

Virginia City and Gold Hill Wastewater System Improvements

Finding of No Significant Impact

DOI-BLM-NV-C020-2011-0004-EA

September 2012



Background

Storey County, Nevada, is proposing to (1) upgrade their existing wastewater treatment plant (WTP) in Virginia City; (2) replace the Virginia City sewer collection system; (3) construct sewer lift stations in Gold Hill; and (4) replace/extend the Gold Hill sewer collection system. Construction of an upgraded WTP is required to reduce potential groundwater contamination, ensure public health, and meet Virginia City and Gold Hill wastewater demands while accommodating potential future growth.

Except for an auger screen installed in 2008, the WTP has not been updated since its construction in 1982. The treatment technology used by the plant is outdated and requires manual removal of solids. In addition, the drying beds are undersized to provide adequate sludge drying time. Construction of the upgraded WTP is needed to update the treatment technology, which would provide adequate treatment of solids and improve the quality of effluent being discharged into Six Mile Canyon Creek. In addition, based on the State of Nevada demographer's population estimates, the current WTP is undersized to process peak demand. An upgraded WTP is needed to treat wastewater for the population over the next 20 years.

During periods of high precipitation and runoff in Six Mile Canyon, stormwater has been known to flood the existing WTP aeration pond, discharging untreated wastewater downstream. This discharge of untreated wastewater is both hazardous to public health and a violation of Nevada Division of Environmental Protection (NDEP) standards that require treatment of wastewater prior to discharge. Construction of a stormwater drainage channel is needed to route stormwater around the aeration pond, and to avoid flooding and discharge of untreated wastewater.

The Virginia City sewer collection system is allowing raw sewage to infiltrate into the ground. This raw sewage is harmful to ground water resources and ultimately public health. The NDEP requires treatment of wastewater prior to discharge. Due to leaks, the current collection system does not meet NDEP standards and needs to be replaced so that all of the Virginia City wastewater is collected and conveyed to the WTP. In addition to deterioration, the existing Virginia City collection system lacks a sufficient number of manholes to ensure proper maintenance of the system. As a result, there is inadequate access to the pipes, so routine repairs cannot be made.

The Gold Hill sewer collection system does not currently service all residences and businesses in the area due to limited capacity of the community septic tank. Those portions of the community that are not connected to the collection system are currently using individual septic systems. In addition, the existing collection main is located in the shoulder of State Highway 341 and is substandard because there are no manholes and insufficiently sized pipes. The disposal field associated with the community septic system is failing as evidenced by the surfacing of effluent in the area. There is a need to provide waste water treatment to the Gold Hill community to reduce the potential for groundwater contamination and public health issues associated with effluent surfacing at the disposal field.

The right-of-way for replacement of approximately 32,900 linear feet of pipeline on BLM-administered lands would be authorized by the BLM pursuant to Title V of the Federal Land Policy and Management Act of 1976 (PL 94-579) and the regulations contained in 43 CFR 2800.

The sewage WTP upgrade and expansion would be authorized by the BLM pursuant to the Recreation and Public Purposes Act of 1926, as amended, and the regulations contained in 43 CFR 2740 and 2912. The 12-acre WTP parcel will be conveyed directly to Storey County as a land patent.

Finding

Based on the analysis of potential environmental impacts in the *Virginia City and Gold Hill Wastewater Improvements Environmental Assessment* (EA), DOI-BLM-NV-C020-2011-0004-EA, I have determined that the Proposed Action will not have a significant effect on the human environment. Therefore, the preparation of an environmental impact statement (EIS) is not required for compliance with the National Environmental Policy of 1969 (NEPA). The BLM has participated as a Cooperating Agency in the development of the EA and hereby adopts the Final EA. The BLM has determined that the EA satisfies NEPA regulations and is consistent with the BLM NEPA Handbook (H-1790-1).

