

DECISION RECORD
BLM CATEGORICAL EXCLUSION (CX) – WY-070-CX13-220
Fuller Construction, Inc. (Fuller Construction),
Hepp Sand/Gravel Mine, WYW-168382
Bureau of Land Management, Buffalo Field Office, Wyoming

DECISION:

BLM approves Fuller Construction’s Hepp Sand/Gravel Mine, non-competitive sale, WYW-168382, as described in CX WY-070-CX13-220, incorporated here by reference. This project is the result of collaboration between the BLM Buffalo Field Office (BFO) and Fuller Construction, Inc. (Fuller Construction). This project involves the removal of up to, but not exceeding, 9,000 tons of previously-prepared sand/gravel from an existing disturbance of approximately 8.1 acres of BLM-administered mineral lands in the area indicated below. The surface disturbance is inclusive of all support infrastructure to include but not limited to the mine, staging area, access road, etc.

Compliance. This decision complies with:

- Federal Land Policy and Management Act of 1976 (FLPMA) (43 USC 1701); Interior Department Order 3310.
- The Materials Act of 1947 (30 USC 601 et seq.), as amended; 43 CFR 3600 et seq.
- National Environmental Policy Act of 1969 (NEPA) (42 USC 4321).
- Buffalo Resource Management Plan (RMP) and Records of Decision (RODs) 1985, 2001, 2003, 2011.
- Supplement to Memorandum of Understanding No. WY 19 Between the US DOI BLM, Wyoming State Office, and the State of Wyoming DEQ LQD for Management of Surface Mining and Exploration for Mineral Materials (Salable Minerals) on Public Lands; 2013.

The following summarizes details of the approval. The project description and site-specific mitigation measures are found in the CX document (WY-070-CX13-220).

County	Feature	TWN	RNG	Sec	Subdivision	Acres
Johnson	Fuller Construction, Inc., Hepp Sand/Gravel Mine	51 N.	80 W.	32	SW of Tract 88	
TOTAL						8.1

Limitations. Approval of this project is dependent on compliance with the attached Standard Stipulations.

THE FINDING OF NO SIGNIFICANT IMPACT. Analysis of the CX, WY-070-CX13-220, found the project comports to findings that this type of action is categorically excluded from having significant impacts on the human environment, thus an EIS or environmental analysis are not required.

COMMENT OR NEW INFORMATION SUMMARY. Public scoping for noncompetitive sales is not required by 43 CFR 3600, although BLM will post the decision to its website.

DECISION RATIONALE. The BLM approves the project for the following reasons:

1. BLM and Fuller Construction added design features and mitigation measures which reduced environmental impacts while meeting the BLM’s need:

- a. BLM approves the non-competitive sale as submitted by Fuller Construction to remove 9,000 tons of sand/gravel from an entirely existing disturbance of approximately 8.1 acres of BLM-administered mineral lands, contingent upon compliance with other conditions of approval and reclamation; and,
 - b. To reduce impacts of elevated noise levels from mining and crushing of gravel on nesting sage-grouse, no surface disturbing or disruptive activities shall occur annually between March 15 and June 30 for the life of the project.
2. The approved project will not result in any undue or unnecessary environmental degradation and complies with 43 CFR 3602.30 through .34, Noncompetitive Sales.
 3. The approved project will help meet the nation's mineral materials needs.
 4. The approved project will help ensure continued public health and safety by meeting needs for nearby road maintenance.
 5. The approved project will help stimulate local economies by maintaining workforce stability.
 6. The Operator committed to:
 - a. Comply with all applicable federal, state, and local laws and regulations.
 - b. Reclaim the mine to the standards in the WY BLM Reclamation Policy found in Appendix A to CX WY-070-CX13-220.
 7. The Operator certified it has posted an acceptable bond.
 8. This project is not located in or near, nor will it affect, a floodplain, wetland, or riparian area.
 9. The project is clearly lacking in wilderness characteristics as it is smaller than 5,000 acres and offers no outstanding opportunities for solitude.
 10. BLM reviewed the 12 extraordinary circumstances and none apply, 43 CFR 46.215.

