



6-18-92

STATE OF NEVADA
DEPARTMENT OF WILDLIFE
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BOB MILLER
Governor

WILLIAM A. MOLINI
Director

June 18, 1992

Mr. Scott Billings, Manager
Paradise-Denio Resource Area
Bureau of Land Management
705 East Fourth St.
Winnemucca, NV 89445

RE: Formal Appeal of Paiute Meadows Grazing Permit

Dear Mr. Billings:

The Nevada Department of Wildlife hereby formally appeals the issuance of the 1992 Grazing Permit for the Paiute Meadows Allotment, which authorizes 4350 AUMs of livestock use with the Paradise-Denio Resource Area from May 1, 1992 through November 5, 1992. Recognizing that the November 22, 1991 Land Use Plan Decision has been vacated, we must necessarily view the Annual Grazing Permit License as the Bureau's final decision in this matter. A copy of the grazing permit was received by our office through the Freedom of Information Act on May 20, 1992, thereby making this appeal timely and within the required 30 day limitation.

Our agency has a long standing interest and investment in the Land Use Planning Process of the Paradise-Denio Resource Area, and particularly the Paiute Meadows Allotment. As an indication of our involvement, the Department provided a comprehensive response to the Draft Paiute Meadows Allotment Evaluation (issued on July 3, 1991) with specific reference to appropriate livestock stocking rates, and seasons of use which may affect important fish and wildlife values also found in this area (response dated August 7, 1991).

On November 22, 1991 the Bureau issued a Full Force and Effect Multiple Use Decision for the Paiute Meadows Allotment, a decision which was formally appealed by the Department of Wildlife on December 18, 1991. This appeal focused on errors in the decision which were used to determine livestock carrying capacities, the implementation

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of a Livestock Use Agreement, and noncompliance with Bureau of Land Management Policies and the National Environmental Policy Act.

Because of the concern expressed by the Bureau and others relative to excessive numbers of wild horses within the allotment, and subsequent need from a budget and administrative standpoint to immediately address this problem, the Bureau facilitated coordination meetings on January 7, and again on January 14, 1992 with Department representatives and other interest groups. All parties present agreed to withdraw their appeals in an effort to allow for the removal of excess wild horses with the understanding that the livestock grazing portion of the decision and our attendant appeals would remain in place, or that a new grazing decision would be issued prior to the 1992 grazing season. Based on this understanding, the Department submitted a letter dated January 27, 1992 to Mr. Burton Stanley, which was used as support before the IBLA (No. 92-188) to insure the immediate removal of excess wild horses from this allotment.

Much to our surprise, the Multiple Use Decision was vacated by the Bureau in May of 1992, an action which renders our appeal invalid; and most disturbing, an annual license for grazing 4350 AUMs of livestock was issued to the Paiute Meadows Ranch. Although the permit references the establishment of 4350 AUMs "as per consultation with the State Director in January 1992", a letter from the State Director to Johanna Wald of NRDC dated May 27, 1992, states that the amount of use was actually established in April of 1990.

In view of the above, and pursuant to 43 CFR Section 4.470(a), and through the incorporation of comments provided in our original appeal dated December 18, 1992, the following represents the required statement as to why this decision is in error:

1. Livestock carrying capacities are invalid.

Livestock carrying capacities must be computed for the North and South pastures. Grazing authorizations must not exceed these livestock carrying capacities computed with monitoring data presented in the Paiute Meadows Final Allotment Evaluation Summary, November 22, 1991.

Streambank riparian vegetation for Paiute, Battle and Bartlett Creeks must be considered key management areas. The allotment evaluation short term objective limits utilization to 30% on key streambank riparian plant species. Furthermore, the evaluation lists seven riparian species to be monitored by the Bureau of Land Management. Livestock stocking rates and/or season of use that exceeds 30% utilization of these riparian plant species will exceed the livestock carrying capacity for the Paiute Meadows Allotment.

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Average/Weighted Utilization estimates cannot be used in livestock carrying capacity calculations. "Range Monitoring Technical Reference 4400-7" instructs the Bureau to use average/weighted estimates only where livestock distribution and utilization is uniform. Monitoring data clearly shows utilization is not uniform on the Paiute Meadows Allotment. Management actions are to be based upon key management areas. "The Nevada Rangeland Monitoring Handbook" sets criteria for determining key areas and requires these areas be treated with special consideration, even if they do not reflect the entire grazing unit.

