

NEPA REVIEW SCREENING FORM (NRSF) Categorically Excluded Actions	Document ID #: DOE/CX-00227
I. Project Title: Benton County Public Utility District Rebuild of Collapsed Portion of Electrical Distribution and Fiber Optic Telecommunication Cables to the Combined Community Communication Facility on Rattlesnake Mountain at the Hanford Site	
II. Describe the proposed action, including location, time period over which proposed action will occur, project dimension (e.g., acres displaced/disturbed, excavation length/depth), and area/location/number of buildings. Attach narratives, maps and drawings of proposed action. Describe existing environmental conditions and potential for environmental impacts from the proposed action. If the proposed action is not a project, describe the action or plan.	
BACKGROUND The United States Department of Energy (DOE), Hanford Field Office (HFO), Site Stewardship Division (SSD) proposes to grant Benton County Public Utility District (Benton PUD) access to Rattlesnake Mountain to rebuild a portion of the Benton PUD owned and operated overhead electrical power and fiber optic telecommunication poles and cables that service the Combined Community Communication Facility (CCCF, see Figure 1). A section of these utilities from pole location 12632-3601 to 12632-4000 collapsed in April 2022 due to high winds and heavy snow (see Figures 2 and 3). Benton PUD performed temporary emergency repairs by placing metal shielded cables on the ground to restore electrical power and telecommunication services to the CCCF. Rattlesnake Mountain is a Traditional Cultural Place (TCP) named "Laliik" by local Native American Tribes. Laliik means "land above the water" referring to the inundation of the Columbia River Plateau during the Missoula Floods approximately 13,000 years ago when flood waters reached depths of 1,200 feet leaving only higher mountain top elevations exposed. Rattlesnake Mountain is an approximately 3,531 feet high treeless ridge overlooking the Hanford Site. Parts of the western slope are privately owned ranch land. The eastern slope is under federal protection and has been designated the Fitzner/Eberhardt Arid Lands Ecology (ALE) Reserve. The ALE Reserve is a unit of the Hanford Reach National Monument (HRNM), which is managed by the United States Fish and Wildlife Service (USFWS) under a permit issued by the DOE-HFO. The HRNM is managed in accordance with Presidential Proclamation 7319 establishing the Monument (June 9, 2000) and the USFWS "Hanford Reach National Monument Comprehensive Conservation Plan and Environmental Impact Statement" and associated "Record of Decision" (73 FR 72519). PROPOSED ACTION The proposed action would replace a portion of the existing overhead electrical power and fiber optic telecommunication poles and cables with buried cables (see Figures 4 and 5) along an approximately 3,583 feet long corridor extending from near the summit of Rattlesnake Mountain and downslope to the southeast (see Figures 6 through 9). The existing overhead telephone line would be removed and its replacement is optional. A total of 23 existing overhead electrical power and fiber optic telecommunication poles and associated cables would be removed from service and replaced with buried cables. Prior to the placement of the buried cables, test boreholes would be drilled along the path to determine soil conditions and depth of cable burial. Up to 13 boreholes would be drilled within the project area using a hand-cranked device or similar method, which would collect samples 4 inches in diameter and up to 2 feet in depth. A trench measuring approximately 6 to 8 inches deep by 4 to 8 inches wide would be excavated using a small bobcat excavator or other appropriate method (see Figure 10) along the route of the current access road. Following placement in the trench, the cables would be covered with removed backfill soil. Additional soil would be imported onsite from existing nearby borrow pits or other approved sources to supplement trench backfilling operations, as needed. In the event soil conditions do not allow excavation of a trench, the electrical power and fiber optic telecommunication cables would be placed on the surface and covered with onsite material from within the work area or using imported soil, as needed. Steel stakes approximately 2 feet in length would be installed along the path of the cables to prevent them from moving downhill. The stakes would be covered with soil and no portion would be exposed or visible after installation. The electrical power and fiber optic telecommunication cables may need to be spliced in some locations to extend cable lengths. Spliced cable connections would be placed in 6 inch diameter conduit for protection. Ongoing maintenance is not expected during the design life of the cables, which is approximately 40 years with 10 to 15 years for splices. The cables would likely need to be accessed after this time to be replaced or potentially earlier for emergency repairs.	

