UNITED STATES DEPARTMENT OF AGRICULTURE

Farm Service Agency Washington, DC 20250 **Notice ECP-88**

For: State and County Offices

Authorizing ECP for Snow Removal

Deep

Approved by: Acting Deputy Administrator, Farm Programs

1 Overview

A Background

Several States suffered severe winter storms during FY 2023 and have requested financial assistance for livestock producers through ECP to clear snow and provide access to livestock feed and water.

Clearing snow to feed and water livestock is normally covered under ELAP. However, ELAP eligibility restricts program availability to producers who experience damage to their feed because of the storm, or the transport of additional feed because of the storm, but not clearing snow to access feed and water for livestock.

Snow removal is necessary for livestock producers to maintain herd health and productivity rates. Clearing snow to enable access to feed and water minimizes the potential for animal mortality and related contamination of surface and ground waters from burial pits, or air pollution from burning of carcasses. Cost share assistance for snow removal contributes to the producer's financial resiliency and helps to maintain a strong food supply chain.

DAFP is authorizing ECP cost share assistance to producers for clearing snow from feed stocks, water supplies, and feeding areas.

Disposal Date	Distribution
May 1, 2024	State Offices; State Offices relay to County Offices

1 Overview (Continued)

B Purpose

This notice:

• provides authorization to use ECP practice EC1 Debris Removal for snow removal related to severe winter storms

Note: This policy is retroactive for winter storms that occurred on or after October 1, 2022.

- provides automation instructions and guidance for establishing State snow removal payment scenarios
- provides State and County Office actions
- obsoletes Notice ECP-86 to correct percentages and provide examples in subparagraph 4 B and Exhibit 3.

2 Implementation of ECP for Snow Removal

A Conditions for Snow Removal

Implementation of ECP EC1 Debris Removal for snow removal for FY 2023 may occur if 1 of the following conditions is met.

- A county was included in a Presidential Disaster Declaration because of a winter storm or snowstorm. Presidential Disaster Declarations can be found at <u>Declared Disasters</u> | <u>FEMA.gov</u>. Exhibit 1 provides a list of eligible Presidential Disaster Declarations for FY 2023. Exhibit 2 provides maps and lists of FY 2023 primary counties included in the Presidential Disaster Declarations.
- A county is contiguous to a county declared in a Presidential Disaster Declaration and the county is authorized to offer FSA emergency loans. Exhibit 2 provides maps and lists of FY 2023 contiguous counties. Counties identified as a contiguous county are eligible to implement EC1 for snow removal.
- A county (or portion of a county) experienced a 40 percent increase in normal snowfall, as documented on CRP-42 (complete items 1 through 7 and item 44). COC will also submit evidence the county precipitation levels indicate above average precipitation of 40 percent or greater for the months receiving snow.

Note: Obtain and attach statistics from National Oceanic and Atmospheric Administration, National Weather Service records, or from the best available source within each respective county and document the source.

2 Implementation of ECP for Snow Removal (Continued)

A Conditions for Snow Removal (Continued)

If any of the criteria in this subparagraph applies, State Offices may enter an implementation request on the ECP Request to Implement SharePoint site at https://usdagcc.sharepoint.com/sites/fsa-dafp/CEPD/policy/Lists/ECP_EFRP_Requests/AllItems.aspx The following data should be included:

- administrative counties
- date of disaster
- Presidential disaster ID
- signup dates
- estimated cost share
- CRP-42 and weather data, where applicable.

These requests will be reviewed and the ECP program manager will determine approval or disapproval for EC1 snow removal accordingly.

Note: Implementation of ECP EC1 Debris Removal for snow removal related to future winter storm events is authorized and guidance is forthcoming in a 1-ECP (Rev. 7) amendment.

3 Parameters of Waivers, Eligibility, and Extent Allowed

A Waiver to Start Work Before Filing an Application

In cases where conditions created a risk to life and property in which immediate action was necessary, producers may not be able to wait for the approval to implement ECP before acting or filing an application for ECP. In this case, COC's are authorized to grant a waiver to start an ECP practice before filing an application, according to 1-ECP (Rev. 7), subparagraph 399 C. Application approval is subject to the following:

- FSA-850 is completed for the practice
- disaster created a situation requiring the producer to take immediate action to prevent further losses.

Because snow removal activities do not require ground disturbance below a previous level of disturbance, a programmatic FSA-850 will be developed by the Farm Production and Conservation, Environmental Activities Division. The programmatic FSA-850 may only be used for applications that meet all criteria in the programmatic FSA-850 and when no extraordinary circumstances exist.

Once FSA-850 is complete, COC may approve a waiver to start work for all eligible applications meeting the criteria in paragraph 2 and document the determination in COC minutes.

3 Parameters of Waivers, Eligibility, and Extent Allowed (Continued)

B Waiver of Onsite Inspection

For FY 2023, winter storm counties may consider this notice DAFP's approval of a waiver for onsite inspection before approval because of the widespread severe damage that occurred across multiple States or counties since October 1, 2022. Therefore, technical assistance for needs determinations and performance is not applicable. COC will determine whether the request and certified performance is reasonable for local conditions.