Wild horses did not have a significant influence on the utilization of streambank riparian vegetation in the North Pasture. Carrying capacity calculations should not utilize wild horse numbers or estimated animal unit months. Use pattern mapping data collected for grazing seasons 1989 and 1990 distinguish livestock and wild horse use of streambank riparian in the North Pasture. Appendix 1 of the allotment evaluation shows that 244 wild horses were present yearlong on the North Pasture during 1989 and 1990. Monitoring studies measured streambank riparian utilization as slight to light (20%) in 1989 and as severe (95%) in 1990. Regardless of actual wild horse numbers, the only significant differences that occurred between these years were the livestock seasons of use in the North Pasture. During 1989, 701 cows occupied the North Pasture from October 26 to February 28 (Fall/Winter). During 1990, 700 cows occupied the North Pasture from May 3 to October 31 (Spring/Summer). Since 1990 the Bureau of Land Management removed 489 wild horses from the allotment (February 1992) which further reduced the possible influence of wild horses on streambank riparian vegetation in the North Pasture.

The stocking rate for Spring/Summer use of the North Pasture for 1992 exceeds the livestock carrying capacity. Livestock carrying capacity for the North Pasture, in accordance to Bureau of Land Management TR 4400-7 and 1990 use pattern mapping data, is as follows:

$$\begin{array}{rcl} \frac{\text{Actual Use}}{\text{Actual Utilization}} & = & \frac{\text{Potential Actual Use}}{\text{Desired Utilization}} \\ \\ \frac{4,017 \text{ AUMs}}{95 \text{ Percent}} & = & \frac{1992 \text{ Carrying Capacity}}{30 \text{ Percent}} \end{array}$$

The livestock carrying capacity for the North Pasture is 1,268 AUMs for the Spring/Summer season of use. The 1992 Grazing Permit authorizes 2,175 AUMs of livestock use. Bureau of Land Management monitoring data confirms that this authorization will cause damage to streambank riparian vegetation and habitat.

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Livestock carrying capacity calculations for the South Pasture cannot be computed without use pattern mapping data for livestock use. The Paiute Meadows Allotment Evaluation used wild horse use pattern mapping data from 1987 to 1990 to estimate a carrying capacity to be divided between wild horses and livestock. These data clearly indicated that wild horses utilized wetland riparian habitats from heavy to severe (60% to 100%). In several areas heavy and severe utilization were observed on upland sites and a seeding. Data clearly justified a significant removal of wild horses to protect and restore range conditions.

The District's computation of carrying capacity was based on wild horse data, uniform utilization, weight/averages and the assumption that livestock and wild horses exhibit similar foraging habits. These data are erroneous. Furthermore, this carrying capacity (4,950 AUMs) was allocated to livestock (4,350 AUMs) by the 1992 Grazing Permit. The Grazing Permit replaced wild horses with livestock on the South Pasture. Livestock are known to use mountain browse species important to big game during summer/fall months. The South Pasture is a critical big game winter range and livestock will compete with big game on these depleted ranges. Failure to collect trend studies on this critical winter range precludes the Bureau from showing any rationale to re-authorize livestock use in the South Pasture.

Using the allotment evaluation's 1990 use pattern mapping data and short term objective for wetland riparian habitat, a carrying capacity for wild horses can be computed. In accordance with Rangeland Monitoring Technical Reference 4400-7, the wild horse carrying capacity for the South Pasture would be as follows:

$$\frac{\text{Actual Use}}{\text{Actual Utilization}} = \frac{\text{Potential Actual Use}}{\text{Desired Utilization}}$$

$$\frac{3,168 \text{ AUMs (Horse only)}}{95 \text{ Percent}} = \frac{\text{Potential Actual Use}}{50 \text{ Percent}}$$

The carrying capacity for wild horses is 1,425 AUMs for the South Pasture in 1992. In February 1992 the Bureau removed 489 wild horses from the Paiute Meadows Allotment. By agreement with special interest groups, the District left 200 adult wild horses on the allotment. Previous monitoring data indicated even distribution of wild horses on this allotment. Assuming that 100 wild horses remain on the South Pasture, the estimated forage consumption would be 1,200 AUMs. Existing conditions of the Paiute Meadows Allotment would only leave 225 AUMs available to livestock. The 1992 Grazing

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Permit authorizes livestock 2, 175 AUMs of Summer/Fall use. The 1992 Grazing Permit will exceed the livestock carrying capacity.

