

RECLAMATION

Managing Water in the West

Environmental Assessment

Santa Barbara County Water Agency WaterWise Landscape Rebate Program

14-27-MP

**WaterSMART: Water and Energy Efficiency Grant No.
R14AS00001**



**U.S. Department of the Interior
Bureau of Reclamation**

October 2014

Mission Statements

The mission of the Department of the Interior is to protect and provide access to our Nation's natural and cultural heritage and honor our trust responsibilities to Indian Tribes and our commitments to island communities.

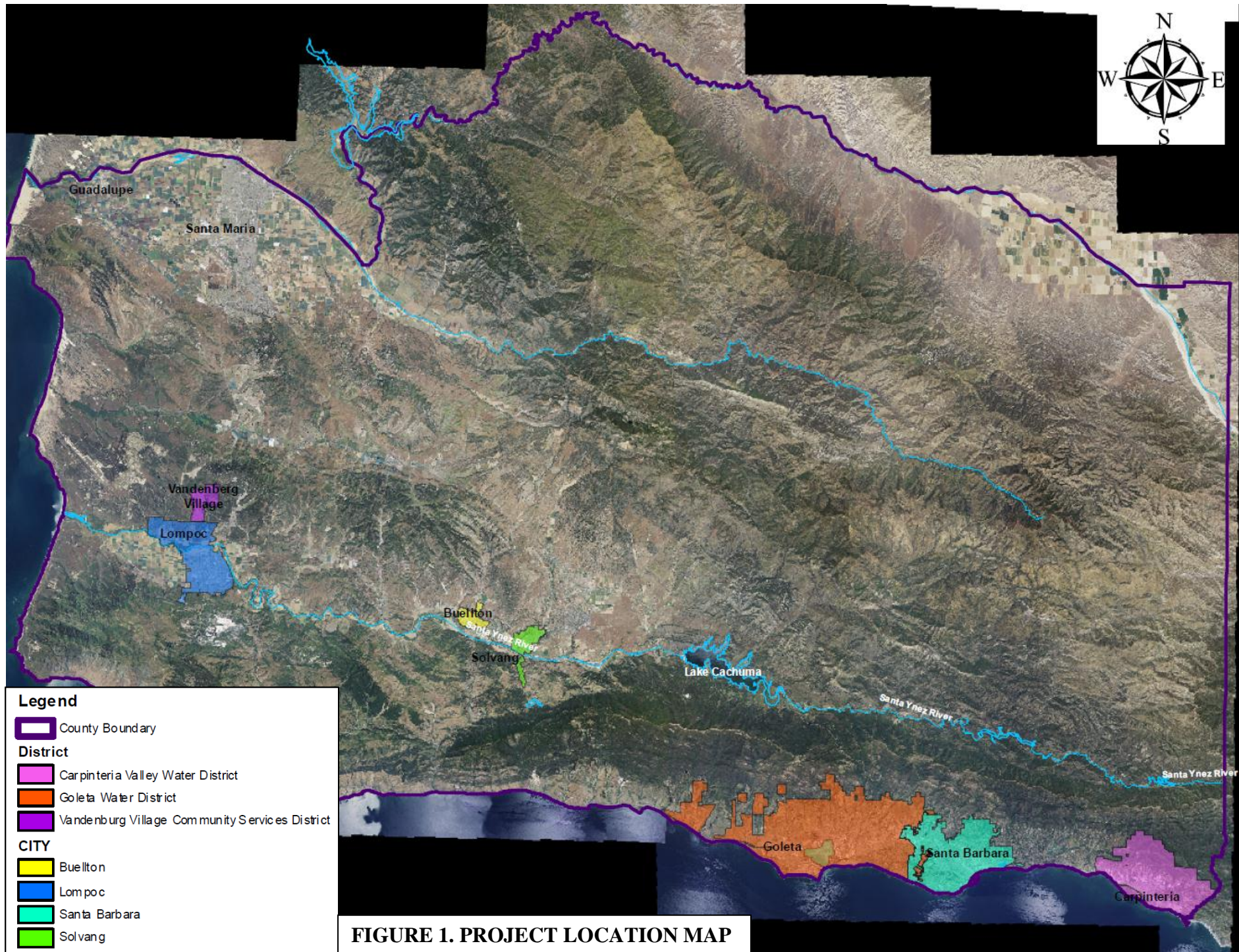
The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