C Eligible and Ineligible Land

In addition to the eligible land criteria described in 1-ECP (Rev. 7), subparagraph 94 A, the following includes eligible land related to ECP assistance for snow removal:

- clearing of roads to access feed stocks
- clearing of areas used to feed and water livestock, and travel corridors to feed stocks (haystacks, etc.).

In addition to the ineligible land criteria described in 1-ECP (Rev. 7), subparagraph 95 A, the following provides a list of ineligible land related to ECP assistance for snow removal:

- clearing of public roads
- clearing of snow around a homestead or personal transportation routes
- clearing of snow to bales left scattered in the field and not stored in a stack.

D Extent Allowed

Cost share is allowed for multiple snow removals during the Presidentially declared disaster period or duration of the documented severe storm, as determined reasonable by COC.

3 Parameters of Waivers, Eligibility, and Extent Allowed (Continued)

E Examples

Example 1: Producer groups livestock in different pastures – cows, replacements, bulls, etc. A field road is cleared for feeding access 10 feet wide to allow for equipment access, and a total of 5 miles long to access all areas for feeding.

Details:

- [10 feet wide x (5,280 feet in a mile x 5 miles)] = $264,000\text{ft}^2/43,560\text{ft}^2$ per acre = 6 acres
- In addition, an acre total was cleared for livestock feeding areas
- Storm lasted 5 days, strong winds persisted for 2 days after the snow stopped, and deep drifts developed after the storm
- Producer was able to clear snow once a day

COC Determination:

- 7 acres are reasonable for this producer to clear from haystack to pasture
- 7 days are reasonable for the conditions created by this storm
- Storm accumulated over 30 inches of snow use scenario 500-034
- COC conditionally approves 7 acres x 7 days = extent 49 acres
- Example 2: Producer has herd close to farmstead. Haystack is in farmstead, travel corridor to feed is a quarter mile down a county road, and a half mile down a field road. Large herd requires 2 acres to be cleared for feeding area. Farmstead, county road, field road, and feeding areas were cleared by producer. Roads were cleared 10 feet wide to allow for equipment access.

Details:

- Farmstead clearing for haystack and county road clearing is ineligible
- [10 feet wide x (5,280 feet in a mile x 0.5 miles)] = $26,400 \text{ft}^2/43,560 \text{ft}^2 \text{ per acre} = 0.6 \text{ acres}$
- In addition, 2 acres were cleared for livestock feeding areas
- Storm lasted 3 days
- Producer was able to clear snow twice a day to feed

3 Parameters of Waivers, Eligibility, and Extent Allowed (Continued)

E Examples (Continued)

COC Determination:

- 2.6 acres are reasonable for this producer to clear from haystack to pasture
- 3 days are reasonable for the conditions created by this storm
- Clearing snow twice a day is reasonable for this operation and the conditions
- Storm accumulated over 16 inches of snow use scenario 500-036
- COC conditionally approves 2.6 acres x 3 days x 2 times per day = extent 15.6 acres

4 Scenarios and Software Guidance

A Payment Scenarios and Rates

New payment scenarios must be created by each State approved to implement ECP EC1 for snow removal.

Cost share will be paid on a per-acre basis based on the total allowable costs for the applicable FY debris removal payment scenarios listed as follows, for the applicable State:

- 500-036 Removal and disposal of light sand and flood sediment 12-30 inches
- 500-034 Removal and disposal of light sand and flood sediment > 30 inches.

The activity of removing snow typically includes equipment on the farm and does not include loading snow into a dump truck and disposing the snow in another location. Snow removal scenarios will **exclude mobilization**, **dump truck**, **and attributed heavy equipment labor for dump truck** included in the sand and flood sediment scenarios, as shown in Exhibit 3.

4 Scenarios and Software Guidance (Continued)

B Program Provisioning

New scenarios will be created in Program Provisioning by each State approved to implement ECP EC1 for snow removal.

To create a new payment scenario, CLICK "Create" in the "Component" category.



State Offices will create payment scenarios with the following naming convention, in which "FY" is the fiscal year of the disaster and "ST" will be the State FIPS code:

- FYST500036S Removal of snow 12-30 inches*
- FYST500034S Removal of snow > 30 inches*.

Average actual unit costs will be calculated based on:

 FYST500036S – Removal of snow 12-30 inches – 37.8430% DAFP-approved adjustment of 23ST500036**

Example: South Dakota's cost per unit for FY 2023 500036 is \$3,181.84 per acre (currently shown for the payment scenario rate in Program Provisioning for the State) x 0.378430 (DAFP-approved adjustment for snow removal) = \$1,204.10 per acre (cost per unit to be entered in Program Provisioning for creating 23ST500036S).

• FYST500034S – Removal of snow > 30 inches – 27.1767% adjustment of 23ST500034**.

Example: North Dakota's cost per unit for FY 2023 500034 is \$4,942.49 per acre (currently shown for the payment scenario rate in Program Provisioning for the State) x 0.271767 (DAFP-approved adjustment for snow removal) = \$1,343.21 per acre (cost per unit to be entered in Program Provisioning for creating 23ST500034S).

