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Submitted online via: https://www.fs.usda.gov/project/?project=63158

RE: Middle Fork Fire Affected Roads Project EA (Rescoping)

Please accept the following comments from Cascadia Wildlands, Oregon Wild, and Willamette Riverkeeper concerning the Middle Fork Fire Affected Roads Project Environmental Assessment. Cascadia Wildlands defends and restores Cascadia's wild ecosystems in the forests, in the courts, and in the streets. We represent 12,000 members and supporters who envision vast old-growth forests, rivers full of salmon, wolves howling in the backcountry, a stable climate, and vibrant communities sustained by the unique landscapes of the Cascadia bioregion. Oregon Wild represents 20,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife, and water as an enduring legacy. Willamette Riverkeeper has approximately 2,500 members who live, work, visit, recreate, and enjoy the Willamette River Basin, including in the waters of the Gales, Cedar Creek, and Bedrock Fires. They believe a river with excellent water quality, abundant natural habitat, safe for fishing and recreation is a basic public right.

Project Description

This project is an updated version of the previous Cedar-Gales Roadside Risk Reduction Project to include the scope of the Bedrock Fire, which burned about 30,600 acres of the Willamette National Forest in summer 2023 and burned about 800 acres of the Gales Fire area. The project seeks to "reduce the risks posed by fire-killed and injured trees that have fallen across or remain standing along important access routes of the Cedar Creek, Gales, and Bedrock fire-affected road system so that access to and through the burned area can be restored. The Middle Fork District remains concerned about risks to public and forest worker safety when using roads, firefighter access to new ignitions, usability of potential evacuation routes, hazardous fuel loads, the functionality of roads as potential fire control lines, and road infrastructure damages and failures. Rescoping Letter at 1. The district proposes to fell fire-killed and injured trees on about 140 miles of road (about 17% of the fire affected road system), including 50 miles of road from the Bedrock Fire. Rescoping Letter at 4. This number of treatment miles could (and should) be reduced following public and agency review processes.

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The Burned Area Emergency Response (BAER) Report completed for the Bedrock Fire in September 2023 listed numerous urgent concerns, including safety around campgrounds, damage to culverts and other road or drainage issues, and rockfall and landslides. The report stated that "[e]mergency treatments will be implemented within one year of containment of the fire to minimize risk to critical BAER values." BAER Report at 12. BAER is also listed as a justification for treatment on the table of proposed roads for the project. In addition, the district submitted a request to utilize the emergency response authority for a portion of the roads impacted by the Bedrock, Cedar, and Gales Fires pursuant to 36 CFR 220.4(b) (2), also in September 2023. If approved, the district will "immediately begin implementing emergency hazard tree abatement to address the imminent hazards adjacent to specified roads and developed recreation sites prior to completion of the Environmental Assessment." Notification Email, September 28, 2023.

The district still awaits approval for its emergency authorization request. What is the status of that request? How would the work anticipated from that request differ from the hazard tree work proposed in this project? From the emergency work alluded to in the BAER Report? Please provide clearer information about the scope, scale, and status of the emergency work completed and the request submitted for national approval. Please also provide timing updates as both the emergency request and EA processes move along, clarifying how the former impacts the latter. We understand the district is beholden to the timeline of national authorities as it awaits approval but appreciate as much transparency around the emergency authorization request as possible, especially if the district and others in the Willamette National Forest anticipate utilizing this emergency request in response to future fires.

Concerns About Post-Fire Hazard Tree Logging

Our concerns and feedback for the project remain the same as described in our initial scoping comments for the Cedar-Gales Roadside Risk Reduction Project, so we incorporate those comments in full by reference and ask that those concerns be considered in the development of this EA.

