

**United States Department of the Interior
Bureau of Land Management**

**Categorical Exclusion
DOI-BLM-CO-SO50-2016-0021 CX**

May 2016

**Western Area Power Administration
Fiber Optic Cable Installation**

Location: Curecanti to Montrose, Montrose County

**U.S. Department of the Interior
Bureau of Land Management
Uncompahgre Field Office
2465 South Townsend Avenue
Montrose, CO 81401
Phone: (970) 240-5300**



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CATEGORICAL EXCLUSION

NUMBER: DOI-BLM-CO-S050-2016-0021 CX

PROJECT NAME: WAPA CURE-MTR Fiber Optic Cable Installation

CASE NUMBER: COC-77666

PLANNING UNIT: Uncompahgre Field Office (UFO)

LEGAL DESCRIPTION: New Mexico Principal Meridian, Colorado
T. 48 N., R. 6 W.,
 sec. 8, SE1/4SW1/4.
T. 48 N., R. 8 W.,
 sec. 15, NW1/4NE1/4;
 sec. 17, NE1/4SW1/4 and S1/2SW1/4;
 sec. 18, lot 4, SE1/4SW1/4, and S1/2SE1/4;
 sec. 19, N1/2NE1/4 and NE1/4NW1/4.
T. 48 N., R. 9 W.,
 sec. 13, N1/2NE1/4;
 sec. 14, lot 2 and SW1/4NE1/4;
 sec. 19, lot 2 and E1/2NW1/4.
T. 48 N., R. 10 W.,
 sec. 13, W1/2NW1/4;
 sec. 24, N1/2NE1/4 and SE1/4NE1/4.

BACKGROUND: Western Area Power Administration (WAPA) has submitted an application for a right-of-way (ROW) to authorize an installed 48-count overhead fiber optic ground wire (OPGW) on WAPA's existing Curecanti to Montrose (CURE-MTR) 115kV Transmission Line between the Curecanti-South Canal-Montrose Substations. This transmission line is presently authorized under COC-27017. The OPGW replaced existing optic ground wire (OPW) already installed on the line. The upgrade work was completed between August and October of 2015, and consisted of replacement or installation of hardware assemblies on existing structures, removal of existing OPW and installing and tensioning the OPGW. This was a joint project between the USDI Bureau of Reclamation (BOR) and WAPA. Each party is entitled to 24 fibers of the OPGW line. All work was confined to WAPA's existing ROW. Existing access was to be used, no new roads were to be constructed, and no surface disturbing activities were expected to occur.

In August 2015, WAPA completed an “Environmental Review for Categorical Exclusion Determination” for this project. This project met the criteria for Department of Energy (DOE) Categorical Exclusion B4.7 Fiber optic cable. (see text in 10 CFR Part 1021, subpart D.) As part of the CX process, WAPA completed an informal consultation with United States Fish and Wildlife Service (USFWS) due to federally protected plants and designated critical habitat for Gunnison Sage-grouse in the project area. The consultation resulted in stipulations being added to the Categorical Exclusion which required biological monitors to be present during construction. In addition, the WAPA archaeologist created two avoidance area maps which were given to the contractors so they could avoid sensitive cultural sites. The avoidance sites were not located on public lands.

APPLICANT: Western Area Power Administration (WAPA)

DESCRIPTION OF PROPOSED ACTION:

The proposed action is to grant WAPA a right-of-way (ROW) for the operation and maintenance of a 48-count OPGW already installed on their existing 115kV transmission line structures. The new ROW is necessary to authorize the OPGW due to the third party (BOR) shared use of the OPGW. The ROW will be 10 feet wide by 25,474 feet (4.825 miles) long containing approximately 5.848 acres. The ROW will be issued under FLPMA for 30 years with a right of renewal. WAPA and BOR are Federal Agencies and as such are rental exempt. The grant would be subject to the design features (Exhibit A) and attached stipulations (Exhibit B).

