

**DECISION RECORD**  
**BLM CATEGORICAL EXCLUSION (CX) – WY-070-CX12-176**  
**Magna Energy Services, LLC, Harris Scoria Mine, WYW-168373**  
**Bureau of Land Management, Buffalo Field Office, Wyoming**

**DECISION:**

BLM approves Magna Energy’s Harris Scoria Mine, non-competitive sale, WYW-168373, as described in CX WY-070-CX12-176. This project is the result of collaboration between the BLM Buffalo Field Office (BFO) and Magna Energy Services, LLC (Magna Energy). This project involves removal of up to, but not exceeding, 19,000 CY of scoria from an existing disturbance of approximately 6.0 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 and the WDEQ LQD for Management of Surface Mining and Exploration for Mineral Materials (Saleable [sic] Minerals) on Public Lands; 2003.

The following summarizes details of the approval. The project description and site-specific mitigation measures are found in the CX document (WY-070-CX12-176).

County	Feature	TWN	RNG	Sec	Subdivision	Acres
Campbell	Magna Energy Services, LLC, Harris Scoria Mine	55 N.	73 W.	1	S2 of Tract 39H	
TOTAL						6.0

**Limitations.** Approval of this project is dependent on compliance with the attached Standard Stipulations, and the following Special Stipulation:

- **To reduce impacts of elevated noise levels from mining and crushing of scoria on nesting Greater Sage-Grouse, no scoria mining or crushing shall occur between 15 March and 30 June for the life of the project.**

**THE FINDING OF NO SIGNIFICANT IMPACT.** Analysis of the CX, WY-070-CX12-176, 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 Magna Energy added design features and mitigation measures which reduced environmental impacts while meeting the project's need:
  - a. BLM approves the non-competitive sale as submitted by Magna Energy to remove 19,000 CY of scoria from an existing disturbance of approximately 6.0 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 scoria on nesting Greater Sage-Grouse, no scoria mining or crushing shall occur between 15 March and 30 June 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-CX12-176.
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: \_\_\_\_\_

*Kathleen Brus*

Date: \_\_\_\_\_

*4/1/13*

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**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-CX12-176.  
WY-070-EA07-085, approved May 15, 2007, for KG Construction’s (former mine owner) Harris Scoria Mine; see BLM casefile WYW-169849.  
DNA (unnumbered), approved October 15, 2007, for Magna Energy Service’s Harris Scoria Mine; see BLM casefile WYW-169849.  
WY-070-EA08-172, approved September 26, 2008, for Cedar Ridge LLC’s Harris Coalbed Natural Gas Plan of Development project (6 wells).  
WY-070-EA11-038, approved November 9, 2010, for Trend Exploration I LLC’s 11 Trend Wells project.  
WY-070-EA12-109, approved March 22, 2013, for Quality Aggregate’s Recluse Scoria Mine; see BLM casefile WYW-168351.

**BLM CASEFILE NO.:** WYW-168373.

**TITLE OF PROPOSED ACTION:** New Sales Contract for Magna Energy Service’s Harris Scoria Mine.

**PROPOSED ACTION:** Remove 19,000 cubic yards (CY) of already prepared scoria from stockpile within existing 6.0 acre disturbance, over 5 years’ time.

**LEGAL DESCRIPTION:**

County	Feature	TWN	RNG	Sec	Subdivision	Acres
Campbell	Magna Energy Services, LLC, Harris Scoria Mine	55 N.	73 W.	1	S2 of Tract 39H	
TOTAL						6.0

**APPLICANT:** Magna Energy Services, LLC (Magna Energy), P.O. Box 2155, Gillette, WY, 82717.

**Description of Proposed Action:** Magna Energy Services, LLC (Magna Energy) proposes to remove

19,000 cubic yards (CY) of previously-prepared (crushed and stockpiled) scoria from their existing Harris Scoria Mine. This mine consists of approximately 6.0 acres of disturbance on privately-owned surface underlain by federally-owned minerals. This mine is permitted under Wyoming Department of Environmental Quality (WDEQ) Land Quality Division (LQD) Permit to Mine #1139ET. The current disturbance consists of the actual mine area, staging area, and access road (see Figures 1 to 4). The mine is situated approximately 2.5 miles east of Bay Horse Road (Campbell County Road 7) and approximately 1.8 miles south of Elk Creek Road (Campbell County Road 33). The mine is accessed from Woods Road, approximately 2.5 miles from the junction of this road with CC7. All equipment needed to mine this pit will be operated and housed within the current and proposed areas 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."