1. Risk Tolerance

Restoring public access to forest in the project area in a safe, ecologically-sensible manner is of the utmost importance, and there are many trade-offs associated with post-fire hazard tree removal. Fire is an important ecological process that shapes our forests and the benefits we obtain from it. Logging degrades the natural beauty and ecological functions of mature and old-growth forests that burn in wildfires, impedes the future development of a diverse forest understory, removes or fragments wildlife habitat, introduces invasives to the environment, degrades soils, and adds sediment to waterways. The trees that the agency may deem as dangerous can also act as significant carbon stores and highly valued habitat features that play critical roles in hydrology, soil development, nutrient cycling,

sediment routing, and more. Ultimately, we hope to see the agency execute a project that protects public safety *and* important ecological values.

2. Water Quality and Aquatic Habitat

We are concerned about effects on water quality and imperiled aquatic species and habitat. Streams within and downstream of the project area support Upper Willamette River Spring Chinook salmon, which is listed as threatened under the federal Endangered Species Act. Fires result in the loss of riparian vegetation and shade, introduction of sediment and debris, culvert damage, peak flow changes, and increases in water temperature. Please evaluate the full range of impacts to water quality and aquatic species and habitat in the EA, ensuring that post-fire hazard tree removal will not exacerbate degradation that may have resulted from the fire. We ask the agency to demonstrate how the project will not result in take of this species.

3. Soils

We are concerned about soil degradation in the project area, especially in the areas that have burned multiple times (Gales Creek Fire in 2021, Jones Fire in 2017, and Clark fire in 2003). About a third of soils the Bedrock Fire area burned at high or very high severity. BAER Report at 2. The BAER reports notes that the large majority of the fire burned soil at low or moderate rates, and moderately burned soils retained fine roots and soil structure noting that "there is a good chance of recovery with the right timing and precipitation." *Id.* The BAER team states that "[n]atural recovery is the recommended treatment to address concerns to soil productivity and hydrologic function." BAER Report at 3. We are concerned that implementation of the hazard tree removal project could hinder recovery processes, as project actions could compact soils and increase erosion and runoff. In the EA, please describe in full the soil conditions, anticipated impacts, and all mitigation efforts for soils in the project area.

4. Weeds and Invasives

We are concerned about the existence and spread of weeds and invasives in the project area.

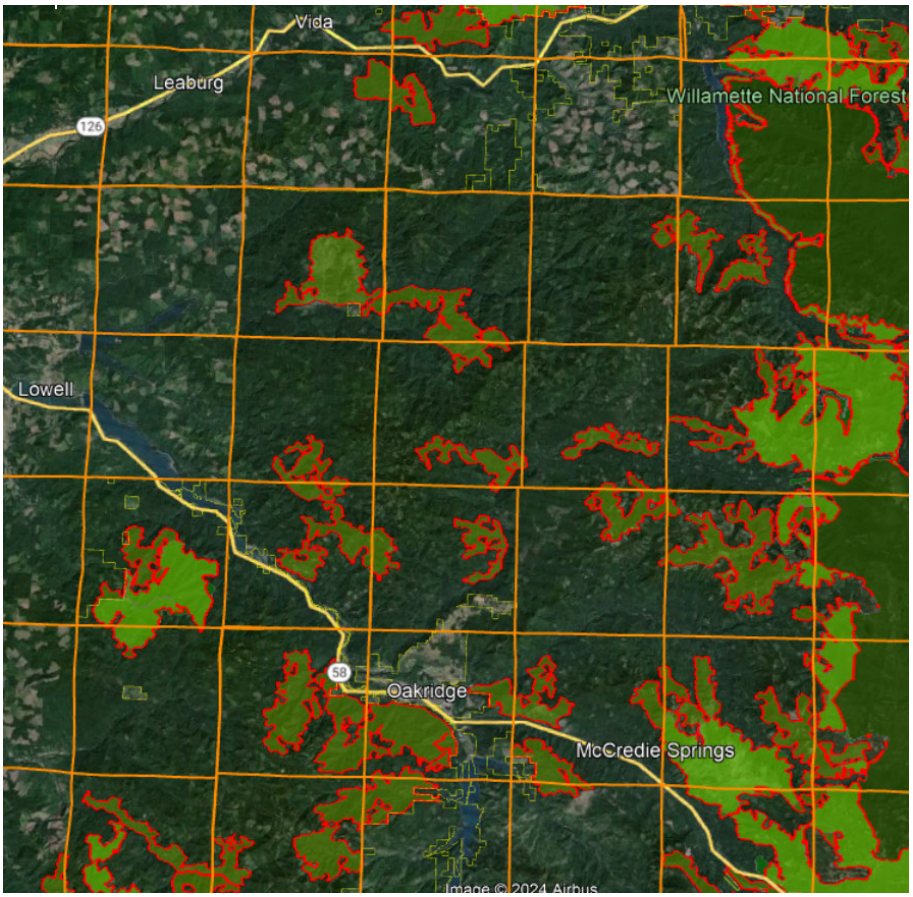
> Suppression work included construction of 114 acres of dozer line and handline. In addition, there were 351 acres of brushing, chipping, snagging and danger tree removal along roads for contingency line. There were also 141 acres of ground disturbance from drop points, staging areas, log decks, and heli-spots that were created because of the fire. These may all serve as weed seed dispersal corridors. Dispersal of weeds from fire equipment movement poses a significant risk to native plant post-fire regeneration. Even though a weed washing station was brought in, seed may have been transported into the burn on suppression vehicles and equipment that arrived on the fire before the washing station was established. This increases the possibility of suppression equipment acting as weed seed vectors. In addition, localized invasive weed populations exist immediately adjacent to

