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Second Supplement to Keith Hammer's "Roads to Ruin" and "TMRD" Reports

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This paper and its attachments provide supplementary documentation of matters discussed in two of my previous reports: 1) "Roads to Ruin: The Flathead National Forest Shirks its Road Reclamation Duties" dated May 2016 and 2) "Only Decommissioned Roads Removed from the Forest Development Road System May be Omitted from Calculations of Total Motorized Route Density [TMRD] on the Flathead National Forest" dated 6/4/15 and updated 2/7/16.

My TMRD report is included as Appendix A in my Roads to Ruin report, which can be found at: http://www.swanview.org/reports/Roads_to_Ruin.pdf. These reports detail Flathead Forest Plan requirements that the Flathead National Forest, in order to lower TMRD, must both remove roads from the Forest Development Road System (System) and re-vegetate those roads so they no longer function as a road or trail.

On December 5, 2017, I issued a Supplement to these reports that included further discussion and documents demonstrating the Flathead used the term road "reclamation" to also mean the road must be "decommissioned" and removed from the road System in the 1995 Flathead Forest Plan Amendment 19 (A19). It details how A19 also requires that reclaimed/decommissioned roads be re-vegetated after having all of their stream-aligned culverts removed so they can't plug and blow out. The road can't simply be physically blocked off or strewn with logs and rocks. My First Supplement can be found at: http://www.swanview.org/reports/Supplement_to_Roads_to_Ruin_171205.pdf.

Second Supplement: A Review of the A19 Biological Opinions and Annual Reports

This Second Supplement to the above reports looks at Fish and Wildlife Service's Biological Opinions (BiOps) on A19, their reporting requirements, and the Flathead's responsive annual A19 reports. These documents confirm that both agencies understood road "reclamation" to be synonymous with road "decommissioning" under A19 and that A19 was to cap the miles of road on the portions of the Flathead National Forest where A19 is applied (the Northern Continental Divide Ecosystem/NCDE Grizzly Bear Management Subunits).

While FWS's initial 1/1/95 BiOp on A19 did not require the Flathead to report the miles of road decommissioned each year, it did require an annual report on other aspects of A19 and included the following conservation recommendation:

Roads constructed or reconstructed for timber sale purposes should be single purpose roads according to the Interagency Grizzly Bear Guidelines. New roads or road reconstruction should be of minimum design specifications and placed on the landscape so that they can easily be recontoured to slope. This will help reduce costs and facilitate reclamation of the roads after the timber sale is completed.

While this can be viewed as a discretionary recommendation on how to reduce costs, the fact that the new or reconstructed roads must be reclaimed following the timber sale remains mandatory. This is consistent with A19's requirement that no Grizzly Bear Subunit have a net increase in Open Motorized Route Density or Total Motorized Route Density or any decrease in Security Core (3/1/95 A19 Decision Notice, page 4). It certainly doesn't say that a road that is constructed or reconstructed can simply be stored as "impassable" to motor vehicles and omitted from TMRD calculations.

The Flathead has issued A19 annual reports to FWS for the years 1995 - 2016, most often in March of the following year. The 1995 and 1996 A19 reports do not provide information on the miles of road decommissioned or the total miles of System roads in the A19 area. The A19 reports from 1997 - 2002 provide the total miles of System roads in the A19 area, although largely in the context of reporting on the types of closure devices on those roads.

From 2003 - 2016, however, the Flathead's A19 reports include a table listing the miles of road decommissioned by calendar year. From 2006 - 2016, the A19 reports also include a discussion of total System road miles on the Flathead, generally related to how decommissioning is reducing those road miles. Other factors increasing road miles, such as new road construction outside the A19 area and the acquisition of heavily roaded Plum Creek lands within the A19 area, are also discussed.

The 2006 onset of these discussions of total road miles roughly corresponds in timing to FWS's 10/25/05 BiOp on the A19 Revised Implementation Schedule, which grappled with slow road decommissioning progress, missed A19 accomplishment deadlines, and the need to effectively close roads waiting for decommissioning. It added a new reporting requirement:

The annual report shall include the date and type of restriction device installed on roads authorized by an existing project decision to be converted from open to restricted at least part of the grizzly bear active season (April 1 through November 30) or decommissioned.

FWS's 1/31/14 BiOp on the A19 Revised Implementation Schedule retained this reporting requirement, as follows:

The Forest shall maintain a database including the date and type of device installed to restrict motorized use on roads authorized by an existing project decision to be converted from open to restricted at least part of the grizzly bear active season (April 1 through November 30) or decommissioned.

This reporting requirement is consistent with the three classes of roads identified by the IGBC Taskforce, as discussed on pages 4-6 of my TMRD Report: open road, restricted road, reclaimed/decommissioned road. It makes no mention of "impassable" roads.

All reports are consistent in treating "reclamation" as synonymous with "decommissioning." All A19 reports that include a table listing the miles of road decommissioned by year (2003 - 2016) use the term "decommissioning," except the 2011 report. It names the table "Road Reclamation Mileage Summaries since 1995," but notes "12.40 miles of road were reclaimed and removed from the system in 2011."

A review of all of the A19 reports also shows they are consistent in their understanding that reclaimed/decommissioned roads were to be re-vegetated and to no longer function as a road or trail (with the exception of the 2012 A19 report to be discussed further below). The 1996 A19 report lists the reasons for a number of changes in A19 Subunit OMRD, TMRD and Security Core values. Among them:

Correction of road class information: Which roads actually exist on the landscape? Does a road have a gate or a berm as the closure device? Is a road vegetatively brushed over or not? Does an old road function as a trail or not?

The 1998 A19 report attached the Flathead's ill-fated Implementation Note #13 (Cathy Barbouletos, 5/6/99), which attempted to bypass A19's requirement that all stream-aligned culverts be removed from reclaimed/decommissioned roads. One thing Note #13 confirms, however, is the A19 requirement that reclaimed/decommissioned roads no longer function as a travelway or trail for motorized or non-motorized use:

Non-motorized use on reclaimed roads would be expected to occur at levels similar to the occurrence in the surrounding forest . . . Treat the [reclaimed] road . . . in a manner that discourages its use as a motorized or non-motorized travelway . . . Roads meeting [these] minimum treatment criteria . . . will be excluded from road data sets used for open access density, total access density, and secure habitat calculations.

The 1999 A19 report states that Note #13 has been rescinded. Government attorneys agreed that the Notice of Intent of a citizens' lawsuit was correct in challenging Note #13's dismissal of A19's culvert removal requirements. See pages 7-8 of my TMRD report for a discussion of how Note #13 was rescinded.

The 2002 A19 report confirms that road decommissioning is used to reduce TMRD in discussing several timber sale projects. It states "projects include access management of open motorized routes as well as decommissioning work." This is followed by a listing of road miles to be restricted to reduce "ORD" and decommissioned to reduce "TRD."

A review of the A19 reports also shows that those reporting road decommissioning mileages relied largely on the Flathead's Road Decommissioning Spreadsheet discussed on pages 8-9 of my TMRD report. The significant jump in decommissioning mileage reported for 1999 in the 2004 A19 report is 77.66 miles larger than was reported for 1999 in the 2003 A19 report. This is identical to the 77.66 miles of Category 3 reclaimed road "left as System roads, still monitor for A19" that were "zeroed out" in 1999 on the Road Decommissioning Spreadsheet, then shifted to be included in the total miles of roads decommissioned and removed from the System. This is a pretty clear indication of the intent to get reclaimed roads decommissioned and removed from the System. (See page 8 of my TMRD report in this regard. See also page 19 of the 2015 Road Decommissioning Spreadsheet attached to the 12/5/17 Supplement to my TMRD report).

Now Comes the Flathead's Notion of "Impassable" Roads

In a single paragraph in its 2012 A19 report, the Flathead informed FWS of its intent to classify some roads as "impassable" roads. This appears to be another attempted shortcut to getting roads omitted from TMRD calculations without removing all of their stream-aligned culverts and without removing them from the System:

Flathead NF reviewed how its impassable roads were being included or excluded from Total Route Density (TMRD) calculations. If there was a signed decision stating the road was to be impassable (by natural vegetation, a bridge or large culvert removed, or the entrance obliterated), the road would not be included in TMRD calculations. However, if the road became impassable over time and not through a specific management decision, the road will be included in TMRD calculations. From this point forward, any road that becomes impassable will be included unless a signed decision specifically states that the road is to be impassable.

The 2012 A19 report and all A19 reports thereafter, however, continue with the standard by-year reporting of road decommissioning mileages and discussion of changes to the Flathead's System road miles. Similarly, FWS's subsequent 2014 A19 BiOp continues with the same reporting requirement for closure devices and road decommissioning (as detailed above) and includes no new requirements for or even a mention of "impassable" roads.

The 2016 A19 report due in March 2017 (Attachment 1) was not issued until January 2018 because the Flathead wanted to conduct an inventory of its "impassable" roads during Summer 2017, in part due to conservation groups' concerns over whether stream-aligned culverts had been left in those roads. As a result, the Flathead found stream-aligned culverts in 13 of the 78 "impassable" roads it had omitted from TMRD calculations. (See page 3 of my 12/5/17 Supplement and its attached "Impassable Roads not in TMRD" spreadsheet, which I extracted from the 2017 survey spreadsheet provided by the Flathead).

The 2016 A19 report consequently lists increases in TMRD in 7 grizzly bear subunits due to finding "a stream-aligned culvert" in a number of roads. I checked these subunits against the Flathead's geospatial data for "impassable" roads and find the

locations of these changes to be largely consistent with the locations of stream-aligned culverts the Flathead reported finding in “impassable” roads during its 2017 survey.

It is important to note, however, that many of the roads mentioned as having “a stream-aligned culvert” in the 2016 A19 report have multiple stream-aligned culverts according to the Flathead’s 2017 survey. Moreover, the Flathead’s 2017 survey does not correctly report stream-aligned culverts in all roads surveyed.

For example: for the “impassable, not included in TMRD” Lower Wolf Road 10753 and Upper Wolf Road 10754, the 2017 survey reports “WEPP surveys compl as part of Crystal Cedar, no strm aligned cmps [culverts], landslides.” The Flathead in 2007, however, found 9 stream-aligned culverts on these two adjoining roads, with 7 of those culverts failed! (See Craig Kendall’s 10/28/09 Terms and Conditions Monitoring Report for 2007-2009, Appendix A). The resulting 3/20/08 Road Log for Road 10753 shows only 2 of the 3 culvert failures on that road and notes that 7 culverts had been removed at an unknown prior date (Attachment 2).

In other words, the Flathead abandons roads with stream-aligned culverts in place, sometimes after removing a few culverts, allows the remaining culverts to fail, designates such roads “impassable,” retains such roads in the System, and yet omits such roads from calculations of TMRD. And when it gets caught doing so, it adds some of those roads back into calculations of TMRD without mentioning to FWS that these were “impassable” roads. Moreover, it does so as though stream-aligned culverts/no stream-aligned culverts is the only issue with substituting “impassable” for “decommissioned.”