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Once the electrical power and fiber optic telecommunication cables are buried, the existing overhead electrical power and fiber optic telecommunication poles and cables would be removed. Existing poles would be cutoff at the ground surface to minimize disturbance of the land. Excavations would not occur as part of this process, although limited off-road driving may be needed to reach some of the pole locations. The poles would be hauled to an existing staging area at the base of Rattlesnake Mountain and subsequently disposed of in the Hanford Site Environmental Restoration Disposal Facility (ERDF) or other approved location. Project work may involve road maintenance including grubbing and blading of existing access roads up to 6 inches in depth. Access for repair work would be through the existing rights-of-way including established roads and within the defined Area of Potential Effects.	
WASTE MANAGEMENT Pentachlorophenol (PCP) is an industrial wood preservative used mainly to treat utility poles and cross-arms. The Environmental Protection Agency (EPA) classifies PCP as toxic and a probable human carcinogen. Utility poles would be disposed in Hanford's ERDF or other appropriately licensed and permitted landfill in accordance with waste acceptance criteria and other applicable requirements. Electrical insulators may use lead-tipped bolts and other lead-containing components. Lead is a dangerous waste that would be handled, managed, and disposed in accordance with applicable Washington Administrative Code (WAC) requirements (e.g., WAC 173-303, "Dangerous Waste Regulations"). The potential exists for any removed electrical transformers to contain polychlorinated biphenyls (PCBs), which are used as a coolant. PCBs are highly carcinogenic chemical compounds and if present, would be managed in accordance with applicable requirements (such as 40 CFR part 761, "Polychlorinated Biphenyls (PCB) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions"). All waste management activities would be conducted in accordance with accepted industry standards and applicable Hanford Site protocols, policies, and procedures.	
ECOLOGICAL RESOURCES REVIEW (ECR-2025-626, HMIS-2504596, September 2, 2025). The DOE-HFO Ecological Compliance Program performed a pedestrian survey of the project area on February 26, 2025. The Hanford Site Biological Resources Management Plan (BRMP, DOE/RL-96-32, Revision 2), which is the primary implementation document for protecting ecological resources on the Hanford Site using best management practices, ranks wildlife species and habitats based on the level of concern for each resource (Levels 0-5). The plant community within and surrounding the project area is classified as an Element Occurrence, which falls into the highest level of concern (Level 5) in the BRMP with mitigation measures established on a case-by-case basis as a function of the actual area impacted by the proposed action. The following best management practices are an integral part of the proposed action and would be implemented to the extent possible to minimize potential ecological resource impacts: (1) work would be conducted in previously disturbed or developed areas, (2) off-road driving would be limited, (3) removal of vegetation within the project area would be minimized, (4) undercarriages of vehicles and equipment would be cleaned to prevent spread of weed seeds, (5) spoil piles would be contained within existing road prisms in identified staging areas, (6) excavations would be recontoured to preexisting conditions, (7) pole removal sites would be treated prior to reseeded, and (8) access roads would be reseeded with low-growing Sandberg's bluegrass after recontouring to minimize erosion. The potential exists for birds to nest within the project area on the ground, on buildings, or on equipment. The nesting season is typically from mid-March to mid-July. The active nests of migratory birds are protected by the Migratory Bird Treaty Act (MBTA). Project personnel would be instructed by management to watch for nesting birds. If any nesting birds (if not a nest, a pair of birds of the same species or a single bird that will not leave the area when disturbed) are encountered or suspected, or bird defensive behaviors (flying at workers, refusal to leave area, strident vocalizations) are observed within the project area, then project management would contact the DOE-HFO Ecological Compliance Program to evaluate the situation. A nesting bird survey would be performed if the project is to begin vegetation clearing activities during the nesting season. Vegetation clearing activities during the nesting season would not be authorized until project personnel have obtained a copy of nesting bird survey results. All land areas disturbed by the project that are not needed for continued project use, access, or	

