# ROADS, LAND, & BIG GAME HARVEST

# THE ENVIRONMENTAL QUALITY COUNCIL HOUSE JOINT RESOLUTION NO. 13

# 2015-2016



# **Executive Summary**

The Environmental Quality Council assembled an immense amount of information previously unavailable in one place as a result of the HJ13 study. The Council examined information on federal roads, parcels of public land with no public access, and harvest rates for elk and deer. The EQC heard from a variety of experts as well as numerous members of the public. The council also toured Forest Service and BLM roads and lands around Helena to see road and access issues first hand.

#### Roads

There are approximately 32,000 miles of Forest Service system roads in Montana. Of those, 9,784 miles are only available for administrative use, meaning they are effectively closed to motorized use.

Other roads taken out of service and often returned to a natural state. and returned to a natural state. There are 5,976 miles of these decommissioned roads no longer in the system .And then there are unauthorized roads; roads not within the system, most of them created by users. The Forest Service estimates there are 6,191 miles of these roads in Montana, which are also off limits to motorized use.

In total over the years about 21,951 miles of Forest Service roads have been closed to motorized use.

The Bureau of Land Management does not a statewide inventory of roads and they are not tracked consistently between field offices. However, there are 709 miles of documented closed roads in the areas covered by field offices in Butte, Missoula, and the Upper Missouri River Breaks National Monument.

#### Inaccessible Public Parcels

About 10% of all public land in Montana are not likely accessible by a public road or waterway. In many cases, the parcel may be surrounded by private land. While the private landowner may grant permission to cross, the general public is without guaranteed access.

Nearly all of the inaccessible land is owned by either the state of Montana or the BLM. State trust lands account for 2,429 square miles of inaccessible parcels. BLM owns 2,179 square miles of inaccessible land.

#### **Big Game Harvest**

While the number of elk in Montana rose over the last few, the total

# HJR 13 Kerry White

Rep. White, who is also a member of the EQC, sponsored the study resolution in 2015. It passed the House 69-37 and the Senate 32-18. The study focused on road management on federal lands, parcels of inaccessible public land, and the effect of diminished access on recreational opportunities, specifically hunting. The EQC built an online map showing

roads, inaccessible

parcels, land

ownership, and big game harvest rates for any area in the state. harvest over the last 16 years was highest in 2003. More than 25,000 elk were killed in 2014, the highest number since 2008. However, many areas in the state remain over the population goals set by the Department of Fish, Wildlife, and Parks.

Mule deer and whitetailed deer populations are rebounding after recent rough winters and disease outbreaks, but harvest numbers over the last decade were highest in 2006 When almost 134,000 deer were harvested. Hunters bagged just under 76,000 deer in 2014.

**Key Findings and Recommendations** 

#### To be Determined by the EQC

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# POLICY OVERVIEWS

## Roads

The EQC examined more than a century of road policy on lands managed by the BLM and the Forest Service. In 1897, the Organic Act stated states the purpose of forests is to improve and protect the forest, secure favorable water flows, and furnish a continuous supply of timber. A settler residing in a forest could construct wagon roads or other improvements to access a home and to utilize the settler's property. Anyone could enter the national forests for lawful purposes, including mineral exploration or development, provided that rules and regulations covering the forest were followed.

In the mid 1970s, the federal government took several actions that attempted to limit certain motorized travel on federal lands. President Nixon ordered off highway use be relegated to designated areas and trails. President Carter expanded that order to require that agencies immediately close areas or trails if off highway vehicle could cause considerable adverse effects on soil, vegetation, wildlife, wildlife habitat, cultural, or historic resources.

The Forest Service also started to inventory all wheel tracks regardless of how developed.

Significant road policy decisions were also made in the early 2000s.

New Forest Service rules:

- sought to balance safe and efficient access for all users and maintain healthy ecosystems;
- prohibited road construction, reconstruction, and timber harvesting on inventoried roadless areas;
- found that the existing road system in national forests is mostly complete and shifts focus from new road development to managing access according to the capability of the land and decommissioning unneeded roads; and
- pledged to keep decisions on road management at the local level.

The BLM and the Forest Service issued a record of decision for off highway vehicle travel on federal lands in Montana and the Dakotas. The decision sought to minimize further resource damage, user conflicts, and related problems, including new user-created roads. Cross country travel was prohibited.

The BLM started designating specific roads and trails for motorized use on a site specific basis. Montana field offices start work on travel management plans. And additional Forest Service rules required the agency to designate trails and roads open to motorized use. Though a road or trail may exist on the ground, if it was not designated on the map, it was closed to motorized travel.

A longer history of federal road policy can be found here.

