

WY050
4160
GR No. 3729

April 30, 2009

CERTIFIED MAIL NO. _____
RETURN RECEIPT REQUESTED

Ranch Name
c/o Name
Address
City, WY Zip

Dear Mr./Mrs: _____

NOTICE OF FIELD MANAGERS PROPOSED DECISION

INTRODUCTION

Bureau of Land Management (BLM) Grazing Permit No. 493729, which authorizes grazing on the Diamond Springs (11509), North Dobie Flat (11511), South Dobie Flat (01512), and Black Jack Ranch (11513) Allotments within the Lander Field Office, expires on February 28, 2013. The current grazing permit has been re-issued under the Department of the Interior and Related Agencies Appropriation Act, 2003(P.L. 108-108). The BLM has authority to renew this grazing permit and to consider the grazing permittee's request for re-issuance consistent with the provisions of the Taylor Grazing Act, Federal Land Policy and Management Act, the Lander Resource Management Plan (RMP) and the grazing regulations in 43 CFR Subpart 4100. Re-issuance of grazing permit No. 493729 for a period of 10 years is subject to the provisions of the National Environmental Policy Act (NEPA).

An Environmental Assessment (EA) (WY-050-EA09-035) for the re-issuance of this grazing permit was completed on April 30, 2009. This analysis identified the appropriate terms and conditions to be included in the grazing permit and is on file at the Lander Field Office (LFO) and is available on-line at http://www.blm.gov/wy/st/en/info/NEPA/lfodocs/split_rock.html.

BACKGROUND

The Split Rock Ranch operation is composed of 10 grazing allotments. An environmental analysis was completed on the four largest of these grazing allotments: Diamond Springs (11509), North Dobie Flat (11511), South Dobie Flat (01512), and Blackjack Ranch (11513). Included in the Diamond Springs Allotment are the two fenced pastures known as the Alice and Frenchie Shipping Pastures. Bureau of Land Management-administered public lands comprise 88 percent of these four Split Rock Ranch Allotments, which equates to 90,113 acres out of a total of 102,799 acres. Private land accounts for 6,579 acres (6 percent) and Wyoming State leased land is 6,107 acres (6 percent). The Split Rock Ranch (SRR) operation is located along the Fremont County and Natrona County boundary, north of the Sweetwater River. The BLM-administered public lands within the allotments are primarily used for livestock grazing, wildlife habitat, and recreation. There has been some mineral exploration, but no mineral development in these allotments. Several utility rights-of-way also traverse these allotments.

Split Rock Holdings, LLC owns and operates the SRR, which includes these four grazing allotments administered by the BLM. Outside of these allotments, hay is produced on private ranch land along the Sweetwater River and livestock are wintered primarily on private land along the river. The current permitted season of use runs from May 5 to December 6, for a total of 216 days.

In each of these four allotments a portion of the upland acres assessed met the Rangeland Health Standard (RHS) and others did not. None of the riparian or wetland acres assessed on Bureau-administered public lands met the Rangeland Health Standards in these allotments. The assessments for these four grazing allotments are available for review at the Lander Field Office located at 1335 Main Street, in Lander, Wyoming. When RHS are not met, and livestock grazing is a causal factor, corrective action is required by federal regulation (43 Code of Federal regulations 4180.2).

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Based on the analysis of potential environmental impacts contained in the EA WY-050-EA09-035, I have determined that impacts are not expected to be significant and an environmental impact statement is not required.

PROPOSED DECISION

My proposed decision is to implement a combination of Alternatives One and Two described in EA No. WY-050-EA09-035. Specifically, my proposed decision includes the establishment of a grazing season of May 21 to December 10 for a total of 204 days with a herd size of 1,100 head of cattle and 6,473 public land AUM’s will be authorized. My proposed decision also includes the implementation of a six pasture modified-deferred rotation grazing system as described in Table 1 below:

Table 1. Dates of Use and Number of Days to be Grazed per Pasture

Year	North Blackjack Ranch (42 DAYS)	South Blackjack Ranch (25 DAYS)	North Diamond Springs (44 DAYS)	South Diamond Springs (36 DAYS)	North Dobie Flat (28 DAYS)	South Dobie Flat (20 DAYS) 05/21-05/30	Shipping Pastures (9 DAYS) 05/31-06/04
2010	06/30-08/10	06/05-06/29	08/11-09/23	09/24-10/29	11/03-11/30	12/01-12/10	10/30-11/02
2011	06/05-07/16	10/05-10/29	08/22-10/04	07/17-08/21	11/13-12/10	11/03-11/12	10/30-11/02
2012	07/19-08/29	08/30-09/23	06/05-07/18	09/24-10/29	11/03-11/30	12/01-12/10	10/30-11/02
2013	07/11-08/21	10/05-10/29	08/22-10/04	06/05-07/10	11/13-12/10	11/03-11/12	10/30-11/02
2014	06/30-08/10	06/05-06/29	08/11-09/23	09/24-10/29	11/03-11/30	12/01-12/10	10/30-11/02
2015	06/05-07/16	10/05-10/29	08/22-10/04	07/17-08/21	11/13-12/10	11/03-11/12	10/30-11/02
2016	07/19-08/29	08/30-09/23	06/05-07/18	09/24-10/29	11/03-11/30	12/01-12/10	10/30-11/02
2017	07/11-08/21	10/05-10/29	08/22-10/04	06/05-07/10	11/13-12/10	11/03-11/12	10/30-11/02
2018	06/30-08/10	06/05-06/29	08/11-09/23	09/24-10/29	11/03-11/30	12/01-12/10	10/30-11/02
2019	06/05-07/16	10/05-10/29	08/22-10/04	07/17-08/21	11/13-12/10	11/03-11/12	10/30-11/02

Other management actions under the proposed decision: The following management actions are also part of my proposed decision and will be implemented as described in the EA WY-050-EA09-035:

East Sage Hen Creek Riparian Exclosure Project

To restore the cold water fishery of East Sage Hen Creek, a riparian protection fence will be constructed and livestock grazing will be excluded on approximately 455 acres. This exclosure will encourage the growth of woody species, such as willows and allow for seedlings and younger plants to become established. The objective of establishing the woody species is to provide habitat for the reintroduction of beaver to this stream. Range materials necessary to construct the riparian exclosure will be provided by the BLM and maintenance responsibility will be assigned to the grazing permittee.

Pasture Rotation/Utilization Indicators

A minimum height of riparian vegetation left after grazing, or utilization level, will be used as a guideline for determining when the movement of livestock is necessary. There are minimum vegetation height requirements for the uplands that are intended to ensure sufficient herbaceous upland vegetation for suitable sage-grouse habitat is left after the grazing period is over. Table 2 describes the site, species and rotation indicator to be used.

Table 2. Proposed Forage Utilization Levels/Rotation Indicators

Pasture	Site	Species	Rotation Indicator**
South Blackjack Ranch	Upland	STCO/AGSP	4-6" residual herbaceous cover on key areas number 1 and 6
	Riparian	CANE/DECA	6" greenline stubble height in fall
		JUBA	4" first terrace stubble height in fall
		Willow	30% of current year's leader growth
North Blackjack Ranch	Upland	STCO/AGSP	4-6" residual herbaceous cover on key areas number 2, 3, and 7
		CANE/DECA	6" greenline stubble height in fall
		JUBA	4" first terrace stubble height in fall
		Willow	30% of current year's leader growth
North Diamond Springs	Upland	STCO/AGSP	4-6" residual herbaceous cover on key area number 6
	Riparian	CANE/DECA	6" greenline stubble height in fall
		JUBA	3-4" stubble height in fall
South Diamond Springs	Upland	STCO/AGSP	4-6" residual herbaceous cover on key areas number 7 and 10
	Riparian	CANE/DECA/JUBA	3-4" stubble height in fall
North Dobie Flat	Upland	STCO/ORHY	4-6" residual herbaceous cover on key areas number 1 and 2
	Riparian	CANE/DECA/JUBA	3-4" stubble height in fall
South Dobie Flat	Upland	STCO/ORHY	4-6" residual herbaceous cover on key areas number 1 and 2

** Stubble height monitoring would be conducted during the grazing season and again after livestock are removed from their respective allotments. During the time livestock are in the first two pastures of the rotation schedule, stubble height monitoring would not be used as a move indicator. If livestock are in either of the last two pastures of the rotation sequence, and stubble height monitoring indicates the

utilization standard has been reached, livestock would be moved to the last pasture of the rotation schedule or off the allotment if in the last pasture.