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safety considerations would be replanted using locally derived, native plant species. The Hanford Site Revegetation Manual (DOE-RL-2011-116, Revision 2) provides guidance regarding species mix, planting rates, and methods. Revegetation would occur in the first planting window (November - January) after project completion and revegetation planning would occur between January and March of the year prior (7-9 months before the planting window) in order to procure plant materials. No adverse impacts to ecological resources are anticipated from the proposed action. Due to the seasonal and migratory nature of plant and animal species on the Hanford Site, the ecological resources review is valid for one year from the date of the clearance letter (dated September 2, 2025) at which time an ecological resources review renewal would be required. CULTURAL RESOURCES REVIEW (HCRC#2023-600-002, HMIS-2504492, August 27, 2025). The DOE-HFO Cultural and Historic Resources Program (CHRP) conducted a Cultural Resources Review (CRR) of the proposed action and sent an Area of Potential Effects (APE) notification to the Washington State Department of Archaeology and Historic Preservation (DAHP) and area Tribes on January 26, 2023. The DOE-HFO CHRP conducted a cultural resources survey on April 25, 2023. One historic property and one Traditional Cultural Place (TCP) was identified within or near the APE. The DOE-HFO CHRP transmitted a CRR with a finding of Adverse Effect to DAHP and area Tribes for a 30-day comment period on February 15, 2024. DAHP concurred with the findings of the CRR on February 20, 2024. A cultural resources Memorandum of Agreement (MOA) between DOE-HFO, DAHP, and the Advisory Council on Historic Preservation (ACHP) was executed on August 21, 2025, to resolve adverse effects to historic properties. DOE-HFO provided a notice of compliance with 54 U.S.C. §306108 (formerly known as Section 106) of the National Historic Preservation Act for this project on August 21, 2025. The DOE-HFO CHRP would monitor compliance with the MOA stipulations and regularly provide updates to consulting parties, as requested. After DOE-HFO CHRP consultation with DAHP, the ACHP, and area Tribes, adherence to the work controls and mitigation measures discussed in letter HMIS-2504492, "Cultural Resource Clearance for Rebuild of Benton PUD Distribution Line on Laliik (Rattlesnake Mountain) within the Hanford Reach National Monument, Benton County, Washington (HCRC#2023-600-002)," dated August 27, 2025, would be conducted to meet the requirements of the MOA, resolve adverse effects, and avoid impacts to cultural resources. These work controls would be an integral part of the proposed action and include, but are not limited to, advance start of work notifications, temporary fencing/flagging for avoidance areas, cultural awareness training/development of digital educational materials, project personnel working with tribal personnel and archaeological monitors, good housekeeping practices, allowances for tribal ceremonies, ensure project vehicles remain within the established APE, and other provisions in accordance with the MOA stipulations. Project personnel would be instructed by management to watch for cultural resources during all work activities (e.g., mussel shells, bone, stone artifacts, burned rocks, charcoal, dark stained soil, chipped or ground stone, arrowheads, stone flakes, clusters of cans/bottles, or agricultural equipment). In the event project personnel discover cultural resources, work in the vicinity of the discovery would stop until DOE-HFO CHRP has been contacted, the significance of the find assessed, appropriate consulting parties notified, and if necessary, arrangements made for mitigation of the find. The DOE-HFO CHRP anticipates no impacts to cultural resources from the proposed action by following the requirements discussed in the cultural resource clearance letter and related stipulations in the MOA. CONCLUSIONS Among other things, the purpose of the "National Environmental Policy Act of 1969" (as amended) is to promote efforts which will prevent or eliminate damage to the environment and enrich the understanding of the ecological systems and natural resources important to the Nation. While terms like "prevent or eliminate" are typically associated with the mitigation of adverse effects, NEPA itself does not mandate the form or adoption of any mitigation measures. However, many federal agencies voluntarily include mitigation measures as an integral part of a proposed action or otherwise to accomplish the purposes of NEPA.	

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Mitigation measures incorporated as an integral part of a proposed action typically include Best Management Practices (BMPs). BMPs are existing policies, practices, plans, standards, procedures, work activities, and other measures that would be adopted to reduce the environmental impacts of designated activities, functions, or processes. Although BMPs mitigate potential impacts by avoiding, minimizing, reducing, eliminating, or compensating impacts, BMPs are distinguished from potential mitigation measures because BMPs are (1) existing requirements for the proposed action; (2) ongoing, regularly occurring practices; or (3) not unique to a particular proposed action. In other words, the BMPs are inherently part of the proposed action and are not potential mitigation measures proposed separately as a function of the NEPA environmental review process for the proposed action. BMPs include activities required to comply with applicable federal or state laws and regulations as a result of the proposed action.	
Mitigation measures for Hanford Site cultural and historic resources identified in a Memorandum of Agreement (MOA) developed through the NHPA Section 106 and related processes serve to resolve adverse effects and comply with applicable federal laws and regulations. Mitigation measures for Hanford Site biological resources described in the BRMP are BMPs and an integral part of the project design to reduce environmental impacts to below a threshold of significance consistent with Section 3.2 of DOE's NEPA Implementing Procedures, Subpart (e). DOE's NEPA Implementing Procedures indicate that environmental effects should be evaluated in context. For example, in considering short-term effects DOE should acknowledge that certain adverse effects that occur during construction may be reversible through revegetation or other actions that return the environment to its original condition or to a functioning ecosystem. Such effects are not significant over the long-term. Accordingly, funding for implementation of mitigation measures, effectiveness monitoring, and adaptive management are critical to achieving expected outcomes and environmental effects while ensuring informed decision making.	
In order to apply a categorical exclusion to a proposed action, the requirements and conditions that are integral elements in DOE's NEPA Implementing Procedures must be met without extraordinary circumstances where a normally excluded action would have significant effects. However, a federal agency may define extraordinary circumstances so that a particular situation, such as the presence of a protected resource, is not considered an extraordinary circumstance per se, but a factor to consider when determining if there are extraordinary circumstances, such as a significant impact to that resource. If an extraordinary circumstance exists, the agency nevertheless may apply the categorical exclusion if the agency determines that the proposed action does not have the potential to result in significant effects despite the extraordinary circumstance, or the agency modifies the action to avoid the potential to result in significant effects. Categorical exclusions may include mitigation measures as an integral part of the proposed action that will ensure that any environmental effects are not significant, so long as a process is established for funding, monitoring, and enforcing the mitigation measures.	
Benton PUD's proposed action to upgrade and rebuild the electrical power and fiber optic telecommunication cables as described herein would be covered by DOE's NEPA Implementing Regulations (10 CFR 1021) and associated DOE NEPA Implementing Procedures under the following "Appendix B Categorical Exclusions Applicable to Specific Agency Actions":	
B1.3, "Routine Maintenance" - Among other things, this CX addresses routine maintenance activities that are corrective (that is, repair), preventive, and predictive, which are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purposes. Such maintenance may occur as a result of severe weather. Routine maintenance may result in replacement to the extent that replacement is in-kind and is not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Subpart (m) provides for the repair and maintenance of electrical transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, cross-arms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor.	
B1.7, "Electronic Equipment" - Among other things, this CX addresses acquisition, installation, operation, modification, and removal of communication systems, data processing equipment, and similar electronic equipment.	

