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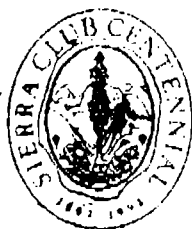
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Sierra Club Northwest - Framework of a Forest Solution [Report]

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SIERRA CLUB



NORTHWEST REGIONAL CONSERVATION COMMITTEE

9004 - 20th Avenue N.E.
Seattle, Washington 98115

April 25, 1993

Kathleen McGinty
Director, Office of Environmental Policy
Old Executive Office Building #360
Washington, D.C. 20501

Dear Ms. McGinty:

The Sierra Club was pleased to participate in the President's Forest Conference. We also appreciate the continuing dialogue as we work with the administration to craft a solution. We have been asked to provide input to that planning process and wish to submit the enclosed *Framework of a Forest Solution* for your review.

We believe our proposal provides a comprehensive, long term and balanced solution to the forest issue in the northwest. It outlines the major points of that solution in the same manner that the teams have been organized. It concludes with a discussion of how the proposal meets the President's criteria enunciated at the conference.

It is necessarily brief. However, we can easily provide you or the teams with more detail. Maps that delineate our recommended Ancient Forest Preserves can be quickly delivered to the teams. Some material has already been provided to team members during previous studies. In such a complex matter, it is important that those preparing the plan have an opportunity to discuss the critical details with interested and informed parties. We are ready to respond.

At the conclusion of the Conference we were encouraged by the President's commitment to forging a solution that is ecologically sound. We believe you will find our proposal meets that test. We were also moved by the stories of social strife in communities affected by the current gridlock. We are supporting measures to improve the situation and have suggested options in our proposal.

Do not hesitate to call on us as you prepare the plan. I have attached a list of Sierra Club leaders whom you can contact for further information.

Please express our thanks to the President for his leadership on this issue.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles C. Raines".

Charles C. Raines
Ancient Forest Campaign

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FRAMEWORK OF A FOREST SOLUTION

SIERRA CLUB

RESPONSE TO NORTHWEST FOREST CONFERENCE

April 25, 1993

OVERVIEW

The following proposal responds to President Clinton's invitation to provide input to his comprehensive forest plan. This response is organized according to the teams and issue groups established by the President. It is brief, as requested, and additional specifics and maps can be provided easily. It is composed of both legislative and administrative elements. It concludes with a discussion of how this proposal meets the five criteria the President enunciated at the conference.

GOALS:

Maintain a healthy forest ecosystem, which insures at least a high level of viability for all native species of fish, wildlife and plants.

1. Establish a system of permanent preserves to provide complete protection for ancient forest ecological systems across the northwest.
2. Protect and restore watersheds, wildlife habitat and fisheries.
3. Initiate programs to improve Eastside forest health.
4. Improve forestry techniques on lands outside preserves.
5. Increase scientific research and monitoring.

Maintain a healthy forest based economy, which provides family wage jobs in rural communities.

1. Provide assistance to affected families and communities during the transition.
2. Stabilize federal timber sale program at ecologically sustainable levels.
3. Encourage domestic manufacture of value added wood products.
4. Reduce export of unprocessed logs.
5. Invest in communities to diversify economies.
6. Maintain private forest land base.

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Inherent in the above elements are the following principles:

1. Solutions are based on best science available.
2. Both legislation and administrative actions are required.

3. No weakening of environmental laws or restrictions on citizen access to the courts.
4. Agency accountability for adhering to law subject to public review and challenge.
5. Increased certainty for environmental interests is attained by statutory forest protection.
6. Increased certainty for timber interests is attained by implementing a scientifically sound solution that meets the requirements of law.

I. ECOSYSTEM MANAGEMENT

A. Objectives

1. Provide protection for old-growth forests and associated ancient forest ecological systems, including aquatic components.
2. Insure recovery of threatened or endangered late successional forest species.
3. Scientific Criteria
 - a. Achieve High/Very High level of reliability for retaining viable late successional forests and species (Late Successional and Old-growth Forests (LS/OG) Scientific Panel evaluation).

B. Ancient Forest Preserves

1. Establish Ancient Forest Preserve System
 - a. Immediate and permanent statutory protection.
 - b. Delineated on maps
 - "Westside"* forests based on LSOG Panel Alternative 12 plus unroaded areas
 - see section I.E. for "eastside" forests.
 - c. Include other public lands if nominated by managing jurisdiction (e.g., WA Dept. of Natural Resources; City of Seattle).
 - d. Moratorium on logging in unroaded areas and biological corridors until system is formally established.
 - e. Incorporate Native American concerns in design of system.
2. Manage to maintain ecological processes essentially undisturbed by man.
 - a. No logging permitted.
 - b. No mining permitted.
 - c. Compatible recreation allowed.
 - existing facilities may be retained.
 - d. Hunting & fishing allowed.