> moderate and high severity burned areas and may spread into approximately unaffected areas now that native vegetation has been removed. BAER treatments include the detection survey, treatment (manual removal, and chemical application), and monitoring of invasive species infestation in these suspectable acres.

BAER Report at 11. In the EA, describe the state of weeds and invasives in the area and indicate how the agency will minimize spread.

5. Unroaded Areas

In addition, we urge the Forest Service to strive to conserve the unroaded areas >1,000 acres outlined in red below. Unroaded areas are rare on the landscape and getting rarer as the agency continues to log and build roads in unharvested stands. Unroaded areas provide disproportionate ecosystem services related to soil conservation, water quality, habitat quality and connectivity, snag habitat, carbon storage and climate mitigation, non-motorized recreation, etc. Logging and road building in unroaded areas significantly degrades those values. As explained below, there is significant new information since the Willamette LRMP was adopted indicating the ecological importance of unroaded areas larger than 1,000 acres. Importantly, wildlife evolved in landscapes dominated by unroaded, unlogged, unmanaged areas that developed habitat under the influence of natural processes. Logging and roads do not mimic those natural processes. Instead, they create novel ecosystem features that conflict with the needs of wildlife.



The Forest Service should develop alternatives that minimize adverse effects on ecologically significant areas, such as unroaded areas. Also, be sure to fully disclose the loss of ecosystem services from the shrinking landscape of undeveloped areas compared to the natural range of variability, and the cumulative effects of those losses, including the effects of this project. Where roads to be treated under this project border unroaded areas, consider options such as: forgoing treatments and allowing natural processes to flourish in the unroaded areas, which may require closing the road to reduce the risk that people will be exposed to risks. Another option is to shrink the footprint of the treatments to provide a balance between conserving the diverse values associated with unroaded areas and the risk aversion reflected in wider treatments.

Large intact expanses of unfragmented habitat were once quite common but are now rare. Species evolved in the context of the large habitat patches that result from the natural disturbance regime. As just one important example, big game need large patches of security cover which is best provided by large unroaded areas. New science confirms that roads and logging tend to be contagious on the landscape (managed areas beget more management until little remains unmanaged), so to conserve the habitat values associated with wild places we have to prevent the first intrusions. The purpose and need for this project should include protecting and restoring large unroaded areas consistent with the natural range of

variability. This goal is just as important as goals related to tree density or species composition that the agency too often relies on to justify logging and road building.