2. The Grazing Permit is not consistent with the Paradise-Denio Management Framework III Decisions.

The Range Management Program Objectives 5 states:

"At the end of the third and fifth year of grazing following issuance of the grazing decision make necessary adjustments based upon monitoring data..... If monitoring reveals that a particular use or practice is causing resource damage, that particular use may be adjusted....."

The Paradise-Denio Resource Area land use plan was completed by the issuance of the Record of Decision (MFP III) on August 6, 1982. Despite nearly a decade since the completion of the land use plan, the completion of the Paiute Meadows Allotment Evaluation and knowledge of occurring resource damage, the Bureau of Land Management issued this Grazing Permit contrary to this land use plan objective.

Range Program Decision RM 1.11 states:

".....initial stocking levels are based on current data, but will not preclude the future establishment of intensive grazing systems or other management practices that may be necessary to obtain proper management of the rangeland resources..."

Wildlife Program Decision WL 1.5 states:

"Management objectives of activity plans will include specific objectives pertaining to improving and maintaining desired riparian and meadow habitats..... meadows will be considered as critical areas.."

Wildlife Program Decision 1.11 states:

"All activity plans, permits, leaseswill take measures to protect:

1. Wildlife concentration areas.
2. Raptor nesting areas.
3. Sage grouse strutting, nesting and brooding areas.
4. Important wildlife waters."

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Aquatic Wildlife Program Decision WLA 1.1, 1.2 states:

"The following listed streams appear to have this potential:

Habitat Expansion

Battle Creek Pahute Creek

Habitat Improvement


Bartlett Creek Battle Creek Pahute Creek"

Aquatic Wildlife Program Decision WLA 1.4, 1.5 and 1.6 states:

"...ensure that fish habitat factors are included as objectives of AMPs that contain fishable streams".

The stocking level or active preference was to be adjusted, if necessary, with monitoring data collected in accordance with an allotment management plan. The Paiute Meadows Allotment has never had an allotment management plan. Grazing management practices were solely described in the terms and conditions of Grazing Permits. In light of the recent allotment evaluation and vacated Full Force and Effect Multiple Use Decision (November 11, 1991), the Department seeks resource protection in the terms and conditions of the 1992 Grazing Permit. The Grazing Permit fails to list allotment objectives and grazing practices that will address specific fish and wildlife land use plan decisions. The 1992 stocking rates and seasons of use for livestock will exceed livestock carrying capacities and cause resource damage adversely impacting wildlife species.

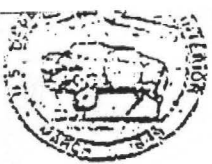
Sincerely,



William A. Molini
Director

WAM:el

cc: BLM State Director
Region I Manager



United States Department of the Interior

OFFICE OF HEARINGS AND APPEALS

Hearings Division
6432 Federal Building
Salt Lake City, Utah 84138
(Phone: 301-524-5344)

August 13, 1990

JOSEPH M. FELLER, : UT-06-89-02
Appellant : Appeal from a decision of
v. : the San Juan Resource Area
BUREAU OF LAND MANAGEMENT, : Manager dated February 20,
Respondent : 1989, issuing a grazing
UTE MOUNTAIN UTE TRIBE, : permit to the White Mesa
Intervenor : Cattle Company, Moab
District, Utah

DECISION

Appellant Joseph M. Feller, a Professor of Law at Arizona State University, sought and was granted "affected interest" status with regard to the Comb Wash allotment in the San Juan Resource Area pursuant to the regulations at 43 CFR 4100.0-5. See attachments "A" and "B" to his Statements of Reasons (SOR). The San Juan Resource Area is located within the Moab District under the supervision of the Utah State Office of the Bureau of Land Management (BLM).

Mr. Feller appeals the issuance by the San Juan Resource Area Manager of a 10-year grazing permit authorizing the White Mesa Ute Cattle Company to graze the Comb Wash allotment. The grazing permit, which is set out as Attachment C to appellant's SOR, "is subject to (A) modification, suspension or cancellation as required by land plans and applicable law; (B) annual review and to modification of terms and conditions as appropriate; and (C) the Taylor Grazing Act, as amended, the Federal Land Policy and Management Act, as amended, the Public Rangelands Improvement Act, and the rules and regulations now or hereafter promulgated thereunder by the Secretary of the Interior." Appellant charges that the issuance of the permit was arbitrary and capricious because BLM failed to follow its own procedures and applicable environmental laws.