ADMINISTRATIVE APPEAL. This decision is subject to administrative review in accordance with 43 CFR 3601.80. Request for administrative review of this decision must include information required under 43 CFR 4 and is appealed to the Interior Board of Land Appeals, as provided in 43 CFR 3601.80 and 43 CFR 4. A party adversely affected by a decision of the authorized officer or State Director made pursuant to subpart 43 CFR 3600, et. al., has the right of appeal to the Interior Board of Land Appeals, Office of Hearings and Appeals, pursuant to 43 CFR 4 and 43 CFR 1840.

Field Manager: _____/s/ Duane W. Spencer

Date: _____ 6/9/14

**BLM CATEGORICAL EXCLUSION (CX) – WY-070-CX13-220
Fuller Construction, Inc. (Fuller Construction),
Hepp Sand/Gravel Mine, WYW-168382
Bureau of Land Management, Buffalo Field Office, Wyoming**

BLM Categorical Exclusion (pursuant to 516 DM 11.9) F-10. Disposal of mineral materials, such as sand, stone, gravel, pumice, pumicite, cinders, and clay, in amounts not exceeding 50,000 cubic yards or disturbing more than 5 acres, except in riparian areas.

A. BACKGROUND

OFFICE: BLM, Buffalo Field Office (BFO), 1425 Fort St., Buffalo, WY, 82834.

TRACKING NUMBERS: WY-070-CX13-220.

* WY-070-EA07-235, approved October 10, 2007, for First Energy Services Co. [former owner of this mine], Hepp Sand/Gravel Mine; see BLM casefile WYW-170028.

* WY-070-CX13-091, approved November 4, 2013, for Giles W. Pritchard-Gordon Farming, Ltd. (dba Pee Gee Ranch), Pee Gee Scoria Mine; see BLM casefile WYW-168399.

* WY-070-CX12-160, approved March 27, 2013, for Fuller Construction, Inc., Ullery Sand/Gravel Mine; see BLM casefile WYW-168401.

* WY-070- EA12-109, approved March 22, 2013, for Quality Aggregate & Construction, Inc. (Quality Aggregate), Recluse Scoria Mine; see BLM casefile WYW-168351.

* BLM tiers to and incorporates these NEPA documents by reference here because of substantially similar proposed mining operations, geography, and/or other resource issues.

BLM CASEFILE NO.: WYW-168382.

TITLE OF PROPOSED ACTION: New Sales Contract for Fuller Construction’s Hepp Sand/Gravel Mine.

PROPOSED ACTION: Remove 9,000 tons of previously-prepared stockpiled sand/gravel from within an existing approximately 8.1-acre disturbance, over 5 years’ time.

LEGAL DESCRIPTION:

County	Feature	TWN	RNG	Sec	Subdivision	Acres
Johnson	Fuller Construction, Inc., Hepp Sand/Gravel Mine	51 N.	80 W.	32	SW of Tract 88	
TOTAL						8.1

APPLICANT: Fuller Construction, Inc., P.O.Box 640, Moorcroft, WY, 82721.

Description of Proposed Action: Fuller Construction, Inc. (Fuller Construction), proposes to remove 9,000 tons of sand/gravel from a stockpile of previously-prepared materials in their existing Hepp Sand/Gravel Mine. This mine consists of approximately 8.1 acres of disturbance on privately-owned surface underlain by all federally-owned minerals. This mine is permitted under Wyoming Department of Environmental Quality (WDEQ) Land Quality Division (LQD) Permit to Mine #1248ET. The current disturbance consists of the actual mine area, staging areas, and access road (see Figures 1 to 3). No new disturbance is anticipated to occur during the duration of this proposed Sales Contract.

The mine is situated approximately 0.1 miles east of Tipperary Road (County Road 54), and approximately 6 miles north of US Interstate 90. The mine access road comes directly off Tipperary Road (CR 54). The City of Buffalo is approximately 9 miles west of the mine. All equipment needed to remove these materials will be operated and housed within the current area of disturbance.

B. LAND USE PLAN CONFORMANCE

Land Use Plan: Buffalo Resource Management Plan (RMP) approved 1985; Amended 2001, 2003, and 2011.

The proposal conforms to the applicable RMP because it is specifically provided for in the following RMP decision(s):

Buffalo Resource Management Plan (RMP), 1985, page 8; MM-8: The entire resource area is available for mineral materials sales initiated either by the BLM or by application. This does not include sites designated by the BLM for free use by city, county, and state entities.