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 Magna Energy added design features and mitigation measures which reduced environmental impacts while meeting the project's need:
  - BLM approves the non-competitive sale as submitted by Magna Energy to remove 19,000 CY of scoria from an existing disturbance of approximately 6.0 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 scoria on nesting Greater Sage-Grouse, no scoria mining or crushing shall occur between 15 March and 30 June 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 CX WY-070-CX12-176.
- 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 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:

- Darci Stafford; BLM Biologist
- Ardeth Hahn; BLM Archaeologist
- John Kelley; BLM NEPA Coordinator
- Kerry Aggen; BLM Geologist, Project Lead, and Document Preparer

**D: SIGNATURE**

Field Manager: Kathleen R. Bues Date: April 1, 2013

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

**REVIEW AND DOCUMENTATION FOR EXTRAORDINARY CIRCUMSTANCES:**

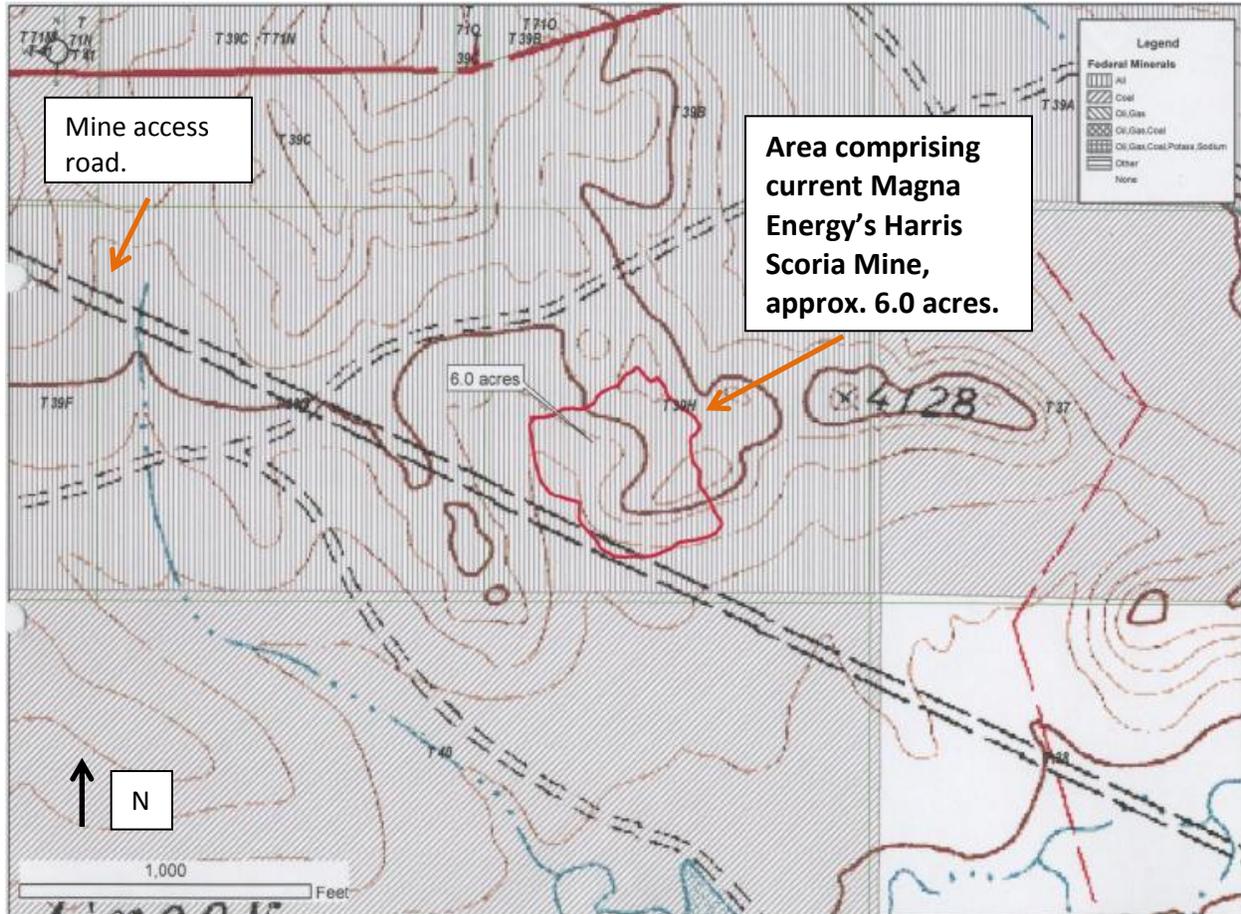
This categorical exclusion is appropriate in this situation because there are no extraordinary circumstances potentially having effects that may significantly affect the environment. The proposed action has been reviewed, and none of the extraordinary circumstances described in 516 DM 2 (and BLM NEPA Handbook H-1790-1, Appendix 5) apply.

