

Summary of Stacey Antilla's Experience in Nevada BLM May 2010:

In March 2009, Stacey Antilla arrived in Tonopah as the new Outdoor Recreation Planner (ORP) for the longest off-road vehicle race in the country, "Vegas to Reno". She was selected for the position in January, but BLM management did not have her start until the beginning of March.

Previously, Ms. Antilla had spent several years working for the Colorado BLM. Her experience in Colorado was positive. After a few years out of federal service, she wanted to return, expecting a similar experience in Nevada. Antilla was asked to sign a two-year contract, as the Nevada BLM office seemed to have a hard time retaining employees. She resigned after one year in Nevada BLM.

Vegas to Reno Debacle

She found BLM was already behind on the National Environmental Policy Act (NEPA) review process for the race. An Environmental Assessment (EA) had to be written for it, and that was her task. BLM had already done public scoping and thousands of letters had already flooded through the doors in response. Nothing much had been done by BLM management in Nevada to address any concerns raised during the public scoping process.

Due to the fact that Antilla's Recreation Planner background with BLM in Colorado was directly related to ORV use of public lands, she was up to the task but daunted by having a lot of catching up to do on the proposed race.

First, the proposed project crossed the Southern Nevada District Office (SNDO), Tonopah Field Office, and the Stillwater Field Office (three BLM Districts). Concern was voiced by the SNDO over impacts to the ESA-listed threatened Desert Tortoise and habitat, and they ended up moving the race course out of their District. The Stillwater Field Office was tiering off an EA they wrote in 2008 for the course on their District. Thus, the Tonopah FO was left with the proposal and preparation of the EA.

As a first step, ORP Antilla did a pre-race course assessment with the race promoters. She also did another pre-race course assessment with another BLM ORP who had dealt with these races before, and they videotaped the entire course on the Tonopah FO managed BLM public lands. Several problems were immediately evident:

- It was apparent that post-race reclamation or rehabilitation had not been completed in the past;
- There were sections of proposed race course which would ultimately create miles of new ORV routes.
- If there was ever a road in many locations, they had long since re-vegetated and should not be driven on, much less raced on by ORVs;

- One of these stretches was several miles located within a desert burn area (the Beatty Burn), which also should have been of concern to BLM;
- Another mile of proposed race route was flagged and basically cut across untouched desert soils in order to avoid using the road. The reason stated by the proponent was that the private landowners which used that road did not want racing near their business (south of Weepah Hills); and
- Yet another location was located in Royston Hills. The proponent had sighted a line of mining prospecting tubes and followed them across the top of the mountain.

After their assessment, ORP Antilla made recommendations to her management. Her principal recommendation was that the race stay on the roads and avoid locations where there were either no roads, re-vegetated desert habitat over old roads, or intense existing damage due to races past (particularly on dry lake beds). **Ms. Antilla was told by BLM management that these were not of concern to them and they would remain part of the race.**

ORP Antilla next reviewed the Resource Management Plan (RMP) to cross-check the restrictions on ORV racing throughout the Tonopah FO. There was a polygon of restriction which excluded the area from ORV racing located in the Montezuma Range, Clayton Ridge area, near Goldfield. **She was then directed to write a Plan Amendment to change the classification to allow ORV racing but stating that there was no reasoning behind the classification.** These changes were signed by BLM manager Tom Seley.

As ORP Antilla was the Project Manager for the race, she moved forward with the categorization of comments received and distribution of those comments to the appropriate resource specialists, with a request for them to write their assessment and place it in a shared drive for the project for her to insert into the document. Antilla was told by several co-workers, including the Planning and Environmental Coordinator (P&EC) and BLM management, that Tonopah BLM doesn't follow the NEPA process like that. Instead, they are comfortable with the project manager writing their resource assessments for projects (pulled from other projects, she assumed) and then reviewing the final draft. Ms Antilla did not want to follow this flawed NEPA method, as she was trained to make sure each specialist did their work, as she is not a specialist for whatever their resource focus is. ORP Antilla came to find out, however, that this was the way most NEPA reviews were being handled in that office.

In Tonopah FO, most of the NEPA documents are typed and then are physically passed around with tiny sheets of paper attached where **you are meant to check a box next to your name, sign your name, and date it, stating you read it and had no issues or concerns.**

When it came time to put the final document together, Ms. Antilla and the other ORP from another BLM District who had been helping her on the race (unlike her counterpart in her district, Christopher Neville) got the OK to put the document into ePlanning, the BLM's new NEPA tool which enables revisions online, documents all changes, structures the document, makes it available for public comment, and accepts and categorizes comments. The BLM P&EC, Eric Williams, was very resistant. He didn't understand how the system worked and did not want to move forward with this method. Nevertheless, Ms. Antilla pushed forward. Mr. Williams gave Ms. Antilla the unapproved changes he wanted to make to the document as they approached the time when we would have to put the EA out for a 30 day public comment period. He changed many of the resource specialists' input dramatically. ORP Antilla caught some of these blatant changes, especially the one for Recreation, which she wrote. Ms. Antilla asked other specialists to review Williams' changes, as she could only assume he had done the same with theirs. ORP Antilla approached management about this issue to request help, but BLM management would not support her. Management left it to the P&EC and Ms. Antilla to debate it between themselves. She had to walk away from several heated discussions with Mr. Williams while BLM management hid just around the corner.