Mr. Feller and BLM agreed to waive the hearing and to submit the matter on briefs. See my Order dated January 30, 1990. The Ute Mountain Ute Tribe (Tribe) moved to intervene on March 19, 1990. The Tribe is a Federally recognized Indian tribe with three cattle operations, one of which is the White Mesa Ute Cattle Company in Utah. The motion was granted on March 22, 1990.

The record consists of appellant's appeal and statement of reasons dated March 14, 1989; BLM's Answer dated March 2, 1989; appellant's March 27, 1990, reply to BLM's answer; the Tribe's motion to intervene, and appellant's response to the motion. Appellant also supplemented his initial statement of reasons on April 11, 1990.

Issues

Mr. Feller's appeal asserts that the issuance of a 10-year grazing permit is subject to the provisions of 43 CFR Subpart 4160, which requires service of a proposed decision on all affected interests and an opportunity to protest and/or appeal BLM's proposed action. The appeal asserts BLM failed to comply with these provisions in issuing the subject permit and that it therefore should be set aside.

Additionally, the appeal asserts that the issuance of the subject permit violated provisions of the National Environmental Policy Act of 1969, the Clean Water Act of 1977, the Federal Land Policy and Management Act of 1976, and applicable grazing regulations. Mr. Feller argues that preparation of a site-specific Environmental Impact Statement (EIS) is necessary before BLM may decide to reauthorize grazing in the Comb Wash allotment and that such a study would show that changes in grazing levels and practices are required in order to keep grazing levels within the allotment's carrying capacity and to comply with applicable environmental laws.

In his final submittals, Mr. Feller makes clear that he does not seek any substantive relief in these proceedings. He seeks merely a procedural remedy: that the permit be set aside and the matter be remanded to BLM for further action in conformity with all applicable laws and regulations.

Applicable Law

The general authority of the Secretary of the Interior with respect to management of Federal rangelands is set forth in the Taylor Grazing Act of 1934, as amended, 43 U.S.C. §§ 315 et seq.:

The Secretary of the Interior shall make provision for the protection, administration, regulation, and improvement of [Federal rangelands] and he shall * * * do any and all things necessary to accomplish the purposes of this chapter * * * namely, to regulate their occupancy and use, to preserve the land and resources from destruction or unnecessary injury, [and] to provide for the orderly use, improvement and development of the range * * *.

43 U.S.C. § 315a.

Thus, the management of the Federal range is committed to the discretion of the Secretary. "[T]he entire authority and responsibility for allocation of the Federal range is vested in the Department [of the Interior], to be exercised in such a manner as to provide for the most beneficial use thereof." United States v. Maher, 5 IBLA 209, 221; 79 I.D. 109, 115 (1972), citing Red Canyon Sheep Company v. Ickes, 98 F.2d 308 (D.C. Cir. 1938).

Where, as here, a decision adjudicating grazing privileges is appealed, it is well settled that the appellant bears the burden of showing by substantial evidence that the decision was arbitrary, capricious, or clearly erroneous as a matter of law. A decision may be regarded as arbitrary and capricious only if it is not supportable on any rational basis or if it does not substantially comply with the grazing regulations. See, e.g., Fasselin v. Bureau of Land Management, 102 IBLA 9 (1988). A decision must also comply with Federal environmental laws. See, e.g., Natural Resources Defense Council v. Morton, 388 F. Supp. 819 (D.D.C. 1975) aff'd, 527 F.2d 1386 (D.C. Cir. 1976), cert. denied, 427 U.S. 913 (1976).

Discussion

The first issue to address is whether the renewal of a 10-year grazing permit for the Comb Wash allotment is a decision or an action on an application for a permit within the meaning of 43 CFR Subpart 4160. BLM asserts that the issuance of a grazing permit for the Comb Wash allotment is not a protestable or appealable decision because the permit "does not convey any new rights or privileges" but "merely recognizes [the permittee's] prior preference." BLM's Answer at 7. See also attachment B to appellant's SOR.

The applicable regulation provides:

[T]he authorized officer shall serve a proposed decision on any applicant * * * who is affected by the proposed action on applications for permits * * * or by the proposed action relating to terms and conditions of permits * * *. The authorized officer shall also send copies to other affected interests. The proposed decision shall state reasons for the action * * * and shall provide * * * for the filing of a protest.