Design Features

See Exhibit A: Plan of Development

PLAN CONFORMANCE REVIEW: The Proposed Action is subject to and has been reviewed for conformance with the following plans (43 CFR 1610.5):

Name of Plan: Uncompaghre Basin Resource Management Plan

Date Approved: July 1989

Decision Language: Provisions standard throughout planning area unless specifically noted in each management unit:

- Major Utilities – Public lands would be open to development of major utilities. Stipulations and mitigating measure would be developed on a case by case basis. (p. 144)

CATEGORICAL EXCLUSION REVIEW: The proposed action qualifies as a categorical exclusion under 516 DM 11.9: E 12, “Grants of right-of-way wholly within the boundaries of other compatibly developed rights-of-way.”

	Exclusion	YES	NO
1.	Have significant adverse effects on public health and safety.	_____	<u> X </u>
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, floodplains; national monuments; migratory birds; and other ecologically significant or critical areas. | _____ <u>X</u> |
| 3. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources. | _____ <u>X</u> |
| 4. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks. | _____ <u>X</u> |
| 5. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects. | _____ <u>X</u> |
| 6. Be directly related to other actions with individually insignificant but cumulatively significant environmental effects. | _____ <u>X</u> |
| 7. Have significant impacts on properties listed, or eligible for listing, in the National Register of Historic Places. | _____ <u>X</u> |
| 8. Have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have adverse effects on designated Critical Habitat for these species. | _____ <u>X</u> |
| 9. Violate a Federal law, or a State, local or tribal law or requirement imposed for the protection of the environment. | _____ <u>X</u> |
| 10. Have disproportionately high and adverse effect on low income or minority populations. | _____ <u>X</u> |
| 11. Limit access to and ceremonial use of Indian sacred sites by Indian religious practitioners or adversely affect the physical integrity of such sacred sites. | _____ <u>X</u> |
| 12. Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species. | _____ <u>X</u> |

INTERDISCIPLINARY REVIEW:

<u>Name</u>	<u>Title</u>	<u>Area of Responsibility</u>
Jana Moe	Realty Specialist	Lands & Realty
Glade Hadden	Archaeologist	Cultural, Native American Religious Concerns
Ken Holsinger	Biologist	T&E and Migratory Birds

REMARKS:

Cultural Resources: The project area has been inventoried and no further inventory work is required. There are two known National Register eligible properties within the ROW, and the proponent has been required to avoid these sites as “no pull” zones. If there are future projects along this line, or if any design modifications are planned within those avoidance areas, a qualified archaeologist must be present during construction to ensure there will be no effects to the historic resources.

Native American religious Concerns: There are none known or anticipated from this project.

TE&S: WAPA is the action agency associated with the proposed action therefore we defer to their agency biologists conclusions regarding threatened & endangered species and associated habitat within the action area. WAPA has instituted mitigation measures to avoid and/or minimize potential impacts to species and associated habitat.

NAME OF PREPARER: Jana Moe

NAME OF ENVIRONMENTAL COORDINATOR: Jedd Sondergard

DATE: 5/5/16



COMPLIANCE WITH NEPA

The Proposed Action is categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with 516 DM 11.9, E 12. This categorical exclusion is appropriate in this situation because there are no extraordinary circumstances potentially having effects that may significantly affect the environment. The Proposed Action has been reviewed, and none of the extraordinary circumstances described in 516 DM 2 apply.

SIGNATURE OF AUTHORIZED OFFICIAL:



Sara L. Dawson
Acting Field Manager
Uncompahgre Field Office

DATE SIGNED: 5/11/16

Attachments:

- EXHIBITS A – Design Features
- EXHIBIT B – Stipulations
- EXHIBIT C – Map

PLAN OF DEVELOPMENT

Curecanti – Montrose 115-kV Transmission Line OPGW Project

FACILITY DESIGN FACTORS & CONSTRUCTION OF FACILITIES:

Western plans to replace existing OGW with 48-count fiber OPGW on the existing Curecanti – Montrose 115-kV transmission line.

Western will install/replace hardware assemblies on existing structures.

Splice locations and pull sites are identified, and will occur in the existing, authorized ROW.

Termination of the OPGW will occur in the Curecanti, South Canal, and Montrose Substations. The substations are not located on BLM administered lands.

Portions of the project will be done by conventional method. Types of equipment which may be utilized include a pickup, spool trailer, and bucket truck.