Section 1 Introduction

This Environmental Assessment (EA) examines the potential direct, indirect, and cumulative impacts to the affected environment associated with the U.S. Bureau of Reclamation (Reclamation) providing WaterSMART: Water and Energy Efficiency Grant funding to the Santa Barbara County Water Agency (SBCWA) for its WaterWise Landscape Rebate Program (Project). The Project will be implemented in seven participating water purveyor service areas, most of which are highly dependent on Reclamation's Cachuma Project for ensuring adequate water supplies. Project participants include the City of Santa Barbara, Goleta Water District, and Carpinteria Valley Water District, all of which are Member Units of the entitlements under the SBCWA's master contract to the Cachuma Project, and Vandenberg Village CSD and the cities of Solvang, Buellton and Lompoc (Participating Purveyors). The Project would be implemented in these seven water purveyor service areas throughout Santa Barbara County, California (see Figure 1).

1.1 Need for the Proposal

As the State of California is currently experiencing record-breaking drought conditions, counties need to reduce water consumption and waste to the extent feasible. The SBCWA needs funding assistance to increase rebates for non-agricultural water customers that replace their water inefficient landscapes and sprinkler systems with water wise landscapes in order to reduce waste and increase water-use efficiency and supply flexibility. Reclamation provides WaterSMART funding to entities with water or power delivery authority that propose projects seeking to conserve and use water more efficiently.



Section 2 Proposed Action and Alternatives

2.1 No Action Alternative

Under the No Action Alternative, Reclamation would not contribute any financial assistance to the SBCWA through a program grant for the Project.

2.2 Proposed Action

Reclamation proposes to contribute \$396,310 to the SBCWA's Project through a WaterSMART Program grant. The SBCWA would also receive \$179,000 from non-federal sources. The SBCWA and local Participating Purveyors will offer rebates to all non-agricultural customers for a variety of landscape-related water efficient upgrades. The Project will be modeled after a prior successful program, the *Smart Landscape Rebate Program*, and aims to improve upon this program by adding a design component to give customers a starting point from which they can plan a water wise landscape. Rebates would be awarded for 50 percent of the cost of approved equipment and materials, up to \$1,000 for residential properties, or up to \$2,000 per meter or \$4,000 per facility for commercial properties. Within the \$1,000 rebate, a customer can receive a rebate of 50 percent of landscape design costs, up to \$250 to receive expert advice to plan and design their landscape. No general labor will be rebated. Reclamation will fund 50 percent of customer rebates, matched by the cash from local water purveyors.

Rebate amounts must be approved by participating purveyors before the start of each project. Rebates will require sales receipts, invoices, and before and after photos or evaluations to verify project completion. The following actions and items qualify for rebates:

- Retrofitted/replaced items; no new items that do not replace the same kind of item, unless they are part of a major system-wide or process change pre-approved by water purveyor staff;
- High efficiency irrigation (smart controllers, rotating nozzles, drip line, *etc.*);
- Water wise or drought tolerant plants;
- Removal of turf areas (*i.e.* cash for grass);
- Mulch or other groundcover;
- Dedicated landscape meters, in place of mixed master meters;
- Rain barrels or tanks and associated equipment;
- Rain gardens and associated equipment; and

- Landscape design services to assist customers in planning their landscape retrofit.

The Participating Purveyors would track and report customers' monthly water usage at the end of the grant period to the SBCWA and Reclamation.

A projected average 121 afy (acre-feet per year) of water savings would result from providing funding to this Water Wise Landscape Rebate Program and replacing drought intolerant landscaping materials and plants. The average 121 afy water savings is expected to be realized in each non-drought year. The Project would also result in a direct saving of energy used to transport, treat, and distribute water at the rate of 2,919 kWh/af. Conserving 121 afy of water through the Project would conserve 353,199 kWh/year.

Reclamation's action to award the grant may occur in September or October 2014, and the SBCWA would begin work to implement rebate-approved actions in October 2014. Implementation of the Project would continue for as long as rebate money is available, or for two years until September 2016, whichever occurs first. Work to retrofit or replace existing landscapes would occur within previously disturbed and maintained yards and shoulders of non-agricultural water user properties (*i.e.* residential, commercial, industrial, *etc.*).