4 Scenarios and Software Guidance (Continued)

B Program Provisioning (Continued)

The details of the scenario will be completed in Program Provisioning as follows.

Category: Debris removal Sub Category: Debris removal

Component Code: FYST500036S (see * above)
And/or FYST500034S (see * above)

Descriptive Title: Removal of snow 12-30 inches

Removal of snow >30 inches

Unit of Measure: Acres
Rate Type: Flat rate

Average Actual Unit Cost: According to calculation above **

Average Unit Cost for SDA: Lesser of the calculation above or \$1,500

Effective Start Date: Date entering scenario in Program Provisioning

Effective End Date: 1-year from Effective Start Date

Regular Cost Share %: 75 LR, SDA, BF Cost Share %: 90

County Offices will copy the scenarios to their county or counties for use in the Cost Share Software (CSS).

5 Certification and Payment

A Certification of Completion

Applicants will certify completion of practice on FSA-848B. No FSA onsite verification is required. COC has discretion to determine whether the certification is reasonable and approve payment for the approved extent performed.

Applicants are required to submit cost share itemization for the equipment and labor.

B Determining Actual Cost

County Offices will determine actual cost according to flat rate payment scenario policy, by multiplying the COC-approved extent by the unit cost of the payment scenario and enter in CSS. Producer actual costs will not be calculated from receipts or invoices.

6 Action

A State Office and STC Action

State Offices and STC's will:

- follow the provisions of this notice
- ensure that County Offices follow the provisions of this notice
- provide the applicable State scenario list to County Offices
- contact Shanita Landon, National Office program manager, with questions about this notice.

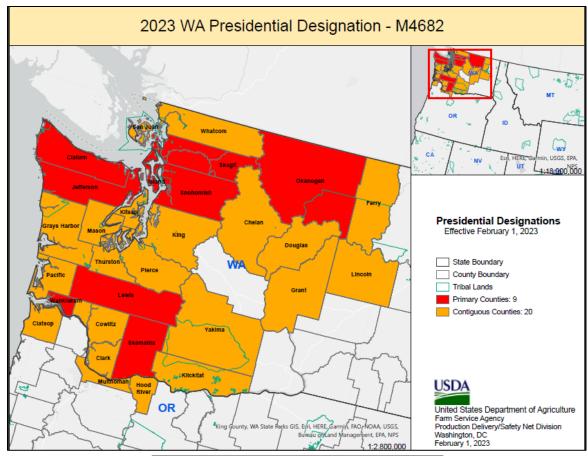
B County Office Action

County Offices will:

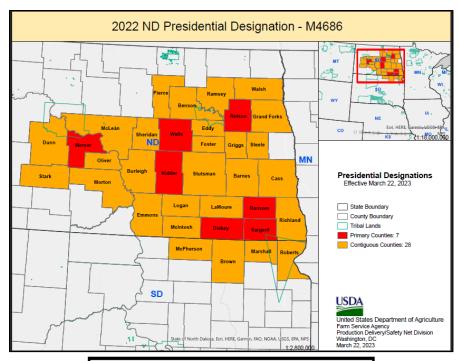
- follow the provisions of this notice
- contact the State Office with questions about this notice.

Current Presidentially Declared Disasters Eligible to Implement EC1 for Snow Removal in FY 2023

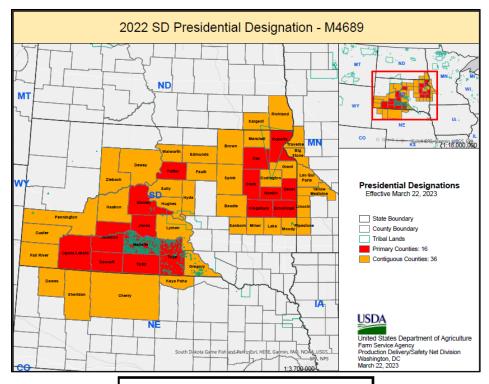
Name	Disaster #	Incident Period	Declaration Date	# Counties
Washington Severe Winter Storm, Straight-line Winds, Flooding, Landslides and Mudslides	DR-4682-WA	11/3/22-11/8/22	1/12/2023	9
North Dakota Severe Winter Storm, Snowstorm, and Straight-line Winds	DR-4686-ND	11/9/22 – 11/11/22	2/5/23	7
South Dakota Severe Winter Storm and Snowstorm	DR-4689-SD	12/12/22 – 12/25/22	2/27/23	16
Oglala Sioux Tribe Severe Winter Storm and Snowstorm	DR-4688	12/12/22 – 12/25/22	2/20/23	Oglala Sioux Tribe of the Pine Ridge Reservation
Oklahoma Severe Winter Storm	DR-4690-OK	12/21/22-12/25/22	3/3/2023	Muscogee (Creek) Nation and 9 counties
Tennessee Severe Winter Storm	DR-4691-TN	12/22/22 – 12/27/22	3/8/23	11
Rosebud Sioux Tribe Severe Winter Storms and Snowstorm	DR-4687-SD	12/23/22 – 12/28/22	2/20/23	Rosebud Indian Reservation
New York Severe Winter Storm and Snowstorm	DR-4694-NY	12/23/22 - 12/28/22	3/15/23	5
Navajo Nation Severe Winter Storms and Flooding	DR-4703	1/14/23 – 1/17/23	4/11/23	Navajo Nation and counties in UT and NM
Arkansas Severe Winter Storm	DR-4700-AR	1/30/23 - 2/2/23	4/4/23	13
Texas Severe Winter Storm	DR-4705-TX	1/30/23 - 2/2/23	4/21/23	22
California Severe Winter Storms, Straight-line Winds, Flooding, Landslides, and Mudslides	DR-4699-CA	2/21/23 and continuing	4/3/23	9
Hoopa Valley Tribe Severe Winter Storms and Mudslides	DR-4707	2/14/23 - 3/5/23	4/25/23	Hoopa Valley Indian Reservation, CA
Nevada Severe Winter Storms, Flooding, Landslides, and Mudslides	DR-4708-NV	3/8/23 - 3/19/23	4/27/23	6