#### MONTANA FOREST SERVICE ROADS

There are several types of roads in the Forest Service vernacular. The largest quantity are called system roads, which include differing levels of roads open to general motorized use based on vehicle clearance and road quality. The other category of system roads are those closed between intermittent uses. The period of closure must exceed 1 year. Basic maintenance is performed to prevent damage to adjacent resources and allow the road to be used in the future for land management needs. Emphasis

Total Miles	Passenger Car	High Clearance Vehicle	<b>Basic Custodial Care (Closed)</b>	Miles of National Forest Roads in Region 1 by Forest		Beauer	nead De	erlotke A	0	1,000	2,000	3,000	4,000	5,000	6,000	7,000	8,000
4,782	1,728	2,758	0 295	Beaverhead- Deerlodge t NF	■ Pa		87	terroot N	*		Í	1					
2,833	849	1,121	863	Bitterroot NF	Passenger Car			Custer	*	1							
1,113	226	205	178	Custer NF	🖬 High Cl			Clathead N									
3,557	962	506	2,089	Flathead	High Clearance Vehicle			Gallatin A									
1,671	376	1,289	6	Gallatin NF													
2,435	511	906	1,018	Helena NF	asic Custodia			Helena N									
7,883	1,714	1,944	4,225	Kootenai NF	Basic Custodial Care (Closed)		1	ootenai A	*								ſ
1,391	468	746	178	Lewis & Clark NF	(b)		'enis	Clart N	*								
6,167	1,526	3,709	931	Lolo NF				10101									
31,831	8,360	13,688	9,784	Total Miles				1	*			ļ,				03	

Data was downloaded from Infra user view II\_ROAD\_CORE October 3, 2014 by bchristensen Query: Route Status = Existing, Jurisdiction= FS, System = NFSR, OperML=1,2,3,4,or 5

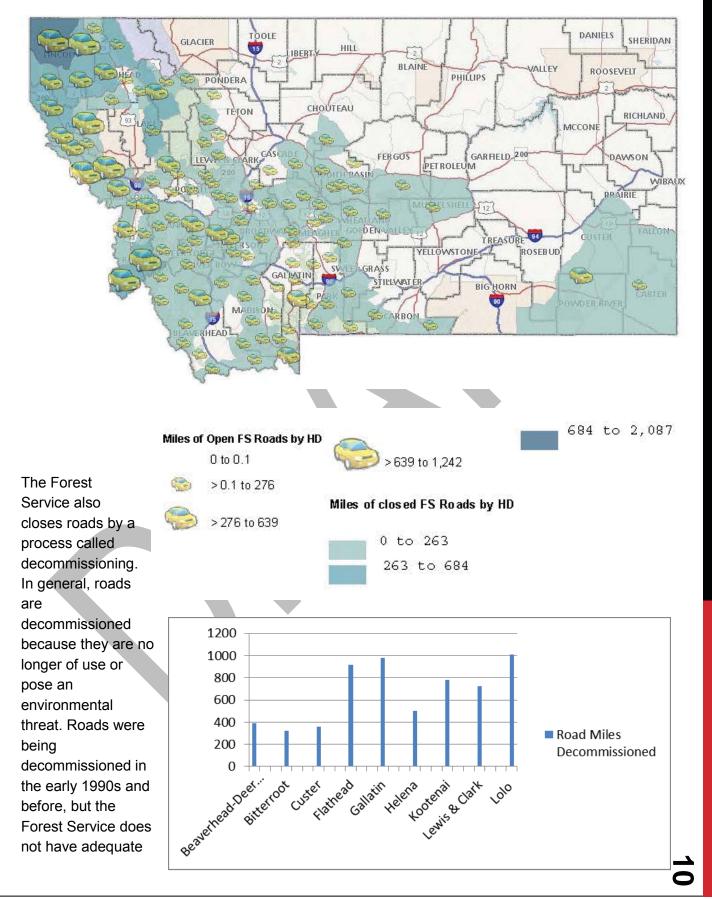
is normally given to maintaining drainage facilities and runoff patterns. Planned road deterioration may occur at this level.

9,000

Miles of National Forest Roads for Montana Forests

Region 1 - Montana Forests – Thru FY 2014

The EQC analyzed Forest Service Roads by hunting district and identified roads closed except for maintenance and those open to general motorized traffic.



records to document the activity. Decommissioning may range from blocking the entrance, revegetating, or full obliteration by recontouring slopes.

There also exist roads in forests that were created over the years by repeated use but were never built

or maintained to an agency standard. In 2005, the Forest Service examined all roads and designated some as part of the transportation system for each forest. While some of these user-created roads were made part of the system, others were not and therefore closed to further motorized use. Some forests have a partial inventory of unauthorized roads, but the actual number is not known.

# More Montana Forest System Road information Online

More information about Montana's National

Documented
Unauthorized Miles
2,168
327
9
12
1
166
548
36
2,924
6,191

Forest Roads including maintenance and funding. A <u>list</u> of every forest system road closed to motorized use except for administrative uses. Historic Forest Service travel <u>maps</u> dating back to the late 1970s.

#### MONTANA BUREAU OF LAND MANAGEMENT ROADS

Each field office of the BLM adopts travel plans.

