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

OFFICE: Battle Mountain District/Mount Lewis Field Office

TRACKING NUMBER: DOI-BLM-NV-B010-2016-0038-DNA

CASEFILE/PROJECT NUMBER: NVN-078104 (16-A1)

PROPOSED ACTION TITLE/TYPE: The revised Project area is located in all or portions of Township 29 North, Range 47 East, Section(s) 3, 4, 5, 9 and 10.

LOCATION/LEGAL DESCRIPTION: The revised Project area is located in all or portions of Township 29 North, Range 47 East, Section(s) 3, 4, 5, 9 and 10.

APPLICANT (if any): Nevada Rae Gold, Inc.

Description of the Proposed Action and any applicable mitigation measures: Nevada Rae Gold submitted an Amendment to the Black Rock Mine Plan of Operations proposing to replace existing unlined process ponds with four lined ponds, add additional equipment to the milling operation, and upgrade infrastructure (all on privately held land).

One damaged water well will be closed and a replacement well drilled on BLM land. All proposed actions are on previously disturbed land and the total disturbance has not been increased.

A. Land Use Plan (LIP) Conformance

LUP Name	NV-Shoshone-Eureka RMP	Date Approved:	February 26, 1986
LUP Name	Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region, Including Greater Sage-Grouse Sub-Regions of Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon and Utah	Date Approved:	September, 2015

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

Page 29 of Shoshone-Eureka Resource Management Plan Record of Decision, as amended, states:
Minerals-Objectives:

1. Make available and encourage development of mineral resources to meet national, regional, and local needs consistent with national objectives for an adequate supply of minerals.
2. Assure that mineral exploration, development, and extraction are carried out in such a way as to minimize environmental and other resource damage and to provide, where legally possible, for rehabilitation of lands.
3. Develop detailed mineral resource data in areas where different resources conflict so that informed decisions can be made that result in optimum use of the lands.

Management Decisions- Locatable Minerals:
All public lands in the planning areas will be open for mining and prospecting unless withdrawn of restricted from mineral entry.

Also:

The Record of Decision (ROD) and Approved Resource Management Plan Amendments for the Greater Basin Region, Including the Greater Sage-Grouse sub-regions of Idaho and Southwestern Montana, Nevada and northeastern California, Oregon, and Utah (ARMPA), detail the Greater Sage Grouse habitat management plan for Nevada. The Proposed Action falls partially or completely within General Habitat Management Areas (GHMA) or Other Habitat Management Areas (OHMA). In order to process this Proposed Action, the Mount Lewis Field Office requires that the intended disturbance area and vicinity be analyzed by the BLM's Nevada State Office and by the State of Nevada Department of Wildlife per 43 CFR 3809.401(c), the 2015 ROD and the 2015 ARMPA, subject to valid and existing rights and applicable law. The Proposed Action is consistent with these requirements.

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

List by name and date all applicable NEPA documents that cover the proposed action.

1. Black Rock Canyon Dry Placer Mine and Mill, Environmental Assessment (EA) (NV063-EA04-077) and Finding of No Significant Impact (FONSI), August, 2005.

C. 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 similar to the NEPA documents for this project and listed above. The Project is in the same analysis area and location. The total surface disturbance has not changed from that covered in the EA.

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 ranges of alternatives analyzed in the EA (August 2005) are appropriate with respect to the new proposed action and given current environmental concerns, intents, and resource values. The existing range of alternatives remains adequate for the analysis. The proposed action includes mineral processing on patented land only. One alternative considered mineral processing and milling on public lands which would eliminate haulage. A no action alternative was also considered (see EA sections 2.1 to 2.3.2). There will be no change in the amount of approved disturbance.

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

Yes. No new information or circumstances have come to light that would invalidate the existing analyses as presented in the EA.

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 direct, indirect, and cumulative effects that would result from the implementation of the proposed action are identical to those analyzed in the existing NEPA document. The proposed action is essentially identical with only minor changes. The direct indirect and cumulative effect are largely addressed by applicant-committed environmental protection measures for air quality, cultural and paleontological resources, surface and groundwater resources, wildlife, special status species including Greater sage-grouse, wildfire prevention,

solid and hazardous waste management, and invasive and non-native species. The current NEPA documents have covered the situation adequately. Impacts and environmental consequences are addressed in Chapter 4.0 (EA, pgs. 30-37).

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

Yes. No further public input will be required, because no impacts to external entities are required.

D. Persons/Agencies/BLM Staff Consulted

Name and Title	Resource/Agency Represented	Signature
Joseph S. Moskiewicz, Jr.	Minerals AFM	
J. Gant Massey, Ph.D.	Renewable AFM (Acting)	
Juan Martinez /J. Gant Massey Ph.D.	Wildlife Biologist	
Justin DeMaio	Archaeologist	

Note: Refer to the EIS for complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

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.

FOR Richard A Singer

Signature of Project Lead

Signature of NEPA Coordinator

Signature of Responsible Official:

6/13/2016

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.

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