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B1.17, "Polychlorinated Biphenyl Removal" - This CX addresses removal of Polychlorinated Biphenyl (PCB)-containing items (including, but not limited to, transformers and capacitors), PCB-containing oils flushed from transformers, PCB-flushing solutions, and PCB-containing spill materials from buildings or other aboveground locations in accordance with applicable requirements (such as 40 CFR part 761). B4.7, "Fiber Optic Cable" - This CX addresses adding fiber optic cables to transmission facilities or burying fiber optic cable in existing powerline or pipeline rights-of-way. Covered actions may include associated vaults and pulling and tensioning sites outside of rights-of-way in nearby previously disturbed or developed areas. B4.13, "Upgrading and Rebuilding Existing Powerlines" - This CX addresses upgrading or rebuilding approximately 20 miles in length or less of existing electric powerlines, which may involve minor relocations of small segments of the powerlines. Any changes to the proposed action described herein would require review and approval by the DOE-HFO NEPA Compliance Officer and may necessitate additional NEPA, cultural, and ecological reviews.	
III. Existing Evaluations (Provide with NRSF to DOE NCO):	
Maps: Figure 1 - Project Area on Rattlesnake Mountain - Hanford Site Figure 2 - Portion of Downed Benton PUD Overhead Electrical Power and Fiber Optic Telecommunication Poles and Cables on Rattlesnake Mountain - 1 Figure 3 - Portion of Downed Benton PUD Overhead Electrical Power and Fiber Optic Telecommunication Poles and Cables on Rattlesnake Mountain - 2 Figure 4 - Installation Plan for Benton PUD Buried Electrical Power Cable, Fiber Optic Telecommunication Cable, and Optional Telephone Line Figure 5 - Example of Metal Shielded 3-Phase Underground Electrical Power Cable Figure 6 - Map of Benton PUD Rebuild of Approximately 3,583 Feet Section of Collapsed Overhead Electrical Power and Fiber Optic Telecommunication Poles and Cables on Rattlesnake Mountain Figure 7 - Benton PUD Overhead Electrical Power and Fiber Optic Telecommunication Poles and Cables (Locale 9A) from CCCF (Locale 4) to 6652-T (Locale 8) on Rattlesnake Mountain (Source: DOE/EA-1660F) Figure 8 - Benton PUD Overhead Electrical Power and Fiber Optic Telecommunication Poles and Cables (Locale 9A) on Rattlesnake Mountain (Source: DOE/EA-1660F) Figure 9 - Benton PUD Overhead Electrical Power and Fiber Optic Telecommunication Poles and Cables (Locale 9A) and 6652-T (Locale 8, Half-Way Down) on Rattlesnake Mountain (Source: DOE/EA-1660F) Figure 10 - Steel Tracked Excavator	
Other Attachments: N/A	
IV. List Applicable CX(s) from 10 CFR 1021, Appendix B, "Categorical Exclusions Applicable to Specific Agency Actions" or Appendix C, "Categorical Exclusions Adopted Pursuant to NEPA Section 109": B1.3, "Routine Maintenance"; B1.7, "Electronic Equipment"; B1.17, "Polychlorinated Biphenyl Removal"; B4.7, "Fiber Optic Cable"; B4.13, "Upgrading and Rebuilding Existing Powerlines"	