The <u>Butte travel plan</u>, which covers much of the area between Butte and Helena as well as the BLM lands surrounding Helena, had about 417 miles of road open to public use as of the 2005 planning analysis.

In response to the EQC, the BLM provided <u>a list of roads</u> closed in the management area in 2014. That total was 390 miles of closed roads.

In Missoula, the list provided to the EQC included almost 112 miles of closed roads.

In <u>Dillon travel plan</u>, there are no areas open to cross country travel. More than 800,000 acres managed as limited travel on designated routes, including 1,342 miles of road open to public travel, of which 159 miles is open seasonally. Roads on the ground closed permanently are not delineated on travel maps.

In the Upper Missouri River Basin plan, the list of closed roads was about 207 miles.

## **Public Access & Public Lands**

A 2013 analysis by the Department of Fish, Wildlife, and Parks found that about 10% of public land - land owned by local, state, and federal entities - is not likely accessible by a public road or waterway.

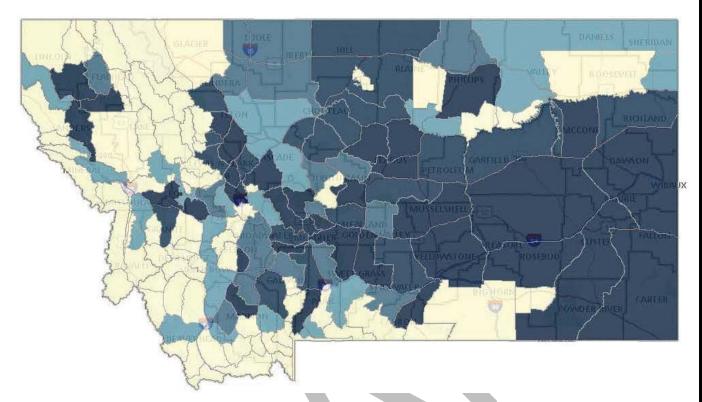
State trust lands and property managed by the Bureau of Land Management account for almost all of the inaccessible lands.<sup>1</sup>

Owner	No Access in Square Miles	Access in Square Miles	Total Square Miles	Percent No Access
Montana State Trust Lands	2,429	5,553	7,982	30%
US Bureau of Land Management	2,179	10,287	12,466	17%
US Forest Service	232	26,050	26,282	1%
US Fish and Wildlife Service	10	1,358	1,368	1%
Unknown - Conflicting Data Sources	8	47	55	15%
US Bureau of Reclamation	4	182	186	2%
Montana Fish, Wildlife, and Parks	3	626	629	1%
State of Montana	1	34	35	4%
US Department of Defense	1	13	14	8%
Local Government	1	9	10	7%
City Government	0	2	3	11%
Montana University System	0	55	55	0%
US Government	0	1	1	14%
Montana Department of Transportation	0	2	2	2%
Montana Department of Natural Resources Water				
Projects	0	2	2	2%
County Government	0	19	19	0%
Montana Department of Corrections		55	55	0%
National Park Service		69	69	0%
US Army Corps of Engineers		2	2	0%
US Department of Agriculture		111	111	0%
Totals	4,870	4,4476	4,9346	10%

Analysis performed by FWP, 2013

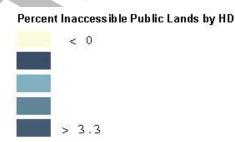
<sup>&</sup>lt;sup>1</sup> In this analysis "inaccessible lands" are characterized as unknown access. Distance from an access point is not considered a limitation to access. Corner crossings are not considered valid access. Public roads are those identified using data provided by the Montana Department of Transportation. Waterways are assumed to be navigable streams, lakes over 1,000 acres, or any lake containing a MT FWP fishing access site. Areas not considered are "non-hunting" areas such as parks, preserves, and land within city limits. Land ownership and access within Indian reservations were not evaluated.

The EQC further analyzed the data to identify what percentage of public land in each hunting district was inaccessible.



The EQC analyzed how much of the 3.1 million acres of inaccessible public land falls within elk distribution areas and found that was about one-third of the total.

Access to public land is not an emerging issue. In 1986, a flock of public officials, landowners, recreationists and others descended on Helena for a conference titled, "Access in Montana: A Historical Issue!"



"Clearly, access is a complicated problem," said Gov. Ted Schwinden, "one that bears out the philosophy that 'For every problem, there is one solution which is simple, neat, and wrong."<sup>2</sup>

The Legislature in 1993 passed House Joint Resolution 24 which acknowledged the "increasingly strained" relations between landowners and recreationists and urged parties to, among other things, achieve optimum hunter access, minimize impacts to landowners, and provide tangible benefits to landowners who allow hunter access.

The next session, the Legislature expanded the block management program and required the governor to create a committee of people interested in private land and public wildlife issues. The Private Land/Public Wildlife (PL/PW) Council has met fairly regularly the last two decades.

