

Worksheet
Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management

OFFICE: Tonopah Field Office

TRACKING NUMBER: DOI-BLM-NV-B020-2014-0045-DNA

CASEFILE/PROJECT NUMBER: NVN-073109

PROPOSED ACTION TITLE/TYPE: Mineral Ridge Mine: Fall 2014 Bat Exclusions

LOCATION/LEGAL DESCRIPTION: The proposed activities would be located within the authorized Plan of Operations boundary (Project Area) shown on Figure 1 which includes portions of:

- Township (T) 1 South (S), Range (R) 39 East (E), Section 31;
- T1S, R38E, Section 36;
- T2S, R38E, sections 1, 2, 11, and 12; and
- T2S, R39E, sections 5, 6, and 7.

APPLICANT (if any): Mineral Ridge Gold, LLC (MRG)

A. Description of the Proposed Action and any applicable mitigation measures

Mineral Ridge Gold (MRG) has submitted to the BLM proposed modifications to the permitted *Pit Expansion Plan of Operations Amendment* (Pit Expansion Plan Amendment) (MRG 2013). As proposed, the modifications would involve disturbances to historic underground workings that provide habitat for bats.

In order to minimize impacts to bats, MRG proposes to install bat exclusions and then permanently close 19 sites within the authorized Project Area. The site locations are shown on Figure 1.

Procedures for the proposed exclusions described below are the same as those described in the Pit Expansion Plan Amendment (MRG 2013), analyzed under *An Environmental Assessment of Mineral Ridge Gold's Proposed Plan of Operations Amendment* (DOI-BLM-NV-B020-2014-0002-EA) (BLM 2014a) [referred to herein as the Pit Expansion Environmental Assessment (EA)] and evaluated under a prior Mineral Ridge Mine Bat Exclusion DNA (DOI-BLM-NV-B020-2014-002-DNA; BLM 2014b).

Exclusion Procedures

Bat exclusions would be installed in the early fall (between September 1 and October 31) after the cessation of maternity activities and prior to the onset of hibernation. Exclusion material, which consists of one-inch mesh, would be installed over the sites to be closed and left in place for three nights to one week. Difficulties in navigating through exclusion material would cause the bats to seek alternate roost sites (Sherwin, et al. 2009).

Exclusions would be installed by experienced contractors in coordination and consultation with the Nevada Department of Wildlife (NDOW) and the Bureau of Land Management (BLM). The openings would be permanently closed immediately following confirmation of successful bat exclusion. The work would also be carried out in compliance with Mine Safety and Health Administration regulations and with due consideration for human safety.

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

Tonopah Resource Management Plan and Record of Decision Date Approved: 1997

Esmeralda County Public Lands Policy Plan Date Approved: 2013

The Proposed Action is ultimately part of mine development and is in conformance with the following land use plan decisions presented in the Tonopah Resource Management Plan and Record of Decision, approved on October 6, 1997 (BLM 1997).

"A total of 6,028,948 acres (99 percent of the Tonopah Planning Area) would be open to the operation of the mining laws," (page 23),

The "BLM provides for mineral entry, exploration, location and operations pursuant to the mining laws in a manner that 1) would not unduly hinder the mining activities, and 2) assures that these activities are conducted in a manner which would prevent undue or unnecessary degradation of the public land," (page 35),

"All operations shall comply with all federal and state laws, including those relating to air quality, water quality, solid waste, fisheries, wildlife and plant habitat, and archeological and paleontological resources," (page 36).