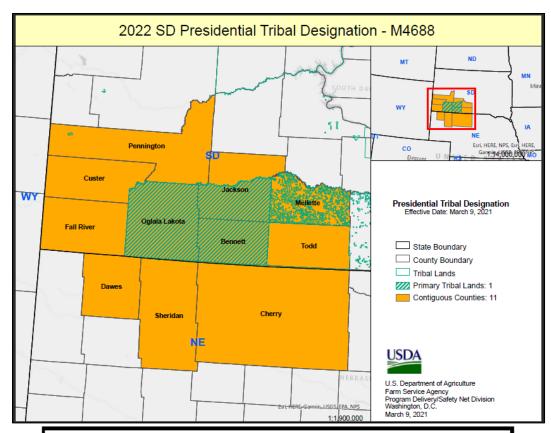
List of Primary and Contiguous Counties							
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE		
53009	Clallam	Washington	41007	Clatsop	Oregon		
53029	Island	Washington	41027	Hood River	Oregon		
53031	Jefferson	Washington	41051	Multnomah	Oregon		
53041	Lewis	Washington	53007	Chelan	Washington		
53047	Okanogan	Washington	53011	Clark	Washington		
53057	Skagit	Washington	53015	Cowlitz	Washington		
53059	Skamania	Washington	53017	Douglas	Washington		
53061	Snohomish	Washington	53019	Ferry	Washington		
53069	Wahkiakum	Washington	53025	Grant	Washington		
			53027	Grays Harbor	Washington		
			53033	King	Washington		
			53035	Kitsap	Washington		
			53039	Klickitat	Washington		
			53043	Lincoln	Washington		
			53045	Mason	Washington		
			53049	Pacific	Washington		
			53053	Pierce	Washington		
			53055	San Juan	Washington		
			53067	Thurston	Washington		
			53073	Whatcom	Washington		
			53077	Yakima	Washington		



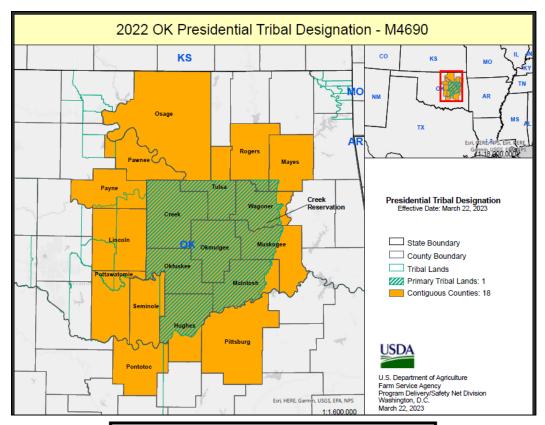
	List of Primary and Contiguous Counties							
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE			
38021	Dickey	North Dakota	38003	Barnes	North Dakota			
38043	Kidder	North Dakota	38005	Benson	North Dakota			
38057	Mercer	North Dakota	38015	Burleigh	North Dakota			
38063	Nelson	North Dakota	38017	Cass	North Dakota			
38073	Ransom	North Dakota	38025	Dunn	North Dakota			
38081	Sargent	North Dakota	38027	Eddy	North Dakota			
38103	Wells	North Dakota	38029	Emmons	North Dakota			
			38031	Foster	North Dakota			
			38035	Grand Forks	North Dakota			
			38039	Griggs	North Dakota			
			38045	LaMoure	North Dakota			
			38047	Logan	North Dakota			
			38051	McIntosh	North Dakota			
			38055	McLean	North Dakota			
			38059	Morton	North Dakota			
			38065	Oliver	North Dakota			
			38069	Pierce	North Dakota			
			38071	Ramsey	North Dakota			
			38077	Richland	North Dakota			
			38083	Sheridan	North Dakota			
			38089	Stark	North Dakota			
			38091	Steele	North Dakota			
			38093	Stutsman	North Dakota			
			38099	Walsh	North Dakota			
			46013	Brown	South Dakota			
			46089	McPherson	South Dakota			
			46091	Marshall	South Dakota			
			46109	Roberts	South Dakota			