<sup>2</sup> <u>"Access?"</u> A summary of the Access in Montana conference, November 1986, in Helena.

The 1999 Legislature passed a bill that included a provision barring a county commission from abandoning a highway, road, or right-of-way use to access public land unless another road, highway, or right of way provides substantially the same access.<sup>3</sup>

In its <u>January 2015 report</u>, the PL/PW Council recommended increasing access to public lands by creating an Interagency Access Committee that would oversee an inventory of public roads and public lands where access is restricted or not available and offering voluntary corner crossing agreements to private landowners next to public land.

The 2015 Legislature expanded a program that provided tax credits to landowners who granted access across private land to state land. <u>Senate Bill No. 309</u> increased the credit from \$500 to \$750, allowed the credit for access to federal land, and clarified that providing a corridor at a corner crossing also qualified for the credit.

#### Wildlife management

The Department of Fish, Wildlife, and Parks manages wildlife in the state. Since most elk and deer habitat is owned by federal and private entities, this means the agency works with federal land managers to implement statutory requirements and management recommendations.

State management plans for elk and deer as well as management plans for national forests and lands managed by the Bureau of Land Management rely on studies that generally conclude elk and deer mortality increases in connection with higher road densities and less hiding cover. A team of elk researchers in Oregon summarized knowledge learned over a half century of studies on the direct impacts of roads and traffic on elk:<sup>4</sup>

- Elk die in collisions with vehicles;
- Elk avoid areas near open roads, resulting in temporary or permanent reduction in effective habitat;
- As open road density increases, elk are more vulnerable to legal and illegal harvest. Closing roads may reduce hunter density because some legal hunters are unwilling to hunt without vehicles. And poachers may be less reluctant to commit crimes without getaway access; and
- Elk exhibit higher stress levels and increased movement in response to road density and traffic, though elk may conserve energy by traveling on closed roads.

In more recent discussions, state and federal officials acknowledge that other factors influence elk distribution and mortality, including forage, distance from roads, and migration between public and private lands, some of which may not be accessible to the general hunting public.

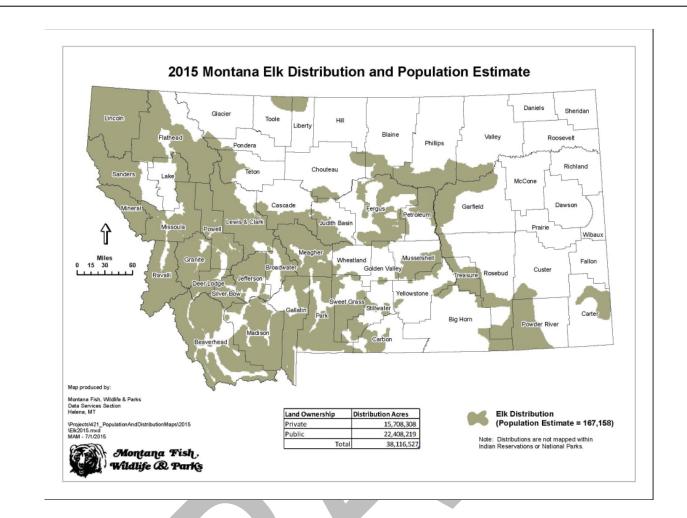
#### **ELK POPULATION AND DISTRIBUTION**

In 1978 an estimated 55,000 elk called Montana home.<sup>5</sup> Today, FWP estimates there are more than 167,000 elk in the state.

<sup>3</sup> <u>House Bill No. 352</u>, 1999

<sup>&</sup>lt;sup>4</sup> M. M. Rowland, M. J. Wisdom, B. K. Johnson, and M. A. Penninger. 2005. <u>Effects of Roads on Elk: Implications</u> <u>for Management in Forested Ecosystems</u>

<sup>&</sup>lt;sup>5</sup> Statewide Elk Management Plan



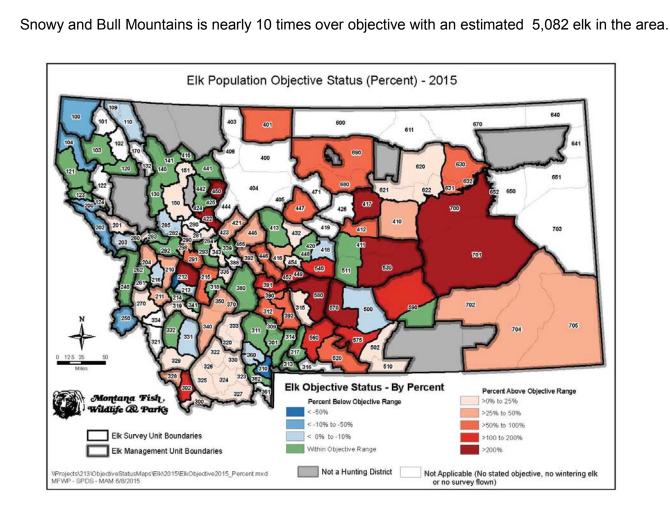
With that higher population has come a wider distribution, but also an increased movement onto private land. Elk distribution in this context means the overall range of elk. Elk may move seasonally or even more frequently within a distribution area. Elk distribution acres on private land increased 17%, or more than 2 million acres, between 2004 and 2015.<sup>6</sup>