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V. Extraordinary Circumstances [10 CFR 1021.102(b)(2)] and Integral Elements (10 CFR 1021, Appendix B, Paragraph B).		Yes	No
REQUIREMENTS			
Would the proposed action fail to fit one or more classes of actions listed in 10 CFR 1021, Appendix B and/or C (see Section IV)? If yes, please describe.	☐	☒	
Has the proposed action been segmented by breaking it into smaller parts to meet the definition of a categorical exclusion and avoid the appearance of significance of the total action? Segmentation does not include proposals developed and implemented over multiple phases where each phase results in a decision to proceed with subsequent phases.	☐	☒	
Are there extraordinary circumstances that may affect the environmental impacts of the proposed action such that a normally excluded action would have a reasonably foreseeable significant adverse effect? The proposed action may be modified to avoid reasonably foreseeable significant adverse effects such that a categorical exclusion would apply. If yes, please describe.	☐	☒	
INTEGRAL ELEMENTS			
Would the proposed action threaten a violation of applicable statutory, regulatory, or permit requirements related to the environment, safety, health, or similar requirements of DOE or Executive Orders?	☐	☒	
Would the proposed action require siting, construction, or major expansion of waste storage, disposal, recovery, or treatment facilities?	☐	☒	
Would the proposed action disturb hazardous substances, pollutants, contaminants, or natural gas products already in the environment such that there might be uncontrolled or unpermitted releases?	☐	☒	
Would the proposed action have the potential to cause significant impacts on environmentally sensitive resources? See examples in 10 CFR 1021, Appendix B, Paragraph B(4).	☐	☒	
Would the proposed action involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, such that the action is not contained or confined in a manner designed and operated to prevent unauthorized release, and conducted in accordance with applicable requirements such as those of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health?	☐	☒	
If "No" to all questions above, complete Section VI, and provide NRSF and any attachments to DOE NCO for review. If "Yes" to any of the questions above, contact DOE NCO for additional NEPA review.			
VI. Responsible Organization's Signatures:			
Initiator:			
<u>Jerry W. Cammann, HMIS/NEPA SME</u> <i>Print First and Last Name</i>	<u>JERRY CAMMANN (Affiliate)</u> Digitally signed by JERRY CAMMANN (Affiliate) Date: 2025.10.07 11:42:34 -07'00' <i>Signature / Date</i>		
Cognizant Program/Project Representative:			
<u>Tashina R. Jasso, DOE-HFO/SSD</u> <i>Print First and Last Name</i>	<u>Tashina Jasso</u> Digitally signed by TASHINA JASSO Date: 2025.10.08 08:23:56 -07'00' <i>Signature / Date</i>		
VII. DOE NEPA Compliance Officer Approval/Determination:			
Based on my review of information conveyed to me concerning the proposed action, the proposed action fits within the specified CX(s): ☒ Yes ☐ No			
<u>Douglas H. Chapin, DOE-HFO/NCO</u> <i>Print First and Last Name</i>	<u>Douglas H. Chapin</u> Digitally signed by DOUGLAS CHAPIN Date: 2025.10.08 08:34:08 -07'00' <i>Signature / Date</i>		
NCO Comments (<i>Note: If comments are added, then this field must be filled out prior to entering the electronic signature in VII.</i>)			

DOE/CX-00227

FIGURES

**Benton County Public Utility District Rebuild of Collapsed Portion of Electrical Distribution
and Fiber Optic Telecommunication Cables to the Combined Community Communications
Facility on Rattlesnake Mountain at the Hanford Site**

(11 pages including this page)

Figure 1 – Project Area on Rattlesnake Mountain – Hanford Site



Project Location on the Hanford Site
HCRC#2023-600-002
Hanford Site, Benton County, Washington

- Area of Potential Effect (APE)
- Hanford Site Boundary
- Hanford Site Areas



Figure 2 – Portion of Downed Benton PUD Overhead Electrical Power and Fiber Optic Telecommunication Poles and Cables on Rattlesnake Mountain - 1

