

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-2016 0010-DNA

CASEFILE/PROJECT NUMBER: NVN 082096 (16-1A)

PROPOSED ACTION TITLE/TYPE: Amendment to the Plan of Operations, Mt. Hope Project.

LOCATION/LEGAL DESCRIPTION: The Project is located in all or parts of Township 20 North, Range 50 East (T. 20 N., R. 50 E.), Sections 2-5; T. 21 N., R. 50 E., Sections 1-3, 11-14, 23, 25, 26, and 32-36; T. 21 N., R. 51 E., Sections 1, 7, 8, 12, 16-18, and 31; T. 21 N., R. 52 E., Sections 4-9; T. 21.5 N., R. 51.5 E., Section 36; T. 21.5 N., R. 52 E., Sections 31-33; T. 22 N., R. 50 E., Section 36; T. 22 N., R. 51 E., Sections 1, 2, 11-15, and 20-36; T. 22 N., R. 51.5 E., Sections 1, 12, 13, 24, 25, and 36; T. 22 N., R. 52 E., Sections 6-8, 17-20, and 29-32; T. 23 N., R. 51 E., Sections 25, 35, and 36; and, T. 23 N., R. 52 E., Section 31, Mount Diablo Base and Meridian, located in Eureka County, Nevada.

APPLICANT (if any): Eureka Moly, LLC

Description of the Proposed Action and any applicable mitigation measures:

The revision to the Mt. Hope Project Plan of Operations in the APO consists of establishing a “Phase 0” for bonding purpose and minor revisions to the Water Resources Monitoring (WRMo) Plan. Phase 0 consists of a phased bonding revision that would reduce EML’s bound amount for the Project from the amount approved for Phase 1 to the amount calculated in the revised remediation cost estimate (RCE) submitted for Phase 0 in the APO. The RCE for Phase 1 was based on the anticipated disturbance at the end of year three (4,269 acres). The Phase 0 RCE is based on the actual disturbance currently present on the Project (1,689 acres).

A. Land Use Plan (LUP) Conformance

LUP Name: Shoshone-Eureka Resource Area Record of Decision.

Date Approve: February 26, 1986

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

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 or restricted from mineral entry.

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. Mt. Hope Project Plan of Operations (NVN 082096) and Environmental Impact Statement (EIS), (DOI-BLM-NV-EIS07-019), 11/16/2012.
2. Mt. Hope Project Amended Plan of Operations (NVN 082096 14-2A) and Environment Assessment (EA) (B010-2015-0015-EA), 4/23/2015

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

There is no other documentation relevant to the proposed action.

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?**

Documentation of answer and explanation:

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 area of disturbance is being reduced to the existing disturbed area for bonding purposes, therefore there is less potential for impacts. The total area of surface disturbance of 1,689 acres is less than that indicated in the EIS and 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?

Documentation of answer and explanation:

Yes. The ranges of alternatives analyzed in the EIS (November 16, 2012) and EA (4/23/2015) 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 reduces the area of disturbance from 4,269 acres to 1,689 acres for bonding purposes.

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?

Documentation of answer and explanation:

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

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?

Documentation of answer and explanation:

The direct, indirect, and cumulative effects that would result from the implementation of the new proposed action are almost identical to those analyzed in the existing NEPA document. The current NEPA documents have covered the situation adequately.

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

Documentation of answer and explanation:

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

D. Persons/Agencies/BLM Staff Consulted

<u>Name and Title</u>	<u>Resource/Agency Represented</u>	<u>Signature</u>
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Joseph S. Moskiewicz

Minerals AFM

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

Conclusion (If you found that one or more of these criteria is not met, you will not be able to check this box.)

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

Acting for Sen. D. Shreve

11-18-15

Signature of 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.

<i>Screening for Extraordinary Circumstances: Will this project...</i>		Yes	No
1	Have significant adverse effects on public health or safety? Rationale: No. The only site activity will be maintenance of existing facilities and infrastructure.		✓
2	Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas? Rationale: No. The only site activity will be maintenance of existing facilities and infrastructure.		✓
3	Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources? Rationale: There are no highly controversial environmental effects or unresolved conflicts concerning alternatives associated with the Project.		✓
4	Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks? Rationale: There are no significant or unknown risks involved with the Project.		✓
5	Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects? Rationale: The Project will not establish any precedents.		✓
6	Have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects? Rationale: There will be no direct insignificant actions which will have a cumulative significant environmental effect.		✓
7	Have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by either the bureau or office? Rationale: The Project will have no significant impact listed or eligible properties on the National Register of Historic Places.		✓
8	Have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species? Rationale: NO. The above were determined not to be impacted during the review of the Plan of Operations and the EIS. The only site activity will be maintenance of existing facilities and infrastructure.		✓
9	Violate a Federal law, or a State, local, or tribal law or requirement imposed for the protection of the environment? Rationale: NO. The above were determined not to be impacted during the review of the Plan of Operations and the EIS. The only site activity will be maintenance of existing facilities and infrastructure.		✓
10	Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898). Rationale: NO. The above were determined not to be impacted during the review of the Plan of Operations and the EIS. The only site activity will be maintenance of existing facilities and infrastructure.		✓
11	Limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites? Rationale: NO. The above were determined not to be impacted during the review of the Plan of Operations and the EIS. The only site activity will be maintenance of existing facilities and infrastructure.		✓
12	Contribute to the introduction, continued existence, or spread of noxious weeds or non-native species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species? Rationale: NO. The above were determined not to be impacted during the review of the Plan of Operations and the EIS. The only site activity will be maintenance of existing facilities and infrastructure.		✓

All of the above questions must be answered negatively before the Categorical Exclusion may be approved. This checklist is taken from 516 DM 2, Appendix 2.