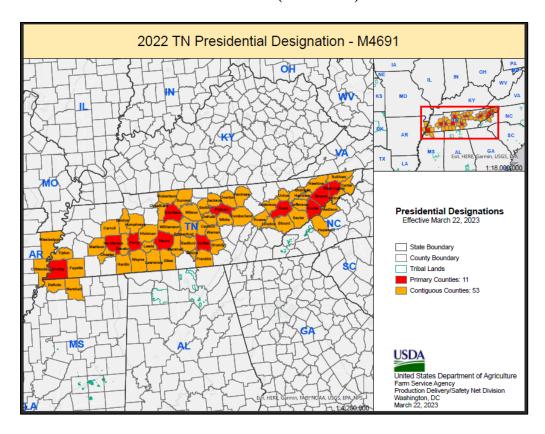
	List of Primary and Contiguous Counties						
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE		
46007	Bennett	South Dakota	27011	Big Stone	Minnesota		
46011	Brookings	South Dakota	27073	Lac Qui Parle	Minnesota		
46025	Clark	South Dakota	27081	Lincoln	Minnesota		
46037	Day	South Dakota	27117	Pipestone	Minnesota		
46039	Deuel	South Dakota	27155	Traverse	Minnesota		
46057	Hamlin	South Dakota	27173	Yellow Medicine	Minnesota		
46071	Jackson	South Dakota	31031	Cherry	Nebraska		
46075	Jones	South Dakota	31045	Dawes	Nebraska		
46077	Kingsbury	South Dakota	31103	Keya Paha	Nebraska		
46095	Mellette	South Dakota	31161	Sheridan	Nebraska		
46102	Oglala Lakota	South Dakota	38077	Richland	North Dakota		
46107	Potter	South Dakota	38081	Sargent	North Dakota		
46109	Roberts	South Dakota	46005	Beadle	South Dakota		
46117	Stanley	South Dakota	46013	Brown	South Dakota		
46121	Todd	South Dakota	46029	Codington	South Dakota		
46123	Tripp	South Dakota	46033	Custer	South Dakota		
			46041	Dewey	South Dakota		
			46045	Edmunds	South Dakota		
			46047	Fall River	South Dakota		
			46049	Faulk	South Dakota		
			46051	Grant	South Dakota		
			46053	Gregory	South Dakota		
			46055	Haakon	South Dakota		
			46065	Hughes	South Dakota		
			46069	Hyde	South Dakota		
			46079	Lake	South Dakota		
			46085	Lyman	South Dakota		
			46091	Marshall	South Dakota		
			46097	Miner	South Dakota		
			46101	Moody	South Dakota		
			46103	Pennington	South Dakota		
			46111	Sanborn	South Dakota		
			46115	Spink	South Dakota		
			46119	Sully	South Dakota		
			46129	Walworth	South Dakota		
			46137	Ziebach	South Dakota		



	List of Primary and Contiguous Counties						
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE		
2810	Oglala Sioux	South Dakota	31031	Cherry	Nebraska		
			31045	Dawes	Nebraska		
			31161	Sheridan	Nebraska		
			46007	Bennett	South Dakota		
			46033	Custer	South Dakota		
			46047	Fall River	South Dakota		
			46071	Jackson	South Dakota		
			46095	Mellette	South Dakota		
			46102	Oglala Lakota	South Dakota		
			46103	Pennington	South Dakota		
			46121	Todd	South Dakota		

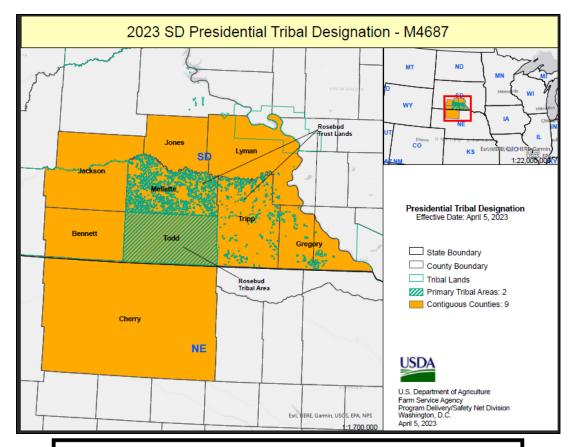


	List of Primary and Contiguous Counties							
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE			
5620	Muskogee Creek	Oklahoma	40037	Creek	Oklahoma			
			40063	Hughes	Oklahoma			
			40081	Lincoln	Oklahoma			
			40091	McIntosh	Oklahoma			
			40097	Mayes	Oklahoma			
			40101	Muskogee	Oklahoma			
			40107	Okfuskee	Oklahoma			
			40111	Okmulgee	Oklahoma			
			40113	Osage	Oklahoma			
			40117	Pawnee	Oklahoma			
			40119	Payne	Oklahoma			
			40121	Pittsburg	Oklahoma			
			40123	Pontotoc	Oklahoma			
			40125	Pottawatomie	Oklahoma			
			40131	Rogers	Oklahoma			
			40133	Seminole	Oklahoma			
			40143	Tulsa	Oklahoma			
			40145	Wagoner	Oklahoma			