State law directs the agency to "maintain elk population numbers at levels producing a healthy and productive condition of elk, vegetation, soil, and water and that also reduces elk conflicts on private and public lands."<sup>7</sup> As of 2015, 80 hunting districts, more than half, were over objective. Another 29% were at objective, and 17% were below objective.<sup>8</sup> The area containing Districts 411E and 530 in the Big

Statewide Elk Management Plan

<sup>8</sup> 2015 Population Status Chart

<sup>&</sup>lt;sup>6</sup> FWP <u>Distribution Maps and Population Charts</u>. Distribution areas represent land that elk may inhabit. Given that elk may roam in response to a variety of factors, it cannot be inferred that elk inhabit all lands in the distribution map equally or at all times.

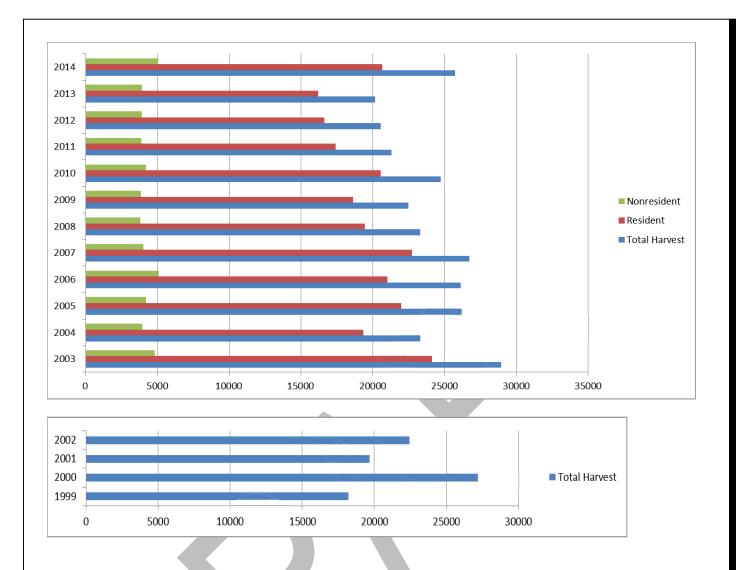


The next highest, at about five times over objective with 547 elk, is District 450 which lies between the Teton and Sun Rivers.

#### HARVEST<sup>9</sup>

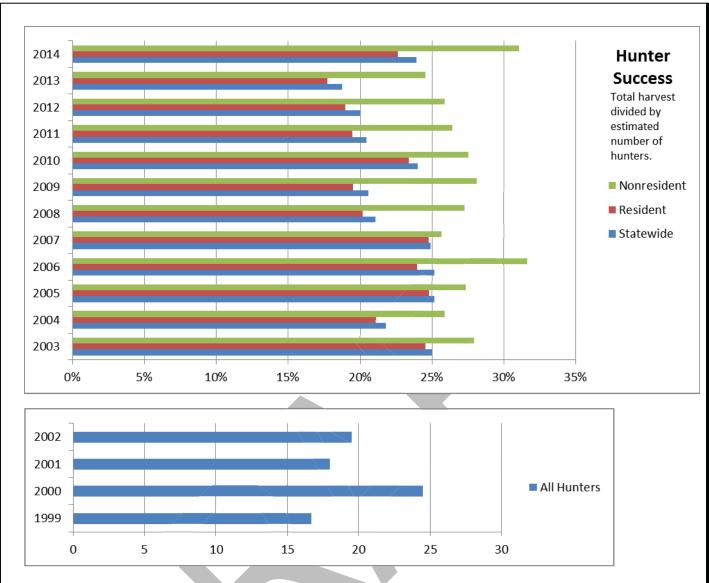
Over the last 16 years, the number of elk killed in Montana ranged from a low of 18,209 in 1999 to a high of almost 29,000 in 2003.

<sup>9</sup> These statistics are derived from Fish, Wildlife, and Parks <u>harvest reports</u>. For the years 1999-2002, numbers were not broken out between residents and nonresidents.



In terms of success rates, the low was again in 1999, when 16% of hunters filled a tag.<sup>10</sup> For the rest of the period examined, in most years at least one out of every five hunters shot an elk. Nonresident hunters, at least some of whom likely hired guides and hunted on private land, fared better than residents.

<sup>&</sup>lt;sup>10</sup> For this analysis, the success percentage is the number of elk divided by the number of hunters.