On April 3, 1985, the Esmeralda County Board of Commissioners adopted a county policy plan for public lands under the Nevada Statewide Policy Plan for Public Lands authorized by Senate Bill 40. Senate Bill 40 directs the State Land Use Planning Agency to work together with local planning entities to prepare local plans and policy statements regarding the use of federal land in Nevada. The Esmeralda County Public Lands Policy Plan was finalized in 2013 (Esmeralda County 2013). As part of a larger mining operation, the Proposed Action is consistent with the following policies found in the plan:

- **Policy 7-1:** Encourage the careful development and production of Esmeralda County's

metal, mineral, and geothermal resources while recognizing the need to protect the environment and ecologic resources

- **Policy 7-3:** Support State and Federal policies that encourage both large and small-scale mining and geothermal operations. Regulatory requirements, e.g., documentation, permitting, should be minimized and expedited in order to maintain the principles of the existing mining and leasing laws, including the Mining Law of 1872.
- **Policy 7-4:** Metal, mineral, and geothermal operations should be consistent with best management practices for the protection of the environmental qualities and the multiple uses of public lands.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

The bat exclusion measures MRG is proposing are the same as those proposed under the Pit Expansion Plan Amendment (MRG 2013) and analyzed under the Pit Expansion EA (DOI-BLM-NV-B020-2014-0002-EA) (BLM 2014a).

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(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. The Proposed Action is an extension of previously approved bat mitigation measures; MRG is proposing to close an additional 19 sites. The exclusions would occur in the same analysis area considered in the Pit Expansion EA (DOI-BLM-NV-B020-2014-0002-EA) (BLM 2014a) and MRG proposes to close openings using the same exclusion procedures analyzed in that document.

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

Yes. The Proposed Action and No Action alternatives analyzed in the Pit Expansion EA (DOI-BLM-NV-B020-2014-0002-EA) (BLM 2014a) disclosed the impacts of both implementing and not implementing bat exclusions in the analysis area. Environmental concerns, interests and resource values have not changed to the degree that would make it appropriate to analyze additional alternatives.

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, the existing analysis is valid. No new information or circumstances have risen since the Pit Expansion EA, Decision and Finding of No Significant Impact were issued on February 4, 2014 that would affect the adequacy of 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, the Pit Expansion EA describes and analyzes potential impacts to bats resulting from bat exclusion measures. Excluded bats would be displaced into the landscape to find other suitable roosting sites. There is no indication that implementing the Proposed Action would result in different environmental effects than those anticipated in the Pit Expansion EA.

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

Yes, the public involvement is adequate. The Proposed Action lies within the same area as the previously approved Pit Expansion Plan Amendment for which agency and public consultation including tribal consultation was carried out.

E. Persons/Agencies/BLM Staff Consulted

NDOW specialist Tracy Kipke and BLM specialist David Price were consulted during the preparation of this DNA. A complete list of the persons consulted and participating in the preparation of the Pit Expansion EA can be found therein.

Conclusion

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



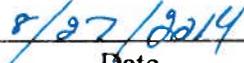
Signature of Project Lead



Signature of NEPA Coordinator



Signature of the Responsible Official:



Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal

decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

References Cited

Bureau of Land Management (BLM). 2014a. *An Environmental Assessment of Mineral Ridge Gold's Proposed Plan of Operations Amendment*. DOI-BLM-NV-B020-2014-0002-EA. February 2014.

BLM 2014b. Mineral Ridge Mine Bat Exclusion DNA (DOI-BLM-NV-B020-2014-002-DNA).

BLM. 1997. *Tonopah Resource Management Plan and Record of Decision*. BLM Battle Mountain Field Office. October 6, 1997.

Esmeralda County 2013. *Esmeralda County Public Lands Policy Plan. Final 2013*.