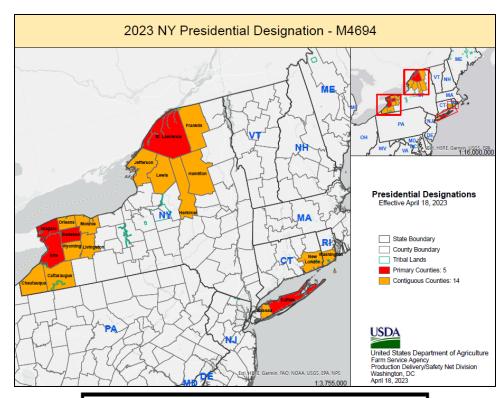


List of Primary and Contiguous Counties						
St/Co	STATE					
FIPS Code 47029	Primary Cocke	STATE Tennessee	FIPS Code 05035	Contiguous Crittenden	Arkansas	
47029			05033			
47031	Coffee Davidson	Tennessee Tennessee	28033	Mississippi DeSoto	Arkansas Mississippi	
47059		Tennessee				
47059	Greene Henderson			Marshall	Mississippi	
47077		Tennessee		Haywood	North Carolina	
	Knox		37115	Madison	North Carolina	
47119 47135	Maury	Tennessee	47001 47003	Anderson Bedford	Tennessee	
	Perry	Tennessee			Tennessee	
47141	Putnam	Tennessee	47005	Benton	Tennessee	
47157	Shelby	Tennessee	47009	Blount	Tennessee	
47179	Washington	Tennessee	47015	Cannon	Tennessee	
			47017	Carroll	Tennessee _	
			47019	Carter	Tennessee	
			47021	Cheatham	Tennessee	
			47023	Chester	Tennessee	
			47035	Cumberland	Tennessee	
			47039	Decatur	Tennessee	
			47041	DeKalb	Tennessee	
			47047	Fayette	Tennessee	
			47049	Fentress	Tennessee	
			47051	Franklin	Tennessee	
			47055	Giles	Tennessee	
			47057	Grainger	Tennessee	
			47061	Grundy	Tennessee	
			47063	Hamblen	Tennessee	
			47071	Hardin	Tennessee	
			47073	Hawkins	Tennessee	
			47081	Hickman	Tennessee	
			47085	Humphreys	Tennessee	
			47087	Jackson	Tennessee	
			47089	Jefferson	Tennessee	
			47099	Lawrence	Tennessee	
			47101	Lewis	Tennessee	
			47105	Loudon	Tennessee	
			47113	Madison	Tennessee	
			47117	Marshall	Tennessee	
			47127	Moore	Tennessee	
			47133	Overton	Tennessee	
			47145	Roane	Tennessee	
			47147	Robertson	Tennessee	
			47149	Rutherford	Tennessee	
			47155	Sevier	Tennessee	

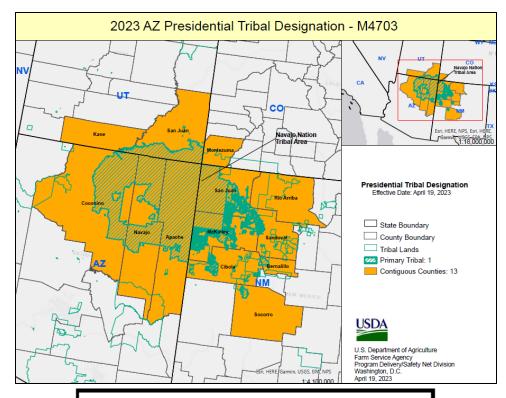
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE
			47159	Smith	Tennessee
			47163	Sullivan	Tennessee
			47165	Sumner	Tennessee
			47167	Tipton	Tennessee
			47171	Unicoi	Tennessee
			47173	Union	Tennessee
			47177	Warren	Tennessee
			47181	Wayne	Tennessee
			47185	White	Tennessee
			47187	Williamson	Tennessee
			47189	Wilson	Tennessee



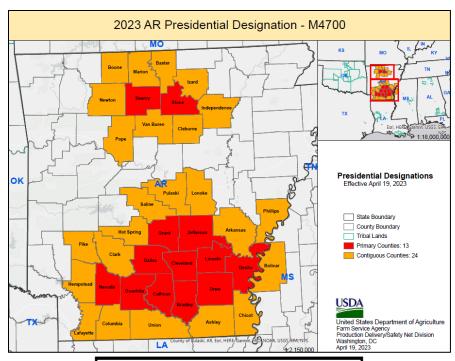
	List of Primary and Contiguous Counties							
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE			
3235	Rosebud Reservation	South Dakota	31031	Cherry	Nebraska			
			46007	Bennett	South Dakota			
			46053	Gregory	South Dakota			
			46071	Jackson	South Dakota			
			46075	Jones	South Dakota			
			46085	Lyman	South Dakota			
			46095	Mellette	South Dakota			
			46121	Todd	South Dakota			
			46123	Tripp	South Dakota			