C. COMPLIANCE WITH NEPA

The Proposed Action is categorically excluded from further analysis under the National Environmental Policy Act (NEPA) in accordance with 516 DM 11.9: F. Solid Minerals, 10, "Disposal of mineral materials, such as sand, stone, gravel, pumice, pumicite, cinders, and clay, in amounts not exceeding 50,000 cubic yards or disturbing more than 5 acres, except in riparian areas." [Note that 50,000 cubic yards (CY) of sand/gravel equals approximately 33,333 tons, as 1 CY equals approximately 1.5 tons.]

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 (and BLM NEPA Handbook H-1790-1, Appendix 5) apply.

I considered:

- BLM and Fuller Construction added design features and mitigation measures which reduced environmental impacts while meeting the BLM's need:
 - BLM approves the non-competitive sale as submitted by Fuller Construction to remove 9,000 tons of sand/gravel from an existing disturbance of approximately 8.1 acres of BLM-administered minerals, contingent upon compliance with other conditions of approval and reclamation; and,
 - To reduce impacts of elevated noise levels from mining and crushing of gravel on nesting sage-grouse, no surface disturbing or disruptive activities shall occur annually between March 15 and June 30 for the life of the project.
- The approved project will not result in any undue or unnecessary environmental degradation and complies with 43 CFR 3602.30-.34, Noncompetitive Sales.

- The approved project will help meet the nation’s mineral materials needs.
- The approved project will help ensure continued public health and safety by meeting needs for nearby road maintenance.
- The approved project will help stimulate local economies by maintaining workforce stability.
- The Operator committed to:
 - Comply with all applicable federal, state, and local laws and regulations.
 - Reclaim the mine to the standards in the WY BLM Reclamation Policy found in Appendix A to WY-070-CX13-220.
- The Operator certified it has posted an acceptable bond.
- This project is not located in or near, nor will it affect, a floodplain, wetland, or riparian area. The nearest riparian area is along Clear Creek, approximately 5.5 miles northwest of the project area.
- The project is clearly lacking in wilderness characteristics as it is smaller than 5,000 acres and offers no outstanding opportunities for solitude.

Persons and Agencies Consulted

The following individuals and agencies were consulted and contributed to this document:

- Jaime Jakes; WDEQ LQD Environmental Analyst
- Darci Stafford; BLM Biologist
- Seth Lambert; BLM Archaeologist
- John Kelley; BLM NEPA Coordinator
- Kerry Aggen; BLM Geologist, Project Lead, and Document Preparer

D: SIGNATURE

Field Manager _____/s/ Duane W. Spencer_____ Date: _____6/9/14_____

CONTACT PERSON: Kerry Aggen, Geologist, Buffalo Field Office, 1425 Fort Street, Buffalo, WY, 82834, 307-684-1196, kaggen@blm.gov.

REVIEW AND DOCUMENTATION FOR EXTRAORDINARY CIRCUMSTANCES:

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 (and BLM NEPA Handbook H-1790-1, Appendix 5) apply.

EXTRAORDINARY CIRCUMSTANCES:		
1. Have significant impacts on public health or safety.		
Yes	No XX	<p>This project will have <i>positive</i> impacts on public health and safety. The mineral materials obtained from the project area will be used on nearby ranch roads to help keep them passable year-round. These roads are used year-round by employees of the ranch, and some operators of oil/gas wells on the ranch. State and federal employees also use these roads to access many of these operations to conduct inspections and other required activities.</p> <p>Any potentially negative impacts on public health and safety are mitigated for and/or minimized through the Standard Stipulations attached to the project.</p>
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.		
Yes	No XX	<p>The proposed undertaking has no potential to affect historic properties. On November 4, 2013, Seth Lambert, BLM Archeologist, electronically notified the Wyoming State Historic Preservation Office (SHPO) following Section IV(A)(3) and Appendix B(2) of the Wyoming State Protocol that the undertaking is exempt from review.</p> <p>There are no Areas of Critical Environmental Concern, Wilderness Study Areas, Monuments, or other areas with special designation or needing special protection in or near the project area.</p> <p>The project area does not occur in, nor will it affect, a floodplain, wetland, or riparian area. The nearest riparian area is along Clear Creek, a minimum of approximately 5.5 miles northwest of the project area.</p> <p>The project area is inside the Buffalo Core Area for Greater Sage-Grouse (GSG) conservation (as outlined in Wyoming State Executive Order 2011-5, "Greater Sage-Grouse Core Area Protection."). Six leks occur within 4 miles of the existing mine, but none within 0.6 mile. Suitable nesting habitat is limited adjacent to the mine, and is most likely used for late brood-rearing. To help reduce impacts to GSG, the following Special Stipulation was attached to this authorization:</p> <ol style="list-style-type: none">To reduce impacts of elevated noise levels from mining and crushing of gravel on nesting sage-grouse, no surface disturbing or disruptive activities shall occur annually between March 15 and June 30 for the life of the project.