43 CFR 4160.1-1 (emphasis added).

The renewal of a 10-year grazing permit clearly is an action both on an application for a permit and relating to its terms and conditions. It is therefore subject to protest and appeal pursuant to 43 CFR Subpart 4160.

The next issue to determine is whether Mr. Feller received appropriate notice of and opportunity to protest BLM's decision to renew the White Mesa Ute Cattle Company's permit to graze the Comb Wash allotment. Mr. Feller asserts he received an unsigned copy of the proposed permit on February 13, 1989. The permit was dated February 6, 1989. It apparently was signed by all parties and became effective as of February 20, 1989.

Mr. Feller asserts that he was not informed until he asked whether the permit he received was intended to be a proposed or final action. Nor is there any indication that any explanation of the reasons for deciding to renew the permit as issued was provided to anyone.

This is not surprising in light of BLM's stated position of which Mr. Feller was advised only days before the permit was issued:

[A]s an affected interest you would have the right to protest and/or appeal decisions which relate specifically to the Comb Wash allotment. Appeal or protests of actions which do not require specific decisions would not be allowed. An example of such an action which would not require a decision would be the renewal of a grazing permit or lease where monitoring showed that there was no need for adjustments in grazing use and are normally issued as standard operating procedure.

Attachment B to Appellant's SOI.

Nevertheless, BLM argues that

If indeed BLM did not give Mr. Feller as much notice as he feels he should have had, he obviously has had every opportunity to appeal this matter, and is now being given an opportunity to have his side of the story told. The very documents which Mr. Feller has submitted for review indicate that BLM has made [an] extraordinary effort to involve this extremely active person in what is merely one allotment of a great many which one area office must assume total responsibility for.

Whether technical violations of informing Mr. Feller occurred or not he obviously has not been harmed in any way in his ability to have his views heard and reviewed.

Indeed, however, violations of the applicable regulation at 43 CFR Subpart 4160 did occur to the substantial prejudice of Mr. Feller's ability to participate as an affected interest in BLM's decision to reauthorize grazing in the Comb Wash allotment. For that reason, BLM's decision to issue the present 10-year grazing permit to the White Mountain Ute Cattle Company must be set aside and the matter must be returned to BLM for proper processing.

As noted above, Mr. Feller also asserts that the grazing permit issued to the White Mountain Ute Cattle Company for the Comb Wash allotment fails to comply with applicable provisions of several environmental laws and grazing regulations. Among other things, he argues

(1) A new site-specific EIS is required to be prepared for the Comb Wash allotment prior to the issuance of a new 10-year grazing permit pursuant to the provisions of the National Environmental Policy Act of 1969, 42 U.S.C. § 4321-4347 (1982) and the District Court's decision in Natural Resources Defense Council v. Morton, 388 F. Supp. 829 (D.D.C. 1975), aff'd 527 F.2d 1386 (D.C. Cir. 1976), cert. denied 437 U.S. 113 (1976).

(2) Grazing levels must be reduced to prevent any violations of Sec. 61 of the Clean Water Act of 1977, P.L. 95-139, 91 Stat. 1566, 1598, 33 U.S.C. § 1323 (1982), which requires all Federal actions to comply with State water quality standards.

(3) Grazing levels must be reduced to those supportable by the allotment's carrying capacity and in conformity with the applicable allotment and resource management plans pursuant to

provisions of the Federal Land Policy and Management Act of 1976, 43 U.S.C. §§ 1701, 1702, 1733, and 1752, and the grazing regulations at 43 CFR 4130.6-1(a) and 4110.3.

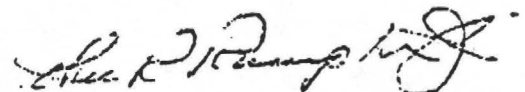
The parties have all submitted arguments concerning the provisions and applicability of, inter alia, a 1963 allotment management plan (AMP) for the Comb Wash allotment, an EIS prepared for an area encompassing the Comb Wash allotment, and a proposed San Juan Resource Management Plan which also encompasses the allotment. Significantly, none of these documents has been submitted into the record before me.

In light of the remand of this matter to BLM and the lack of a substantial factual record, I find it inappropriate to address the other issues raised in this appeal. On remand, BLM should take care to set out in an articulate and reasoned manner the basis for any decision regarding grazing in the Comb Wash allotment and, among other things, the decision should set forth the basis for asserting compliance with, or exemption from, the applicable provisions of law and regulation and should demonstrate consideration of any applicable monitoring studies.