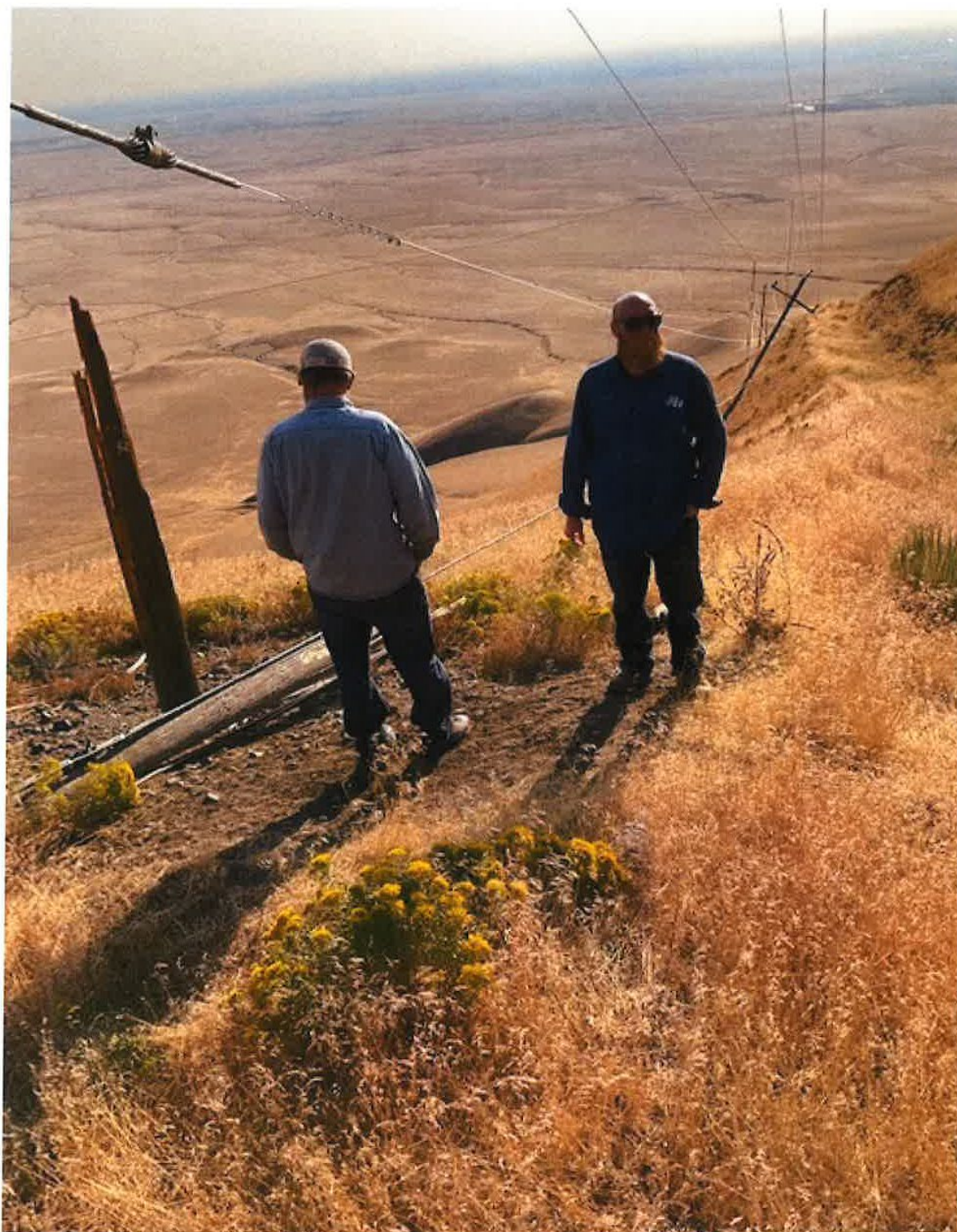


Figure 3 – Portion of Downed Benton PUD Overhead Electrical Power and Fiber Optic Telecommunication Poles and Cables on Rattlesnake Mountain - 2

