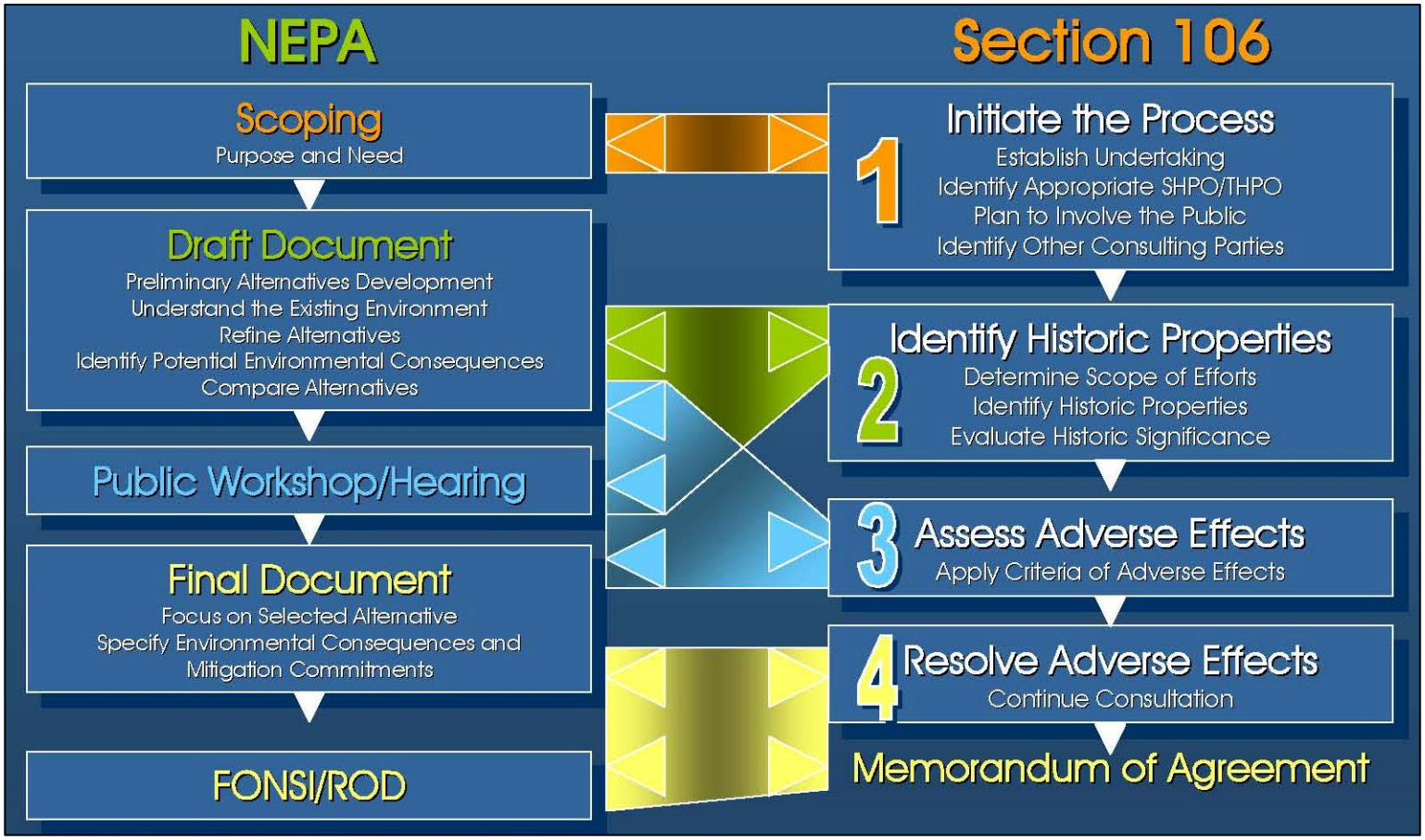Timing Section 106 with NEPA