EXTRAORDINARY CIRCUMSTANCES:		
		<p>Suitable raptor nesting habitat is present within 0.5 miles of the proposed project; however, no nests have been documented near the project area.</p> <p>Suitable nesting habitat for migratory birds exists in the project area. No nests were located during surveys.</p> <p>No new surface disturbance is proposed for the pit. Impacts to wildlife from the hauling of stockpiled material will be minimal.</p> <p>No listed or proposed Threatened and Endangered species, or their critical habitat, occur in/near the project area.</p>
3. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA section 102 (2) (E)].		
Yes	No XX	<p>This project involves continued removal of previously prepared (crushed and stockpiled) sand/gravel from an existing mine. This mine has been in existence since 2005, when it was first opened by Basic Energy Co. All authorizations since then have been to either Basic Energy Co. or First Energy Services Co.</p> <p>The nearest BLM-authorized sand/gravel mines to the project area are: Stinson Aggregate's Hepp (WYW-170029), approximately 0.25 miles north; Earth Work Solution's Stranahan (WYW-170033), approximately 6 miles SW; and Johnson County's Hakert (WYW-170084), Campbell County's Hakert (WYW-168349), and CCC Services' Camino (WYW-170257), all approximately 9 miles SSW; City of Buffalo's Tisdale (WYW-168353). No Wyoming BLM-authorized clinker (locally called "scoria") mines exist within 20 miles of the project area.</p> <p>The impacts of this project are similar to other mineral materials projects that have been implemented and monitored, such as Pee Gee Ranch's Pee Gee Scoria Mine (WYW-168399), Stinson Aggregate's Ullery Sand/Gravel Mine (WYW-168401), and Quality Aggregate's Recluse Scoria Mine (WYW-168351). Therefore, impacts of the proposed project are well-known, and will be overwhelmingly positive (see #1 above).</p>
4. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks.		
Yes	No XX	The proposed action generally has very predictable consequences well established as insignificant.
5. Establish a precedent for future action or represent a decision in principal about future actions with potentially significant environmental effects.		
Yes	No XX	This project will not have a potentially significant environmental effect.
6. Have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects.		
Yes	No XX	This project does not have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects.

EXTRAORDINARY CIRCUMSTANCES:		
7. Have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by the bureau.		
Yes	No XX	The project area consists entirely of existing disturbances, and no new disturbances are proposed. No Cultural Resources, including historical properties, will be affected (see #2 above).
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.		
Yes	No XX	<p>The project area is inside the Buffalo Core Area for Greater Sage-Grouse (GSG) conservation (as outlined in Wyoming State Executive Order 2011-5, "Greater Sage-Grouse Core Area Protection."). Six leks occur within 4 miles of the existing mine. Suitable nesting habitat is limited adjacent to the mine, and is most likely used for late brood-rearing.</p> <p>Suitable raptor nesting habitat is present within 0.5 miles of the proposed project; however, no nests have been documented near the project area.</p> <p>Suitable nesting habitat for migratory birds exists in the project area. No nests were located during surveys.</p> <p>No new surface disturbance is proposed for the pit. Impacts to wildlife from the hauling of stockpiled material will be minimal.</p> <p>No listed or proposed Threatened and Endangered species, or their critical habitat, occur in/near the project area.</p> <p>No Special Stipulations were recommended to be attached to the mine's authorization, as further mitigation is likely not needed (see #2 above).</p>
9. Violate a Federal law, or a State, local or tribal law or requirement imposed for the protection of the environment.		
Yes	No XX	The existing mining operation is currently, and will continue to be, permitted by WDEQ LQD under Permit to Mine #1248ET. WGFD will routinely monitor the site for wildlife impacts.
10. Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898).		
Yes	No XX	Neither low-income nor minority populations will be impacted. The nearest residents to the project area are ranchers, who own affected and adjacent surface and/or mineral lands.
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 (Executive Order 13007).		
Yes	No XX	No sacred sites exist in or near the project area, therefore access to sacred sites will not be affected by approval of this project (see #2 above).