Uninventoried roadless areas have many of the same values as inventoried roadless areas. Before logging roadless areas the agency should consider the impacts to all the values of roadless areas, including:

> (1) High quality or undisturbed soil, water, and air;
> (2) Sources of public drinking water;
> (3) Diversity of plant and animal communities;
> (4) Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land;
> (5) Primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation;
> (6) Reference landscapes;
> (7) Natural appearing landscapes with high scenic quality;
> (8) Traditional cultural properties and sacred sites; and
> (9) Other locally identified unique characteristics.

36 CFR §294.11 (2001).
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5050459.pdf

Large unroaded areas are important simply due to the fact that they better represent the historic condition that species evolved with but they are now rare on the landscape due to human activities that have degraded and fragmented the majority of the landscape. The Northwest Forest Plan LSOG Effectiveness Monitoring Plan says that "perhaps 80 percent or more [of the historic late-successional old-growth forest] would probably have occurred as relatively large (greater than 1,000 acres) areas of connected forest." Miles Hemstrom, Thomas Spies, Craig Palmer, Ross Kiester, John Teply, Phil McDonald, and Ralph Warbington; Late-Successional and Old-Growth Forest Effectiveness Monitoring Plan for the Northwest Forest Plan, USFS General Technical Report PNW-GTR-438; December 1998; http://www.fs.fed.us/pnw/pubs/gtr_438.pdf. Currently, these 1,000 acre and larger patches are rare on the landscape.

Boakes et al (2009) explained why it is important to retain large unroaded areas.

> **Abstract:** Habitat clearance remains the major cause of biodiversity loss, with consequences for ecosystem services and for people. In response to this, many global conservation schemes direct funds to regions with high rates of recent habitat destruction, though some also **emphasize the conservation of remaining large tracts of intact habitat**. If the pattern of **habitat clearance is highly contagious**, the latter approach will help **prevent destructive processes gaining a foothold** in areas of contiguous intact habitat. Here, we test the strength of spatial contagion in the pattern of habitat clearance. Using a global dataset of land-cover change at 50x50 km resolution, we discover that intact habitat areas in grid cells are

> refractory to clearance only when all neighbouring cells are also intact. The **likelihood of loss increases dramatically as soon as habitat is cleared in just one neighbouring cell**, and remains high thereafter. **This effect is consistent for forests and grassland, across biogeographic realms and over centuries, constituting a coherent global pattern**. Our results show that landscapes become vulnerable to wholesale clearance as soon as **threatening processes begin to penetrate**, so actions to prevent any incursions into large, intact blocks of natural habitat are key to their long-term persistence.

Elizabeth H. Boakes, Georgina M. Mace, Philip J. K. McGowan and Richard A. Fuller 2009. Extreme contagion in global habitat clearance. Proceedings of the Royal Society B: Biological Sciences. November 25, 2009. doi: 10.1098/rspb.2009.1771

World Wildlife Fund and the Conservation Biology Institute summarized the important attributes of small roadless areas (1,000-5,000 acres).

> Small roadless areas share many of attributes in common with larger ones, including:
> • Essential habitat for species key to the recovery of forests following disturbance such as herbaceous plants, lichens, and mycorrhizal fungi
> • Habitat refugia for threatened species and those with restricted distributions (endemics)
> • Aquatic strongholds for salmonids
> • Undisturbed habitats for mollusks and amphibians
> • Remaining pockets of old-growth forests
> • Overwintering habitat for resident birds and ungulates
> • Dispersal "stepping stones" for wildlife movement across fragmented landscapes

DellaSala, Dominick and James Strittholt. 2002. Scientific Basis For Roadless Area Conservation. World Wildlife Fund. Ashland, OR; Conservation Biology Institute. (June 2002 - Updated October 2003) https://d2k78bk4kdhbpr.cloudfront.net/media/reports/files/Scientific_Basis_For_Roadless_Area_Conservation.pdf.