<b>EXTRAORDINARY CIRCUMSTANCES:</b>		
1. Have significant impacts on public health or safety.		
Yes	<b>No XX</b>	<p>This project will have significant <i>positive</i> impacts on public health and safety. The mineral materials obtained from the project area will be used on nearby oil/gas development roads to help keep them passable year-round. These roads are used year-round by employees and operators of these oil and gas operations, and neighboring ranchers. State and federal employees also use this road 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 and Special 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	<b>No XX</b>	<p>The proposed undertaking has no potential to affect historic properties. On July 3, 2012, Ardeth Hahn, BLM Archeologist, electronically notified the Wyoming State Historic Preservation Office (SHPO) following Section IV(A)(3) and Appendix B(23) 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 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.</p> <p>The existing Harris pit occurs 0.3 miles, and out of the line-of-sight, from 2 raptor nests: great horned owl nest 5623 and red-tailed hawk nest 5624. The pit is outside the species-specific spatial buffers recommended by the U.S. Fish and Wildlife Service, 0.125 and 0.25 miles, respectively. The BLM typically applies a timing limitation to surface disturbing activities within 0.5 miles of active raptor nests to mitigate potential impacts. However, topography in the area creates a buffer that likely also serve to mitigate visual and some noise impacts resulting from activities at the mine. Because impacts are currently being mitigated with biological and other buffers, the BLM does not propose any additional mitigation for raptors.</p> <p>The mine occurs approximately 1.8 miles from the Elk Creek Road lek, outside of preliminary priority habitats (PPH) for Greater Sage-Grouse (GSGS). Habitat models do not indicate any high-quality nesting habitat occurring near the mine; however, the BLM biologist confirmed suitable nesting habitat to the south. Topography adjacent to the mine creates a moderate visual barrier to most suitable habitat to the north and east, and to the existing lek.</p>