The environmental review process included the consultation requirements under the National Historic Preservation Act (NHPA), recognizing that the Proposed Action is completely within the Virginia City National Historic Landmark (VC NHL), and some adverse effects to historic and cultural resources can be anticipated. Actions will be taken to identify, evaluate, assess affects, and mitigate all adverse impacts to historic resources, and to resolve affects identified under NHPA. In regard to the process to be followed and sites being adversely affected, on March 12, 2012 a Programmatic Agreement (PA) was executed between the U.S. Army Corps of Engineers (federal lead), the BLM, the Nevada State Historic Preservation Officer (SHPO), and Storey County.

This finding and conclusion is based on the consideration of the Council on Environmental Quality's (CEQ) criteria for significance (40 CFR 1508.27), both with regard to the *context* and the *intensity* of impacts described in the EA. Although adverse effects to historic resources in Virginia City and Gold Hill are anticipated, the impacts are not determined to be significant. The impacts under the Proposed Action will not compromise the VC NHL as a whole, and adverse impacts will be mitigated to a large degree by actions mutually agreed to in the PA between the BLM, SHPO and other parties.

Context:

The affected area of the Proposed Action are the communities of Virginia City and Gold Hill. The combined population estimate of the communities encompassing 18.5 square miles is 1,220 people. The project area is highly developed and disturbed. A significant amount of the sewer line replacement will occur under existing paved roadways. Other areas where the project would occur are highly disturbed and natural resources values are low. The project has been planned with input from the interested public and users of public land.

Intensity:

1) *Impacts that may be both beneficial and adverse.*

The Proposed Action is predominantly beneficial; improvements in public services and water quality are anticipated to occur as a result of the project's implementation. Some historic resources will be identified as important elements of the VC NHL, and they could be adversely

impacted by the Proposed Action. The effects will be resolved per Sections 106, 110(f) and 111(a) of NHPA through application of the PA. The loss of some scientific, cultural, and historical value of the VCNHL is anticipated to be minimal and not significant.

2) The degree to which the proposed action affects public health or safety.

The present Virginia City sewer collection system is allowing raw sewage to infiltrate in the ground. This raw sewage is harmful to ground water resources and ultimately to public health. The Proposed Action would benefit public health by resolving this issues with proper treatment of effluent in Virginia City and Gold Hill. There are no public safety concerns; measures will be implemented during construction to minimize hazards around work areas and impacts to traffic circulation cause by the project.

3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

The Proposed Action is completely within the VC NHL, the Virginia City National Register District, and the Comstock Historic District. Historic and cultural resources that contribute to the importance and values of these designated areas are known to be present.

No wetlands, park lands, prime or unique farmlands, wild and scenic rivers, ecological critical areas, or Areas of Critical Environmental Concern will be affected by the Proposed Action.

4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.

The Proposed Action is predominantly beneficial; improvements in public services and water quality are anticipated to occur as a result of the project's implementation.

5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

There only is one aspect of the Proposed Action which carries effects that are highly uncertain or involve unique or unknown risks. Some historic resources will be identified through application of the PA. Although unique and highly valuable historic or cultural resources could be encountered in a previously undisturbed context, this is not of high likelihood.

6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The Proposed Action would not establish a precedent for future actions. Any future improvements or alterations to the wastewater system on BLM-administered lands in Virginia City or Gold Hill would require project-specific NEPA analysis.

7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

The Proposed Action is not related to other actions with individually insignificant but cumulatively significant impacts.

8) *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the NRHP or may cause loss or destruction of significant scientific, cultural, or historical resources.*

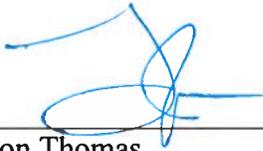
Some historic resources will be identified as important elements of the VC NHL, and they could be adversely impacted by the Proposed Action. The effects will be resolved per Sections 106, 110(f) and 111(a) of NHPA through application of the PA. The loss of some scientific, cultural, and historical value of the VC NHL is anticipated to be minimal and not significant.

9) *The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the ESA of 1973.*

The Proposed Action will have no effect on any federally listed species or their critical habitat under the ESA.

10) *Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.*

The Proposed Action is in compliance with the Carson City Field Office Consolidated Resource Management Plan. The Proposed Action will not violate or threaten to violate any federal, State, or local law or requirement imposed for the protection of the environment.



Leon Thomas
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9-25-12
Date