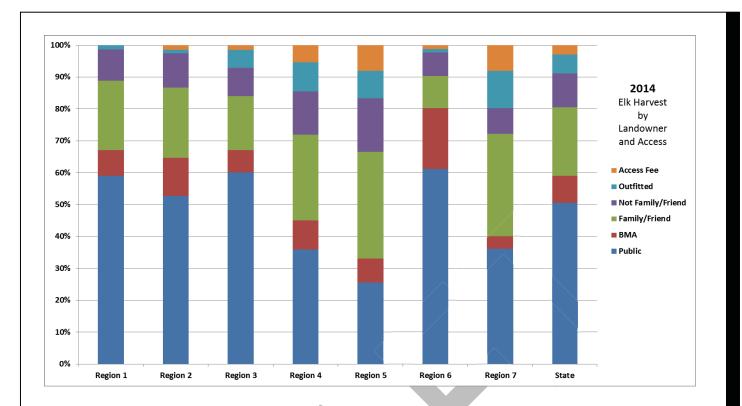


Of the more than 25,000 elk killed in 2014, about half of the died on public land. Another 19% were either killed on private land in the block management program or by hunters who did not have a relationship with the landowner. The remaining 31% were harvested on private land by outfitted hunters, family and friends of the landowner, or those who paid an access fee.

Regions 4, 5, and 7, which have less land in elk habitat than the three westernmost regions, had the lowest percentages of harvest on public land.

While most elk were killed on public or block management lands, hunters on those lands in 2014 had much lower success rates than those on private land. Fourteen percent of elk hunters on public land had success. Of those who hunted on private block management land, 8% got their elk. The success rates rose on private land and were highest on private land that was either outfitted or subject to access fees.<sup>11</sup>

<sup>&</sup>lt;sup>11</sup> FWP, <u>HD Unit Research Summary No. 38</u>, September 2014



#### **DEER POPULATION & HARVEST**

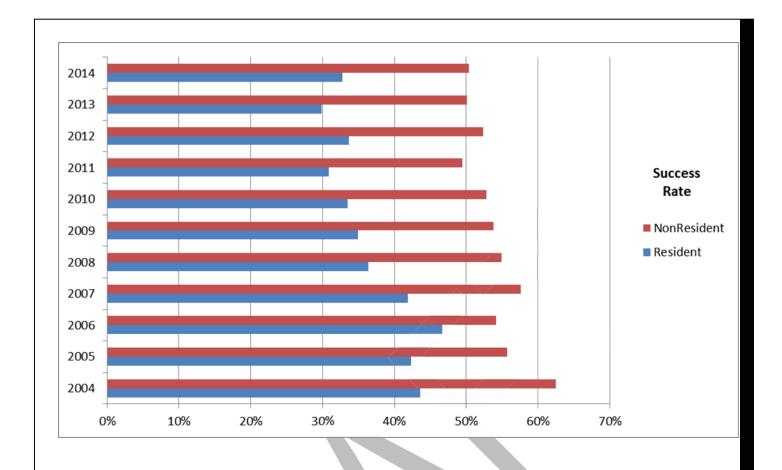
It is estimated that almost 300,000 mule deer and about 200,000 white tailed deer live in Montana. After recent rough winters and disease outbreaks, the populations are starting to rebound. The total deer harvest and success rates also declined from a high in 2006.<sup>12</sup>

	WHITE TAILED DEER		
	POPULATION		
	ESTIMATES	YEARS USED FOR 10-	2015 TOTAL
REGION 1	75,920	2005-2014	84,655
REGION 2	33,791	2005-2014	35,872
REGION 3	23,974	2003-2008 & 2011-2013	23,451
REGION 4	30,225	2003-2008 & 2011-2013	26,193
REGION 5	18,297	2005-2014	12,520
REGION 6	13,216	2005-2014	11,110
REGION 7	12,154	2005-2014	14,350
STATEWIDE TOTAL	207,577		208,151

White tailed deer estimates are not comprehensively validated with site specific research or enhanced monitoring

White tailed deer estimates are not framed with confidence intervals and are subject to adjustment.

<sup>&</sup>lt;sup>12</sup> Statewide success for deer harvest is the total harvest estimate divided by the number of licenses and permits issued.