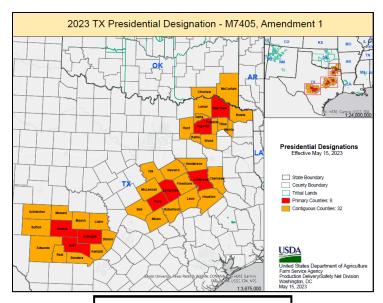
	List of Primary and Contiguous Counties							
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE			
36029	Erie	New York	09011	New London	Connecticut			
36037	Genesee	New York	36009	Cattaraugus	New York			
36063	Niagara	New York	36013	Chautauqua	New York			
36089	St. Lawrence	New York	36033	Franklin	New York			
36103	Suffolk	New York	36041	Hamilton	New York			
			36043	Herkimer	New York			
			36045	Jefferson	New York			
			36049	Lewis	New York			
			36051	Livingston	New York			
			36055	Monroe	New York			
			36059	Nassau	New York			
			36073	Orleans	New York			
			36121	Wyoming	New York			
			44009	Washington	Rhode Island			



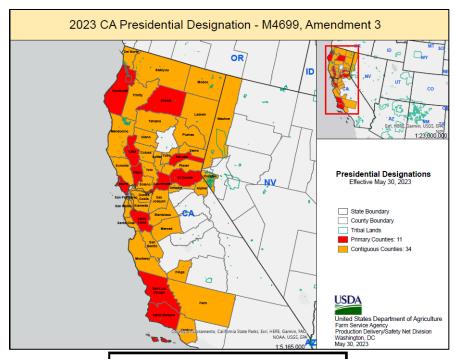
	List of Primary and Contiguous Counties						
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE		
2430	Navajo Nation	Arizona	04001	Apache	Arizona		
			04005	Coconino	Arizona		
			04017	Navajo	Arizona		
			08083	Montezuma	Colorado		
			35001	Bernalillo	New Mexico		
			35006	Cibola	New Mexico		
			35031	McKinley	New Mexico		
			35039	Rio Arriba	New Mexico		
			35043	Sandoval	New Mexico		
			35045	San Juan	New Mexico		
			35053	Socorro	New Mexico		
			49025	Kane	Utah		
			49037	San Juan	Utah		



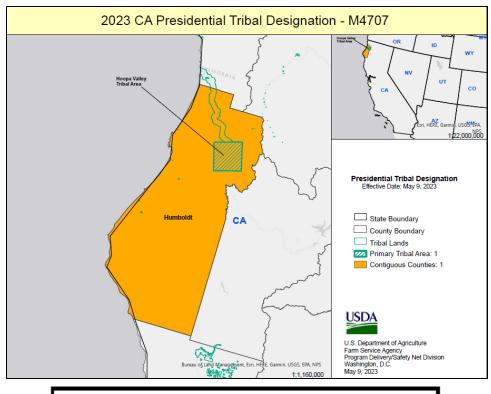
List of Primary and Contiguous Counties						
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE	
05011	Bradley	Arkansas	05001	Arkansas	Arkansas	
05013	Calhoun	Arkansas	05003	Ashley	Arkansas	
05025	Cleveland	Arkansas	05005	Baxter	Arkansas	
05039	Dallas	Arkansas	05009	Boone	Arkansas	
05041	Desha	Arkansas	05017	Chicot	Arkansas	
05043	Drew	Arkansas	05019	Clark	Arkansas	
05053	Grant	Arkansas	05023	Cleburne	Arkansas	
05069	Jefferson	Arkansas	05027	Columbia	Arkansas	
05079	Lincoln	Arkansas	05057	Hempstead	Arkansas	
05099	Nevada	Arkansas	05059	Hot Spring	Arkansas	
05103	Ouachita	Arkansas	05063	Independence	Arkansas	
05129	Searcy	Arkansas	05065	Izard	Arkansas	
05137	Stone	Arkansas	05073	Lafayette	Arkansas	
			05085	Lonoke	Arkansas	
			05089	Marion	Arkansas	
			05101	Newton	Arkansas	
			05107	Phillips	Arkansas	
			05109	Pike	Arkansas	
			05115	Pope	Arkansas	
			05119	Pulaski	Arkansas	
			05125	Saline	Arkansas	
			05139	Union	Arkansas	
			05141	Van Buren	Arkansas	
			28011	Bolivar	Mississippi	



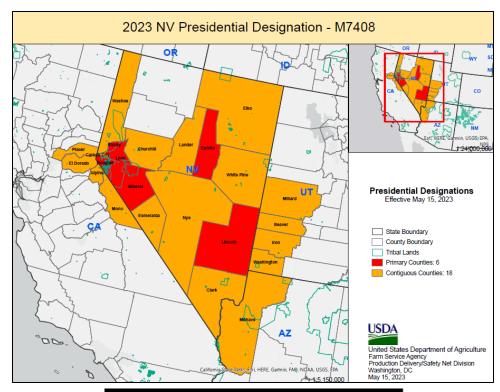
List of Primary and Contiguous Counties					
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE
48001	Anderson	Texas	40023	Choctaw	Oklahoma
48145	Falls	Texas	40089	McCurtain	Oklahoma
48171	Gillespie	Texas	48019	Bandera	Texas
48223	Hopkins	Texas	48027	Bell	Texas
48265	Kerr	Texas	48031	Blanco	Texas
48267	Kimble	Texas	48037	Bowie	Texas
48293	Limestone	Texas	48073	Cherokee	Texas
48387	Red River	Texas	48119	Delta	Texas
			48137	Edwards	Texas
			48159	Franklin	Texas
			48161	Freestone	Texas
			48213	Henderson	Texas
			48217	Hill	Texas
			48225	Houston	Texas
			48231	Hunt	Texas
			48259	Kendall	Texas
			48277	Lamar	Texas
			48289	Leon	Texas
			48299	Llano	Texas
			48309	McLennan	Texas
			48319	Mason	Texas
			48327	Menard	Texas
			48331	Milam	Texas
			48343	Morris	Texas
			48349	Navarro	Texas
			48379	Rains	Texas
			48385	Real	Texas
			48395	Robertson	Texas
			48413	Schleicher	Texas
			48435	Sutton	Texas
			48449	Titus	Texas
			48499	Wood	Texas