Special construction requirements must be observed for the project and include the following:

- a) Earth moving or grading equipment shall NOT be used to make any improvements to the existing access roads. All vehicles used on the ROW access roads shall be rubber tired. If road improvements or staging areas are necessary, the Contractor shall submit a detailed description of the improvements to Western for environmental review and approval 60-days prior to construction.
- b) The introduction and or spread of noxious weeds shall be minimized by washing all equipment at a commercial facility prior to the start of construction, by avoiding vehicle traffic in known weedy areas, and by rewashing equipment if weeds are encountered. The Contractor shall reclaim all disturbed areas as soon as practical after construction.
- c) No construction or routine maintenance activities shall be performed during periods when the soil is too wet to adequately support construction equipment. If equipment creates ruts in excess of 6-inches deep, the soil shall be deemed too wet to adequately support construction equipment.
- d) Existing, authorized access roads shall be used as depicted on the access road maps. The width of the disturbance zone along the route shall be minimized to the extent practicable.
- e) Construction vehicles shall be excluded from traveling or turning around in undisturbed areas outside the ROW, except for reasons of safety.
- f) The Contractor is responsible for determining all pulling and splicing locations with exception of those required in the specifications. If the Contractor wishes to use

pulling locations or staging areas that are outside of Western's ROW, then the Contractor shall allow Western a minimum of 60-days, after receipt of the proposed site, to coordinate with the appropriate agencies and review and environmentally clear the area.

- g) If any cultural resources or paleontological materials are discovered during construction, work in the area shall halt immediately; Western and the Colorado SHPO staff shall be contacted, and the material evaluated by an archaeologist or historian.
- h) To comply with the Migratory Bird Treaty Act and Gunnison Sage Grouse Rangeland Conservation Plan, construction work should be scheduled outside the March 1 through July 31 general nesting periods. If the construction work is proposed to be done during this time period, the Contractor shall contact Western's Environmental Division 60 days prior to commencing work so that Western may arrange for a pedestrian survey to be conducted in advance of the maintenance crews to identify active nests that are to be avoided.

No explosives or blasting is allowed.

GOVERNMENTAL AGENCY INVOLVEMENT:

The Department of Energy (DOE) is Western's regulatory and licensing authority as established by the DOE Organization Act of 1977, 42 U.S.C., 7152(A) (3), and Reclamation Project Act of 1939, 43 U.S.C. 485h(c).

RESOURCE VALUES AND ENVIRONMENTAL CONCERNS:

Western completed an Environmental Review for Categorical Exclusion (CX) Determination. The CX is attached for reference (Figure 2). Western completed an informal consultation with the United States Fish and Wildlife Service (USFWS). The concurrence letter is attached for reference (Figure 3).

The construction contractor is required to follow Environmental Quality Protections standards, included in Western's project specifications for the project.

OPERATION AND MAINTENANCE:

Western will operate, use, maintain, and perform routine maintenance on the transmission line and access roads. All activities will take place within the existing, authorized 75 foot transmission line ROW, and the existing, authorized 30 foot access road ROWs. No new ROW is needed.