Diamond Springs and Blackjack Ranch Division Fences

Beginning in the late 1990's temporary electric fences were employed to facilitate livestock handling, substitute for herding to keep livestock from over using riparian areas, and to achieve better utilization on some of the uplands. In practice however, the fences proved impractical to operate and maintain. In 2006 and 2007 the Diamond Springs and Blackjack Ranch Allotments were divided with permanent barbed wire fences to break these large allotments into more manageable pastures to facilitate timely pasture and allotment moves within the grazing rotation strategy. These fences would also reduce the time spent on the riparian areas of these allotments. These two large allotments can now be used as four pastures in a grazing rotation that includes the North and South Dobie Flat Allotments.

Beaver Rim Road Realignment

Road maintenance problems have occurred within the BLM's Beaver Rim Road (#2401) through the Diamond Springs Allotment. The problems were typically related to wet road conditions and channel erosion from spring runoff in the vicinity of the several springs that the road crosses. At several of the springs, the roadbed forms a small dike impounding water behind it which is not conducive to maintaining a dry, stable roadbed. The soils at the springs are high in silt, clay and soluble salts making them easily erodible and subject to rutting from vehicle traffic when moist. Also, in several locations, the public road traverses private land parcels of SRR with no easement or access agreement for the public. To remedy these maintenance problems and to secure legal access to the road by the public, it is necessary for the road to be relocated around these private parcels on drier ground.

Cold Spring Exclosure

In previous field meetings with the SRR, there was general agreement on the need to protect the wetland/riparian resources at Cold Spring which is located on private land. BLM will seek to work cooperatively with the SRR to develop protection measures for this sensitive riparian area.

Salt, Mineral Placement, and Supplemental Feeding

Salt and mineral supplements shall be located at least 0.5 mile from water sources to promote better livestock distribution and discourage livestock from concentrating near water sources. Supplements or salt shall not be placed within 0.6 mile of all known sage-grouse strutting grounds unless the location is agreed to by the BLM. On rare occasions when emergency supplemental feeding is authorized, only certified weed-free forage shall be used on BLM-administered lands.

Drought Planning

Wyoming BLM has implemented a drought policy that addresses drought conditions on a case-by-case basis (Instruction Memorandum No. WY-2004-020: Drought Management). BLM would meet with the grazing permittee prior to livestock turn-out to consider proposed grazing plans and contingencies and would review range conditions with the permittee on the ground, as necessary. During emergency conditions related to drought, insect infestations, or wildfire, the BLM would close pastures or the allotment to livestock grazing.

BLM's Instruction Memorandum No. WY-2004-020 goes on to state:

“As we manage through [a] drought, the main focus of our actions should be to maintain the long-term health and productivity of Wyoming's public rangelands. We also need to keep in mind that every action taken may place a hardship on those who use, or rely on, the public lands for their livelihood. It is critically important that we communicate early and often with the permittees during these challenging times.

The importance of maintaining rangeland health cannot be over emphasized as consideration is given to returning uses to rangelands following the end of a drought.”

Predator Control

Predator control by the grazing permittee would be limited as follows: The permittee/lessee and/or his/her employees would not use or place poison or M-44 devices for prairie dog or predator control on BLM-administered public lands. Predation control actions would be carried out by the Animal and Plant Health and Inspection Service (APHIS), Wildlife Services (WS), or the Wyoming Game and Fish Department, or whoever has the responsibility for the offending species.