The 2016 A19 report never mentions the fact that the changes in TMRD involved “impassable” roads. The word “impassable” is used only once in noting that “one short road is now classified as impassable” in the Porcupine Woodward Subunit. The report includes the standard reporting on road decommissioning miles and total System road miles. It includes no summary of how many impassable roads exist on the Flathead and how many of them are or are not included in TMRD calculations.

Now Comes the About-Face

The Flathead regularly updates its “Evaluation and Compliance with National Forest Management Act Requirements to Provide for Viability and Diversity of Animal Communities” document for use in both Forest Planning and project planning. Page 92 of its February 2017 update (Flathead Forest Planning document #00246) summarizes Flathead road building:

New roads built on FNF between 1985 and 1995 totaled 140 miles while new construction from 1996 to 2010 has totaled just 24 miles (3.2 of which within NCDE [A19 area]). From a high of 4121 miles of System roads in 1989 the number has dropped to 3267 miles by Jan. 2010, a decrease of 854 miles [prior to the major acquisition of Plum Creek lands and roads].

I have tracked these road mileages since the current Flathead Forest Plan was released in 1985 and was fully involved in commenting on the development of A19 and nearly every A19 and timber sale project since. It is my understanding that the 3.2 miles of road built in the A19/NCDE area since 1996 was due to timber sales already decided or under contract when A19 was adopted in 1995. While concerns for watershed health and other factors contributed to the decrease in road construction outside the A19 area, the NFMA Compliance document's findings are consistent with the fact that A19 capped the miles of System road allowed through its companion requirements that roads must be decommissioned to not count in TMRD and that no net increase in TMRD is allowed in any Grizzly Bear Subunit under A19.

Contrast this to the Flathead's newly invented claim that "impassable" roads need not count in TMRD even though they remain on the road System. Using this claim, the Flathead has already reconstructed 3.3 miles of previously decommissioned roads in its now completed 2016 Trail Creek Fire Salvage Project. Those roads are now stored as "impassable" System roads with no increase in TMRD because they aren't included in TMRD calculations. (See the Trail Creek Decision Notice and other NEPA documents at: <https://www.fs.usda.gov/project/?project=48619>).

While the 2016 Trail Creek decision alone built more permanent System road miles than was built in the A19 area from 1996 - 2010, that's just a taste of what the Flathead has in its timber sale and road building pipeline using the "impassable" claim. The Bug Creek logging project, for example, proposes to renege on 60 miles of pending A19 road decommissioning and rebuild nearly 17 miles of previously decommissioned roads, stating clearly: "This project proposes to add the roads back on to the road System from decommissioning [authorized] in the [1996] Crane Mountain salvage decision." (See the Bug Creek Scoping Package at: <https://www.fs.usda.gov/project/?project=47327>).

Moreover, the Flathead proposes to reconstruct 7.6 miles of previously decommissioned roads in its Hungry Lion project then leave them in the System as "impassable" stored roads not counted in TMRD. (See the Hungry Lion EA and other NEPA documents at: <https://www.fs.usda.gov/project/?project=50134>). Clearly, the notion of "impassable" roads is being used to upend A19 and remove its cap on System road miles.

This will undo the hard gains made for grizzly bear security by rebuilding previously decommissioned and re-vegetated roads that were not allowed to function as either motorized or non-motorized trails. This turns them into barren roads with as little as the first 50' treated to deter wheeled motorized use only. Indeed, the revised Flathead Forest Plan (December 2017, Glossary page 29) defines "impassable road" as:

A road that has been treated in such a manner that the road is blocked and there is little resource risk if road maintenance is not performed on a regular basis (self-maintaining). These roads are not counted in the total motorized route density as long as the road (generally the first 50 to 300 feet) has been treated to make it inaccessible to wheeled motorized vehicles during the non-denning season [December 1 - March 31].

"Impassable" roads remain open to snowmobiles, snow-bikes, mountain bikes, skiing, and hiking year-round and to motorcycles and ATVs during the grizzly bear denning

season, which will see decreasing snow pack as the climate warms. “Impassable” roads need not have all stream-aligned culverts removed and the Flathead has already demonstrated its penchant for leaving such culverts as though they are “self maintaining.” This is not your father’s properly decommissioned road.

In its 1/3/95 letter of comment on A19 (Attachment 3), Swan View Coalition asked the Flathead:

How many miles of road would need to be restricted with physical barriers, obliterated, or reclaimed under the various alternatives, by each category? This is not given on page 81 or elsewhere in the EA.

In its 1/23/95 letter of comment on A19 (Attachments 4), Swan View Coalition told the Flathead and FWS:

The FS appears to have attempted to rewrite the definitions to require absolutely no road obliteration whatsoever, omitting bermed roads from the moving window scan as though they were obliterated (see EA at page C-1). The EA, on page 79 however, still indicates that no roads will be obliterated as there is no category for obliteration and the total miles of road remains unchanged between 1993 and 1999.

In response to these and other public comments, and as detailed and attached to my 12/5/17 Supplement, the February 1995 Amended A19 EA included a new graph showing that the miles of road to be reclaimed would indeed be removed from the road System. This Second Supplement demonstrates that the subsequent A19 records reviewed consider “reclamation” to be synonymous with “decommissioning” and require the removal of all stream-aligned culverts from the road and the removal of the road from the System.

There are only two exceptions to this rule:

1. The Flathead’s failed Implementation Note #13, which attempted to leave stream-aligned culverts in roads reclaimed to reduce and be omitted from TMRD.
2. The Flathead’s similarly flawed notion of “impassable” roads that it has omitted from TMRD without removing all stream-aligned culverts and without removing them from the road System via decommissioning.

2016
Annual Flathead National Forest
Forest Plan Amendment 19
Implementation Monitoring Report
and Responses to
Amendment 19 Revised Implementation Schedule
Terms and Conditions

January 2018

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Introduction

This document includes:

1. A summary of 2016 changes from past annual reports.
2. The Flathead National Forest 2016 LRMP Amendment 19 Monitoring Report, including:
 - ✓ Tables 1a, 1b; 2a, 2b; 3a, 3b; 4a, 4b; and Figures 1, 2 and 3. Open Route Density (ORD), Total Route Density (TRD), and Security Core (CORE) summaries for all grizzly bear management subunits. Tables 1a/1b are compiled from numbers found in Tables 2a/b through 4a/b below.
 - ✓ Table 5. Late Spring Open and Total Route Density and Security CORE percentages.
 - ✓ Table 6. Decommissioning Mileage Summaries since 1995.
 - ✓ Table 7. Summary of Closure Device Monitoring for 2016, A19 analysis area only.
 - ✓ Table 8a and 8b. Summary of Closure Device Monitoring, entire Forest from 1995.
 - ✓ Table 9. Subunits that exceeded Administrative Use for 2016.
3. Responses to Amendment 19 Revised Implementation Schedule (BO Grizzly Bears 10/25/06) terms and conditions.

Questions regarding this report should be directed to Kathy Ake @ 406.758.5358 or Amy Jacobs @ 406.758.3544.

Changes from Past Years

OPEN Route Motorized Density. Thirty-seven (37) of 47 subunits with >75% NFS lands meet or are less than 19% OMRD (32 subunits) or meet the amended standards (5 subunits) (see Tables 1, 2a and Figure 1). Two (2) additional subunits are at 20% OMRD; 5 subunits are between 21 and 30 percent; and 3 subunits are over 30 percent.

TOTAL Route Motorized Density. Thirty-one (31) of 47 subunits with >75% NFS lands meet or are less than 19% TMRD (29 subunits) or meet the amended standards (2 subunits) (see Tables 1, 3a and Figure 2). Two (2) additional subunits are at 20% TRMD; 6 subunits are between 21 and 30 percent; and 8 subunits are over 30 percent.

Security CORE. Thirty-one (31) of the 47 subunits with >75% NFS lands meet or are over 68% CORE (27 subunits) or meet the amended standards (4 subunits) (see Tables 1, 4a and Figure 3).

Four (4) additional subunits are between 57 and 67 percent CORE; 1 subunit is within 3% of their amended standard; and 11 subunits are less than 57 percent.

As of fall 2013, roads acquired through the MT Legacy project are all re-assigned to NFSR roads in the database, changing the miles of NFSR roads managed by the Flathead NF. Additionally, all of these roads are having field road logs completed, which may or may not result in updates to the INFRA database, such as type and location of closure devices. It is expected for this to occur over the next couple of years, and will probably cause shifts in OMRD, TMRD and CORE.

Changes for 2016 Report – Specific Subunits

The following 10 subunits had changes in road management, spatial re-alignments, and re-alignments of the ownership feature class, which resulted in a whole percent value change in at least one of the following: OPEN route density, TOTAL route density, and Security CORE.

Red Meadow Moose. TMRD increased from 17% to 18% (17.39% to 18.11%). Change is due to one road having a stream-aligned culvert and therefore included in TMRD calculations. Subunit still meets TMRD standard of 19%.

Coal and South Coal. TMRD increased from 19% to 24%. Change is due to sections of four roads having a stream-aligned culvert and therefore included in TMRD calculations. Subunit no longer meets TMRD standard of 19%.

Canyon McGinnis. TMRD increased from 32% to 33% (32.00% to 33.40%). Change is due to one road having a stream-aligned culvert and therefore included in TMRD calculations. Additionally, a short spur road (0.1 mile) needed to be included in TMRD as it became revegetated naturally, without a signed decision. Subunit still meets amended TMRD standard of 33%.

Meadow Smith. Security CORE decreased from 42% to 41% (41.55% to 41.49%). Change is due to spatial realignments of the GIS layer in order to more accurately reflect locations on the ground.

Crane Mountain. TMRD increased from 58% to 59% (57.68% to 59.28%). Change is due to three roads having a stream-aligned culvert and therefore included in TMRD calculations.

Cold Jim. TMRD decreased from 57% to 55% (56.77% to 55.40%). Security CORE increased from 43% to 44% (43.18% to 43.51%). Change is due to decommissioning of several roads that had gates or barriers.

Doris Lost Johnny. TMRD increased from 19% to 23%. Change is mainly due to one road having a stream-aligned culvert and therefore included in TMRD calculations. Additionally, one motorized trail was spatially realigned to more accurately reflect its location on the ground. As a result, subunit no longer meets TMRD standard of 19%.

Cedar Teakettle (No Net Increase/Decrease subunit). TMRD increased from 27% to 28% (27.36% to 27.53%). Change is due to a road in the adjacent Canyon McGinnis subunit. That road has a stream-aligned culvert and is now included in TMRD calculations.