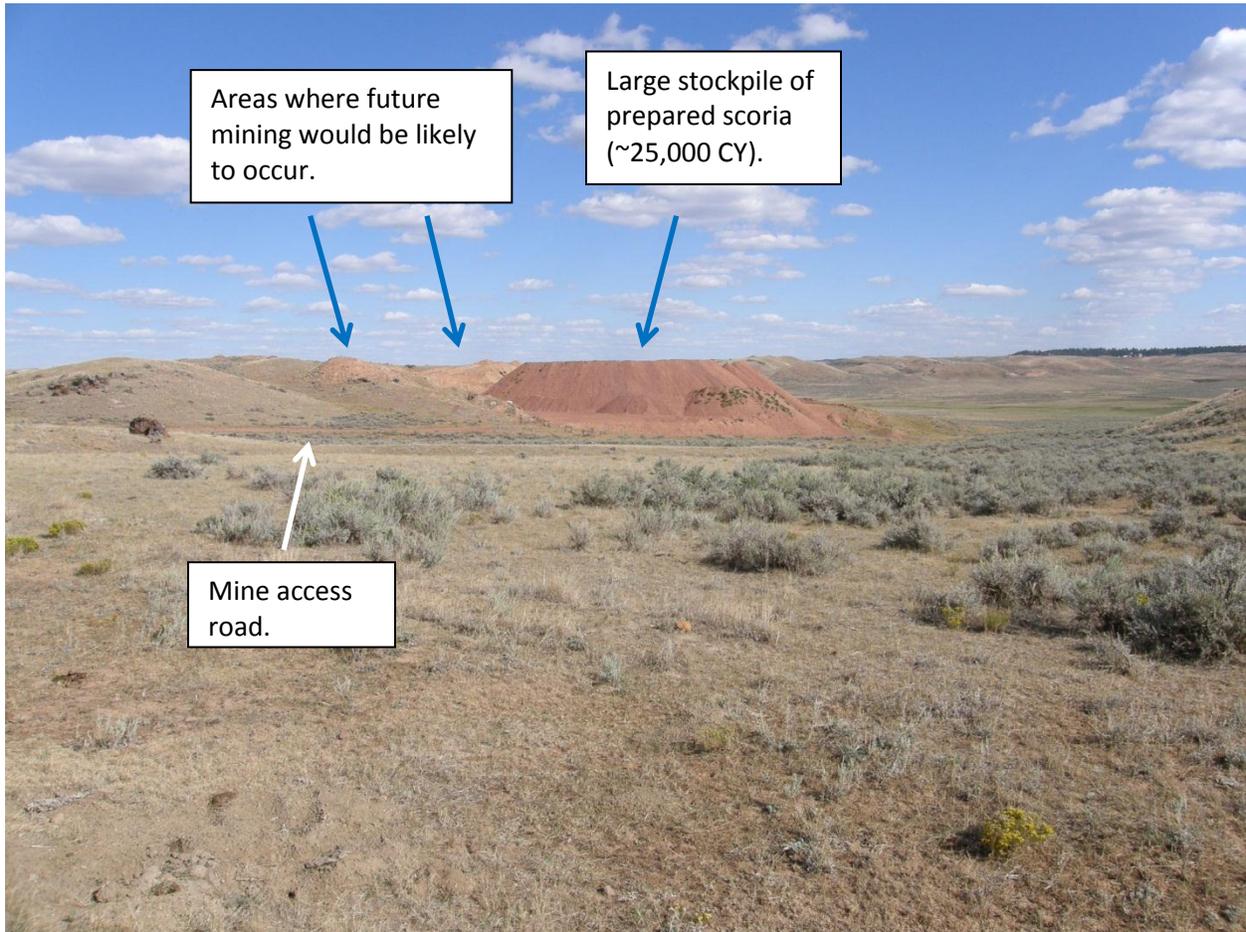
<b>EXTRAORDINARY CIRCUMSTANCES:</b>		
		<p>Topography surrounding the pit mitigates some noise impacts to habitat to the north and east. GSG are likely to utilize summer habitat along White Tail Creek, 0.25 miles to the south and east. Broods traveling through the project area may be impacted by activities at the mine. Research has shown that hens are sensitive to noise from oil and gas drilling operations when selecting a location for nesting, and they may therefore be sensitive to noise from other surface disturbing activities such as mining and crushing of scoria (Holloran et al. 2005, Holloran et al. 2007, Aldridge and Boyce 2007, Walker et al. 2007, Doherty et al. 2008, WGFD 2009). The BLM proposes a timing limitation on mining and crushing of scoria during the nesting season (March 15 – June 30) in order to mitigate the impacts from noise and human disturbance to GSG that may be utilizing the nesting habitat to the south and west of the mine. Even with the timing limitation, activities associated with oil and gas development may be impacting GSG using the area. GSG may avoid the area.</p> <p><b>The following one (1) Special Stipulation is attached to this authorization, to avoid potential impacts to GSG:</b></p> <ol style="list-style-type: none"> <li><b>To reduce impacts of elevated noise levels from mining and crushing of scoria on nesting Greater Sage-Grouse, no scoria mining or crushing shall occur between 15 March and 30 June for the life of the project.</b></li> </ol>
3. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA section 102 (2) (E)].		
Yes	<b>No XX</b>	This project involves continued removal of already prepared (crushed and stockpiled) scoria from an existing mine. This mine has been in existence since 2002, when it was first opened by KG Construction, Inc. (original mine owner). There are two (2) BLM-authorized scoria mines within approximately 6 miles of the project site, both to the northwest: newly-authorized Quality Aggregate's Recluse, approximately 3.5 miles, and inactive Hettinger's Brug, approximately 5.5 miles, (WYW-168351 and WYW-169859, respectively). No BLM-authorized sand/gravel mines exist within less than 10 miles of the project area. The impacts of this project are similar to other mineral materials projects that have been implemented and monitored, such as Quality Aggregate's and Hettinger's. Therefore, impacts of the proposed project are well-known, and will be overwhelmingly positive (see #1 above).
4. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks.		
Yes	<b>No XX</b>	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	<b>No XX</b>	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.		