2.2.1 Environmental Commitments and Best Management Practices

As part of the Proposed Action, the SBCWA will implement the following environmental commitments and Best Management Practices in order to avoid and minimize potential effects to the affected environment:

- There will be no construction work during night time hours.
- There will be no discharges to any bodies of water.
- No construction will occur within wetland or riparian areas adjacent to any Project action area.

Section 3 Affected Environment and Environmental Consequences

Potential impacts to the following resources were considered and found to be minor. Brief explanations for their impacts are provided below:

- **Indian Trust Assets:** The Proposed Action does not have the potential to affect Indian Trust Assets (see Appendix A).
- **Indian Sacred Sites:** The Proposed Action would not be located on or impact federal lands and therefore could not affect Indian sacred sites on federal lands.
- **Environmental Justice:** the Proposed Action would not have disproportionately negative impacts on low-income or minority individuals or populations within the Project area.

Low Income Communities

The federal per capita poverty threshold is \$11,670 per person (U.S. Department of Health & Human Services 2014) and in Santa Barbara County, 15.3 percent of their population live below that threshold (American FactFinder 2012b). The physical changes from the Project involve voluntary alteration of the landscapes and sprinkler systems of non-agricultural water customers (*i.e.* residences and commercial facilities). There would be negligible effects to low-income households and places of work.

Minority Communities

Demographic characteristics of Santa Barbara County were evaluated to determine the population mix that would be expected in the water purveyor service areas involved in the Project. The population in Santa Barbara County is predominantly white at 74.3% of the total persons living in the area (American FactFinder 2012a). As a whole, the population served by the seven Participating Purveyors would not meet the definition of a minority community. Therefore, the proposed Project would not have a disproportionate effect on minority communities.

3.1 No Action Alternative

The No Action Alternative would consist of Reclamation not providing grant funding to increase rebates for non-agricultural water customers in Santa Barbara County that replace existing landscapes with water wise landscapes and sprinkler systems. Under the No Action Alternative, there would be no change to existing

conditions and current trends of the affected environment. The landscapes and sprinkler system currently in place would continue to operate and the SBCWA would continue to provide water to its nonagricultural users.

3.2 Proposed Action

3.2.1 Water Resources

Santa Barbara County residents obtain most of their potable water from three sources: storm runoff collected in reservoir systems (~40 percent), groundwater withdrawal (~28 percent), and the State Water Project (SWP) (~27 percent). The Cachuma Reservoir is the main surface water reservoir in the county, and downstream discharges are also a major contributor to groundwater recharge for communities along the lower Santa Ynez River. The SWP is also linked to Cachuma Reservoir, which is the end of the SWP pipeline within the county, as its water is stored there until pumped to the county's south coast communities.

Water conserved by this Project is currently lost through a variety of pathways including water lost to evaporation due to inefficient overhead water practices, water lost to urban runoff due to overwatering and poorly managed irrigation, and excessive water lost to transpiration from high evapotranspiration plants such as turf grass. Only water that is lost below the root zone due to overwatering is currently "recoverable" water. Water conserved would remain in local surface water reservoirs such as Lake Cachuma, within local groundwater basins, or in the SWP system. The savings of 121 afy will help reduce pressure on local and statewide water supplies and provide more flexibility in meeting water demands.

The percentages of water supply conserved by this Project in each water purveyor service area are shown in Table 1. The total percentage conserved is 0.32 percent (based on the average annual water supply of 38,418 afy from 2010 – 2012).

Table 1. Average annual water supply and projected water savings.