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 (Federal Noxious Weed Control Act and Executive Order 13112).		
Yes	No XX	Operator has agreed to abide by the Standard Stipulations attached to the approval of this project. These Stipulations include requirements that the operator take necessary actions to prevent the introduction and/or spread of noxious or non-native invasive species in the project area.

Figure 1. Map showing location, and extent of disturbance, of Fuller Construction’s proposed Hepp Sand/Gravel Mine project (WYW-168382). Fuller Construction’s entire current limit of disturbance of their Hepp Sand/Gravel Mine is indicated by the red outermost polygon. The inner red polygon represents the main stockpile of previously-prepared materials from which they propose to haul materials for use off-site. Disturbance was GPS’ed on August 6, 2008, by Gerald Queen – no further disturbance has occurred since then, nor is any proposed here.

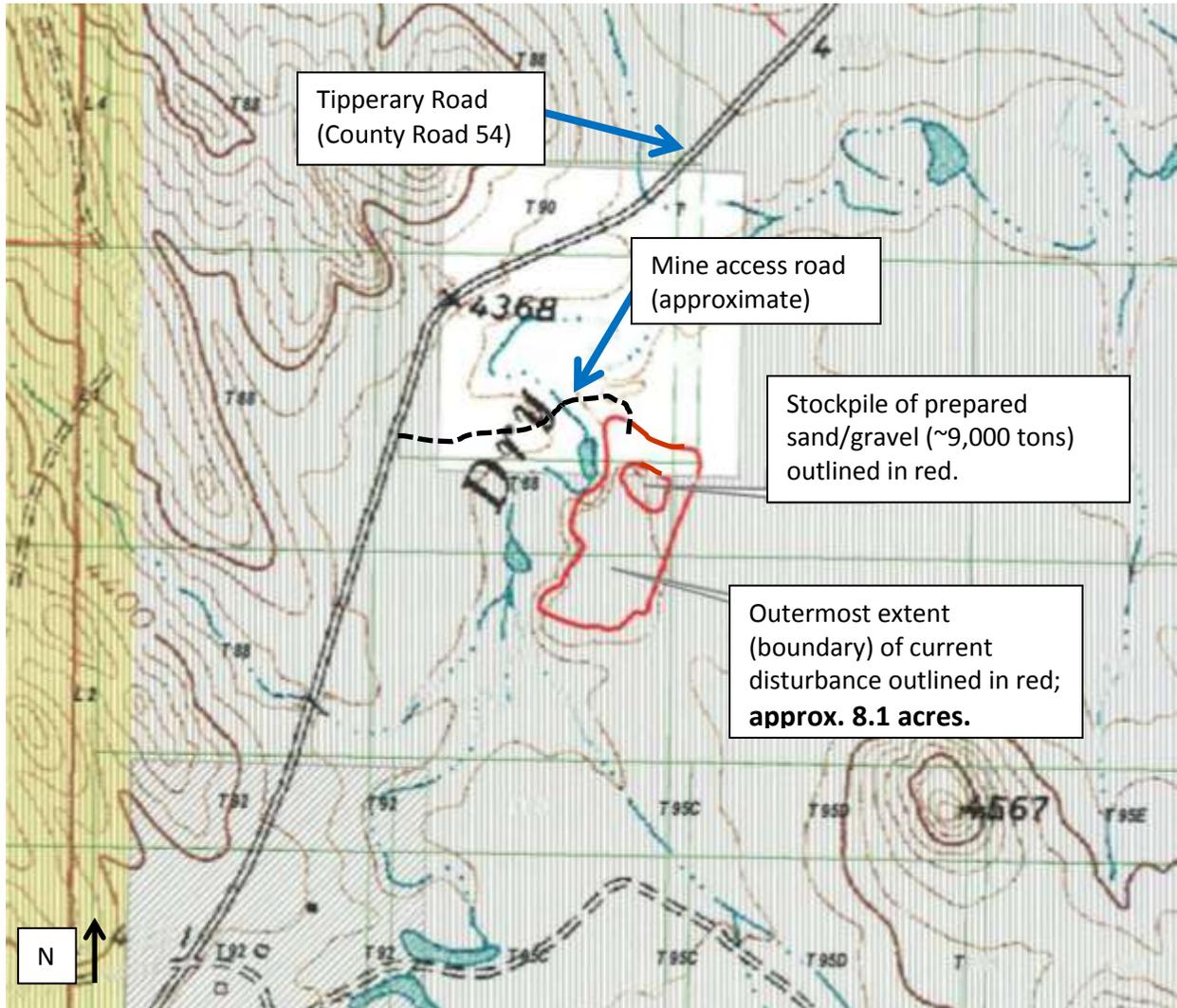


Figure 2. View of entire Fuller Construction’s proposed Hepp Sand/Gravel Mine project (WYW-168382). The stockpile of existing previously-prepared sand/gravel can be seen in left middle ground, just to the right of the access road, and just behind the topsoil stockpile. Much potentially usable sand/gravel remains unmined at this site; much of this material occurs south of the current stockpile, within the low rise that sits under, and continues southward of, the stockpile. Photo taken looking east from Tipperary Road (CR 54), directly west of the Mine, on August 30, 2013, by Kerry L. Aggen.