In a 1997 letter to President Clinton, 136 scientists said:

> There is a growing consensus among academic and agency scientists that existing roadless areas–irrespective of size–contribute substantially to maintaining biodiversity and ecological integrity on the national forests. The Eastside Forests Scientific Societies Panel, including representatives from the American Fisheries Society, American Ornithologists' Union, Ecological Society of America, Society for Conservation Biology, and The Wildlife Society, recommended a prohibition on the construction of new roads and logging within existing (1) roadless regions larger than 1,000 acres, and (2) roadless regions smaller than 1,000 acres that are biologically significant…. Other scientists have also recommended protection of all

> roadless areas greater than 1,000 acres, at least until landscapes degraded by past management have recovered…. As you have acknowledged, a national policy prohibiting road building and other forms of development in roadless areas represents a major step towards balancing sustainable forest management with conserving environmental values on federal lands. In our view, a scientifically based policy for roadless areas on public lands should, at a minimum, protect from development all roadless areas larger than 1,000 acres and those smaller areas that have special ecological significance because of their contributions to regional landscapes.

Letter to President Clinton from 136 scientists (Dec. 10, 1997). https://drive.google.com/file/d/0B4L_-RD-MJwrRzhFcm5QcFR0MHM/view?usp=sharing&resourcekey=0-2-sbGMN3bOUBQGGMDBQM1Q

To the list of special values found within unroaded areas must be added carbon storage. European policy leaders consider roadless areas effective for carbon storage and climate mitigation:

> [T]he European Parliament has agreed to raise the issue of roadbuilding in intact forests at the UN Climate Change Conference to be held next month in Warsaw (Poland); it calls on parties to use the existence of roads in forest areas as an early negative performance indicator of REDD+ projects, and to prioritise the allocation of REDD+ funds towards road free forests.

Oct 24, 2013 Press release: EUROPEAN PARLIAMENT BACKS THE PROTECTION OF ROADFREE AREAS. http://kritonarsenis.gr/eng/actions/view/european-parliament-backs-the-protection. Federal land managers should recognize the tremendous carbon values in unroaded/unmanaged forests and avoid actions that would threaten these values. See also, William R. Moomaw, Susan A. Masino, and Edward K. Faison. 2019. Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good Front. For. Glob. Change, 11 June 2019 | https://doi.org/10.3389/ffgc.2019.00027; https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full.

Roadless and unroaded areas also play a significant role in both climate change mitigation (through carbon storage) and climate change adaptation (by facilitating connectivity and resilience to disturbance).

> **Transportation infrastructure and carbon sequestration**
> The topic of the relationship of road restoration and carbon has only recently been explored. [and there are presumably similar carbon benefits from conserving unroaded areas and not building roads in the first place.] There is the potential for large amounts of carbon (C) to be sequestered by reclaiming roads. When roads are decompacted during reclamation, vegetation and soils can develop more rapidly and sequester large amounts of carbon. A recent study estimated total soil C storage

increased 6 fold to 6.5 x 107g C/km (to 25 cm depth) in the northwestern US compared to untreated abandoned roads (Lloyd et al. 2013). Another recent study concluded that reclaiming 425 km of logging roads over the last 30 years in Redwood National Park in Northern California resulted in net carbon savings of 49,000 Mg carbon to date (Madej et al. 2013, Table 5).

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Benefits of roadless areas and roadless area networks to climate change adaptation

Undeveloped natural lands provide numerous ecological benefits. They contribute to biodiversity, enhance ecosystem representation, and facilitate connectivity (Loucks et al. 2003; Crist and Wilmer 2002, Wilcove 1990, The Wilderness Society 2004, Strittholt and Dellasala 2001, DeVelice and Martin 2001), and provide high quality or undisturbed water, soil and air (Anderson et al. 2012, Dellasalla et al. 2011). They also can serve as ecological baselines to help us better understand our impacts to other landscapes, and contribute to landscape resilience to climate change.

Forest Service roadless lands, in particular, are heralded for the conservation values they provide. These are described at length in the preamble of the Roadless Area Conservation Rule (RACR)4 as well as in the Final Environmental Impact Statement (FEIS) for the RACR5 , and include: high quality or undisturbed soil, water, and air; sources of public drinking water; diversity of plant and animal communities; habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land; primitive, semi-primitive non- motorized, and semi-primitive motorized classes of dispersed recreation; reference landscapes; natural appearing landscapes with high scenic quality; traditional cultural properties and sacred sites; and other locally identified unique characteristics (e.g., include uncommon geological formations, unique wetland complexes, exceptional hunting and fishing opportunities).