Attachment 1

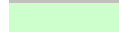
Noisy Red Owl (No Net Increase/Decrease subunit). TMRD increased from 16% to 17% (15.86% to 16.59%). Change is due to updates to the spatial layer to correctly reflect on the ground conditions.

Porcupine Woodward (No Net Increase/Decrease subunit). OMRD increased from 27% to 28% (27.44% to 27.72%). TMRD increased from 73% to 74% (73.49% to 73.54%). The OMRD change is due to a road that had been correctly updated for the 2015 report to show it as closed, but that was updated to open for 2016 since access issues were resolved. The TMRD change is due to a road in the adjacent Crane Mountain subunit. That road has a stream-aligned culvert and is now included in TMRD calculations. Additionally, one short state road is now classified as impassable.

Attachment 1

Table 1a. Existing status of BMU Subunits where NF ownership >75%. Numbers are compiled from Tables 2a and 2b through 4a and 4b below.

#	BMU Subunit	RD	OPEN Route Density	TOTAL Route Density	Security CORE
1	Frozen Lake	GV	10	4	80
2	Ketchikan	GV	14	3	73
3	Upper Trail	GV	14	4	88
4	Lower Whale (amended 37-19-47)	GV	36	17	50
5	Upper Whale Shorty	GV	12	11	86
6	Red Meadow Moose	GV	25	18	68
7	Hay Creek	GV	25	16	55
8	Coal and South Coal	GV	15	24	73
10	Werner Creek (amended 29-19-63)	GV	29	20	63
11	Lower Big Creek	GV	18	19	71
12	Canyon McGinnis (amended 19-33-53)	GV/TL	19	33	50
17	Peters Ridge	HH/SL	52	25	34
19	Swan Lake	SL	39	26	45
22	Lion Creek	SL	18	47	41
23	Meadow Smith	SL	20	53	41
24	Buck Holland	SL	24	41	40
25	Crane Mountain	SL	31	59	25
27	Piper Creek	SL	19	45	55
28	Cold Jim	SL	18	55	44
29	Hemlock Elk	SL	6	30	64
30	Glacier Loon	SL	22	41	48
31	Beaver Creek	SL	6	26	66
32	Doris Lost Johnny (amended 57-19-36)	HH	57	23	36
33	Wounded Buck Clayton (amended 27-30-65)	HH	27	30	65
35	Emery Firefighter	HH	19	20	58
36	Riverside Paint	HH	18	16	71
37	Jewel Basin Graves	HH	19	19	68
38	Wheeler Quintonkon (amended 25-19-68)	HH/SB	25	19	68
39	Logan Dry Park	HH/SB	30	36	51
40	Lower Twin	SB	9	2	92
41	Twin Creek	SB	0	0	100
42	Moccasin Crystal	HH	8	1	81
43	Stanton Paola	HH	8	3	81
44	Dickey Java	HH	9	0	81
45	Long Dirtyface	HH	0	0	100
46	Tranquil Geifer	HH	0	2	85
47	Skyland Challenge	HH	20	17	65
48	Plume Mtn Lodgepole	HH/SB	0	0	97
49	Flotilla Capitol	HH/SB	0	0	99
50	Ball Branch	SB	7	12	84
51	Kah Soldier	SB	19	19	68
52	Spotted Bear Mtn	SB	19	18	68
53	Big Bill Shelf	SB	11	6	80
54	Jungle Addition	SB	19	19	68
55	Bunker Creek	SB	5	3	92
56	Gorge Creek	SB	0	0	90
57	Harrison Mid	SB	1	0	95

 Subunits meet LMRP A19 objective.
 Subunits meet amended LMRP A19 objective.

Attachment 1

Table 1b. Existing status of BMU Subunits where NF ownership <75%. Numbers are compiled from Tables 2a and 2b through 4a and 4b below.

#	BMU Subunit	RD	OPEN Route Density	TOTAL Route Density	Security CORE
9	State Coal Cyclone	GV	29	25	58
13	Cedar Teakettle	GV	25	28	24
18	Noisy Red Owl	SL	20	17	52
20	South Fork Lost Soup	SL	25	47	37
21	Goat Creek	SL	23	59	39
26	Porcupine Woodward	SL	28	74	15
34	Coram Lake Five	HH	26	46	14

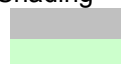
 Subunits meet LMRP A19 objective.

Attachment 1

Table 2a. Subunit % Open Route Density for BMU Subunits where NF ownership >75%.

#	BMU Subunit	RD	Jan 1995 existing	2016 existing	NEPA decision*	% Change 2016-1995**
1	Frozen Lake	GV	10	10		0
2	Ketchikan	GV	19	14		-5
3	Upper Trail	GV	18	14		-4
4	Lower Whale (amended 37%)	GV	60	36		-24
5	Upper Whale Shorty	GV	17	12		-5
6	Red Meadow Moose	GV	36	25		-11
7	Hay Creek	GV	33	25		-8
8	Coal and South Coal	GV	23	15		-8
10	Werner Creek (amended 29%)	GV	43	29		-14
11	Lower Big Creek	GV	35	18		-17
12	Canyon McGinnis	GV/TL	34	19		-15
17	Peters Ridge	HH/SL	50	52		+2
19	Swan Lake	SL	56	39		-17
22	Lion Creek	SL	24	18		-6
23	Meadow Smith	SL	23	20	18	-3
24	Buck Holland	SL	25	24	24	-1
25	Crane Mountain	SL	51	31	24	-20
27	Piper Creek	SL	21	19		-2
28	Cold Jim	SL	21	18		-3
29	Hemlock Elk	SL	13	6		-7
30	Glacier Loon	SL	25	22		-3
31	Beaver Creek	SL	6	6		0
32	Doris Lost Johnny (amended 57)	HH	58	57		-1
33	Wounded Buck Clayton (amended 27)	HH	38	27		-11
35	Emery Firefighter	HH	32	19		-13
36	Riverside Paint	HH	23	18		-5
37	Jewel Basin Graves	HH	22	19		-3
38	Wheeler Quintonkon (amended 25)	HH/SB	28	25		-3
39	Logan Dry Park	HH/SB	33	30		-3
40	Lower Twin	SB	9	9		0
41	Twin Creek	SB	0	0		0
42	Moccasin Crystal	HH	7	8		+1
43	Stanton Paola	HH	12	8		-4
44	Dickey Java	HH	10	9		-1
45	Long Dirtyface	HH	0	0		0
46	Tranquil Geifer	HH	0	0		0
47	Skyland Challenge	HH	15	20		+5
48	Plume Mtn Lodgepole	HH/SB	0	0		0
49	Flotilla Capitol	HH/SB	0	0		0
50	Ball Branch	SB	41	7		-34
51	Kah Soldier	SB	39	19		-20
52	Spotted Bear Mtn	SB	20	19		-1
53	Big Bill Shelf	SB	12	11		-1
54	Jungle Addition	SB	38	19		-19
55	Bunker Creek	SB	12	5		-7
56	Gorge Creek	SB	0	0		0
57	Harrison Mid	SB	1	1		0

Shading



Subunits meet LMRP A19 objective of ≤19% Open Route Density.

Subunits meet amended LMRP A19 objective for Open Route Density.

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* Numbers in the NEPA decision column show where the forest has made NEPA decisions that changed or will change Open Route Density within a subunit.

** Percent Change number shows the difference between Jan 1995 existing to 2013 existing.

-
+

A negative number (-) indicates a decrease in % Open Route Density.

A positive number (+) indicates an increase in % Open Route Density.

A blank cell indicates no change for that variable for that subunit.

Table 2b. Subunit % Open Route Density for BMU Subunits where NF ownership <75%.

#	BMU Subunit	RD	Jan 1995 existing	2016 existing	NEPA decision*	% Change 2016-1995**
9	State Coal Cyclone	GV	39	29		-10
13	Cedar Teakettle	GV	32	25		-7
18	Noisy Red Owl	SL	26	20		-6
20	South Fork Lost Soup	SL	60	25		-35
21	Goat Creek	SL	27	23		-4
26	Porcupine Woodward	SL	48	28		-20
34	Coram Lake Five	HH	30	26		-4

Shading

 Subunits meet LMRP A19 objective of NO NET INCREASE due to Forest Service actions.

* Numbers in the NEPA decision column show where the forest has made NEPA decisions that changed or will change Open Route Density within a subunit.

** Percent Change number shows the difference between Jan 1995 existing to 2013 existing.

-	A negative number (-) indicates a decrease in % Open Route Density.
+	A positive number (+) indicates an increase in % Open Route Density.
	A blank cell indicates no change for that variable for that subunit.

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Table 3a. Subunit % Total Route Density for BMU Subunits where NF ownership >75%.

#	BMU Subunit	RD	Jan 1995 existing	2016 existing	NEPA decision*	% Change 2016-1995**
1	Frozen Lake	GV	6	4		-2
2	Ketchikan	GV	5	3		-2
3	Upper Trail	GV	5	4		-1
4	Lower Whale	GV	44	17		-27
5	Upper Whale Shorty	GV	13	11		-2
6	Red Meadow Moose	GV	25	18		-7
7	Hay Creek	GV	21	16		-5
8	Coal and South Coal	GV	37	24		-13
10	Werner Creek	GV	48	20		-28
11	Lower Big Creek	GV	39	19		-20
12	Canyon McGinnis (amended 33)	GV/TL	44	33		-11
17	Peters Ridge	HH/SL	25	25		0
19	Swan Lake	SL	33	26		-7
22	Lion Creek	SL	39	47		+8
23	Meadow Smith	SL	52	53	53	+1
24	Buck Holland	SL	44	41	41	-3
25	Crane Mountain	SL	75	59	27	-16
27	Piper Creek	SL	30	45	44	+15
28	Cold Jim	SL	56	55	54	-1
29	Hemlock Elk	SL	29	30	30	+1
30	Glacier Loon	SL	39	41	41	+2
31	Beaver Creek	SL	24	26	19	+2
32	Doris Lost Johnny	HH	31	23		-12
33	Wounded Buck Clayton (amended 30)	HH	49	30		-19
35	Emery Firefighter	HH	42	20	19	-22
36	Riverside Paint	HH	39	16		-23
37	Jewel Basin Graves	HH	26	19		-7
38	Wheeler Quintonkon	HH/SB	33	19		-14
39	Logan Dry Park	HH/SB	40	36		-4
40	Lower Twin	SB	2	2		0
41	Twin Creek	SB	0	0		0
42	Moccasin Crystal	HH	1	1		0
43	Stanton Paola	HH	3	3		0
44	Dickey Java	HH	1	0		-1
45	Long Dirtyface	HH	0	0		0
46	Tranquil Geifer	HH	2	2		0
47	Skyland Challenge	HH	18	17		-1
48	Plume Mtn Lodgepole	HH/SB	0	0		0
49	Flotilla Capitol	HH/SB	0	0		0
50	Ball Branch	SB	21	12		-9
51	Kah Soldier	SB	45	19		-26
52	Spotted Bear Mtn	SB	32	18		-14
53	Big Bill Shelf	SB	7	6		-1
54	Jungle Addition	SB	31	19		-12
55	Bunker Creek	SB	6	3		-3
56	Gorge Creek	SB	0	0		0
57	Harrison Mid	SB	0	0		0

Shading



Subunits meet LMRP A19 objective of ≤19% Total Route Density.