<b>EXTRAORDINARY CIRCUMSTANCES:</b>		
Yes	<b>No XX</b>	This project does not have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects.
7. Have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by the bureau.		
Yes	<b>No XX</b>	The project area consists of entirely already existing disturbances. 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	<b>No XX</b>	<p>The topography surrounding the mine is sufficient to mitigate visual and noise effects to nesting raptors (see #2 above).</p> <p>No listed or proposed Threatened and Endangered (T&amp;E) species, nor any their critical habitat, occur in/near the project area.</p> <p>Although suitable habitat for Greater Sage-Grouse (GSG) exists in/near the project area, the nearest lek is 1.8 miles away. In addition, the visual and noise buffer created by the topography surrounding the mine should be sufficient to avoid impacts to GSG; However, a Special Stipulation is attached to the mine's authorization, to provide further mitigation, as 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	<b>No XX</b>	The existing mining operation is currently, and will continue to be, permitted by WDEQ LQD under Permit to Mine #1139ET. 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	<b>No XX</b>	Neither low-income nor minority populations will be impacted. The nearest residents to the project area are ranchers, who own 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	<b>No XX</b>	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	<b>No XX</b>	Operator has agreed to abide by the Standard and Special 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 extent of disturbance of Magna Energy's proposed Harris Scoria Mine project.** Magna Energy's entire proposed Harris Scoria Mine is indicated by the red polygon. Quality Aggregate's newly-authorized Recluse Scoria Mine (WYW-168351) and Hettinger's inactive Brug Scoria Mine (WYW-169859), occur northwest approximately 3.5 and 5.5 miles (respectively) of the Harris Mine. The access road leading from Woods Road to the mine is indicated by the black dashed lines. Disturbance was GPS'ed on September 19, 2008, by Jerry Queen – no further disturbance has occurred since that time.