The Forest Service, National Park Service, and US Fish and Wildlife Service recognize that protecting and connecting roadless or lightly roaded areas is an important action agencies can take to enhance climate change adaptation. For example, the Forest Service National Roadmap for Responding to Climate Change (USDA Forest Service 2011b) establishes that increasing connectivity and reducing fragmentation are short and long term actions the Forest Service should take to facilitate adaptation to climate change.6 The National Park Service also identifies connectivity as a key factor for climate change adaptation along with establishing "blocks of natural landscape large enough to be resilient to large-scale disturbances and long-term changes" and other factors. The agency states that: "The success of adaptation strategies will be enhanced by taking a broad approach that identifies connections and barriers across the landscape. Networks of protected areas within a larger mixed landscape can provide the highest level of resilience to climate change."7 Similarly, the National Fish, Wildlife and Plants Climate Adaptation Partnership's Adaptation Strategy (2012) calls for creating an ecologically-connected network of conservation areas.8

Crist and Wilmer (2002) looked at the ecological value of roadless lands in the Northern Rockies and found that protection of national forest roadless areas, when added to existing federal conservation lands in the study area, would 1) increase the representation of virtually all land cover types on conservation lands at both the regional and ecosystem scales, some by more than 100%; 2) help protect rare, species-rich, and often-declining vegetation communities; and 3) connect conservation units to create bigger and more cohesive habitat "patches."

Roadless lands also are responsible for higher quality water and watersheds. Anderson et al. (2012) assessed the relationship of watershed condition and land management status and found a strong spatial association between watershed health and protective designations. Dellasalla et al. (2011) found that undeveloped and roadless watersheds are important for supplying downstream users with high-quality drinking water, and developing these watersheds comes at significant costs associated with declining water quality and availability. The authors recommend a light-touch ecological footprint to sustain the many values that derive from roadless areas including healthy watersheds.

The Wilderness Society. 2014. Transportation Infrastructure and Access on National Forests and Grasslands - A Literature Review. May 2014. https://www.fs.usda.gov/nfs/11558/www/nepa/96158_FSPLT3_3989888.pdf, https://www.sierraforestlegacy.org/Resources/Conservation/ProjectsPlans/ForestPlanRevisions/SFL%20et%20al.%20FPR%20comments%20part%205%20of%205.pdf

The importance of conserving unroaded areas is highlighted by the finding that forest fragmentation in the U.S. continues to increase. Riitters et al (2012) compared the decline in total forest area to the decline in interior forest conditions from 2001 to 2006 at 5 spatial scales and found that interior forest is declining faster than total forest at all spatial scales, with greater losses in the largest spatial scales.

Table 1 | Scale-dependent change in forest interior area from 2001 to 2006. Forest interior area was measured at five spatial scales defined by neighborhood size and was summarized for the conterminous United States

	Forest interior area			
	2001	2006	Change	
Neighborhood size (ha)	(Thousand km²)	(Thousand km²)	(Thousand km²)	(Percent)
4.41	1,419	1,374	−45	−3.2
15.2	1,151	1,102	−49	−4.3
65.6	867	817	−50	−5.8
590	523	482	−41	−7.8
5,310	277	248	−29	−10.5

Riitters, K.H. & Wickham, J.D. (2012) Decline of forest interior conditions in the conterminous United States. Sci. Rep. 2, 653; DOI:10.1038/srep00653. https://www.srs.fs.fed.us/pubs/ja/2012/ja_2012_riitters_002.pdf.

Gales Fire Field Checking Observations

Cascadia Wildlands staff visited publicly accessible roads in the Gales Fire area on July 14, 2023 (***before the Bedrock fire began and related order was in effect***).

^West side of FR 1824.