Subunits meet amended LMRP A19 objective for Total Route Density.

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* Numbers in the NEPA decision column show where the forest has made NEPA decisions that changed or will change Total Route Density within a subunit.

** Percent Change number shows the difference between Jan 1995 existing to 2013 existing.

-
+

A negative number (-) indicates a decrease in % Total Route Density.

A positive number (+) indicates an increase in % Total Route Density.

A blank cell indicates no change for that variable for that subunit.

Table 3b. Subunit % Total Route Density for BMU Subunits where NF ownership <75%.

#	BMU Subunit	RD	Jan 1995 existing	2016 existing	NEPA decision*	% Change 2016-1995**
9	State Coal Cyclone	GV	29	25		-4
13	Cedar Teakettle	GV	30	28		-2
18	Noisy Red Owl	SL	18	17		-1
20	South Fork Lost Soup	SL	47	47		0
21	Goat Creek	SL	49	59		+10
26	Porcupine Woodward	SL	59	74	65	+15
34	Coram Lake Five	HH	49	46		-3

Shading

 Subunits meet LMRP A19 objective of NO NET INCREASE due to Forest Service actions.

* Numbers in the NEPA decision column show where the forest has made NEPA decisions that changed or will change Total Route Density within a subunit.

** Percent Change number shows the difference between Jan 1995 existing to 2013 existing.

-	A negative number (-) indicates a decrease in % Total Route Density.
+	A positive number (+) indicates an increase in % Total Route Density.
	A blank cell indicates no change for that variable for that subunit.

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Table 4a. Subunit % Security CORE for BMU Subunits where NF ownership >75%.

#	BMU Subunit	RD	Jan 1995 existing	2016 existing	NEPA decision*	% Change 2016-1995**
1	Frozen Lake	GV	80	80		0
2	Ketchikan	GV	65	73		+8
3	Upper Trail	GV	84	88		+4
4	Lower Whale (amended 47)	GV	7	50		+43
5	Upper Whale Shorty	GV	80	86		+6
6	Red Meadow Moose	GV	47	68		+21
7	Hay Creek	GV	41	55		+14
8	Coal and South Coal	GV	59	73		+14
10	Werner Creek (amended 63)	GV	35	63		+28
11	Lower Big Creek	GV	38	71		+33
12	Canyon McGinnis (amended 53)	GV/TL	31	50		+19
17	Peters Ridge	HH/SL	30	34		+4
19	Swan Lake	SL	29	45		+16
22	Lion Creek	SL	55	41		-14
23	Meadow Smith	SL	42	41		-1
24	Buck Holland	SL	34	40		+6
25	Crane Mountain	SL	0	25	32	+25
27	Piper Creek	SL	57	55	55	-2
28	Cold Jim	SL	42	44	44	+2
29	Hemlock Elk	SL	66	64		-2
30	Glacier Loon	SL	40	48		+8
31	Beaver Creek	SL	67	66	71	-1
32	Doris Lost Johnny (amended 36)	HH	35	36		+1
33	Wounded Buck Clayton (amended 65)	HH	33	65		+32
35	Emery Firefighter	HH	38	58	68	+20
36	Riverside Paint	HH	58	71		+13
37	Jewel Basin Graves	HH	50	68		+18
38	Wheeler Quintonkon	HH/SB	49	68		+19
39	Logan Dry Park	HH/SB	50	51		+1
40	Lower Twin	SB	91	92		+1
41	Twin Creek	SB	97	100		+3
42	Moccasin Crystal	HH	80	81		+1
43	Stanton Paola	HH	75	81		+6
44	Dickey Java	HH	80	81		+1
45	Long Dirtyface	HH	95	100		+5
46	Tranquil Geifer	HH	75	85		+10
47	Skyland Challenge	HH	58	65		+7
48	Plume Mtn Lodgepole	HH/SB	79	97		+18
49	Flotilla Capitol	HH/SB	78	99		+21
50	Ball Branch	SB	50	84		+34
51	Kah Soldier	SB	43	68		+25
52	Spotted Bear Mtn	SB	49	68		+19
53	Big Bill Shelf	SB	70	80		+10
54	Jungle Addition	SB	53	68		+15
55	Bunker Creek	SB	69	92		+23
56	Gorge Creek	SB	87	90		+3
57	Harrison Mid	SB	91	95		+4

Shading

	Subunits meet LMRP A19 objective of ≥68% Security CORE.
	Subunits meet amended LMRP A19 objective for Security CORE.

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* Numbers in the NEPA decision column show where the forest has made NEPA decisions that changed or will change Security CORE within a subunit.

** Percent Change number shows the difference between Jan 1995 existing to 2013 existing.

-
+

A negative number (-) indicates a decrease in % Security CORE.

A positive number (no sign) indicates an increase in % Security CORE.

A blank cell indicates no change for that variable for that subunit.

Table 4b. Subunit % Security CORE for BMU Subunits where NF ownership <75%.

#	BMU Subunit	RD	Jan 1995 existing	2016 existing	NEPA decision*	% Change 2016-1995**
9	State Coal Cyclone	GV	47	58		+11
13	Cedar Teakettle	GV	22	24		+2
18	Noisy Red Owl	SL	48	52		+4
20	South Fork Lost Soup	SL	6	37		+31
21	Goat Creek	SL	42	39		-3
26	Porcupine Woodward	SL	21	15		-6
34	Coram Lake Five	HH	19	14		-5

Shading

 Subunits meet LMRP A19 objective of NO NET DECREASE due to Forest Service actions.

* Numbers in the NEPA decision column show where the forest has made NEPA decisions that changed or will change Security CORE within a subunit.

** Percent Change number shows the difference between Jan 1995 existing to 2013 existing.

-	A negative number (-) indicates a decrease in % Security CORE.
+	A positive number (no sign) indicates an increase in % Security CORE.
	A blank cell indicates no change for that variable for that subunit.

Figure 1. Histogram of Existing 2016 OPEN Route Density for BMU Subunits where NF Ownership >75%. Standard is $\leq 19\%$ >1.0 mi/mi², unless amended (lighter shaded bars).

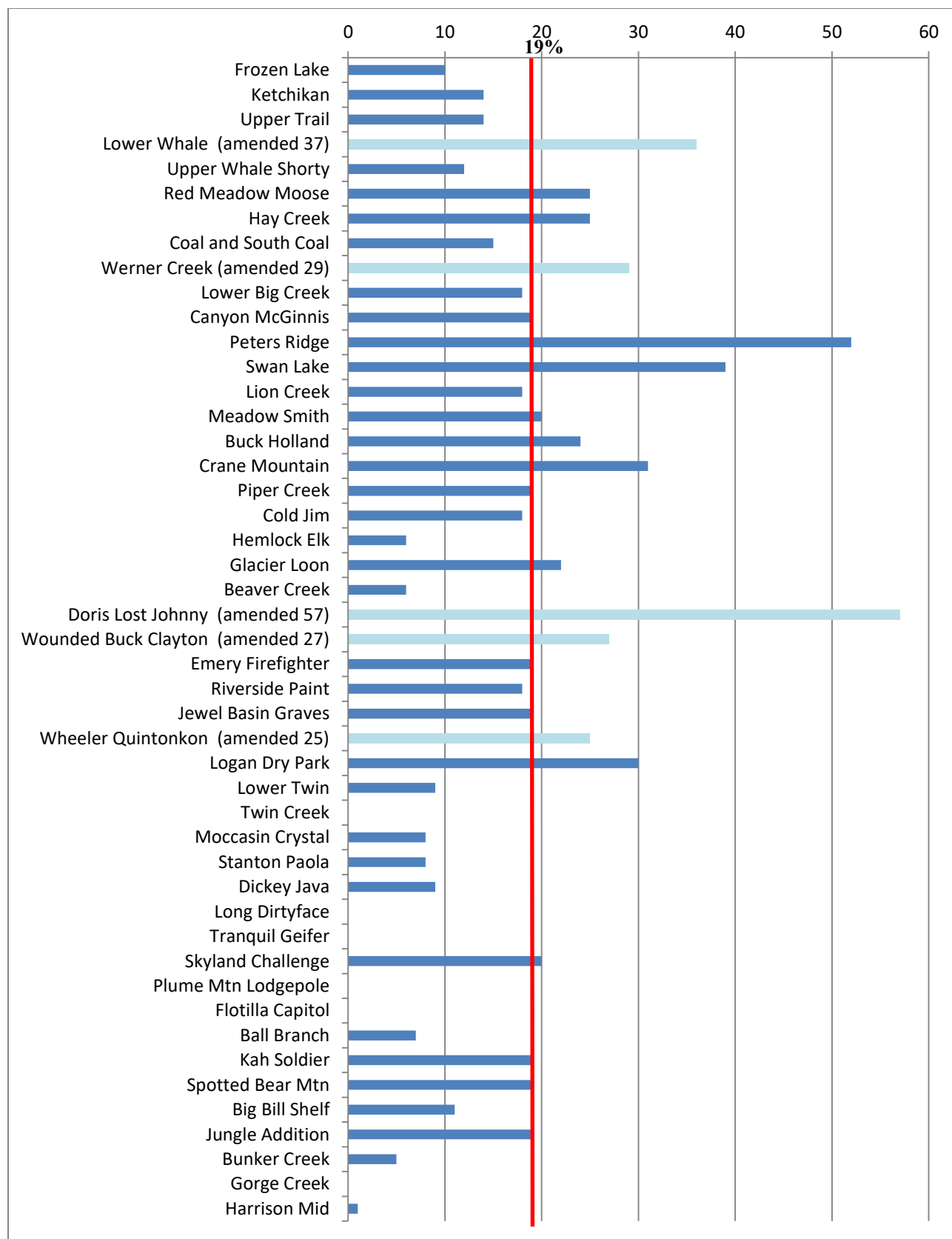


Figure 2. Histogram of Existing 2016 TOTAL Route Density for BMU Subunits where NF Ownership >75%. Standard is $\leq 19\%$ >2.0 mi/mi², unless amended (lighter shaded bars).