Agency	Average Annual Water Supply during 2010-2012 (AF)	Estimated Amount of Water Conserved (AF)	Percent Water Conserved
City of Santa Barbara	13,310	31	0.23%
Buellton	1,203	10	0.80%
Carpinteria Valley WD	4,161	8	0.18%
Goleta WD	12,284	38	0.31%
Solvang	1,417	17	1.22%
Lompoc	4,559	11	0.23%
Vandenberg Village CSD	1,483	7	0.44%
Total	38,418	121	0.32%

3.2.2 Air Quality

Water conserved by the Project would result in a direct saving of natural gas, electricity, and other energy sources used to transport, treat, and distribute water, which indirectly reduces greenhouse gas (carbon dioxide) emissions. As shown in Table 2, the energy saved varies significantly on supply source, with water imported through the SWP consuming 2,919 kWh/af. Where water providers can reduce potable demand, the more expensive and energy intensive water supply sources will often be the first to be avoided, reducing the energy embedded within potable water used by Participating Purveyors. Conserving 121 afy of water through the Project would conserve 353,199 kWh/year and result in long-term, minor reductions in greenhouse gas emissions from water treatment and distribution.

Table 2. Embedded energy in Goleta Water District potable water system, 2007.

Water Production	AF	kWh	kWh/AF	kWh/gal
Surface Transport	10,409	-	-	-
Imported Transport	3,007	8,777,433	2,919	.00896
GW Pumping	439	171,966	392	.00120
Recycled Water	1,012	107,738	106	.00033
Treatment	13,855	565,760	41	.00013
Distribution	14,867	99,656	7	.00002
Total Upstream	14,867	9,722,552	654	.00201

Replacing turfgrass landscapes with water efficient trees and plants would also reduce greenhouse gas emissions as the need to operate pollutant-emitting lawn mowers and leaf blowers decreases, and as shade trees reduce energy generation to cool home or office buildings (EPA 2009; EPA 2013).

3.2.3 Special Status Biological Resources

A list of federal endangered or threatened species was generated for Santa Barbara County on September 17, 2014, from the U.S. Fish & Wildlife Service's website, California Natural Diversity Database, and other information available to Reclamation to help determine if the Proposed Action would have the potential to affect federally-listed species within the action areas.

The action area is the footprint of the landscaping modification on commercial and residential properties and a 200-foot buffer around those activities in which noise and dust could occur. The present land use of the potential action areas of the Participating Purveyors consist of residential, commercial and industrial properties, horse pastures, golf courses, schools including the University of California, Santa Barbara, and an airport. All work involved in retrofitting or replacing existing landscapes that qualify for a WaterWise landscape rebate would occur within landscaped yards, acreage and shoulders of non-agricultural properties that have been heavily disturbed by human activity for decades. The

landscapes of non-agricultural water customers are maintained on a regular basis, creating unsuitable habitat conditions and disturbance for federal endangered or threatened species.

Table 3 includes federally-listed species potentially occurring within the Carpinteria, Santa Barbara, White Ledge Peak, Goleta, Dos Pueblos Canyon, Solvang, Zaca Creek, Lompoc, and Surf USGS 7.5-minute Quadrangles that encompass a 10-mile radius around the Proposed Action areas within Santa Barbara County. Included is a brief description of each species' status, determination of effects from the Proposed Action, and summary of the rationale supporting the no effect determinations.

Table 3: Federally-Listed Species Identified as Potentially Occurring in the Carpinteria, Santa Barbara, White Ledge Peak, Goleta, Dos Pueblos Canyon, Solvang, Zaca Creek, Lompoc, and Surf USGS 7.5-minute Quadrangles

Scientific Name	Common Name	Federal Status	Effects	Potential habitat utilized by species in Proposed Action Area
AMPHIBIANS				
<i>Ambystoma californiense</i>	California tiger salamander	T	NE	Absent. There are several historic records of this species within 10 miles of Lompoc and Vandenberg Village, but there is no vernal pool habitat or ponds with necessary habitat conditions within one mile of a Project site. No suitable habitat in the Proposed Action area. No suitable habitat would be disturbed.
<i>Rana draytonii</i>	California red-legged frog	T	NE	Absent. There are several historic records of this species within 10 miles of the Project action areas. No suitable habitat in the Proposed Action area. No suitable habitat would be disturbed.
<i>Anaxyrus californicus</i>	arroyo toad	E	NE	Absent. There are two historic records of this species within 10 miles of Santa Barbara and Carpinteria. No suitable habitat in the Proposed Action area. No suitable habitat would be disturbed.
FISH				
<i>Eucyclogobius newberryi</i>	tidewater goby	E	NE	Absent. There are several historic records of this species within 10 miles of Project action areas, but Project activities will occur on the terrestrial landscapes of disturbed properties. This species occurs in fresh to brackish water in the lower reaches of streams and small coastal lagoons. No