A new decision regarding grazing on the Comb Wash allotment should issue within 60 days of the effective date of this decision and should be issued in compliance with the provisions of 43 CFR 4160.1-1.

Conclusion

For the reasons set forth above, the decision of the San Juan Resource Area Manager to issue a 10-year grazing permit to the White Mountain Ute Cattle Company for grazing on the Comb Wash allotment is hereby set aside. The matter is remanded to BLM for further action consistent with this decision. A new decision concerning grazing on the Comb Wash allotment should be issued by BLM within 60 days of the effective date of this decision. In the interim, grazing levels should be maintained as currently authorized.


John R. Rampton, Jr.
District Chief
Administrative Law Judge

6-30-92



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

Winnemucca District Office
705 East 4th Street
Winnemucca, Nevada 89445

IN REPLY REFER TO:

June 30, 1992

4160
(NV-240)

Mr William Molini
Director, Nevada Department of Wildlife
P.O. Box 10678
Reno, Nevada 89520-0022

Dear Mr. Molini:

This letter is in response to a letter I received from you dated June 18, 1992 in which you indicated that you were formally appealing the issuance of the 1992 Grazing Permit for the Paiute Meadows allotment. You are viewing the issuance of this grazing permit as a final decision because the Multiple Use Decision dated November 22, 1991 was vacated.

Your interpretation of this action is not correct. The yearly license is not an appealable action and was issued based on the transfer of 4350 AUMs of active use to Mr. Dan Russell in April of 1990 when he offered proof of control for the base properties at Paiute Meadows.

As you are aware, part of the proposal from the wild horse groups was to drop their appeal of the gathering of wild horses on the Black Rock East HMA if the Bureau would vacate the Full Force and Effect decision for the Paiute Meadows allotment that was issued on November 22, 1991. Once that decision was vacated, then the permittee is allowed to use 4350 AUMs (the amount allowed in the transfer process) until another decision is issued to adjust that amount.

The stipulated agreement with the wild horse groups states that a new Proposed Multiple Use Decision will be issued in consultation with the interested parties and in coordination with the Paiute Meadows evaluation.

The consultation process leading to another decision can be lengthy. In addition to the meetings that you attended in Reno on January 7 and January 14, the Resource Area held a consultation meeting on March 10, 1992 to discuss the issues surrounding Paiute Meadows. Representatives from the Nevada Department of Wildlife were present at that meeting and part of the discussion centered around the action that would be taken if a new decision was not completed and issued prior to the 1992 grazing season.

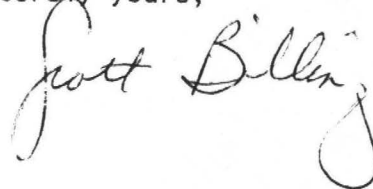
My staff is currently working to develop alternatives for management on the allotment that address the concerns you identified in your appeal dated December 18, 1991 as well as the concerns of the wild horse groups, NRDC and the Sierra Club. A copy of the alternatives will be sent to all interested parties for their review and comment. Once my staff and I have reviewed the comments, a determination will be made if another consultation meeting is necessary before the management action is developed.

In closing, I want to reiterate that your interpretation of the yearly grazing permit being a final decision is not correct. Therefore, I view your letter dated June 18, 1992 as a protest as described in 43 CFR 4.450-2 and not as an appeal.

If you wish to appeal this final decision in accordance with 43 CFR Part 4, you are allowed thirty (30) days from receipt of this notice within to file such appeal with the Area Manager, Paradise-Denio Resource Area, Bureau of Land Management, 705 East Fourth Street, Winnemucca, Nevada 89445. The appeal should state clearly and concisely why you think the decision is in error.

If you have any other questions, please give me a call.

Sincerely yours,

A handwritten signature in cursive script that reads "Scott Billing". The signature is written in dark ink and is positioned to the right of the typed name "Scott Billing".

cc: Mr. Richard Heap
Ms. Cathy Barcomb
Ms. Dawn Lappin
Mr. Thomas Van Horne
NRDC
Sierra Club
Humane Society of the United States
American Horse Protection Association
Animal Protection Institute
Mr. William Cummings
Mr. Andy Johas
Mr. Dan Russell