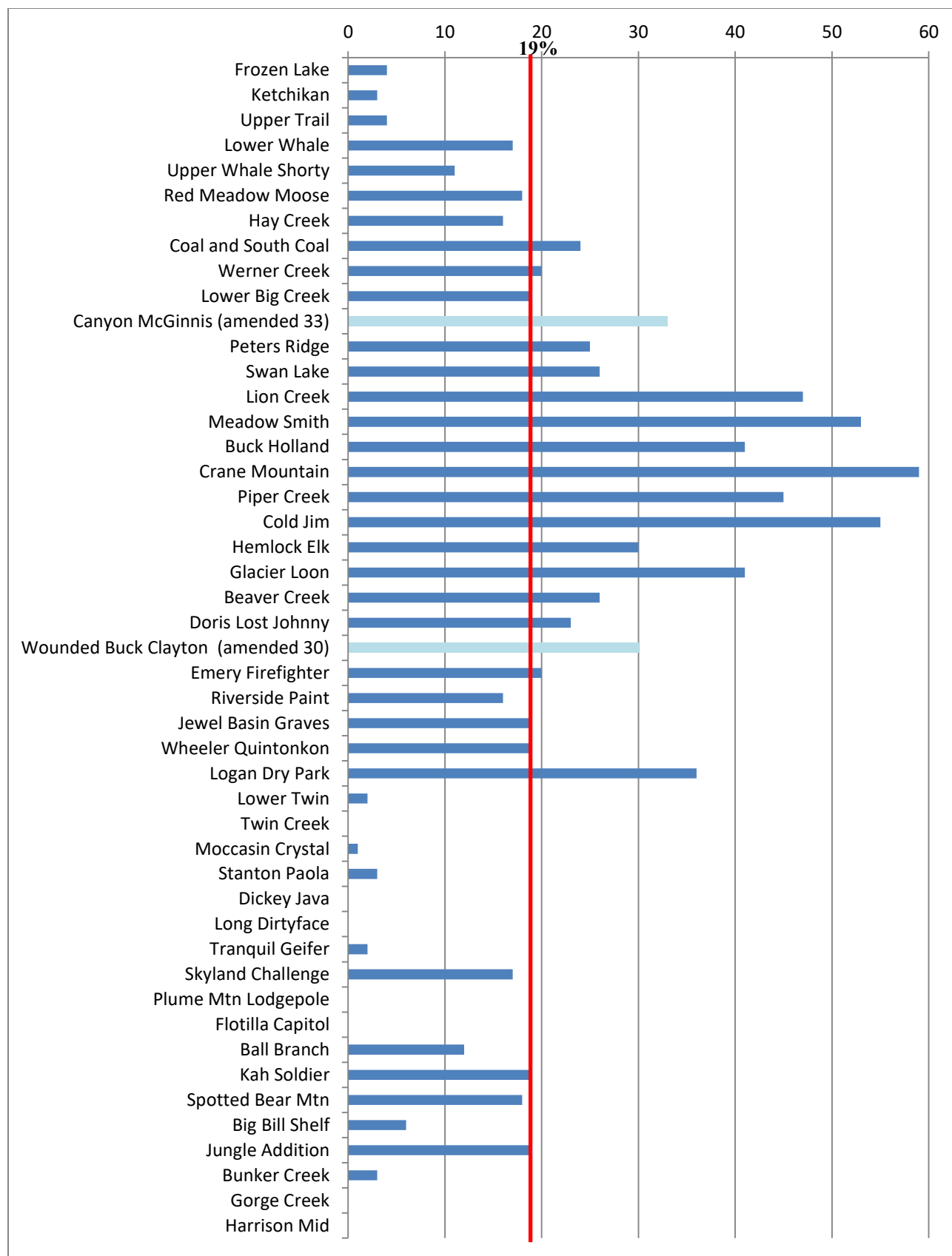
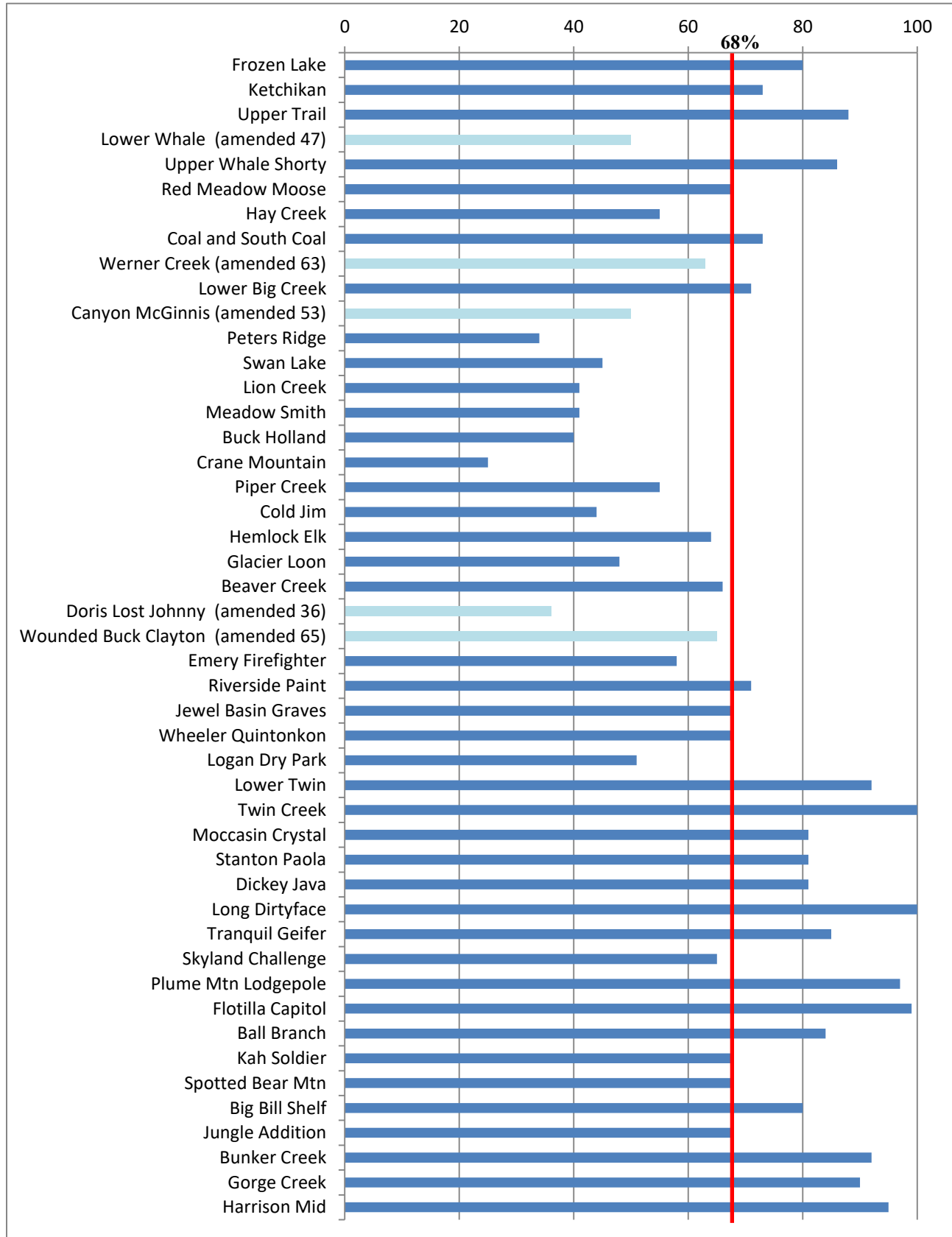


Figure 3. Histogram of Existing 2016 Security CORE for BMU Subunits where NF Ownership >75%. Standard is $\geq 68\%$ CORE, unless amended (lighter shaded bars).



Late Spring Over-Snow Vehicle Use

Amendment 24 outlined where and when over-snow vehicle use could occur during April and May on the Flathead National Forest. A-24 BO, Appendix A. Reporting: *Within the Canyon Creek, Sixmile, Skyline Challenge and Lost Johnny areas, as shown in Appendix WW maps, the Forest Service will calculate and report open road density in the Annual A-19 Monitoring Report as follows:*

1. Calculate and report Open Road Density (ORD) and Core area from the end of the legal snowmobiling season to the end of the non-denning season (12/1).
2. Calculate and report ORD from the end of the denning period (4/1) to the end of legal snowmobiling season (Canyon Creek area until 4/15, Sixmile area until 4/30, Skyland Challenge area until 5/15 and Lost Johnny area until 5/31).

For the two-month season of April-May, OPEN and TOTAL route density and Security CORE analyses were completed in the same manner as for the non-denning season, except for the following changes. For all federal agency, state agency, and Plum Creek Timber Company roads, road management was assigned as 1) open April-May, 2) open seasonally in April-May, or 3) closed in April-May and by what type of device. Wheeled motorized trail traffic was considered to not occur due to spring conditions except for the two low-elevation areas (Cedar Flats and Hungry Horse Track). The entire designated over-snow “play” areas were considered as >2.0 miles/square mile density for both OPEN and TOTAL route density. The 100-foot buffer on route corridors on Glacier View RD, and the three play areas were buffered 500 meters for Security CORE analyses. Results listed in Table 5 are only for those subunits affected by the designated late spring over-snow vehicle use areas and groomed routes.

Table 5. Late Spring OPEN and TOTAL Route Density and Security CORE percentages.

#	BMU Subunit	RD	OPEN Route Density		TOTAL route density		Security CORE	
			Late Spring	Non-denning	Late Spring	Non-denning	Late Spring	Non-denning
Canyon Creek Area								
10	Werner Creek (amended)	GV	18	29	23	20	61	63
11	Lower Big Creek	GV	15	18	same	19	70	71
12	Canyon McGinnis (amended)	GV/TL	24	19	34	33	41	50
13	Cedar Teakettle (<75% NFS land)	GV	15	25	same	27	24	24
Lost Johnny Area								
32	Doris Lost Johnny (amended)	HH	79	57	77	23	17	36
33	Wounded Buck Clayton (amended)	HH	51	27	62	30	34	65
17	Peters Ridge	HH/SL	14	52	18	25	66	34
Sixmile Area								
19	Swan Lake	SL	27	39	24	26	54	45
38	Wheeler Quintonkon (amended)	HH/SB	20	25	23	19	64	68
18	Noisy Red Owl (<75% NFS land)	SL	13	20	16	17	60	52
50	Ball Branch	SB	2	7	14	12	89	84
Challenge/Skyland Area								
47	Skyland Challenge	HH	51	20	50	17	31	65
46	Tranquil Geifer	HH	7	0	7	2	81	85

From the above table, where the OPEN and/or TOTAL route density decreased, those subunits either had 1) roads closed during April-May that were open in the summer, or 2) wheeled motorized trail traffic is assumed to not occur due to spring conditions. Where the OPEN and/or TOTAL route density increased, those subunits either 1) contained “play” areas with density assumed to be $>2.0 \text{ mi/mi}^2$, or 2) had additional over-snow routes not present as open roads in other seasons. Where Security CORE increased, it was assumed wheeled motorized traffic was not occurring due to spring conditions, so those motorized trails were not buffered. Where Security CORE decreased, those subunits either 1) contained “play” areas, which were buffered 500m, and the area plus the buffer is not considered CORE, or 2) contained route corridors (100 feet on either side of route), which were buffered 500meters and the route corridor plus the buffer is not considered CORE.