Scientific Name	Common Name	Federal Status	Effects	Potential habitat utilized by species in Proposed Action Area
				suitable habitat in the Proposed Action area. No suitable habitat would be disturbed.
<i>Oncorhynchus mykiss irideus</i>	southern steelhead – southern California DPS	E	NE	Absent. There are several historic records of this species within 10 miles of Project action areas, in the Santa Ynez River and its tributaries, San Ysidro Creek, and Arroyo Hondo Creek. No suitable habitat in the Proposed Action area. No suitable habitat would be disturbed.
<i>Gasterosteus aculeatus williamsoni</i>	unarmored threespine stickleback	E	NE	Absent. There are two historic records of this species within 10 miles of Lompoc and Vandenberg Village in San Antonio Creek and Canada Hondo Creek near the coast. No suitable habitat in the Proposed Action area. No suitable habitat would be disturbed.
BIRDS				
<i>Gymnogyps californianus</i>	California condor	E	NE	Absent. The Sespe Condor Sanctuary is within 10 miles of Carpinteria. Project action areas contain no foraging habitat for this species. No suitable habitat in the Proposed Action area. No suitable habitat would be disturbed.
<i>Sternula antillarum browni</i>	California least tern	E	NE	Absent. There is one historic record of this species 10 miles from Vandenberg Village and Lompoc in an extensive sand dune habitat on the coast. No suitable habitat in the Proposed Action area. No suitable habitat would be disturbed.
<i>Charadrius alexandrinus nivosus</i>	western snowy plover	T	NE	Absent. There are four historic records of this species within 10 miles of Vandenberg Village, Lompoc, Goleta, and Santa Barbara. This species inhabits dune-backed beaches. No suitable habitat in the Proposed Action area. No suitable habitat would be disturbed.
<i>Vireo belli pusillus</i>	least Bell's vireo	E	NE	Absent. There are several historic records of this species within 10 miles of Solvang, Buellton, Goleta, Santa Barbara, and Carpinteria. This species inhabits riparian areas with willow-cottonwood forests. No suitable habitat in the Proposed Action area. No suitable habitat would be disturbed.

Scientific Name	Common Name	Federal Status	Effects	Potential habitat utilized by species in Proposed Action Area
<i>Rallus longirostris levipes</i>	light-footed clapper rail	E	NE	Absent. There are several historic records of this species within 10 miles of Goleta, Santa Barbara, and Carpinteria. This species inhabits sloughs, marshes and wetlands. No suitable habitat in the Proposed Action area. No suitable habitat would be disturbed.
<i>Empidonax traillii eximius</i>	southwestern willow flycatcher	E	NE	Absent. There are several historic records of this species within 10 miles of Solvang, Buellton, Goleta, Santa Barbara, and Carpinteria. This species inhabits forested wetland and riparian habitat. No suitable habitat in the Proposed Action area. No suitable habitat would be disturbed.
PLANTS				
<i>Lasthenia conjugens</i>	Contra Costa goldfields	E	NE	Absent. No suitable habitat in Project action areas of disturbed and regularly maintained landscapes.
<i>Nasturtium gambelii</i>	Gambel's water cress	E	NE	Absent. No suitable habitat in Project action areas of disturbed and regularly maintained landscapes..
<i>Deinandra increscens</i> ssp. <i>villosa</i>	Gaviota tarplant	E	NE	Absent. No suitable habitat in Project action areas of disturbed and regularly maintained landscapes.
<i>Cirsium scariosum</i> var. <i>loncholepis</i>	La Graciosa thistle	E	NE	Absent. No suitable habitat in Project action areas of disturbed and regularly maintained landscapes.
<i>Eriodictyon capitatum</i>	Lompoc yerba santa	E	NE	Absent. No suitable habitat in Project action areas of disturbed and regularly maintained landscapes.
<i>Mimulus fremontii</i> var. <i>vandenbergensis</i>	Vandenberg monkeyflower	PE	NE	Absent. No suitable habitat in Project action areas of disturbed and regularly maintained landscapes.
<i>Astragalus pucnostachyus</i> var. <i>lanosissimus</i>	Ventura Marsh milk-vetch	E	NE	Absent. No suitable habitat in Project action areas of disturbed and regularly maintained landscapes.
<i>Layia carnosa</i>	beach layia	E	NE	Absent. No suitable habitat in Project action areas of disturbed and regularly maintained landscapes.
<i>Chloropyron maritimum</i> ssp. <i>maritimum</i>	salt marsh bird's-beak	E	NE	Absent. No suitable habitat in Project action areas of disturbed and regularly maintained landscapes.