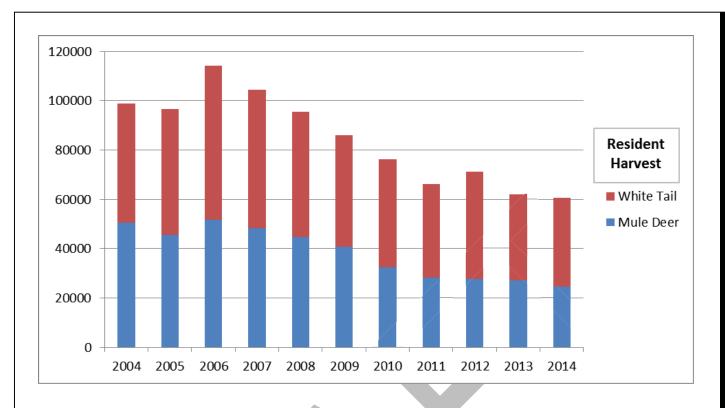
#### 2015 MULE DEER STATUS

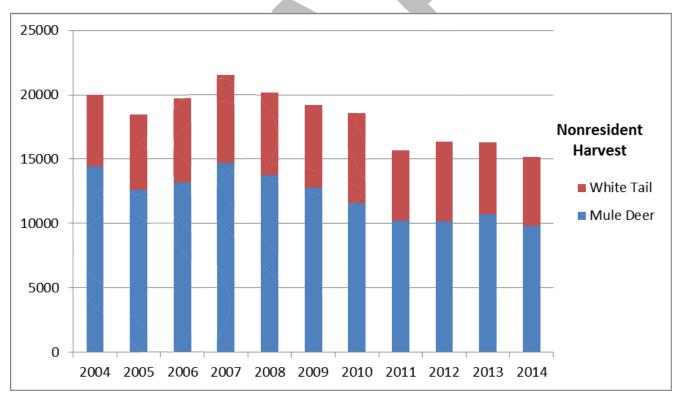
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Region	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	AVERAGE
Ŭ												
1	15,260	16,722	13,915	11,722	9,296	8,983	13,095	6,226	7,590	10,782	8,008	11,359
2	18,599	21,209	24,837	16,188	13,229	11,486	14,226	11,472	12,754	12,267	14,26	15,627
3	51,116	52,477	62,759	46,594	40,747	33,624	33,293	33,204	34,172	35,482	38,91	42,347
4	76,408	68,337	70,262	65,826	59,589	50,096	46,384	46,216	49,210	56,133	56,62	58,846
5	43,139	38,434	41,765	41,791	39,813	38,334	34,720	33,836	37,977	32,185	32,04	38,199
6	35,305	48,902	39,683	51,428	45,056	35,488	42,053	32,983	36,674	37,487	43,56	40,506
7	74,714	98,061	93,650	101,16	93,167	69,213	65,549	47,424	53,934	79,287	103,8	77,617
TOTAL	314,541	344,142	346,870	334,71	300,895	247,224	249,320	211,361	232,312	263,62	297,2	284,501
				7						3	31	

Mule deer estimates are not comprehensively validated with site specific research or enhanced monitoring efforts.

Mule deer estimates are not framed with confidence intervals and are subject to adjustment.

The method used to make mule deer population estimates was changed in 2015. The estimates above are based on the new methodology.





#### Additional information

- Background on state elk management;
- Summaries of big game management in plans for each National Forest in Montana and each BLM Field Office;
- Summaries of ongoing FWP elk research;

# EXPERT TESTIMONY, PUBLIC COMMENT, & EQC DISCUSSION

## September 9, 2015 EQC Meeting

#### FEDERAL ROAD MANAGEMENT

- George Bain, the Region 1 Director of Recreation, Lands, Minerals, Heritage and Wilderness for the U.S. Forest Service explained the evolution of road policy in the agency.
- Jamie Connell, the State Director for the Bureau of Land Management explained how the agency does travel planning
- Russ Ehnes, the Executive Director of the National Off-Highway Vehicle Conservation Council discussed the priorities of off-highway vehicle recreationists.
- Clayton Elliott the Policy Director Montana Wilderness Association discussed how the group participates in travel planning.

#### PUBLIC ACCESS TO FEDERAL LAND

- Alan Charles, the Sportsmen Landowner Relations Bureau Chie for FWP explained Block Management, Unlocking Public Lands, and Access Public Land. Charles referenced "<u>The</u> <u>Montana Access Guide to Federal and State Lands</u>."
- Chuck Denowh of the United Property Owners of Montana discussed the role of private property owners and ideas to encourage landowners to allow access to private land.
- Ray Marxer, a former board member of the Montana Stockgrowers Association discussed public access, private land, and road management.
- Nick Gevock, the conservation director for the Montana Wildlife Federation, said the
  organization supports the acquisition of land that provides public access.
- George Bain, the Region 1 Director of Recreation, Lands, Minerals, Heritage and Wilderness for the U.S. Forest Service said the agency considers access as part of any land acquisition.
- Jamie Connell, State Director for the Bureau of Land Management, said access is a major issue for BLM lands.

# January 13, 2016 EQC Meeting

- Quenten Kujala, FWP Wildlife Bureau Coordinator said the agency aims to evaluate the amount of road access consistent with management prescriptions so that displacement of elk does not reduce harvest.
- Eric Johnston, Region 1 USFS, Deputy Director for Renewable Resources discussed the distinction between access to National Forest System lands and open roads that provide opportunities for motorized travel. He explained the coordination between the Forest Service and the state regarding elk management.
- Rick Hotaling, BLM Western District Manager explained BLM policy on access and roads.