Miles of Road Decommissioned

In 1995, total system road mileage on the Flathead National Forest was 3,842 miles. As the end of 2015 there were 3,569 miles. The information was not gathered at the end of 2016, and is estimated at 3,552 miles, assuming there were no re-alignments or new construction.

Table 6. Flathead National Forest Road Decommissioning Mileage Summaries Since 1995.

Year	Miles of Road	Cumulative
1995	69.97	
1996	40.38	110.35
1997	28.40	138.75
1998	18.36	157.11
1999	109.20	266.31
2000	37.24	303.55
2001	1.25	304.80
2002	56.54	361.34
2003	36.43	397.77
2004	41.52	439.29
2005	28.09	467.38
2006	46.67	514.05
2007	42.09	556.14
2008	48.44	604.58
2009	22.43	627.01
2010	54.84	681.85
2011	12.40	694.25
2012	13.03	707.28
2013	3.98	711.26
2014	13.46	724.72
2015	6.57	731.29
2016	16.80	748.09
Total	748.09	

Monitoring Closure Devices for Effectiveness

Sign-only closures are not included in Table 7 and any road closed by a sign device is considered an open road for route density analysis. Tables only include information on closure devices within the A19 analysis area. In Table 7, the column “# Requiring Inspection” does not include the number of devices behind that 1st device. Using data from Table 7, the first line is for Swan Lake, and lists 167 gates, of which 127 are requiring inspection. The difference is 25 gates that are either administrative gates or in locations that are restricted by a gate that is located closer to the beginning of the road. In Table 7, the column “# Ineffective” represents the number of devices that were ineffective upon inspection. Within the A19 analysis area, there were 627 closure devices inspected. Of these 627 devices, 17 (2.7%) devices were found to be ineffective upon inspection. Of the 17, nine (52.9%) were immediately corrected, one (5.9%) was repaired at a later time, and seven (41.2%) are currently ineffective.

Table 7. Summary of Closure Device Monitoring for 2016 for the A19 analysis area only.

District	Type	# of Devices	# Requiring Inspection	# Inspected	# Ineffective	% Inspected ¹	Of Inspected, % Ineffective ¹
Swan Lake	# of gate	167	127	127	3	100%	2%
Does not include Island Unit	# of barriers	501	207	206	4	100%	2%
	TOTAL	668	334	333	7	100%	2%
Spotted Bear	# of gate	34	27	27	1	100%	4%
	# of barriers	101	16	15	0	94%	0%
	TOTAL	135	43	42	1	98%	2%
Hungry Horse	# of gate	113	59	59	2	100%	3%
	# of barriers	240	79	79	5	100%	6%
	TOTAL	353	138	138	7	100%	5%
Glacier View	# of gate	65	44	43	1	98%	2%
	# of barriers	182	73	71	1	97%	1%
	TOTAL	247	117	114	2	97%	2%
FOREST	# of gate	379	257	256	7	100%	3%
Only includes analysis area for A19	# of barriers	1024	375	371	10	99%	3%
	TOTAL	1403	632	627	17	99%	3%

¹ – Percentages are rounded to nearest whole percent value. For example, on GVRD, the % Inspected for barriers is 97.26% (71/73), which is rounded to 97%.

In Table 8a (1995 through 2005) and Table 8b (2006 through 2016) **below**, the row “# Ineffective” may not be consistently tallied prior to 2005 and 2005 forward. In 2005 and 2006, if the device was ineffective upon inspection, the device was called ineffective. Prior to 2005, if the device was ineffective but fixed before the inspector left, the device was called effective. Therefore, prior to

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2005, the total ineffective devices are those devices that the inspector was not able to fix before leaving.

Table 8a. Summary of Closure Device Monitoring, Entire Flathead National Forest from 1995 through 2005.

Description	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005
# of Gates	536	537	550	550	539	nodata	nodata	531	532	537	536
# Requiring Inspection											425
# Inspected	319	314	252	451	nodata	386	nodata	294	152	166	425
# Not Inspected	217	223	298	99	nodata		nodata	237	380	371	0
# Ineffective	17	28	19	9	nodata	16	nodata	28	9	8	81
# of Barriers	792	848	897	818	786	nodata	nodata	915	927	997	886
# Requiring Inspection											585
# Inspected	229	77	142	524	nodata	449	nodata	156	43	36	571
# Not Inspected	563	771	755	294	nodata		nodata	759	884	961	14
# Ineffective	27	29	27	20	nodata	14	nodata	14	5	6	53
# of Signs	46	59	59	56	43	nodata	nodata	17	19	31	29
# Inspected	24	6	6	27	nodata	8	nodata	1	1	0	17
# Not Inspected	22	53	53	29	nodata		nodata	16	18	31	12
# Ineffective	46	59	59	56	nodata	8	nodata	17	19	31	29
Total # of Devices ¹	1328	1385	1447	1368	1325	nodata	nodata	1446	1459	1534	1422
Total # Req. Inspect. ¹											1010
Total # Inspected ¹	548	391	394	975	nodata	835	nodata	450	195	202	996
% Inspected ^{1 & 2}	41%	28%	27%	71%	nodata	nodata	nodata	31%	13%	13%	99%
Total # Not Inspected ^{1 & 2}	780	994	1053	393	nodata	nodata	nodata	996	1264	1332	426
# Ineffective ¹	44	57	46	29	nodata	30	nodata	42	14	14	134
Of Inspected, % Ineffective ¹	8%	15%	12%	3%	nodata	4%	nodata	9%	7%	7%	13%

¹ – Totals and overall calculations do not include sign closures. Under Amendment 19, the very nature of a sign makes it an ineffective closure device as it is not a physical barrier.

² – From 2005 on, percentage is calculated using total number of devices requiring inspection

Table 8b. Summary of Closure Device Monitoring, Entire Flathead National Forest from 2006 through 2016.

Description	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
# of Gates	512	535	523	499	557	560	556	567	563	570	569
# Requiring Inspection	406	418	398	349	423	420	426	425	430	448	414
# Inspected	366	298	398	349	421	416	422	266	386	246	259
# Not Inspected	40	120	0	0	2	4	4	159	44	202	155
# Ineffective	86	50	45	23	39	17	21	24	28	28	7
# of Barriers	864	938	904	896	1032	1049	1175	1180	1188	1180	1181
# Requiring Inspection	576	637	544	536	635	665	684	753	763	753	455
# Inspected	469	431	544	536	631	632	664	643	709	344	372
# Not Inspected	107	206	0	0	4	33	20	110	54	409	83
# Ineffective	25	20	30	13	56	21	11	9	7	33	10
# of Signs	24	29	22	20	19	19	17	17	17	18	16
# Inspected	6	6	22	10	19	14	10	6	5	12	6
# Not Inspected	18	23	0	10	3	1	7	11	12	6	10
# Ineffective	24	5	22	6	16	13	13	14	13	12	1
Total # of Devices ¹	1376	1473	1427	1395	1589	1609	1731	1747	1751	1750	1750
Total # Req. Inspect. ¹	982	1055	942	885	1058	1085	1110	1178	1193	1201	869
Total # Inspected ¹	835	729	942	885	1052	1048	1086	909	1095	590	631
% Inspected ^{1 & 2}	85%	69%	100%	100%	99%	97%	98%	77%	92%	49%	73%
Total # Not Inspected ^{1 & 2}	541	326	0	0	6	37	24	269	98	611	238
# Ineffective ¹	111	70	75	36	95	38	32	33	35	61	17
Of Inspected, % Ineffective ¹	13%	10%	8%	4%	9%	4%	3%	4%	3%	10%	3%

¹ – Totals and overall calculations do not include sign closures. Under Amendment 19, the very nature of a sign makes it an ineffective closure device as it is not a physical barrier.

² – From 2005 on, percentage is calculated using total number of devices requiring inspection.

Administrative Use

Hungry Horse RD had 1 road where administrative use levels were exceeded four different weeks due to a national climate change project, timber work, and handicapped hunting uses. Spotted Bear RD had one road where administrative use levels were exceeded for one week due to MFWP grizzly bear trapping and recreation use. Swan Lake RD had one road where administrative use levels were exceeded for one week due to silvicultural activities. This also affected a road off the main road.

Table 9. Subunits containing roads, or affected by roads, that exceeded administrative use level.

RD	BMU Subunit	Project or Activity	OPEN Route Density		TOTAL Route Density		Security CORE	
			Exist	Admin	Exist	Admin	Exist	Admin
HH	Coram Lake Five	various	26	31	46	same	14	same
SB	Jungle Addition	MFWP and recreation	19	22	19	same	68	same
SL	Swan Lake	Silviculture	39	41	26	same	45	same

Responses to Terms and Conditions in A19 Revised Implementation Schedule (BO dated January 31, 2014)

1. Forest activities shall not result in a net increase in OMAD, TMAD, or net decrease in core habitat without additional consultation.

See respective resource management and post-fire project BO reports. From this report, see section titled “Changes from 2016 Report – Specific Subunits” starting on page 3.

2. The Forest shall proceed with reductions of access densities and increases of core as authorized and scheduled by project decisions with timetables. Access management direction shall be completed within the Firefighter Mountain/Paint Emery Resource projects by the end of 2015.

The Forest continues to make progress reducing access densities and increasing security core. The Chilly James project decommissioned approximately 14 miles of road. The Firefighter Mountain/Paint Emery Resource project bermed Road 1621 and completed access management work on 11042, 11042A, and temporary roads.

3. Proceed with reductions of access densities and increases in core as authorized by project decisions without time tables as funding allows.

There are no road management activities from projects without time tables planned for FY2017.

4. In subunits subject to additional administrative motorized use restrictions, all restricted roads shall continue to have an effective physical restriction. Effective physical restriction could be a gate, berm, or others needed to limit motorized use to appropriate levels. The use of a restriction device is needed only during the period or season the road is restricted.

This was addressed in the 2006 A19 report. The Forest’s “Red Lock” policy insures additional administrative motorized use restrictions from authorized and unauthorized Forest Service key holders. “Red Lock” policy affects the Coal and South Coal, Logan Dry Park, Peters Ridge, Crane Mountain, Swan Lake, and Beaver Creek subunits.

5. The first restriction device on any road shall be inspected annually and kept in good repair. Effectiveness of the barrier to prevent unauthorized access shall be determined and recorded. In the case of an ineffective device, an alternative device, technique, or repair shall be implemented, and implementation of the appropriate remedy shall be considered a priority in the Forest’s work scheduling. Human health and safety takes priority over this term and condition.