Key:

- (PE) Proposed Endangered – Proposed in the Federal Register as being in danger of extinction
- (PT) Proposed Threatened – Proposed as likely to become endangered within the foreseeable future
- (E) Endangered– Listed in the Federal Register as being in danger of extinction
- (T) Threatened – Listed as likely to become endangered within the foreseeable future
- (C) Candidate – Candidate which may become a proposed species
- (NE) No Effect – Proposed Action will have no effect on the species
- (NLAA) Not Likely to Adversely Affect – Proposed Action may affect the species, but is not likely to adversely affect.

3.2.4 Cultural Resources

The Proposed Action would allow the expenditure of federal funds by the SBCWA to provide rebates for non-agricultural water users that replace their water inefficient landscapes with water wise or technology, and this is the type of activity that has no potential to cause effects on historic properties. As such, Reclamation has no further obligations under Section 106 of the National Historic Preservation Act (NHPA), pursuant to 36 CFR Part 800.3(a)(1). There will be no significant impacts to cultural resources under the Proposed Action (see Appendix B).

3.2.5 Cumulative Impacts

According to CEQ regulations for implementing the procedural provisions of NEPA, a cumulative impact is defined as *the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions*. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time. As there would be no adverse impacts associated with implementing the action, there are no cumulative effects to consider.

Section 4 Consultation and Coordination

4.1 Agencies and Groups Consulted

Reclamation coordinated with the USFWS, Ventura Fish and Wildlife Office, SBCWA, and Reclamation's Native American Affairs Coordinator in the preparation of the EA.

4.2 Endangered Species Act (16 USC § 1531 et seq.)

Section 7 of the Endangered Species Act requires Federal agencies, in consultation with the Secretary of the Interior, to ensure that their actions do not jeopardize the continued existence of endangered or threatened species, or result in the destruction or adverse modification of the critical habitat of these species.

Reclamation determined that there would be no effect on federally-listed as endangered or threatened species, therefore the USFWS was not consulted.

4.3 National Historic Preservation Act (16 USC § 470 et seq.)

The National Historic Preservation Act of 1966, as amended (16 USC 470 et seq.) is the primary Federal legislation that outlines the Federal Government's responsibility to cultural resources. Section 106 of the National Historic Preservation Act requires the Federal Government to take into consideration the effects of an undertaking on cultural resources listed on or eligible for inclusion in the National Register of Historic Places, and to give the Advisory Council on Historic Preservation an opportunity to comment on the effects.

Reclamation determined that the Proposed Action is the type of activity that has no potential to cause effects on historic properties; therefore the California State Historic Preservation Officer was not consulted.

Section 5 References

American FactFinder. 2012a. Race: 2012 American Community Survey 1-Year Estimates. U.S. Census Bureau. Web. 17 Sept. 2014.
http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_12_1YR_B02001&prodType=table.

American FactFinder. 2012b. Selected Economic Characteristics: 2008-2012 American Community Survey 5-Year Estimates. U.S. Census Bureau. Web. 17 Sept. 2014.
<http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>.

U.S. Environmental Protection Agency. 2009. Research Report on Turfgrass Allowance. EPA WaterSense. Web. 17 Sept. 2014.
http://www.epa.gov/watersense/docs/home_turfgrass-report508.pdf.

EPA. 2013. Water-Smart Landscapes. EPA WaterSense. Web. 17 Sept. 2014.
http://www.epa.gov/watersense/docs/home_turfgrass-report508.pdf.

U.S. Department of Health and Human Services. 2014. Federal poverty guidelines.
<http://aspe.hhs.gov/poverty/14poverty.cfm>. Web. 17 Sept. 2014.