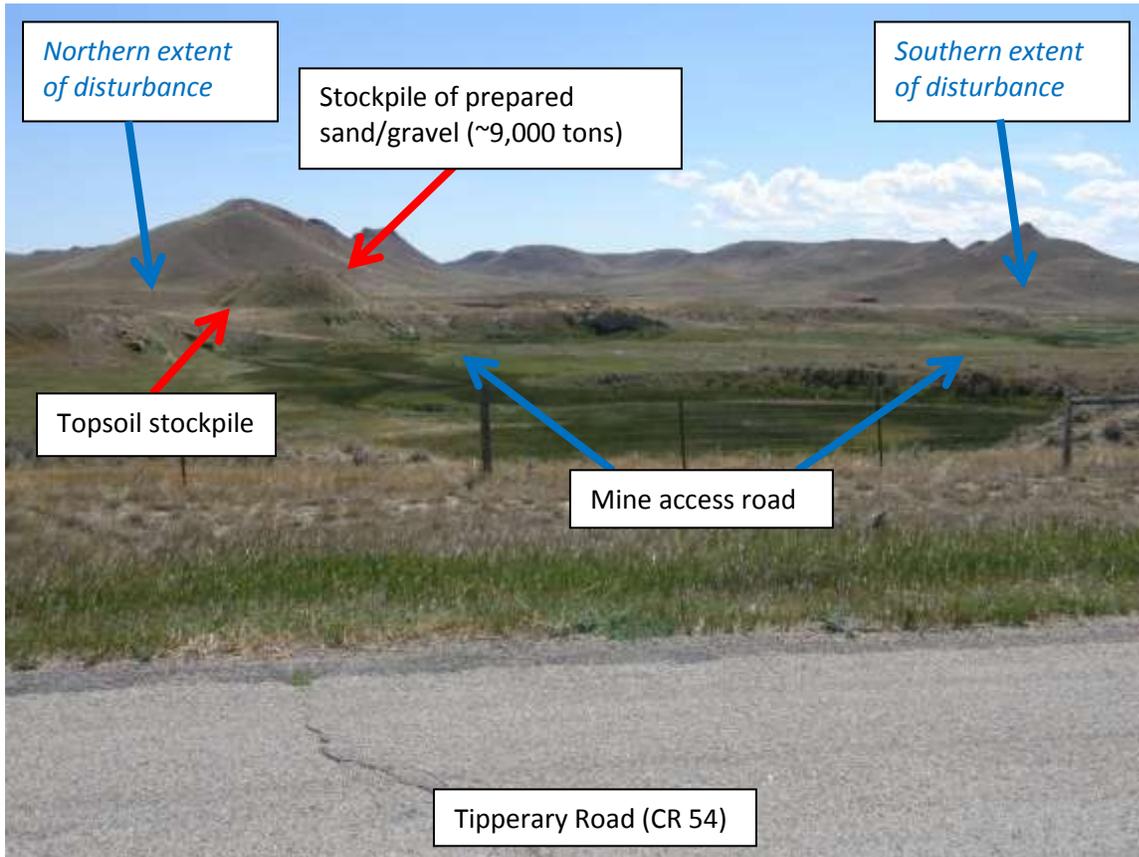
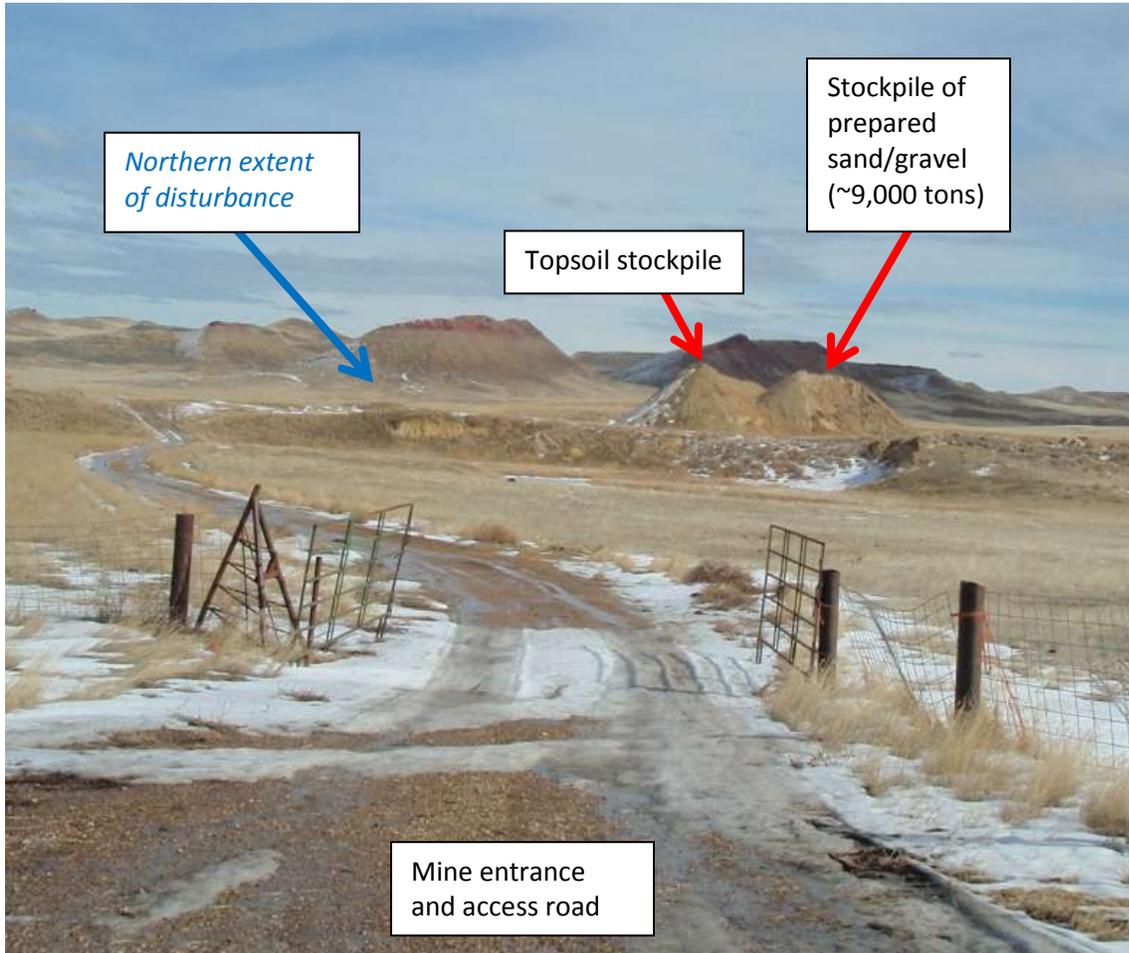


Figure 3. Closer-up view of Fuller Construction’s proposed Hepp Sand/Gravel Mine project (WYW-168382). The stockpile of existing prepared sand/gravel (approximately 9,000 tons) can be seen in right middle ground, just to left of topsoil stockpile. Unmined materials occur to the right (south) of the stockpile, mostly out of the picture. Photo taken looking ENE from Mine entrance just off Tipperary Road (CR 54), on March 30, 2011, by Kerry L. Aggen.



APPENDIX A: RECLAMATION REQUIREMENTS, WYOMING BLM.

The following Reclamation Requirements apply to all surface disturbing activities, including BLM-initiated activities, and must be addressed in each reclamation plan. These requirements also must be met prior to release of the bond and/or the reclamation liability. Where these Reclamation Requirements differ from other applicable federal, laws, rules, and regulations, those requirements supersede this policy. State and/or local statutes or regulations may also apply.