See Monitoring Closure Devices for Effectiveness section and Tables 7 and 8 in the 2016 A-19 report above.

6. The Forest shall continue to coordinate with the Service to further reduce, or eliminate, administrative use on any number of specific restricted roads within subunits to simulate a 19 percent or less TMAD in that subunit. Considerations will include existing TMAD, core levels, juxtaposition of restricted roads and core area (i.e. opportunity to increase amount of effective core habitat), and watershed issues, including the conservation of bull trout.

See Administrative Use section and Table 9 in the 2016 A-19 report section above.

7. The Service's February 1995 incidental take statement directed the Forest, under terms and conditions, to develop and implement a public information program on the positive effects of road closures for fish and wildlife, water quality, and other Forest resources. The Forest shall continue the implementation of this public information program focusing on both information that is available and relevant at a local, district level and on information pertinent to a broad-based Forest level approach. A clear and understandable explanation of the status of existing road densities and future road densities as directed by A19 shall be available to the public. The explanation shall include how road management actions benefit grizzly bears. The net reduction in OMAD, and the remaining opportunities for motorized public access, timber extraction, recreation, and other Forest uses should be emphasized.

A package of material the Forest uses for maps, brochures, handouts, etc. at our front offices for grizzly bear access management, sanitation and awareness was included in the 2004 A-19 report. Information is also included within contracts, provided to special-use permit holders, and fire crews, and found on our website, <http://www.fs.usda.gov/flathead>.

8. Roads facilitate human access and increase the possibility of grizzly bears encountering human-related attractants. Continue the implementation of appropriate food storage and handling program in the action area. Provide and make information available to Forest employees, contractors, and Forest users on the effects, consequences and ways to avoid grizzly bear conditioning to human-related foods.

- **The food storage order was expanded to include the entire forest in June 2011. Food storage information is also included within contracts, provided to special-use permit holders and fire crews, included with forest maps, and found on our website, <http://www.fs.usda.gov/flathead>.**
- **The forest continues to work with partners to support three seasonal "Bear Rangers", working on all five Ranger Districts to monitor camping areas and forest users for awareness and compliance with sanitation requirements, both inside and outside the NCDE.**
- **The Forest made numerous public presentations about bear sanitation in 2016, and interacted with well over 1,000 people. These ranged from individual encounters with campers at campgrounds, dispersed sites, and hunting camps; to elementary school classroom appearances to PowerPoint presentations at meetings; to working-in-bear-country and living-with-bears presentations (i.e. employee bear safety training, the Spring Bear Wake-up Social in Condon, and the Bear Fair in Ferndale). Bear-safety booths were staffed at the Family Forestry EXPO and local farmer's markets. Partners in these efforts included Swan Valley Connections; Interagency Grizzly Bear Committee; Montana Department of Natural Resources and Conservation; Montana Fish, Wildlife and Parks; and private grants.**
- **In partnership with the Swan Valley Connections, the Swan Valley Bear News was included in the Swan Valley Connections' autumn newsletter, with copies at <https://www.swanvalleyconnections.org/s/swan-valley-bear-resources-fall-2016.pdf>.**
- **Placement/replacement of Forest kiosk, bulletin boards, outhouses with bear aware/food storage signs.**

- As part of the Southwest Crown of the Continent Initiative, the USFS purchased 10 bear-resistant food storage lockers for Holland Lake and Swan Lake Campgrounds (5 at each, to be installed in 2017).
- Continued the pannier, bear kegs, and pulley system loaner program. In 2016, worked with Swan Valley Connections to purchase an additional 35 bear-resistant garbage containers for residents in the Swan Valley. At the end of 2016, 202 containers and 28 dumpsters were being used by community members or businesses as part of the program in the Swan Valley.
- In 2016, nearly 15,000 visitors toured the Summit Nature Center, which features grizzly bear messages.
- Other efforts continued outside the recovery zone. These include the maintenance of Upper Stillwater Lake Campground's food pole, bear-resistant coolers available for free check-out from campground concessionaires, and bear-resistant dumpsters throughout Tally Lake Campground with a concessionaire responsible for pick-up.
- Other material the Forest uses for maps, brochures, handouts, etc., for grizzly bear sanitation and awareness was included in the 2004 A-19 report. These were reviewed in 2016 and the use of many was discontinued because they were out-of-date. Initial progress was made at revising the Forest's food storage brochure.

9. The Forest shall notify the Service's Grizzly Bear Recovery Office in Missoula within 24 hours of discovery of a human-caused grizzly bear mortality on the Forest.

MFWP bear management specialists coordinate management actions with forest personnel as conflict or relocation occurs. Extensive protocol, information and reports by MFWP bear management specialists are required by and reported to the FWS grizzly bear coordinator on a case-by-case basis and within an annual report. Information on mortality is included in the MFWP annual NCDE grizzly bear monitoring team annual report. Grizzly bear mortality data for 2016 for inside and within 10 miles of the recovery zone had 18 mortalities caused by automobiles (3), management removals (6), augmentation (1), illegal (2), defense of life/property (1), orphaned cubs (2), mistaken ID (1), natural (1), and undetermined (1). Of the 18, nine mortalities were within or within 1 mile of the 54 A19 subunits on the Flathead NF, and these were reported as automobiles (1), management removals (4), augmentation (1), illegal (1), mistaken ID (1), and natural (1).

10. The Forest shall contact the Service by March 15 of each year, and notify the Service as to what access management changes will occur the following work season. This requirement could be met at the Forest and Service's annual meeting in January or February.

Access management work that was accomplished in 2017 will be described in the 2017 report.

Attachment 2

Travel Routes Point Feature road Log

For Route #: 10753

Sorted by Road # and MP

Date run: 20-Mar-2008

Route Name	MP	Loc	Feat Type	Feat Subtype	Stat	Rdwy Loc	Feature ID	Name	Size	Remarks
10753 LOWER WOLF	.000		ADJ_FEATURE	RD - ODOM ROAD LOG C	EXIST	ON	10753--0			
			ADJ_FEATURE	RD - INTERSECTION	EXIST	ON	10753--0	TRUMBULL CANYON ROAD		Road 9848
			BARRIER	VEG - LIVE	EXIST	ON	10753--0			
			BARRIER	BERM - EARTH BERM	EXIST	ON	10753--0			
	.268		CULVERT	ROUND PIPE	EXIST	UNDER	10753-.268		18" x 32'	
			CULVERT_INST		EXIST		10753 - 0.26			
	.381		CULVERT	ROUND PIPE	EXIST	UNDER	10753-.381		18"	
	.556		CULVERT	ROUND PIPE	EXIST	UNDER	10753-.556		18"	End totally plugged inlet buried under 2 1/2' of deposition. Not functioning
	.620		CULVERT	ROUND PIPE	EXIST	UNDER	10753-.62		24" x 32'	
			CULVERT_INST		EXIST		10753 - 0.62			
	.742		CULVERT_INST		EXIST		10753 - 0.74			
			CULVERT	ROUND PIPE	EXIST	UNDER	10753-.742		18"	
	.818		ADJ_FEATURE	RD - INTERSECTION	EXIST	RIGHT	10753-.818	UPPER WOLF		Road 10754
	.921		CULVERT	ROUND PIPE	EXIST	UNDER	10753-.921		18"	
	1.099		CULVERT	ROUND PIPE	EXIST	UNDER	10753-1.099		18"	
	1.771		CULVERT	ROUND PIPE	EXIST	UNDER	10753-1.771		18"	Length of CMP was greater than 50 ft.
			CULVERT_INST		EXIST		10753 - 1.77			
	1.923		ADJ_FEATURE	RD - INTERSECTION	EXIST	RIGHT	10753-.818	UPPER WOLF		Road 10754
	2.198		CULVERT_INST		EXIST		10753 - 2.19			
			CULVERT	ROUND PIPE	EXIST	UNDER	10753-2.198		18"	This culvert has plugged / failed and is buried under stream deposition
	2.387		ADJ_FEATURE	RD - SMALL STREAM	EXIST	ON	10753-2.387			
			CULVERT	ROUND PIPE	DISPO	UNDER	10753-2.387			Pulled - date unknown
	2.427		CULVERT	ROUND PIPE	DISPO	UNDER	10753-2.387			Pulled - date unknown
	2.696		CULVERT	ROUND PIPE	DISPO	UNDER	10753-2.387			Pulled - date unknown
	2.724		CULVERT	ROUND PIPE	DISPO	UNDER	10753-2.387			Pulled - date unknown
	2.736		CULVERT	ROUND PIPE	DISPO	UNDER	10753-2.387			Pulled - date unknown
	2.739		CULVERT	ROUND PIPE	DISPO	UNDER	10753-2.387			Pulled - date unknown
	2.830		CULVERT	ROUND PIPE	DISPO	UNDER	10753-2.387			Pulled - date unknown
	2.847		DRAINAGE_STR	DRAIN DIP	EXIST	ON	10753-2.847			
	2.859		DRAINAGE_STR	DRAIN DIP	EXIST	ON	10753-2.847			
	3.000		BARRIER	BERM - EARTH BERM	EXIST	ON	10753--3			
			BARRIER	VEG - LIVE	EXIST	ON	10753--3			

File Copy

SWAN VIEW COALITION

P.O. Box 1901, Kalispell, MT 59901
(406) 755-1379

January 3, 1995

Joel Holtrop
Flathead Forest Supervisor
1935 3rd Avenue East
Kalispell, MT 59901

Re: Comments on proposed Forest Plan Amendment 19.

Dear Mr. Holtrop;

Please accept these comments into the record for proposed Amendment 19. By enclosure, we include as a part of these comments the following letters regarding the management of grizzly bear habitat, security areas and roads:

August 8, 1994, letter to Ralph Morgenweck re: IGBC Task Force Report.
October 17, 1994, letter to Joel Holtrop re: MEMP.
October 18, 1994, letter to Ralph Morgenweck re: MFEMP and Amend. 19.
October 19, 1994, letter to Joel Holtrop re: MFEMP.
October 27, 1994, letter to Kemper McMaster re: MFEMP and Amend. 19.
November 9, 1994, letter to Ralph Morgenweck and Joel Holtrop re: Amend 19.
December 6, 1994, letter to Ralph Morgenweck and Joel Holtrop re: Amend 19.

By reference, we wish to also include in the record two letters from our attorney, Dan Rohlf, in the matter of your failure to reexamine management area allocations in crafting Amendment 19. The latter letter is addressed to Joel Holtrop and Kemper McMaster and enclosed an earlier letter to Joel Perella of the Department of Justice. This letter was faxed to you on or about December 20, 1994, with follow-up service of hard copy by mail. We ask that copies of these letters be included in the Amendment 19 record of comments.