The proposed section of new race course, and ultimately new road, near and through the Beatty Burn area had not been surveyed by BLM Archaeologist, Susan Rigby. ORP Antilla told her she would take her out there to see the area so she could survey it. They went out there. Ms. Rigby would not drive the non-existent road and had no desire to walk it., instead declaring that there were no known cultural concerns, sight unseen.

The start of the race course had now been changed, due to the SNDO pulling out. The start of the race was now proposed to be located at Fluorspar Canyon Road, just south of Beatty, Nevada. The road crossed through the Amargosa River, which is the habitat of the imperiled Amargosa toad, a special status species in Nevada, endemic to the Amargosa River near Beatty. There were no culverts and was no bridge to conserve river habitat and keep vehicles out of the water flowing across the maintained dirt road. The race was proposed to begin just about 1/4 mile past the river crossing, with the staging area located in the Nevada Department of Transportation's (NDOT) gravel pit. However, the semi-trucks and other race vehicle transport entourage would be traveling across the river to get to the gravel pit, a concern for the Amargosa toad.

Mr. Seley stated that culverts would need to be installed and Ms. Antilla wrote this into the EA. She was later instructed by Mr. Seley to take it out of the document, stating that "it was a separate action which would be taken by NDOT in their Right of Way (ROW)". ORP Antilla did as instructed. **NDOT installed those culverts with no NEPA compliance two weeks prior to the race.**

The Vegas-Reno ORV race took place with minimal BLM presence on the ground. Ms. Antilla was told to keep staff to a minimum because the proffer account was close to being dry and BLM still had post race evaluation to contend with. **The proponent was not asked to post a bond**, though Ms. Antilla had recommended it several times both to

BLM management and on Interdisciplinary (ID) Team conference calls for reclamation.

After the race, Ms. Antilla conducted a post race brief assessment of locations she knew would have impacts and rode the southern portion on an ATV. It was really torn up and rough. She and an intern also drove much of the rest of it in a truck. They took pictures, made notes and took GPS data showing what sections of the route were in need of reclamation, re-vegetation, and rehabilitation. Some of the route had been bladed when they made this post assessment. ORP Antilla got all of the maps showing these locations together with photographs, and the recommendations based upon input from one of BLM's Rangeland Specialists for reseeding and for any blown-out turns, Ms. Antilla recommended fencing. She sent this with a letter signed by Mr. Seley to the proponent.

Ms. Antilla was then told that Casey Folks, **the race proponent, had bladed the majority of the rest of the route shortly thereafter. The EA stated that BLM would do a full post race assessment with video after all reclamation was complete. This never happened.**

Body in a Ghost Town

In another disturbing issue involving cultural resources, at the ghost town of Rhyolite, Nevada, a Special Recreation Management Area south of Beatty, there was a historic preservation project for which Ms. Antilla was partly responsible. Ms. Antilla had two volunteers in her charge at Rhyolite. One of the volunteers was working and a tourist approached him to let him know that they had found what appeared to be skeletal remains right outside one of the buildings. This should have, under normal circumstances, led to a phone call to Ms. Antilla and then a follow-up by her, calling the Law Enforcement Officer (LEO), David Hall, for the Battle Mountain District, and then reporting to management in their office. Some form of law enforcement should have traveled to the site to investigate and Archaeologist Rigby should have also traveled to the site and determined what this find was, its age, and formulate a formal report based upon her analysis.

However, in Ms. Antilla's absence on personal business, Ms. Rigby got the phone call from the volunteer. The volunteer was instructed to take a look at the skeletal arm and hand protruding from the ground and over the phone determined that it was a fake. **She instructed the volunteer to remove the arm from the ground and give it to the tourist that found it. No report was filed with the LEO.**

Ms. Antilla found out about this because the volunteer felt that this was not legal and he was not still sure the bones were not real. He called Ms. Antilla in Las Vegas on her cell phone and told her what had happened. Ms. Antilla called the LEO who had not been informed about the incident and neither had the local Beatty authorities. No specialist or law enforcement ever saw this potentially important cultural resource while in place or otherwise.

When Ms. Antilla returned to Tonopah, she was confronted by angry BLM managers. Around the end of that day, Mr. Seley came to Ms. Antilla's desk and reprimanded her

for ruining his day because he had to spend it trying to convince the Battle Mountain District Office that it was a fake arm that someone recently buried as a prank.

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Hostile Work Environment and Resignation

The tension in the office between the FO management and Ms. Antilla was now very high. Her supervisor, Alan Buehler, pulled her aside one day and gave her a letter from Mr. Seley stating that she was facing a proposal of 30-day suspension. When Mr. Buehler handed ORP Antilla the letter, he had tears rolling down his face and stated he “did not want to do this”.

At this point, Ms. Antilla knew then she could not stay in Tonopah. She resigned with two weeks notice.

Her resignation did not, as she expected, reduce tensions but exacerbated them. The next week and a half was nightmarish for her. Physically sick from the stress and unable to keep food down, she did not finish out the last two days in that office and moved out of town that week.