1. Manage all waste materials:

- a. Segregate, treat, and/or bio-remediate contaminated soil material.
- b. Bury only authorized waste materials on site. Buried material must be covered with a minimum of three feet of suitable material or meet other program standards.
- c. Ensure all waste materials moved off-site are transported to an authorized disposal facility.

2. Ensure subsurface integrity, and eliminate sources of ground and surface water contamination:

- a. Properly plug all drill holes and other subsurface openings (mine shafts, adits etc.).
- b. Stabilize, properly back fill, cap, and/or restrict from entry all open shafts, underground workings, and other openings.
- c. Control sources of contamination and implement best management practices to protect surface and ground water quality.

3. Re-establish slope stability, surface stability, and desired topographic diversity:

- a. Reconstruct the landscape to the approximate original contour or consistent with the land use plan.
- b. Maximize geomorphic stability and topographic diversity of the reclaimed topography.
- c. Eliminate highwalls, cut slopes, and/or topographic depressions on site, unless otherwise approved.
- d. Minimize sheet and rill erosion on/or adjacent to the reclaimed area. There shall be no evidence of mass wasting, head cutting, large rills or gullies, downcutting in drainages, or overall slope instability on/or adjacent to the reclaimed area.

4. Reconstruct and stabilize water courses and drainage features:

- a. Reconstruct drainage basins and reclaim impoundments to maintain the drainage pattern, profile, and dimension to approximate the natural features found in nearby naturally functioning basins.
- b. Reconstruct and stabilize stream channels, drainages, and impoundments to exhibit similar hydrologic characteristics found in stable naturally functioning systems.

5. Maintain the biological, chemical, and physical integrity of the topsoil and subsoil (where appropriate):

- a. Identify, delineate, and segregate all salvaged topsoil and subsoil based on a site-specific soil evaluation, including depth, chemical, and physical characteristics.
- b. Protect all stored soil material from erosion, degradation, and contamination.
- c. Incorporate stored soil material into the disturbed landscape.
- d. Seed soils to be stored beyond one growing season, with desired vegetation.
- e. Identify stockpiles with appropriate signage.

6. Prepare site for revegetation:

- a. Redistribute soil materials in a manner similar to the original vertical profile.
- b. Reduce compaction to an appropriate depth (generally below the root zone) prior to redistribution of topsoil, to accommodate desired plant species.
- c. Provide suitable surface and subsurface physical, chemical, and biological properties to support the long term establishment and viability of the desired plant community.
- d. Protect seed and seedling establishment (e.g. erosion control matting, mulching, hydro-seeding, surface roughening, fencing, etc.)

7. Establish a desired self-perpetuating native plant community:

- a. Establish species composition, diversity, structure, and total ground cover appropriate for the desired plant community.
- b. Enhance critical resource values (e.g. wildlife, range, recreation, etc.), where appropriate, by augmenting plant community composition, diversity, and/or structure.
- c. Select genetically appropriate and locally-adapted native plant materials based on the site characteristics and ecological setting.
- d. Select non-native plants only as an approved short term and non-persistent alternative to native plant materials. Ensure the non-natives will not hybridize, displace, or offer long-term competition to the endemic plants, and are designed to aid in the re-establishment of native plant communities.

8. Reestablish complementary visual composition:

- a. Ensure the reclaimed landscape features blend into the adjacent area and conform to the land use plan decisions.
- b. Ensure the reclaimed landscape does not result in a long-term change to the scenic quality of the area.

9. Manage Invasive Plants:

- a. Assess for invasive plants before initiating surface disturbing activities.
- b. Develop an invasive plant management plan.
- c. Control invasive plants utilizing an integrated pest management approach.
- d. Monitor invasive plant treatments.

10. Develop and implement a reclamation monitoring and reporting strategy:

- a. Conduct compliance and effectiveness monitoring in accordance with a BLM- (or other surface management agency-) approved monitoring protocol.
- b. Evaluate monitoring data for compliance with the reclamation plan.
- c. Document and report monitoring data and recommend revised reclamation strategies.
- d. Implement revised reclamation strategies as needed.
- e. Repeat the process of monitoring, evaluating, documenting/reporting, and implementing, until reclamation goals are achieved.