

DOI-BLM-NV-W010-2014-0016-DNA
September 2014 Competitive Geothermal Lease Sale

Worksheet
Determination of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management (BLM)

OFFICE: Winnemucca District (WD) Humboldt River Field Office (HRFO)

TRACKING NUMBER: **DOI-BLM-NV-W010-2014-0016-DNA**

CASE FILE/PARCEL NUMBER: NV-09-14-001

PROPOSED ACTION TITLE/TYPE: September 2014 Competitive Geothermal Lease Sale

LOCATION/LEGAL DESCRIPTION: See attached general and site vicinity maps and list of legal descriptions

APPLICANT (if any): BLM Nevada State Office

A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures.

The Proposed Action is to review one nominated geothermal parcel associated with the Sonoma-Gerlach Management Framework Plan (MFP III). The geothermal parcel was nominated for the September 2014 lease sale. The geothermal parcel is being reviewed against the existing National Environmental Policy Act (NEPA) documents as identified in part C of this worksheet to determine if the parcel is open for leasing in the WD. This review included identifying any potential impacts and the appropriate stipulations that would be made a part of any subsequent Offer to Lease and Lease for Geothermal Resources (for new leases issued under the Energy Policy Act of 2005). Lease issuance alone does not authorize any ground-disturbing activities to explore for or develop geothermal resources without site-specific approval for the intended operation. Such approval could include additional environmental reviews and permits.

A determination has been made that these parcels are open for leasing subject to both general stipulations that would apply to all lease parcels within the WD as well as applicable site specific stipulations. These stipulations are attached and made a part of this worksheet.

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B. Land Use Plan (LUP) Conformance

The parcel being evaluated in this DNA is subject to up to two planning documents. The parcel is subject to the Sonoma-Gerlach MFP III and the 2008 Geothermal Leasing ROD:

1) BLM WD Sonoma-Gerlach MFP III, approved in 1982. The parcel being evaluated in this DNA is subject to this MFP.

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

Sonoma-Gerlach MFP III, M 5.5

The Sonoma-Gerlach Resource Area will be open to geothermal and oil and gas leasing with the following restrictions:

1. Special stipulations for no surface occupancy will be applied to the following:
 - Sage grouse strutting grounds
 - S-1 cultural and historical sites
 - The George Lund Petrified Forest

The following will be leased with special stipulations:

Critical wildlife habitat areas

2. No leasing will be permitted on community watersheds and the Mahogany Creek Natural Area.

Note: Legal descriptions for the community watersheds can be found in Lands Decision 2.5.

2) Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States, Record of Decision (ROD) and Resource Management Plan Amendments for Geothermal Leasing in the Western United States, dated December 2008 (2008 PEIS). This ROD Amends the Sonoma-Gerlach MFP and applies to all parcels being evaluated in this DNA.

C. Identify applicable NEPA documents and other related documents that cover the proposed action.

1. EA# NV-020-02-029 "Winnemucca Field Office Geothermal Resources Leasing Programmatic Environmental Assessment", Decision Record/Finding of No Significant Impact (DR/FONSI) dated September 10, 2002, and modification DR/FONSI dated September 13, 2002.

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2. Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States, ROD and Resource Management Plan Amendments for Geothermal Leasing in the Western United States, dated December 2008 (2008 PEIS).

In previous lease sale evaluations, stipulations associated with these two NEPA documents and Decisions were clarified. Some of these clarified stipulations are utilized in this evaluation. Additionally, during the January 2012 lease sale evaluations, stipulations associated with these two NEPA documents and Decisions were further clarified. These clarified stipulations are also utilized in this evaluation.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Yes. Thirteen Potentially Valuable Areas (PVAs) were identified and analyzed in EA# NV-020-02-029. Geothermal parcel NV-09-14-001, which was nominated for the September 2014 lease sale, is located within PVA 8.

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

Yes. The nominated geothermal parcel was reviewed with respect to the range of alternatives analyzed in the existing NEPA documents.

The proposed action and the No Action Alternative were the two alternatives analyzed in EA NV-020-02-029. The proposed action was to consider leasing all or some of the geothermal resources within thirteen PVAs and Known Geothermal Resource Areas (KGRAs) within the jurisdiction of the WD and a portion of the Stillwater Field Office. Under the No Action Alternative, pending leases would be analyzed under a previous EA that did not include PVAs or KGRAs and would result in additional NEPA analysis on a case by case basis.

The 2008 PEIS identified three alternatives:

- Alternative A- No Action: Continuation of Current Management
- Alternative B- Proposed Action and Amendments
- Alternative C- Leasing Lands near Transmission Lines

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Alternative B was selected as the proposed plan amendment based on: (1) its consistency with the requirements of the Energy Policy Act of 2005, (2) its balanced use and protection of resources, (3) the Final PEIS's analysis of potential environmental impacts, and (4) the comments and recommendations from agencies, states, stakeholders, and the public. Alternative B is structured to be consistent with the congressional mandate of the Energy Policy Act to facilitate geothermal leasing by amending land use plans to allocate geothermal resources and adopt stipulations and procedures for leasing.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes. A review of the proposed parcel did not result in the finding of any new information or circumstances and it can be reasonably concluded that new information and new circumstances would not substantially change the analysis.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes. Both documents state there would be no direct impacts to issuing leases for future geothermal exploration, development, and production activities. Indirect impacts and cumulative effects to resources were considered in the "reasonably foreseeable development scenario". The indirect effects of allowing the nominated parcel to be leased are within the range of the reasonably foreseeable development scenarios identified in both NEPA documents.

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

Yes. EA# NV-020-02-029 was made available for a 30-day public comment period via Dear Interested Party letters and news releases. Comments were taken into consideration prior to the final EA and FONSI/DR.

The 2008 PEIS was made available for a 90-day public comment period and held 13 public meetings in the 12-western states project area prior to issuing the ROD.

In addition, the Nevada Department of Wildlife and the following Native American Tribes were consulted regarding this proposal:

- Fort McDermitt Paiute & Shoshone Tribe

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- Lovelock Paiute Tribe
- Pyramid Lake Paiute Tribe
- Summit Lake Paiute Tribe
- Winnemucca Indian Colony
- Reno-Sparks Indian Colony
- Battle Mountain Band Council
- Fallon Paiute and Shoshone Tribe
- Burns Paiute Tribal Council
- Cedarville Rancheria
- Fort Bidwell Indian Community Council

E. Persons/Agencies/BLM Staff Consulted

See Attached Section E for Review Signatures and Conclusion