The following comments will make reference to the Amendment 19 Biological Assessment (BA), Environmental Assessment (EA) and your December 28, 1994, response to our FOIA request (FOIA response). Our comments on the BA are best summarized in the attached November 9 and December 6 letters. The following comments are presented roughly in the order the issues arise in the EA:

1. What exactly will be monitored regarding roads and trails? The EA, on page 11, is not specific. John Ganiere has made it clear that the Flathead is not monitoring the effectiveness of road closures in actually stopping use by snowmobiles and ORVs (see the attached December 6 letter). Arbitrary use levels cannot be used to define

motorized and nonmotorized roads and trails, nor can monitoring adequately determine levels of use. The legal status of the road or trail must be used to define whether or not it is motorized.

2. The EA, on pages 12, 29, 30 and elsewhere, greatly downplays the advantages of reducing fire risk by reducing human access. The EA's discussion on fire risk is biased and inadequate.

3. The EA (pages 15 and 40) and FOIA response fail to provide any statistical analysis to support the claim that documented grizzly bear "mortalities do not correlate well with motorized access density". If indeed they do not, it is perhaps because highways, county roads and private roads are not included in calculations of access density.

4. The EA, on page 16, incorrectly states our concern that management areas (MAs) be made consistent with grizzly bear standards and guidelines and then summarily dismisses the task because it would require a significant amendment to the Forest Plan. The proposed amendment and analysis simply does not address the issues before the Court when it rendered its decision and order for reconsultation with FWS.

Former Flathead planner Fred Hodgeboom correctly noted that management direction for MS-1 habitat "is in direct conflict with land uses prescribed in the Forest Plan which are recognized to reduce the habitat potential." He concluded that a solution to this conflict would either involve altering the Guidelines or "mak[ing] Situation 1 equivalent to the MA-11 grizzly bear habitat emphasis by revising the Forest Plan and EIS to disclose the social, economic, and environmental effects of grizzly bear habitat maximization over all the area now mapped as Situation 1."

The EA and BA simply attempt to sweep this conflict under the rug. They do not disclose this conflict and the documents which investigate it. They do not forward this information to FWS, as ordered by the Court. The few documents specifically mentioned by the court which are attached to the BA contend extensively with the effects of changes in MAs on the ASQ, but the BA and EA simply do not address the still-standing conflict. They do not address Hodgeboom's suggestions for resolving the conflict. As a result, an ASQ is proposed which does not provide for consistency with standards and guidelines for grizzly bear and the same mistake is repeated. The referenced letters from our attorney, Dan Rohlf, discuss this matter in greater detail.

5. No BA is prepared for bull trout, in violation of the Forest Service Manual and Regional policy, and the EA is inadequate in this regard.

6. The EA, on pages 20-23, indicates the ASQ was estimated by using the same mix of clearcutting and other harvest techniques as was used in the original Plan analysis, while acknowledging that such a mix is unlikely in the future. What is the

likelihood that less use of clearcutting will reduce the 54 MMBF ASQ to 37 MMBF? Why is Talley Lake assumed to always produce 37MMBF in spite of standards necessary to reduce clearcutting and retain adequate snags, old growth and water quality? Reports from the Talley Lake District Ranger during the original Plan analysis indicated that he could not keep up the level of cutting and these concerns are repeated on page 23 of the EA. The ASQ appears to be as arbitrarily selected as during the initial planning process.

7. The EA, on page 25, gives no supporting documentation for its claim that more mature forest now exists than historically. We certainly hope that this claim is not being based on Ayers again!

8. The Flathead has not normally pulled culverts and taken other measures to reduce erosion before berming a road closed, as suggested on page 34 of the EA. During my 1988 inventory of abandoned Forest Service roads in the Swan Valley, I found that one-third of them warranted further erosion control measures.

9. The assumption on page 35 of the EA, that replicating the home range conditions found in the South Fork Study Area will be adequate to achieve recovery goals, is false. The December 14, 1994, draft report to the IGBC has confirmed our concerns that the South Fork grizzly bear population is declining and that more stringent management standards are required. We repeat our longstanding request that standards even more restrictive than those in the Lost Silver biological opinions be adopted because the Lost Silver opinions simply replicate South Fork Study Area home range conditions.

10. For the above and other reasons, the rationale for using a 55% core area standard rather than 68% is rejected. In light of the above IGBC report, 68% may indeed be inadequate. Use of 55% certainly does not "favor the bear" as required in MS-1 habitat by the Guidelines.

11. The EA, on page 37, fails to set adequate and measurable standards for the distribution of core areas by elevation. See particularly the attached letters of October 17, 18, and 27 in this regard.

12. The EA, on pages 48 and 49, makes contradictory statements regarding the continued use of the Chief's interim direction because no decision on proposed Amendment 16 was issued. It states that interim direction will be followed because Amendment 16 lacks a decision, but then references Amendment 16 as authority for the statement that interim direction is "adequate".

13. The EA, on page 50, states clearly that the current snag retention standard of 225 snags/100 acres is inadequate, but fails to provide either an indication of what is adequate or a quantifiable indication of how an adequate standard will affect the ASQ.

14. Why does the EA say on page 62 that Alternative 2 will cause "no change in revenue producing outputs" when it would lower the ASQ from 100 to 64 MMBF?

15. How many miles of road would need to be restricted with physical barriers, obliterated, or reclaimed under the various alternatives, by each category? This is not given on page 81 or elsewhere in the EA. The EA gives an inadequate analysis of effects in this regard.

16. Why, on page 82 in Table 13, does the EA show that removing culverts and berming a road is cheaper than just berming the road? Is this because of decrease flood damage/risk/costs? We feel that the EA's treatment of various road "restricting" methods is extremely biased against obliteration and will be looking further into the actual costs and benefits of these techniques.

17. The EA does not provide sufficient information to assess to what extent areas with a total road density greater than 2 miles per square mile will fall within core security areas. It appears, however, that this does and will occur. South Fork research indicates that these areas will be used significantly less than expected by grizzly bears, even though they will be defined and considered to be core secure areas. The EA's disclosure of essential information is inadequate in this regard.

It is something more than ironic that the EA cites the South Fork Study as a reason for its purpose and need, then presents a convoluted analysis which cannot be compared directly with the results of the original South Fork research. Similarly, the core areas defined as roadless and trailless by the South Fork Study now are allowed to contain roads and trails. See the attached letters of November 9 and December 6 in this regard and all attached letters for more detail regarding our concerns over definitions used in the analysis.

18. Because of the above and enclosed problems with how the Flathead has attempted to define its way out of a problem, we cannot support any of the proposed amendment language. We repeat the enclosed letters in objecting in the strongest of terms to your use of "objectives" as a way to bypass legally enforceable "standards".

19. As requested in our scoping letters for this amendment, we again feel that the preparation of an EIS is warranted. Having reviewed the BA, EA and your FOIA response, we must conclude that substantial and essential information is absent and must be produced for consultation with FWS. Your FOIA response indicates clearly that the following essential information is absent:

a. Maps and calculations regarding areas where total road density exceeds 2 miles per square mile.

b. Maps showing all trails and roads on the Forest and their current legal status regarding closure to certain uses.

Joel Holtrop

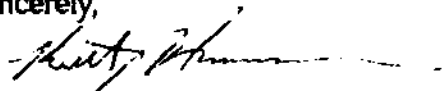
January 3, 1995

5

c. Documents that discuss changes in management area allocations necessary to make the Forest Plan consistent with grizzly bear management guidelines and standards.

We must insist that this information be made a part of your consultation with FWS.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith J. Hammer", with a long horizontal flourish extending to the right.

Keith J. Hammer
Chairman

enclosures (7 letters)

SWAN VIEW COALITION

PO Box 1901, Kalispell, MT 59901
(406) 755-1379

January 23, 1995

Ralph Morgenweck
USFWS Regional Director
PO Box 25486
Denver, CO 80225

Joel Holtrop
Flathead Forest Supervisor
1935 3rd Ave. East
Kalispell, MT 59901

Re: Flathead Forest Plan Amendment 19

Dear Sirs;

We have reviewed FWS's January 6, 1995, biological opinion (BO) in the above matter and offer the following observations:

1. Like the FS's biological assessment (BA) and environmental assessment (EA), the BO fails to address the changes in management area allocations necessary to make them consistent with the grizzly bear standards and guidelines. In turn, the BO also fails to adequately address what the ASQ must be to adequately protect listed species, concluding: "Accomplishing these core area objectives may or may not require an adjustment to the amended ASQ." The amended ASQ of 54 MMBF is still essentially "being pulled out of a hat" and is still being determined in an arbitrary and capricious manner.

2. At no point does the BO approve the motorized access management definitions used by the FS in its EA and BA. The FS must make its final NEPA documents consistent with the IGBC Task Force definitions in order to be consistent with the BO. Our earlier letters point out specific problems with these definitions.

The FS appears to have attempted to rewrite the definitions to require absolutely no road obliteration whatsoever, omitting bermed roads from the moving window scan as though they were obliterated (see EA at page C-1). The EA, on page 79 however, still indicates that no roads will be obliterated as there is no category for obliteration and the total miles of road remains unchanged between 1993 and 1999. Also, in response to our FOIA request, the FS has been unable to say how many roads, or if any, will need to be obliterated.

3. The FS has erred in omitting "system" trails legally open to motorized use from the moving window scan. Use of the IGBC definition will help and we fully intend to document that all trails open to motorized use actually receive such use if it becomes necessary. A more conservative and less wasteful course is for the FS and FWS to drop the words "and is used by motorized vehicles" from the IGBC definition of "open motorized trail".

4. The FS and FWS have attempted to remove the current requirement that areas with excessive road densities be brought into compliance when a timber sale is planned in the area. While it is good that an independent management program is proposed, it is not acceptable that timber sales be allowed to proceed with additional impacts in areas already receiving impacts in excess of the ten-year incidental take thresholds. BMU subunits containing and surrounding proposed timber sales must be brought up to the ten-year standards before the sale can proceed.

The FS has failed to demonstrate that it has either the will or the budget to accomplish adequate road and trail management independent of the "carrot" of its timber sale program. The FS must make absolutely clear how it intends to fund and meet the conditions set forth in the BO and how its five- and ten-year objectives apply to areas of proposed timber sales.

In summary, there exist wide gaps between what the FS proposes and what the FWS has agreed to. There also exists a wide gap between what both agencies have done in this consultation and what the court found necessary to be done in order to remedy the inadequacies of prior consultations.

We ask that each of you respond point-by-point to this letter and indicate what you intend to do to resolve the disparities described above and in order to clarify exactly how the agencies intend to implement Amendment 19 and the Flathead's timber sale program.

Sincerely,



Keith J. Hammer
Chairman

cc: Dan Rohlf - Attorney at Law