^East side of FR 1824. The Gales Fire did not reach these. The Bedrock Fire may have.

^The two photos above were taken on FR 1824, where the scoping map shows small portions of red lined roads proposed for treatment. The Gales Fire burned in low severity here. The Bedrock Fire may have changed the conditions, though the Bedrock scoping map shows low to no mortality in the same location. We encourage the agency to reduce the roads proposed for treatment by eliminating small pockets of red lined areas on roads the burned at low to no severity like this area. In our field checking experience, the forest along roads included for treatment hardly differs from roads not proposed for treatment in those scenarios and treatment is not necessary.


^Log deck and timber boundary unit marker along FR 1824-210. Justification for treatment here is “CSA, Under Contract.”

< This shows a potential danger tree (no green needs, leaning toward road from uphill steep slope) along FR 1825. This portion of road is not included for treatment according to the scoping map. We encourage the agency to evaluate this tree (coordinates 43.950180, -122.482087).

^What appear to be freshly cut trees along FR 1825.

< Most alarmingly, we encountered numerous log decks. Some, like this, included massive trees, which we were told were cut during firefighting efforts.

< We estimated this tree was nearly 400 years old. Others in the deck were much larger.

These photos were taken along FR 1832 in a portion of road proposed for treatment. This area burned at relatively high severity, but there are few roadside trees remaining.

^There were numerous log decks along FR 1832. We are very concerned by accompanying slash piles, all of which were very large in size and some of which were draped by a black tarp that barely covered the pile. Leaving slash piles on the landscape and not burning in a timely manner increases fire risk.

Bedrock Fire Field Checking Observations

The areas proposed for treatment in the Bedrock Fire area are largely inaccessible due to continued road closures. Certain roads can only be reached if one travels through stretches of active logging operations on private industrial timber lands, bookended by gates that are closed or could be closed at any time. This hindered our ability to field check current conditions of the proposed treatment areas. We ask that the district provide detailed descriptions of current conditions for each proposed treatment area in the draft EA so that we can offer more informed feedback. The rescoping notice included two example photos of current conditions—please provide additional photos and condition data in the draft EA. We also ask that the agency consider offering limited field visits where it is safe to do so to aid the public and stakeholders in understanding the site conditions and project proposal and making it possible to offer informed feedback.

The district has deployed signage and road barriers where roads in the fire footprint remain closed to public entry. While most road signage communicates closures, some areas also include burn area warning signs communicating risks to expect in post-fire landscapes.

We encourage the agency to continue using signage describing the inherent risks of entering a post-fire landscape, such as the sign pictured on the next page, throughout and after the implementation of roadside hazard tree work. Signage and education can be used to support the risk-tolerant approach to post-fire hazard tree removal described above and in our original scoping comments. Investing in education and awareness of post-fire forest risk *and natural recovery processes* is crucial to protecting public safety while maintaining ecological values, reducing the number of unnecessary roads, lowering related wildlife ignition risks, and bringing road maintenance costs and requirements into a manageable load for the agency.

Conclusion

Thank you for working to develop the project. We recommend undertaking a conservative hazard-tree removal process that targets only true hazard trees and reopens necessary roads while minimizing the volume of wood removed from the forest. Accordingly, the agency should consider scaling down the scope of the project proposal as much as possible to prioritize a transportation system that is manageable and maintainable.

Each substantive issue discussed in these comments should be (i) incorporated into the purpose and need for the project, (ii) used to develop NEPA alternatives that balance tradeoffs in different ways, (iii) carefully analyzed and documented as part of the EA or an EIS, and (iv) considered for mitigation. Thank you for taking our input into consideration. Please feel free to reach out with any questions or to request copies of referenced documents.[1]

Sincerely,

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[1] Note: If any of these web links in this document are dead, they may be resurrected using the Wayback Machine at Archive.org: http://wayback.archive.org/web/. Referenced documents can be found at the following Dropbox link: https://www.dropbox.com/sh/ctippifimdczyk6/AACp2fJYnsIjRuyFh96ocie3a?dl=0.