations is documented in Section 1.6.3.

	of a conservation system.			
2	BLM must take all reasonable steps to consult and collaborate with the public and stakeholders, especially with tribes who are culturally connected to the landscape.	Conservation Lands Foundation and The Wilderness Society	No	The BLM has consulted with the Tribes and sought public input on the EA and proposed action. See Section 1.8 for a summary of public participation and Section 5.2.2 for a summary of Tribal consultation.
4	Some things to consider with the interpretive kiosk: <ul style="list-style-type: none"> <li>• Being inclusive of all history of the Mt. Irish Archaeological Site and the National Monument</li> <li>• Ensuring consultation of Tribal nations on all appropriate activities</li> <li>• Enlisting Tribes in the interpretation of key tribal resources at the Mt. Irish Site in the National Monument, and using Native stories and languages where appropriate</li> <li>• Drawing upon “Traditional Ecological Knowledge”-Native knowledge, traditions, values, and attitudes toward the Earth – as guidance for how BLM might interpret natural and cultural resources at the site for the public</li> <li>• Crating culturally accessible materials for non-English speakers</li> </ul>	Conservation Lands Foundation and The Wilderness Society	No	Thank you for the suggestions. BLM will consider these when developing the kiosk and outreach materials.
5	Proposal supported as written	Nevada Division of Water Resources	No	Thank you for your comment

6	Proposal supported as written	Nevada Division of Wildlife	No	Thank you for your comment
7	<p>We would like to see the following items incorporated in the project:</p> <ul style="list-style-type: none"> <li>• Local community involvement including local Tribal input on signage, especially for informational kiosks</li> <li>• A concrete pad on-site to assist in small group activities such as astronomy programs and wildlife viewing. This pad could also be used to increase accessibility for the public</li> <li>• We would also like to ensure that the site will be monitored for impacts from the presumably increased numbers of on-site visitors</li> </ul>	Friends of Basin and Range Monument Team	No	Thank you for your comments. See response to comment number 2. Monitoring of the new site will continue with BLM personnel and volunteer groups. A concrete pad may be considered in the final site design.
7	Generally in support of the project, however, the description of the project is so vague that it is impossible to make useful comments on most issues. For example, how can anyone comment on the siting of the campground if the site is not described in text or on the map? Details should be provided before decisions are made, and the public should weigh in on those details.	Jim Boone	Yes	A new map has been incorporated into the EA at Section 1.2.2. The BLM conducted a more thorough field visit of the site during the comment period and determined that the location shown on the new map is a feasible option for the facilities.
8	Contrary to what is stated in the EA, the southeast corner of the project area (as marked on the EA map) is inside Mt. Irish Wilderness Area.	Jim Boone	No	This was a GIS error and has been corrected. The BLM has no intention of developing any facilities within the Wilderness area.

9	<p>The project area includes three important archaeological sites and the campground should be sited well away from these sites, preferably outside the Mt. Irish Archaeological District.</p>	Jim Boone	No	<p>See the map at Section 1.2.2. The chosen location is sited far enough away from the cultural sites so as not to disturb or disrupt their naturalness, but close enough to provide convenient access to the restroom. Placing a campground outside of the Archaeological District would not meet the purpose and need of the EA to address public misuse of the sensitive cultural sites.</p>
10	<p>A better site for a campground is east of the project area downhill from Silver Canyon Road. The area west of Silver Canyon Road crosses Silver Canyon Wash which is traditionally the site of frequent washouts that block two-wheel-drive vehicles, let alone larger RVs and vehicles towing trailers. It could be tragic to have campers stranded in the campground until Lincoln County has a chance to reopen the washed out road. Placing the campground east of Silver Canyon road eliminates this problem, moves the campground out of the Archaeological District, and into an area with plenty of suitable land.</p>	Jim Boone	Yes	<p>The BLM considered an alternative for moving the campground in the suggested location. However, it was dismissed from further analysis because placing a campground outside of the Archaeological District would not meet the purpose and need of the EA to address public misuse of the sensitive cultural sites.</p> <p>The BLM has also clarified the intent of the road improvements, which is not to allow RVs and</p>

				vehicles towing trailers into the campground, but to temporarily improve the road in order to get the vault toilet back to the site.
11	Implementation of the proposed action would provide a better recreational and educational experience while also protecting valuable cultural resources in a remote area. Implementation of the no action alternative would result in increasing degradation of rock art and other cultural resources at the site. BLM should implement the proposed action.	Steve Swansen	No	Thank you for your comment.
12	The N-4 Board reiterates opposition to encouraging more public visitation to this area because of the possibility that the petroglyphs could be disturbed and this would destroy the natural order of this historic site.	N-4 State Grazing Board	No	Public visitation to the sites has increased as a result of the designation of the Basin and Range National Monument. The current situation is not meeting visitor needs for camping and toilets which is resulting in direct damage and disturbance of the petroglyph sites. The campground and associated facilities would be sited out of site and away from the petroglyph sites in order to preserve their current condition.
13	The big reason this area is special is because of the care and thought given by the ranching community over	N-4 State Grazing Board	No	Thank you for your comment.

	many years. Several generations of ranching are an integral part of the values attributed to this area and these petroglyphs.			
14	There continue to be negative impacts to this area by unknowing publics who travel unprepared for this fragile desert arid climate. Many hours and countless dollars have already been spent to rescue such visits by the unprepared public; bringing mechanical, communication (lack of cell phone signal) and medical rescues to necessity by local ranchers, residents and members of the Lincoln County Sheriffs Office and the Lincoln County Road Department, and the Lincoln County Emergency Response teams This is an unnecessary unfunded mandate, brought on by encouraging more visitors to the Basin and Range National Monument and therefore the Mt Irish Petroglyph location.	N-4 State Grazing Board	No	Thank you for your comment. While these are legitimate concerns for a small, rural community, developing a primitive campground would not in itself encourage more visitation to the site. There is no plan to actively promote more visitation to the Basin and Range National Monument.
15	This Board hereby supports the following topics: "No Action Alternative", <ul style="list-style-type: none"> <li>• Assuring No Net Loss of grazing AUMs occur</li> <li>• Taking action to maintain and enhance range improvements in consultation with affected ranchers</li> <li>• Recognize the extremely fragile soils and vegetation and establish protocols for their adaptive monitoring and management to assure health, viability, and preservation of these important resources</li> <li>• Provide ongoing communication with area ranchers during planning and</li> </ul>	N-4 State Grazing Board	No	While several of these points are beyond the scope of this EA, they have all been addressed in the planning, design, and analysis of the Proposed Action.

	<p>construction and operation of any facilities built at the Mt. Irish Petroglyph site</p> <ul style="list-style-type: none"> <li>• Include noxious weed control and invasive species management plans</li> <li>• Design grazing systems to keep historic livestock grazing patterns and migrations in place</li> <li>• Take specific care to eliminate potential for looting of native American artifacts</li> <li>• Assure wildlife are not disturbed by human visitations that could increase</li> </ul>			
16	Provide trailheads and trails for citizens and visitors to visit Nature traveling by Jeeps and OHVs.	Robert Adams	No	Thank you for your comment.
17	In regards to the proposed improvements near Mount Irish on the Basin and Range National Monument, I am in full favor of all of those.	Susan Bright	No	Thank you for your comment.