	List of Prim	ary and C	ontiguous	Counties	
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE
06017	El Dorado	California	06001	Alameda	Californi
06023	Humboldt	California	06003	Alpine	Californi
06033	Lake	California	06005	Amador	Californi
06041	Marin	California	06011	Colusa	Californi
06055	Napa	California	06013	Contra Costa	Californ
06057	Nevada	California	06015	Del Norte	Californ
06067	Sacramento	California	06021	Glenn	Californ
06079	San Luis Obispo	California	06029	Kern	Californ
06083	Santa Barbara	California	06031	Kings	Californ
06085	Santa Clara	California	06035	Lassen	Californ
06089	Shasta	California	06045	Mendocino	Californ
			06047	Merced	Californ
			06049	Modoc	Californ
			06053	Monterey	Californ
			06061	Placer	Californ
			06063	Plumas	Californ
			06069	San Benito	Californ
			06075	San Francisco	Californ
			06077	San Joaquin	Californ
			06081	San Mateo	Californ
			06087	Santa Cruz	Californ
			06091	Sierra	Californ
			06093	Siskiyou	Californ
			06095	Solano	Californ
			06097	Sonoma	Californ
			06099	Stanislaus	Californ
			06101	Sutter	Californ
			06103	Tehama	Californ
			06105	Trinity	Californ
			06111	Ventura	Californ
			06113	Yolo	Californ
			06115	Yuba	Californ
			32005	Douglas	Nevada
			32031	Washoe	Nevada



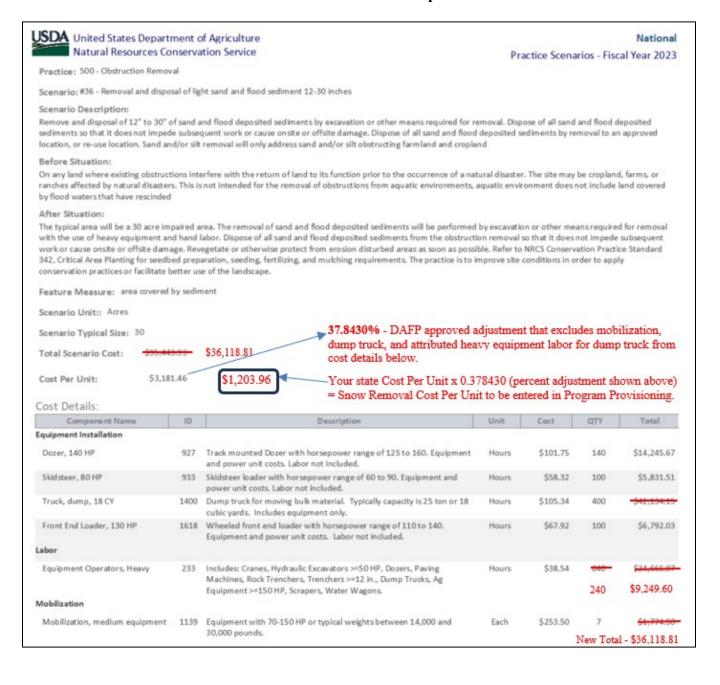
List of Primary and Contiguous Counties							
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE		
1490	Hoopa Valley Tribe	California	06023	Humboldt	California		



List of Primary and Contiguous Counties					
St/Co FIPS Code	Primary	STATE	St/Co FIPS Code	Contiguous	STATE
32005	Douglas	Nevada	04015	Mohave	Arizona
32011	Eureka	Nevada	06003	Alpine	Califomia
32017	Lincoln	Nevada	06017	El Dorado	California
32019	Lyon	Nevada	06051	Mono	California
32021	Mineral	Nevada	06061	Placer	California
32029	Storey	Nevada	32001	Churchill	Nevada
			32003	Clark	Nevada
			32007	Elko	Nevada
			32009	Esmeralda	Nevada
			32015	Lander	Nevada
			32023	Nye	Nevada
			32031	Washoe	Nevada
			32033	White Pine	Nevada
			32510	Carson City	Nevada
			49001	Beaver	Utah
			49021	Iron	Utah
			49027	Millard	Utah
			49053	Washington	Utah

Detail of Snow Removal Scenario

A Detail of Snow Removal Scenario – 12-30 Inches Deep



Detail of Snow Removal Scenario (Continued)

B Detail of Snow Removal Scenario -> 30 Inches Deep

