Worksheet
Determination of NEPA Adequacy (DNA)
for
Idaho Gold Company Test Pits for Future Passive Treatment System
Department of the Interior
Bureau of Land Management (BLM)

BLM Office: Upper Snake Field Office- Idaho Falls, ID
NEPA Number: DOI-BLM-ID-I010-2014-0026-DNA

Proposed Action Title/Type: Idaho Gold Company Test Pits for Future Passive Treatment System

Location of Proposed Action: About 15 miles west of Arco, Idaho along the south, unnamed tributary to Champagne Creek in T3N R24E Sec. 14 and 15 in Butte County (see enclosed Figure).

Description of the Proposed Action: Idaho Gold Company proposes to dig 4 infiltration pits and 3 geotechnical test pits to determine infiltration, soil type and depth adjacent to the south, unnamed tributary to Champagne Creek south of the South Pit. Each pit will be approximately 2 feet wide by 20 feet long by 15 feet deep, for a total disturbance of only approximately 0.006 acres. As soon as the tests are completed (1 or 2 days) the pits will be backfilled. The project is scheduled to take place between May 19 to May 21st, 2014.

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

LUP Name* Big Lost Management Framework Plan (MFP)/ Environmental Impact Statement; BLM 1982.

Other document** Champagne Creek—Moran Tunnel Abandoned Mined Lands Remediation Environmental Assessment # ID-030-99-063. This EA analyzed impacts including: removing two waste rock piles and burying them in a repository; constructing an acid mine drainage (AMD) passive treatment system (consisting of ponds, berms using imported rock, clay limestone, manure and straw; fencing the site, and seeding the affected areas. The current, proposed action is much smaller of an action than the existing EA project, but covers similar types of actions, and therefore impacts.

The proposed action is in conformance with the Big Lost MFP because it is specifically provided for in the following LUP decision:

- Watershed Decision 2.1 Control pollution from the Last Chance Mine Group on Champagne Creek.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

Champagne Creek—Moran Tunnel Abandoned Mined Lands Remediation Environmental Assessment # ID-030-99-063. This EA covered the impacts of removing spoil material and constructing an AMD passive treatment system at the mouth of Moran Tunnel.

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?

Yes, the current, proposed action, digging approximately 4 soil pits for infiltration testing and 3 geotechnical pits for soil type and depth information is a very small part of the previously analyzed EA, which addressed digging up and transporting spoil material and materials to construct the passive treatment system. This current proposal would only disturb 0.006 acres. This current, proposed action would only have a fraction of the impacts associated with the EA analyzed in 1999.

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

Yes, the existing EA included a No Action Alternative, Total Removal of the waste rock piles and partial removal of the waste rock piles. This would be similar to how the current, proposed action would be analyzed today.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

Yes, the analysis included loss of habitat, soil disturbance, and temporary particulate impacts to air quality. Yes, the impacts from the current, proposed project are so minor that they would be considered insignificant.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Yes, given what minor impacts the current, proposed action would have, the methodology and analytical approach used in the existing EA continue to be appropriate.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action?

Yes. Direct, indirect and cumulative impacts of the current, proposed action are substantially unchanged and are substantially smaller in scope from the existing EA, which identified soil disturbance, loss of habitat, air particulates, visual resources and turbidity as impacts.
Yes, the existing EA sufficiently analyzes the site-specific impacts of the current, proposed action. The current, proposed project area is just adjacent to the area analyzed in the existing EA.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?

Yes. The current, proposed action's cumulative impacts would be so minor that they would be covered by the existing EA's cumulative impacts.

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

Yes. Section VII of the existing EA under Consultation and Coordination covers the 8 entities/agencies consulted and the ten BLM staff members that helped in the development/review of the EA.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

Name	Title	Resource Represented
Dan Kotansky	Sup. Hydrologist/ Haz-mat Coordinator	Haz-mat/ Water Resources
Dick Hill	Archeologist	Cultural Resources
Jordan Hennefer	Rangeland Management Specialist	Veg/ Livestock Grazing
Justin Frye	Wildlife Biologist	Wildlife

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

1. These pits, once completely dug will be fenced from livestock if they appear to be a hazard for livestock or wildlife, especially if any ground water enters the soil pits.
2. Weed control will continue to be managed at all disturbed areas from this project's activities.
3. Any road damage resulting from these activities will be corrected as soon as local conditions allow for it.

CONCLUSION

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

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked.

/s/ Dan Kotansky
Dan Kotansky, Preparer
Date: 5/2/2014

/s/ Marissa Guenther
Marissa Guenther, NEPA reviewer
Date: 5/9/2014

/s/ Jeremy Casterson
Jeremy Casterson, Field Manager
Date: 5/6/2014