Sage-grouse Guidelines

Based on the most recent research concerning the seasonal habitat needs of the greater sage-grouse and its response to disturbance, the following vegetation management objectives and restrictions would be applied to livestock management within the SRR:

- No surface occupancy or surface disturbance within 0.6 mile radius of the identified perimeter of a lek.
- No placement of salt or mineral supplements within 0.6 mile radius of the identified perimeter of a lek unless location is agreed to by the BLM.
- No disruptive activity within 0.6 mile radius of the identified perimeter of a lek between one hour before sunset to one hour after sunrise from March 1 to May 15 (this restriction does not include casual use as described by the Code of Federal Regulations).
- No surface disturbing or disruptive activities within a three-mile radius of the perimeter of an identified lek or in identified sage-grouse nesting/early brood-rearing habitat outside the 3 mile radius from March 15 to July 15 (this restriction does not include casual use as described by the Code of Federal Regulations).
- Range improvement projects should not be located in areas that are detrimental to nesting/early brood rearing habitat. If this is not possible, these projects should be located in areas that are deemed to be the least detrimental to these habitats.
- Range improvement projects located inside suitable sage-grouse nesting/early brood-rearing habitat must be mitigated to prevent excessive predation on breeding or nesting/brood rearing sage-grouse from perching raptors.
- No vegetation manipulation within 0.6 miles radius of the identified perimeter of a lek or in identified winter concentration areas, unless the action would benefit greater sage-grouse habitat.

- No surface disturbing and/or disruptive activities in identified winter concentration areas from November 15 to March 14 (this restriction does not include casual use as described by the Code of Federal Regulations).

Monitoring

Rangeland health monitoring would be conducted in accordance with BLM standard operating procedures and policy. Existing range condition and trend studies shall continue to be monitored in accordance with existing direction provided in the Lander Field Office Resource Management Plan (1987). A cooperative monitoring effort with the active participation of the grazing permittee and affected interests would be encouraged. The grazing permittee would be required to continue submitting the actual use reports as a grazing permit condition. To accomplish the necessary monitoring, the following items apply:

1. The BLM Manual, Wyoming State Office Supplement Handbook H-4423-1, Section 4423.56 would be used as a general guide in developing range condition trend-monitoring procedures. Plant frequency, density, production and utilization, and ground cover would be sampled to evaluate vegetation and soil erosion trends. Other parameters, such as canopy cover, seedling or shrub characteristics would be considered as needed on unique areas such as riparian zones, aspen stands, and bitterbrush or other mountain shrub thickets.
2. During and after the grazing of each pasture, forage utilization would be measured using the height-weight method or the key forage plant method described in BLM Manual, Wyoming State Office Supplement Handbook H-4423-1, Section 4423.47. This would aid in determining whether existing stocking levels are providing proper use and what adjustments in the present management, if any, would be needed. These studies would also help determine a schedule for seasonal use within a grazing system.
3. Selected key areas (meadows and riparian areas) would be monitored to determine impacts from grazing as described in the BLM Manual, Wyoming State Office Supplement Handbook H-4423-1, Section 4423.56C; Marlow and Clary (1996); and BLM Technical Reference TR 1737-3, Inventory and Monitoring of Riparian Areas.
4. Existing rain gauges within or adjacent to the SRR allotments would continue to be used to measure precipitation to help interpret vegetative production variations resulting from climatic changes. Currently, there are three rain gauges that the BLM is actively monitoring that are within or adjacent to the analysis area.
5. Soil quality monitoring would utilize data that is being collected as part of other monitoring efforts in this allotment. Soil cover will be of primary concern to discern how well the monitored sites would be protected from erosion under the chosen management scenario. This data can then be used to compare existing cover to that expected to be present on a particular ecological site.
6. Actual use information would be required to evaluate the future use levels of the allotments. Direct and indirect methods (according to the guidelines in BLM Manual 4400.23A, Wyoming State Office Supplement Handbook H-4423-1, Section 4423.3) would be used to collect this information.
7. The approval and use of rangeland monitoring data collected by non-BLM entities will comply with existing Wyoming State Office policy. The BLM may approve and utilize monitoring data collected on public land by parties other than BLM; however, the acceptance of this data by the BLM is not automatic. The BLM will have the final decision authority concerning the planning, collection, and interpretation of monitoring data that is used to make resource management decisions. The BLM will take advantage of

these offers of monitoring data from non-BLM entities to the extent feasible, and will honor the concept of public involvement and stewardship in the management of the public rangelands.