Appendix A: ITA Concurrence

9/17/2014

DEPARTMENT OF THE INTERIOR Mail - ITA Request: Santa Barbara County Water Agency WaterWise Landscape Rebate Program



Aviles, Alexandra <aaviles@usbr.gov>

ITA Request: Santa Barbara County Water Agency WaterWise Landscape Rebate Program

RIVERA, PATRICIA <privera@usbr.gov>

Wed, Sep 17, 2014 at 6:20 AM

To: "Aviles, Alexandra" <aaviles@usbr.gov>

Cc: "Mary (Diane) Williams" <marywilliams@usbr.gov>, Kristi Seabrook <kseabrook@usbr.gov>

Alex,

I reviewed the proposed action to award a WaterSMART Program: Water Use and Energy Efficiency Grant to Santa Barbara County Water Agency to fund a portion of the Project to expand rebates that would implement a variety of landscape-related water efficient upgrades. The [Santa Barbara County Water Agency WaterWise Landscape Rebate Program](#) would increase rebates offered in a WaterWise Landscape Program for all non-agricultural customers in seven water purveyor service areas in Santa Barbara County (see attached map). The following materials, equipment, and design advice for water efficient and drought tolerant landscaping are eligible for rebates:

Retrofitted/replaced items; no new items that do not replace the same kind of item, unless they are part of a major system-wide or process change pre-approved by water purveyor staff;
High efficiency irrigation (smart controllers, rotating nozzles, drip line, etc.);

Water wise or drought tolerant plants;
Removal of turf areas (cash for grass);
Mulch or other groundcover;
Dedicated landscape meters, in place of mixed master meters;
Rain barrels or tanks and associated equipment;
Rain gardens and associated equipment; and
Landscape design services to assist customers in planning their landscape retrofit

Reclamation's action to award the grant may occur in September or October 2014, and the County Water Agency would begin work to implement rebate-approved actions in October 2014. Implementation of the rebate program would continue for as long as rebate money is available, or for two years until September 2016, whichever occurs first. Work to retrofit or replace existing landscapes would occur within previously disturbed and maintained yards, roadways and shoulders of residential or commercial properties.

The proposed action does not have a potential to impact Indian Trust Assets.

Patricia Rivera
Native American Affairs Program Manager
US Bureau of Reclamation
Mid-Pacific Region

<https://mail.google.com/mail/u/0/?ui=2&ik=b9281d3274&view=pt&search=inbox&msg=14883c51ca259e16&siml=14883c51ca259e16>

1.


Appendix B: NHPA, Section 106 Concurrence

CULTURAL RESOURCES COMPLIANCE Mid-Pacific Region Division of Environmental Affairs Cultural Resources Branch

MP-153 Tracking Number: 14-MPRO-242

Project Name: Santa Barbara County Water Agency WaterWise Landscape Rebate Program

NEPA Document: EA

MP 153 Cultural Resources Reviewer: Joanne Goodsell 

Date: September 15, 2014

Reclamation proposes to provide financial assistance to the Santa Barbara County Water Agency to expand its WaterWise Landscape Rebate Program through a WaterSMART Water Use and Energy Efficiency Grant. Reclamation would contribute \$396,310 to the Santa Barbara County Water Agency's existing WaterWise program. The County Water Agency would receive \$179,000 from non-federal sources. Funding would be used for a variety of landscape-related water efficient upgrades for non-agricultural customers in seven water purveyor service areas in Santa Barbara County. Reclamation's action is the award of grant funding only. Decisions regarding materials and activities eligible for rebate are under the control of the County Water Agency.

The proposed action involves the type of activity that has no potential to cause effects on historic properties, assuming such properties are present. As such, Reclamation has no further obligations under Section 106 of the National Historic Preservation Act (NHPA), pursuant to 36 CFR §800.3(a)(1). There will be no significant impacts to cultural resources under the proposed action.

This memorandum is intended to convey the completion of the NHPA Section 106 process for this undertaking. Please retain a copy in the administrative record for this action. Should changes be made to the proposed action, additional NHPA Section 106 review, possibly including consultation with the State Historic Preservation Officer, may be necessary. Thank you for providing the opportunity to comment.