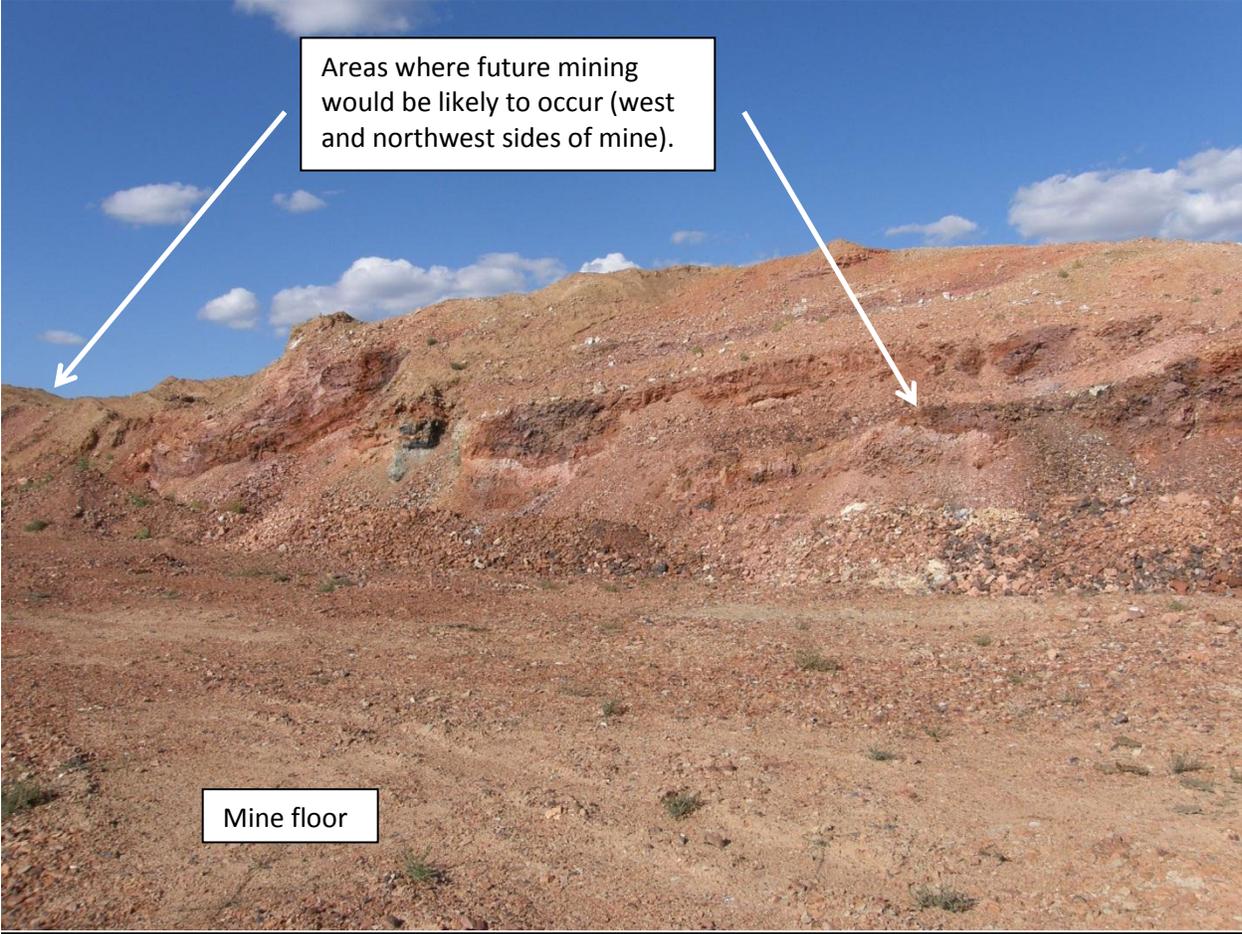
**Figure 2. Photograph of Magna Energy's proposed Harris Scoria Mine project.** Seen in center middle ground is the entire mine. A large stockpile of prepared scoria (~25,000 CY) sits in the middle of the mine on the mine floor. If mining were to resume in the future, it would continue proceeding to the left of the stockpile area (west and northwest sides of mine). Access road is visible just in front of the mine, in left through center middle ground. Taken looking north-northeast from Woods Road by Kerry L. Aggen on September 7, 2012.



**Figure 3. Photograph of Magna Energy’s proposed Harris Scoria Mine project.** Immediate foreground is mine floor – the deepest extent of mining, and a relatively flat platform to serve as area for equipment staging, scoria processing, and loading of scoria onto trucks for transport off-site. Seen in center foreground is the large stockpile of prepared scoria (~25,000 CY). Access road is behind the stockpile. If mining were to resume in the future, it would continue proceeding to the right of the stockpile area (west and northwest sides of mine). Taken looking south-southwest from northeastern edge of mine floor by Kerry L. Aggen on September 7, 2012.



**Figure 4. Magna Energy’s proposed Harris Scoria Mine project.** The large stockpile of prepared scoria (~25,000 CY) is to the left, out of the photo. If mining were to resume in this mine in the future, it would most likely continue to proceed into the west and northwest sides of mine, seen in photo. Taken looking west from northeastern edge of mine floor by Kerry L. Aggen on September 7, 2012.



## **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 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.