Additional Term and Conditions

- A) Grazing use will not be authorized in excess of the amount of specified grazing use (AUM number) for each allotment. Numbers of livestock annually authorized in the allotment(s) may be more or less than the number listed on the permit/lease within the grazing use periods as long as the amount of specified grazing use is not exceeded.
- B) Hazardous Materials: No hazardous materials/hazardous or solid waste/trash shall be disposed of on public lands. If a release does occur, it shall immediately be reported to this office at (307)332-8400.
- C) Administrative Access: The permittee/lessee shall provide reasonable administrative access across private and leased lands to the BLM and its agents for the orderly management and protection of public lands.
- D) Application of a chemical or release of pathogens or insects on public lands must be approved by the authorized officer.
- E) Human Remains/Cultural Resources: Pursuant to 43 CFR 10.4(g), the holder of this authorization must notify the authorized officer, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

All proposed actions with the allotment on public lands will have a cultural/paleontological resource evaluation completed by the field office archeologist and/or regional paleontologist. Standard cultural inventory and evaluation procedures will be followed. Appropriate inventories and mitigation measure must be completed prior to project implementation.

RATIONALE

In 2005, a comprehensive rangeland health assessment and evaluation report was completed to determine whether public lands within the Diamond Springs (#11509), North Dobie Flat (11511), South Dobie Flat (01512), and Black Jack Ranch (11513) Allotments were meeting the standards for rangeland health. The evaluation concluded that rangeland health standards were not being met. In particular, riparian health and upland soils was determined to be the biggest rangeland health issues on the allotments. The action items identified in this proposed decision will make significant progress towards meeting rangeland health objectives.

In April, 2009 the Bureau of Land Management prepared an environmental assessment (WY-050-EA09-035) that described and analyzed three management alternatives for cattle grazing within these four allotments. This analysis has been developed following consultation and coordination with the grazing permittee, state and local agency personnel, other affected parties, and interested members of the public.

The proposed decision is a combination of Alternatives One and Two which provides the Bureau of Land Management with the best opportunity to improve rangeland health and meet the bureau's multiple use mission.

The proposed decision is consistent with present and projected future uses in the subject area and is environmentally acceptable as it does not result in undue or unnecessary environmental degradation. The proposed decision is also consistent with the Lander Resource Management Plan which was approved on June 9, 1987, and will fulfill a need (livestock forage use) that has been expressed by the public.

AUTHORITY

The Bureau of Land Management has authority to renew these grazing permits consistent with the provisions of the Taylor Grazing Act, Public Rangelands Improvement Act, Federal Land Policy and Management Act, and the Lander Resource Management Plan, approved on June 9, 1987. Further, an approved grazing permit is required to authorize grazing use on public lands and this authority is contained in the following sections of the 43 Code of Federal Regulations (CFR):

43 CFR 4130.2(a) which states.

(a) Grazing permits or leases shall be issued to qualified applicants to authorize use on the public lands and other lands under the administration of the Bureau of Land Management that are designated as available for livestock grazing through land use plans. Permits or leases shall specify the types and levels of use authorized, including livestock grazing and suspended use. These grazing permits or lease shall also specify terms and conditions pursuant to § 4130.3, 4130.3-1, and 4130.3-2.

43 CFR 4110.3-2(b) which states.

(b) When monitoring or field observations show grazing use or patterns of use are not consistent with the provisions of subpart 4180, or grazing use is otherwise causing an unacceptable level or pattern of utilization, or when use exceeds the livestock carrying capacity as determined through monitoring, the authorized officer shall reduce permitted grazing use or otherwise modify management practices.

43 CFR 4110.3-3(a) which states.

(a) After consultation, cooperation, and coordination with the affected permittee, the State having lands or managing resources within the area, and the interested public, reductions of permitted use shall be implemented through a documented agreement or by decision of the authorized officer. Decisions implementing 4110.3-2 shall be issued as proposed decisions pursuant to 4160.1.

43 CFR 4120.2(a)(1)(2)(3)(4) which states.

(1) include terms and conditions under 4130.3, 4130.3-1, 4130.3-2, 4130.3-3, and subpart 4180 of this part;

(2) Prescribe the livestock grazing practices necessary to meet specific resource objectives;

(3) Specify the limits of flexibility...