STIPULATIONS

1. The holder shall contact the Authorized Officer (AO) at least 60 days prior to the anticipated start of any surface disturbing activities in order to determine if threatened, endangered and sensitive species and cultural resources clearances are needed and what documentation is required in order to comply with the National Environmental Policy Act. It is the holder's responsibility to comply with all applicable Federal, State, and local laws and regulations existing or hereafter enacted or promulgated. The BLM will determine if any surveys or inventories are required. As necessary, the holder shall demonstrate compliance in writing, i.e., with surveys and inventories completed by qualified individuals, with the following laws including, but not limited to, the Endangered Species Act (if potential habitat is determined to be present), the National Historic Preservation Act, and the Native American Graves Protection and Repatriation Act. Evaluations and inventories can be completed by BLM, or by the holder in order to meet the holder's schedule and subject to approval by the AO. Inventories may be time sensitive and may require US Fish and Wildlife Service concurrence, therefore this process could take longer than 60 days to complete. The holder shall not initiate any surface disturbing activities on the right-of-way without prior written approval, as determined necessary by the AO. Contact BLM Realty Specialists Nick Szuch at (970) 240-5322 or Jana Moe at (970) 240-5324.
2. The holder shall contact the authorized officer at least five days prior to the anticipated start of construction for monitoring purposes. The authorized officer may require and schedule a preconstruction conference with the holder prior to the holder's commencing construction and/or surface disturbing activities on the right-of-way. The holder and/or his representative shall attend this conference. The holder's contractor, or agents involved with construction and/or any surface disturbing activities associated with the right-of-way, shall also attend this conference to review the stipulations of the grant. The BLM authorized representative is Barney Buria, Environmental Protection Specialist, who can be reached at the Uncompahgre Field Office, 2465 South Townsend, Montrose, Colorado 81401 or phone at (970) 240-5333. An alternate contact is Nick Szuch, Realty Specialist, Uncompahgre Field Office, (970) 240-5322.
3. Any relocation, additional construction, or use that is not in accord with the approved conditions shall not be initiated without the prior written approval of the authorized officer. A copy of the complete right-of-way grant, including all plans and stipulations shall be made available at the right-of-way site during construction. Noncompliance with the above will be grounds for an immediate temporary suspension of activities if it constitutes a threat to public health or the environment.
4. If historic or archaeological materials are uncovered during permitted activities, the operator is to immediately stop activities in the immediate area of the find that might further disturb such materials, and immediately contact the AO. Within five working days the AO will inform the operator as to:
 - a. whether the materials appear eligible for the National Register of Historic Places;

- b. the mitigation measures the operator will likely have to undertake before the construction may proceed.
5. Pursuant to 43 CFR 10.4(g) the holder of the authorization must notify the AO, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer. Unless permitted, anyone associated with this project shall not disturb historic, archaeological, or scientific resources, including collecting artifacts, or will be subject to prosecution. If in connection with operations under this contract the project proponent, his contractors, subcontractors, or the employees of any of them, discovers, encounters or becomes aware of any objects or sites of cultural or paleontological value or scientific interest such as historic or prehistoric ruins, graves or grave markers, fossils, or artifacts, the proponent shall immediately suspend all operations in the vicinity of the cultural or paleontological resource and shall notify the BLM authorized officer of the findings (16 U.S.C. 470h-3, 36CFR800.112). Operations may resume at the discovery site upon receipt of written instructions and authorization by the authorized officer.
6. Use of pesticides/herbicides shall comply with the applicable Federal and state laws. Pesticides/herbicides shall be used only in accordance with their registered uses and within limitations imposed by the Secretary of the Interior. Prior to the use of pesticides/herbicides, the holder shall obtain from the authorized officer written approval of the applicant's plan showing the type and quantity of material to be used, pest(s) to be controlled, method of application, location of storage and disposal of containers, and any other information deemed necessary by the authorized officer. The plan should be submitted no later than March 1 of any calendar year to cover the proposed activities for the next growing season. Emergency use of pesticides/herbicides shall be approved in writing by the authorized officer prior to such use.
7. The holder shall be responsible for weed control within the limits of the right-of-way. The holder is responsible for consultation with the authorized officer and/or local authorities for acceptable weed control methods (within limits imposed in the grant stipulations) including pesticides/herbicides approved for use on BLM land.
8. The holder shall comply with applicable State standards for public health and safety, environmental protection and siting, construction, operation and maintenance, if these State standards are more stringent than Federal standards for similar projects.
9. The holder shall comply with all applicable Federal laws and regulations existing or hereafter enacted or promulgated regarding toxic substances or hazardous materials. In any event, the holder shall comply with the Toxic Substances Control Act of 1976, as amended (15 U.S.C. 2601, *et seq.*) with regard to any toxic substances that are used, generated by or stored on the right-of-way or on facilities authorized under this right-of-way grant. (See 40 CFR, Part 702-799 and especially, provisions on polychlorinated biphenyls, 40 CFR 761.1-761.193.) Additionally, any release of toxic substances (leaks, spills, etc.) in excess of the reportable quantity established by 40 CFR, Part 117 shall be reported as required by the Comprehensive

Environmental Response, Compensation and Liability Act of 1980, section 102b. A copy of any report required or requested by any federal agency of state government as a result of a reportable release or spill of any toxic substances shall be furnished to the authorized officer concurrent with the filing of the reports to the involved Federal agency of State government.