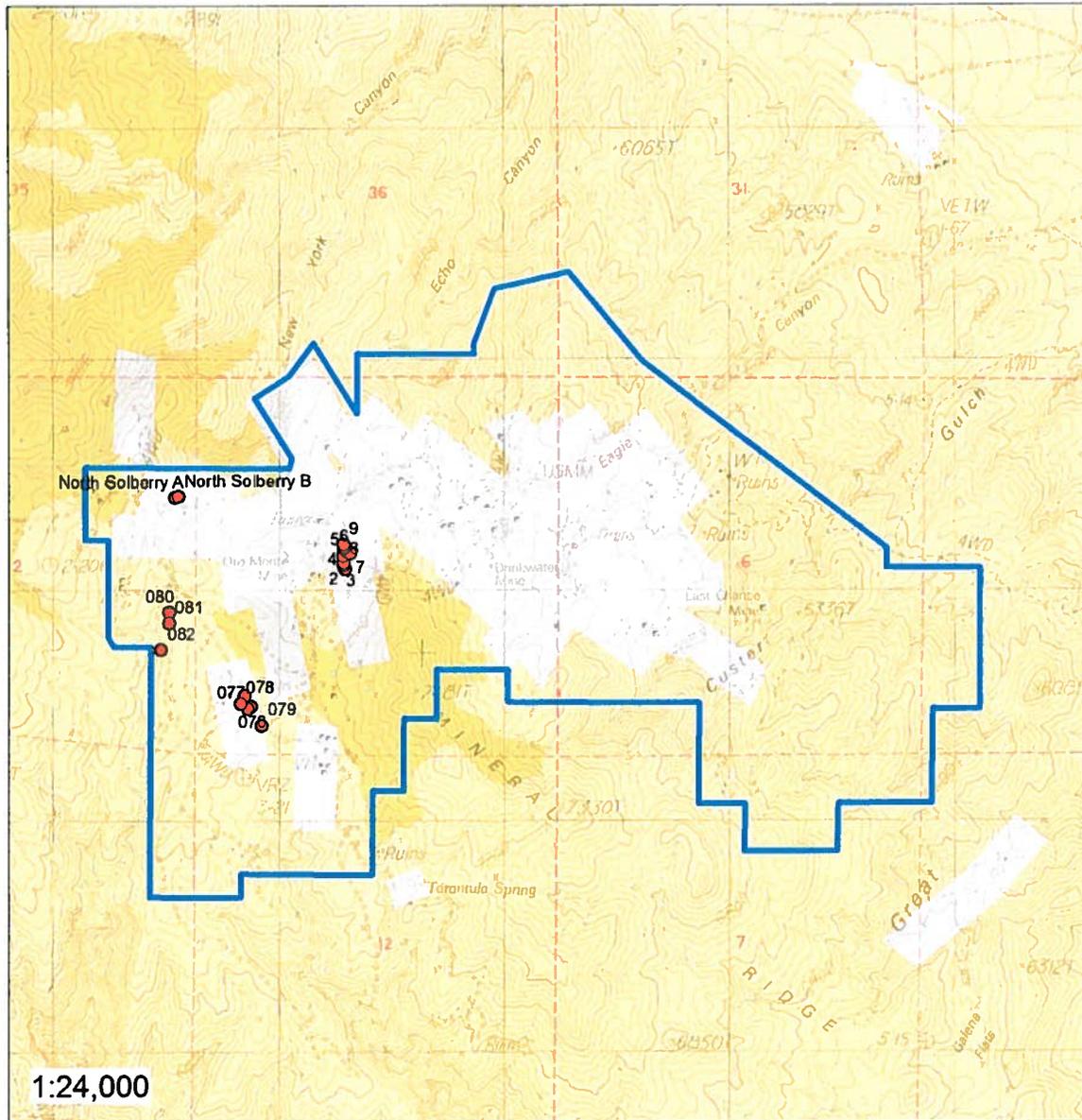
Mineral Ridge Gold, LLC (MRG). 2014. *Mineral Ridge Mine: Bat Protection Measures*. March 2014.

MRG. 2013. *Mineral Ridge Mine (NVN-73109/Reclamation Permit 0103) Pit Expansion Plan of Operations Amendment*.

Sherwin, R.E., Altenback, J.S., and Waldien, D.L. 2009. *Managing Abandoned Mines for Bats*. Bat Conservation International.

FIGURE 1

Mineral Ridge Mine Fall 2014 Bat Exclusion



1:24,000

0 0.5
Miles

Battle Mountain District Office



Legend

- Exclusions Sites
- ▭ Mineral Ridge Mine Plan Boundary



Source: BLM 2012
Bureau of Land Management
Tonopah Field Office
No warranty is made by the BLM as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.