- Mark Lambrecht, Director of Government Affairs, Rocky Mountain Elk Foundation discussed issues affecting hunting opportunities in Montana.
- Marshall Johnson, Eastern Montana Regional Director, Mule Deer Foundation explained the organizations views on public and private land and block management.

# TOUR

The EQC toured BLM and Forest Service lands near Helena with federal officials.

At the BLM Ward Ranch trailhead, officials discussed travel planning that closed the area between the trailhead and Canyon Ferry Reservoir to motorized use.

Ward Ranch





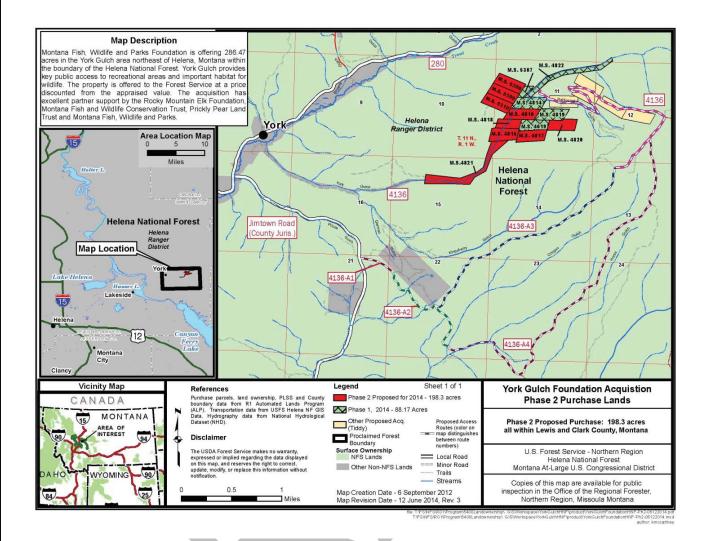
## **York Gulch**

The EQC also toured a 200 acre Forest Service land acquisition in the York Gulch that provided permanent access to public land.









# **MAP OVERVIEW**

The EQC gathered a large amount of data during the HJ13 study that is best displayed with an online map.

#### **Getting Started**

Click on the link: http://arcg.is/10iyF1G

The map comes up showing Elk Hunter Success by hunting district (the antlered icon) and the percentage of inaccessible public land by hunting district (the darker the color the higher the percentage).

#### **Explore**

Click on the Content tab.

The Content tab shows all the layers available for viewing. By checking and unchecking the boxes in Content, layers turn on and off in the map. (If you have too many turned on at once, it will be hard to read the map.

- Elk Success is the number of elk harvested by district from 2004-2012, and 2014 divided by the number of hunters. (An estimate for the number of hunters by district is not available for 2013).
- Elk Distribution shows the general area elk inhabit in Montana. Keep in mind that elk may move in response to seasons or for other reasons, so elk are not distributed evenly across the distribution area at any one time.
- Elk Objective shows the population of each district in relation to the desired objective population.
- Elk Harvest per HD square mile is the density of the historic elk harvest in relation to the area of the district.
- White Tail Success 2013 is the number of deer harvested in 2013 divided by the estimated hunters in each district. (District estimates are not done annually).
- Mule Deer Success 2013 is the number of deer harvested in 2013 divided by the estimated hunters in each district. (District estimates are not done annually).
- Percent Inaccessible Public Lands by HD is the percent of public lands in the district that do not have legal access by road or water. (The lands may be accessed by permission of an adjoining landowner, but that information is not available).
- Percent Public Land Ownership by Hunting District shows how much of the district is publically owned.
- No Access Public Lands. These parcels with no legal road or water access show up as the map is zoomed into a specific area.
- Miles of open FS Roads by HD shows the total mileage in each district of roads open to motorized travel in the national forests.
- Miles of closed FS roads by HD shows the total mileage in each district of roads closed except for administrative use (Level 1).
- National Forest System Roads closed to motorized uses will appear as the map is zoomed into a specific area. Roads will appear in red.
- BLM Roads shows roads that are open, closed, temporarly closed, and without designation.
- FWP administrative regions shows the districts contained in each region.
- National Forest System Roads will appear as the map is zoomed in.
- Montana Cadastral Parcels will appear as the map is zoomed in. Clicking on the parcel will show the ownership.
- Vegetation Analysis shows how vegetation changed between 1990-2010.

## Tips

- The map can be zoomed in and out with the cursor.
- Clicking on the words in a layer (not the box) will bring up the legend for that layer.
- Only turn on one of the Success layers at time and view it in conjunction with the information sought. For example, Elk Success and Objective. Or turn off Objective and turn on Percent Inaccessible Lands to see how those relate.
- Clicking anywhere on the map will open a pop up box that shows information about the layers that are checked. In the upper left, it will show how many layers are open click the right arrow to move through the boxes.

# RESULTS OF FWP SURVEY Expected in May 2015

PUBLIC COMMENT

To Be Solicited

# FINDINGS AND RECOMMENDATIONS

To Be Determined by the EQC

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