10. The authorized officer may suspend or terminate in whole, or in part, any construction or maintenance activities, when in his judgment, unforeseen conditions arise which result in the approved terms and conditions being inadequate to protect the public health and safety or to protect the environment.
11. All construction, operation and maintenance shall be within the authorized limits of the right-of-way granted herein.
12. All brush, grasses, and other woody material cleared from the right-of-way shall be removed from the public land and not scattered on site; unless the debris is mulched and used for reclamation as natural materials to enhance surface stability and re-vegetation efforts.
13. No burning of trash, litter, trees, brush or other vegetative material shall be allowed under this grant.
14. No operations or routine maintenance activities shall be performed during periods when the soil is too wet to adequately support such equipment. If the equipment creates ruts in excess of four (4) inches deep, the soil shall be deemed too wet to adequately support the construction equipment. Emergency repairs to restore and maintain services are exempt; however, any damages to resources caused by emergency repairs during wet conditions will be repaired as directed by the authorized officer as soon as possible after the occurrence
15. The holder shall disturb the minimum amount of soils and vegetation necessary for the construction, operation, and maintenance of the facility. The holder shall recontour disturbed areas as necessary by grading to restore the area to approximately the original contour of the ground as directed by the authorized officer.
16. The holder shall contact the AO to determine the appropriate seed mix to be used on all disturbed areas in the right-of-way.
 - 1) All seed must comply with BLM and Colorado weed seed guidelines. There should be no prohibited species seed, and no more than allowable levels of restricted species seed. In addition, there should be no more than 0.5% total weed seed, less than 2% other seed, and no trash larger than 1/4" in length. Seed shall not be stored in burlap bags.
 - 2) The BLM Uncompahgre Field Office places additional local restrictions on seed to minimize cheatgrass spread. If seed tests show any *Bromus tectorum* or *Bromus japonicus*, the BLM should be consulted with for approval. No mix placed on BLM shall contain more than 150 *Bromus tectorum* and/or *Bromus japonicus* seeds per pound.
 - 3) BLM requires additional seed tests on seeding projects that are greater than 20

acres and/or require over 200 lbs of seed. For these seeding projects, the holder should have the seed supply company store the purchased seed prior to mixing, and pull samples to be sent to a certified laboratory, preferably Wyoming State Seed Laboratory at the following address. Seed test results must comply with the criteria listed above before seed is mixed, shipped and applied to the project area:

Wyoming State Seed Laboratory
749 Road 9
Powell, WY 82435

- 4) BLM will need copies of seed tags and test results for all seed applied regardless of project size.
 - 5) Only State Certified weed free mulch shall be used.
17. The holder shall seed all disturbed areas with the following seed mix. There shall be no primary or secondary noxious weed seed in the seed mixture. In addition, there should be no more than 0.5% total weed seed, less than 2% other seed, and no trash larger than ¼ inch in length. Seed shall not be stored in burlap bags. Seed going on projects less than 20 acres or less than 200 lbs. shall be tested, and the viability testing of seed shall be done in accordance with State law(s). Seed tests shall be less than one year old and can be from the company's seed test. Seed test documents can be from: a) certified "blue" tag(s); b) an independent seed lab test; or c) a seed lab analysis either by seed lot or by seed mix. Copies of the seed test documents shall be forwarded to the BLM, Uncompahgre Field Office. Commercial seed shall be either certified or registered pure live seed (PLS). The seed container shall be tagged in accordance with State law(s) and available for inspection by the authorized officer. Only State Certified weed free mulch shall be used.
18. The seed shall be evenly and uniformly planted over any disturbed areas. Seed shall be broadcast and the area shall be raked or chained to cover the seed. The seeding will be repeated until a satisfactory stand is established as determined by the authorized officer. Evaluation of growth will not be made before completion of the second growing season after seeding. The authorized officer is to be notified a minimum of two days prior to seeding of the project. Seeding shall be completed at a time of optimum soil moisture content, i.e., early spring or the fall.
19. It is the holder's responsibility to comply with all applicable Federal, State, and local laws and regulations existing or hereafter enacted or promulgated.
20. **Fiber Optic Cable:** The holder may authorize or sub-grant to third parties the right to use the holder's facilities upon a filing of a grant amendment application and a finding by the authorized officer that the amendment is acceptable. Third party sub-grant holders shall be required to comply with the requirements as presented herein as well as those stipulations imposed by the authorized officer upon approval of the grant amendment.
21. For access and maintenance of facilities, the holder shall use existing roads. When existing roads are not available, the holder may use the right-of-way for access. BLM roads should not be maintained without first consulting with the authorized officer.