(4) Provide for monitoring to evaluate the effectiveness of management.

43 CFR 4130.3-1(a) which states.

(a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, and the amount of use for every grazing permit.

43 CFR 4130.3-2 (c)(f) which states.

The authorized officer may specify in grazing permits other terms and conditions which will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands. These may include but are not limited to:

(c) Authorization to use, and directions for placement of supplemental feed, including salt, for improved livestock and rangeland management on the public lands.

(f) Provisions for livestock grazing temporarily to be modified to allow for the restoration of vigor of plants, provide for the improvement of riparian areas.

43 CFR 4130.2(d)(4) which states.

(d) The terms of grazing permits or leases authorizing livestock grazing on the public lands and other lands under the administration of the Bureau of Land Management shall be 10 years unless--

(4) The authorized officer determines that a permit or lease for less than 10 years is in the best interest of sound land management.

43 CFR 4130.6-1(a) which states.

(a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands in the same allotment when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations.

43 CFR 4180.1 (b)(d) which states.

The authorized officer shall take appropriate action under subpart 4110, 4120, 4130, and 4160 of this part as soon as practicable but no later than the start of the next grazing year upon determining that existing grazing management needs to be modified to ensure that the following conditions exist.

(b) Ecological processes, including the hydrologic cycle, nutrient cycle, and energy flow, are maintained,

(d) Habitats are, or are making significant progress toward being, restored, or maintained for

Federal threatened and endangered species.

43 CFR § 4130.7(c) (e) which states:

(c) The authorized officer may require counting and/or additional special marking or tagging of the authorized livestock in order to promote the orderly administration of the public lands.

(e) The brand and other identifying marks on livestock controlled, but not owned, by the permittee or lessee shall be filed with the authorized officer.

RIGHT OF PROTEST AND/OR APPEAL

Any applicant, permittee, lessee or other interested public may protest a proposed decision under Sec. 43 CFR 4160.1 and 4160.2, in person or in writing to Lander Field Manager, Bureau of Land Management,

1335 Main or P.O. Box 589, Lander, Wyoming 82520, within 15 days after receipt of such decision. The protest, if filed, should clearly and concisely state the reason(s) why the proposed decision is in error.

In accordance with 43 CFR 4160.3 (a), in the absence of a protest, the proposed decision will become the final decision of the authorized officer without further notice unless otherwise provided in the proposed decision.

In accordance with 43 CFR 4160.3 (b) upon a timely filing of a protest, after a review of protests received and other information pertinent to the case, the authorized officer shall issue a final decision.

Any applicant, permittee, lessee or other person whose interest is adversely affected by the final decision may file an appeal in accordance with 43 CFR 4.470 and 43 CFR 4160.3 and 4160 .4. The appeal must be filed within 30 days following receipt of the final decision, or within 30 days after the date the proposed decision becomes final. The appeal may be accompanied by a petition for a stay of the decision in accordance with 43 CFR 4.471 and 4.479, pending final determination on appeal. The appeal and petition for a stay must be filed in the office of the authorized officer, as noted above. The appellant must serve a copy of the appeal by certified mail on the Office of the Field Solicitor, Rocky Mountain Region, 755 Parfet Street Suite 151, Lakewood, Colorado, 80215 and person(s) named (43 CFR 4.421(h)) in the Copies sent to: section of this decision.

The appeal shall clearly and concisely state the reasons why the appellant thinks the final decision is in error, and otherwise complies with the provisions of 43 CFR 4.470.

Should you wish to file a petition for a stay, see 43 CFR 4.471 (a) and (b). In accordance with 43 CFR 4.471(c), a petition for a stay must show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied.
- (2) The likelihood of the appellant's success on the merits.
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

As noted above, the petition for stay must be filed in the office of the authorized officer and served in accordance with 43 CFR 4.473.

Any person named in the decision that receives a copy of a petition for a stay and/or an appeal see 43 CFR 4.472(b) for procedures to follow if you wish to respond.

If you have any questions, feel free to contact either John Likins at 307-332-8411, or myself at 307-332-8435.

Sincerely,

James A. Cagney
Field Manager

Copies sent to: Interested public (see attached mailing list)