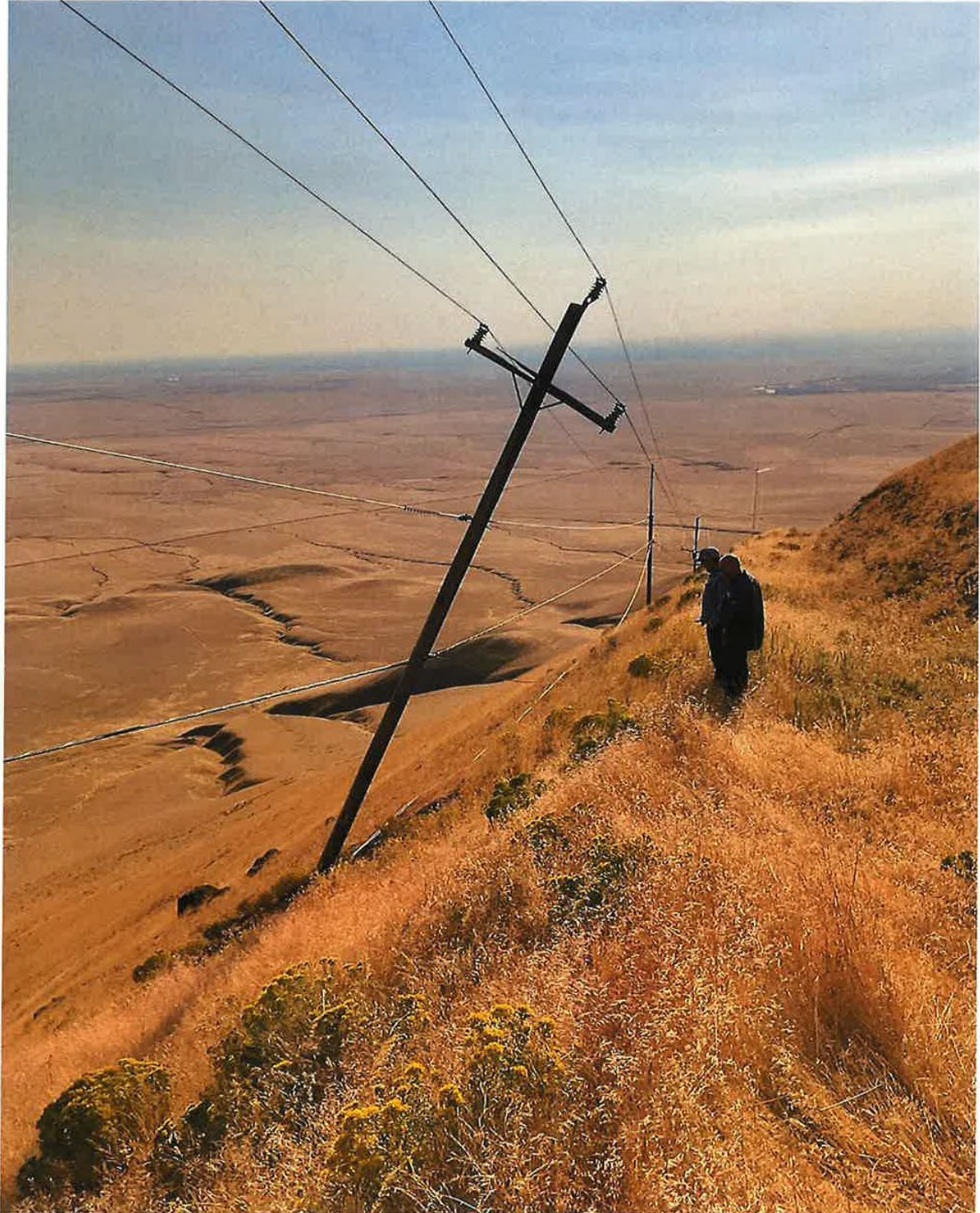


Figure 4 – Installation Plan for Benton PUD Buried Electrical Power Cable, Fiber Optic Telecommunication Cable, and Optional Telephone Line

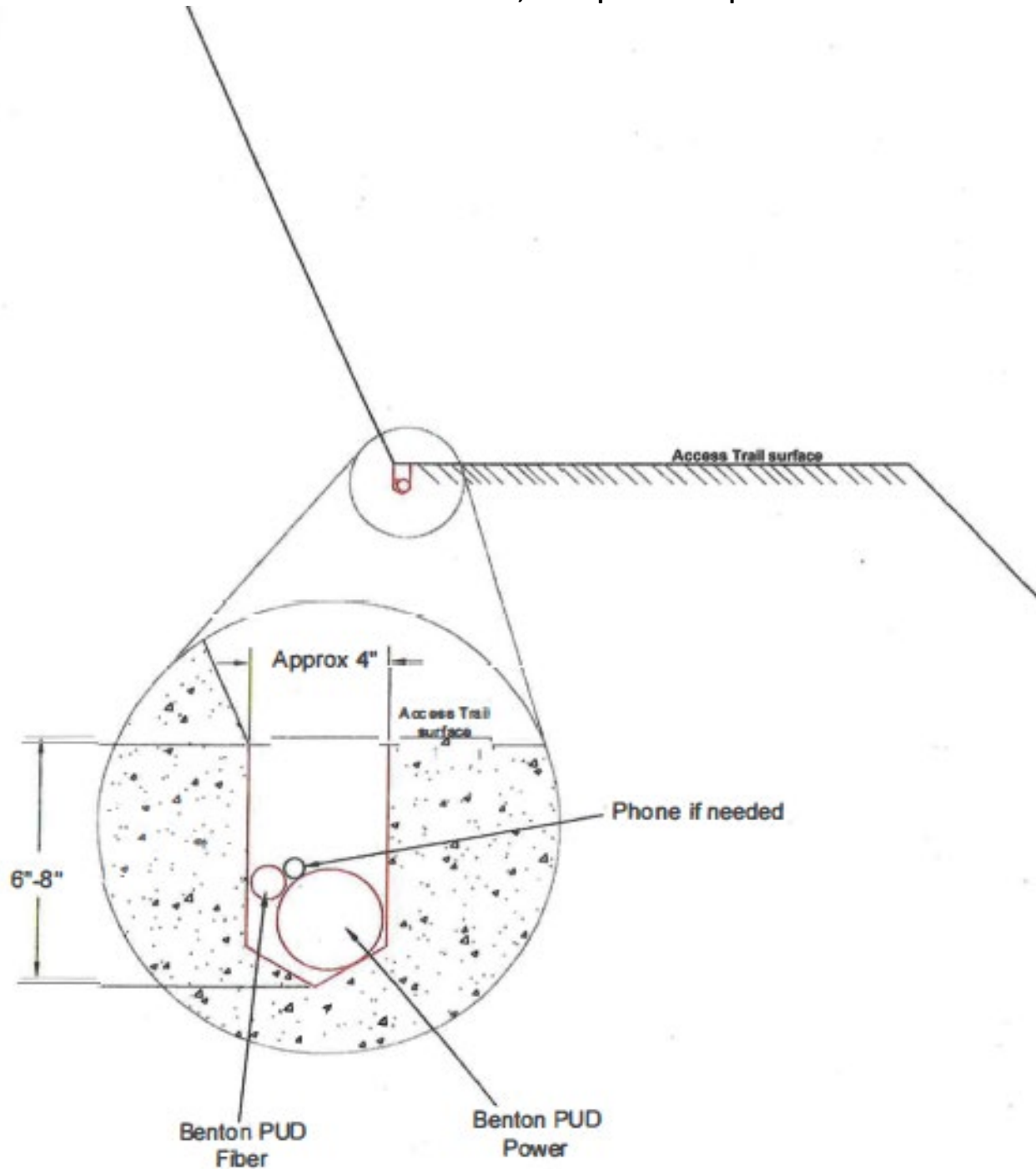
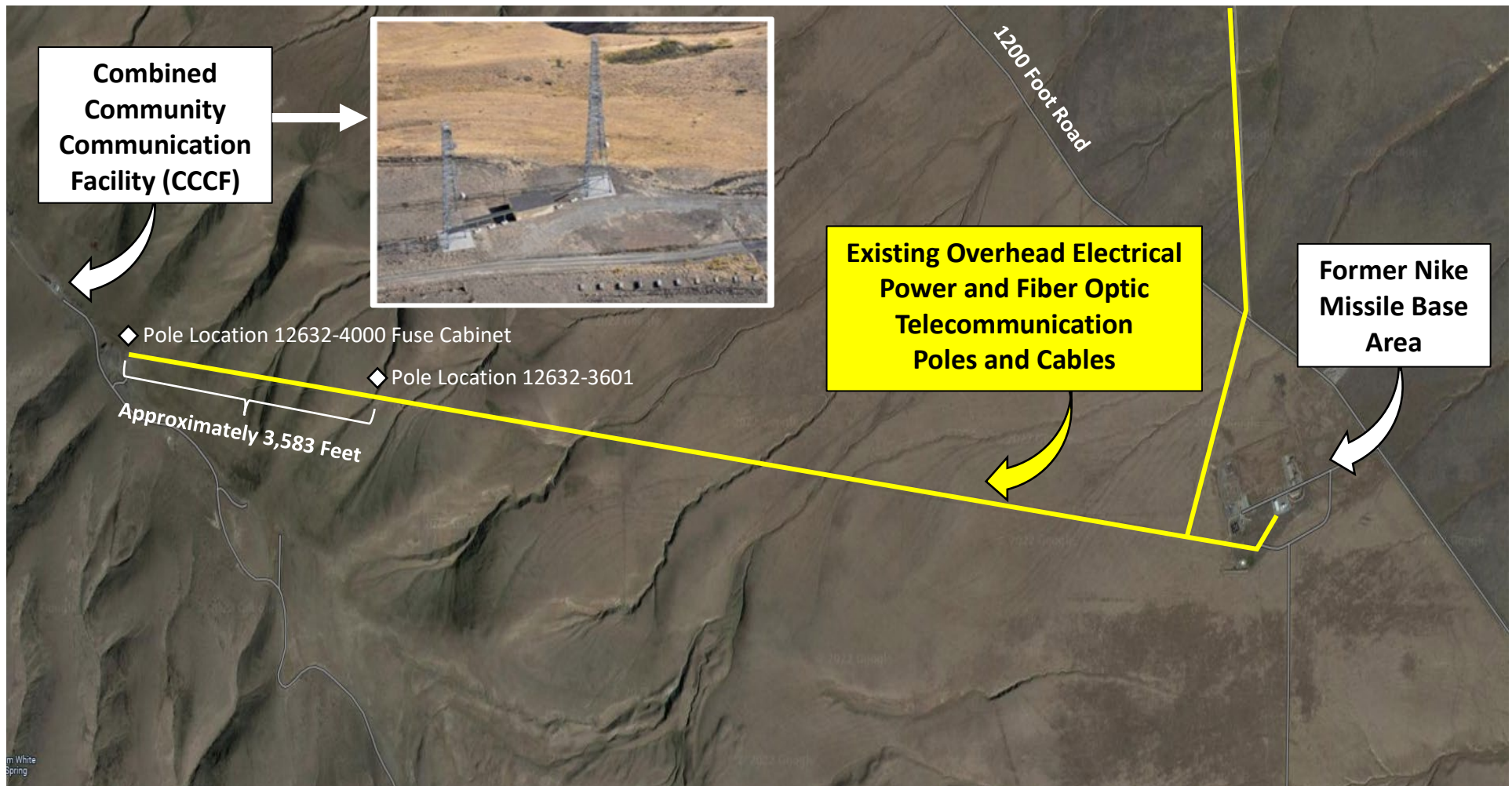


Figure 5 – Example of Metal Shielded 3-Phase Underground Electrical Power Cable



Figure 6 – Map of Benton PUD Rebuild of Approximately 3,583 Feet Section of Collapsed Overhead Electrical Power and Fiber Optic Telecommunication Poles and Cables on Rattlesnake Mountain



**Figure 7 – Benton PUD Overhead Electrical Power and Fiber Optic Telecommunication Poles and Cables (Locale 9A) from CCCF (Locale 4) to 6652-T (Locale 8) on Rattlesnake Mountain
(Source: DOE/EA-1660F)**



Figure 8 – Benton PUD Overhead Electrical Power and Fiber Optic Telecommunication Poles and Cables (Locale 9A) on Rattlesnake Mountain
(Source: DOE/EA-1660F)



Figure 9 – Benton PUD Overhead Electrical Power and Fiber Optic Telecommunication Poles and Cables (Locale 9A) and 6652-T (Locale 8, Half-Way Down) on Rattlesnake Mountain
(Source: DOE/EA-1660F)



Figure 10 – Steel Tracked Excavator