22. Prior to termination of the right-of-way, the holder shall contact the authorized officer to arrange a joint inspection of the right-of-way. This inspection will be held to agree to an acceptable termination and rehabilitation plan as necessary. This plan shall include, but is not limited to, removal of facilities, drainage structures, or surface material, recontouring, topsoiling, or seeding. The authorized officer must approve the plan in writing prior to the holder's commencement of any termination activities.
23. Per the BLM AO, the holder shall conform to the following mitigation measures to ensure the project has no effect on any federally listed or sensitive species:
- Construction activity and new surface disturbance will be prohibited during the period from December 1st to April 30th for the protection of elk and mule deer within winter and severe winter range. Any exceptions to this requirement must have prior written approval from the authorized officer.
 - To the extent possible, reptiles or amphibians observed in the project area will be avoided and will not be intentionally harmed.
 - Surface disturbing activities or application of herbicide will not occur within 660 feet of known federally protected plant populations, or within 330 feet of known BLM sensitive plant populations. For small scale or less intensive treatments or activities (e.g., vegetation trimming, handtool work, etc., as determined by a BLM biologist), ground disturbing activities will not occur within 100 feet of known federally protected plants, or within 50 feet of known BLM sensitive plants. Appropriate sediment and erosion control, weed control, and similar practices will be applied as necessary to protect plant populations.

**U.S. Department of the Interior
Bureau of Land Management
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2465 South Townsend Avenue
Montrose, CO 81401**

Decision Record

(DOI-BLM-CO-S050-2016-0021 CX)

PROJECT NAME: WAPA Fiber Optic Cable Installation

DECISION: It is my decision to issue a new ROW grant to Western Area Power Administration, for operation and maintenance of an installed fiber optic cable. This ROW will be issued under Title V of FLPMA, 1976. This grant will be issued for a thirty year term.

RATIONALE:

The Proposed Action is categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with 516 DM 11.9, E. 12. The categorical exclusion is appropriate in this situation because there are no extraordinary circumstances potentially having effects that may significantly affect the environment. The Proposed Action has been reviewed, and none of the extraordinary circumstances described in 516 DM 2 apply.

COMPLIANCE WITH MAJOR LAWS and CONFORMANCE WITH LAND USE PLAN:

The decision is in compliance with applicable laws, regulations and policy, including the Endangered Species Act, Migratory Bird Treaty Act and National Historic Preservation Act. It is also in conformance with the Uncompahgre Basin RMP.

PUBLIC COMMENT:

The BLM informed the public about this project by listing it on the online Uncompahgre NEPA Register and a copy of the completed Categorical Exclusion will be posted on the NEPA website.

ADMINISTRATIVE REMEDIES:

If you are adversely affected by this decision, within 30 days of receipt of this decision you have the right of appeal to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations at 43 CFR §4.400. This decision goes into effect immediately and will remain in effect pending appeal unless a stay is granted (43 CFR §2801.10).

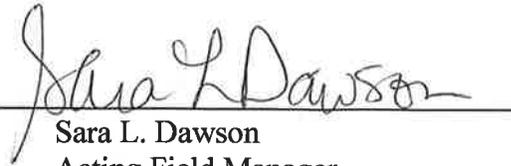
NAME OF PREPARER: Jana Moe

NAME OF ENVIRONMENTAL COORDINATOR: Jedd Sondergard

DATE

5/5/16

SIGNATURE OF AUTHORIZED OFFICIAL:



Sara L. Dawson
Acting Field Manager
Uncompahgre Field Office

DATE SIGNED

5/11/16