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- e. Non-destructive research and educational activities allowed.
- f. Reduction of road network
 - no new roads
 - existing roads evaluated to maintain, obliterate, or convert/return to trails.
- g. Acquire intermingled corporate lands that have existing ancient forest
 - purchase (Land & Water Conservation Fund), donation, exchange

Rationale:

The preserve system provides the foundation for all other ecosystem management activities. It insures that if all experiments fail, a core large enough to sustain all species has been preserved. Experiments in recreating old-growth forests cannot be allowed in the preserves.

Large areas are necessary to allow for natural processes (e.g., fire) to proceed in a relatively natural manner. Unroaded areas** provide contiguous habitat, without roads and other fragmentation. This is important for large predators (e.g. wolves, grizzly bear in north Cascades- recovery plans in preparation). This also would provide the best protection for lynx, spotted owl and murrelet. Unroaded areas also include other eco-types that were not specifically noted in LSOG Panel report, due to its focus on certain types of forests or lack of data. Examples of major omissions can be found in the Methow Valley (Okanogan NF) and the Kalmiopsis (Siskiyou NF).

Strong management language is necessary to preserve ecosystem intact. Essential restoration work (e.g. road conversion) would be allowed in first five years after establishment. Interim management direction (moratoria) is needed as some national forests (e.g., Wenatchee, Okanogan) are accelerating timber sales in critical areas, that should become part of the preserve system.

Legislation provides permanence, to avoid reopening this issue each time forest plans are revised. Legislation is also necessary to withdraw areas from mineral entry. Immediate designation would assist in targeting road conversion programs and accelerate funding.

Consultation with Native Americans will insure adequate protection for cultural sites and allowance for traditional religious and cultural practices.

Boundaries of preserves would avoid heavily developed areas such as ski resorts. Acquisition of private lands (e.g., Plum Creek "checkerboard" in I-90 corridor, WA; Maxxam Headwaters Forest, CA) would prevent the destruction of critical habitat in strategic locations.

Due to excessive cutting for the past 150 years, the remaining old-growth and associated ancient forests need to be preserved to achieve a sustainable balance.

* "Westside" or "owl" forests include all of Wenatchee NF and Okanogan NF west of the Okanogan/Columbia Rivers.

**** Some unroaded areas did not appear in RARE II or Forest Plan EISs (e.g., Alpine Lakes Mgt. Area, Mt. Baker-Snoqualmie NF). Sierra Club has prepared maps for Washington.**

Reference:

Okanogan NF Unroaded Areas maps (Sierra Club, April 1993).

Mt. Baker-Snoqualmie NF Unroaded Areas Map (Sierra Club, April 1993)

Okanogan & Wenatchee NF FY 93 Timber Sales (Sierra Club, April 1993)

Portland Scientific (LS/OG) Panel Maps/Report (1991).

USFWS letter on I-90 Area of Concern, Spotted Owl Critical Habitat (June 9, 1992)

Forest age class maps, Okanogan NF (Wilderness Society 1993)

Vegetative association type maps of north Cascades (USFS, FWS, WDW 1992)

C. Ancient Forest Research Program

1. Ancient Forest Study Areas
 - a. Delineate on a map.
 - b. Interim Protection
 - No logging of low elevation old-growth or murrelet habitat
 - c. Any salvage, thinning or other harvest must be limited to designated restoration or experimental areas and approved by FWS and Scientific Committee.
2. Scientific Committee
 - a. Recommends allocation of Study Areas to Preserve or Forest Plan designation.
 - b. Recommends additional protection measures to provide refugia in highly disturbed landscapes.
 - b. Recommends new forestry type prescriptions for lands outside of Preserves, as modifications to forest plan guidelines.
 - c. Review extends to broader landscape of federal and non-federal forest lands within affected major drainages.

Rationale:

Oversight by a scientific committee would insure implementation of the plan is scientifically grounded. Study Areas provide direction for those areas that require additional evaluation, major restoration measures (e.g. highly fragmented public forests interspersed with cutover private lands) or that provide active research opportunities. Committee would recommend adaptive management outside of preserves and develop specifics for elements such as refugia in highly fragmented landscapes, and watershed plans in coastal basins.

Reference:

Scientific Advisory Team Report (March 1993)

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D. Watershed Protection/Restoration

1. Implement watershed emphasis protection measures on all federal lands (described by LS/OG Panel and Scientific Advisory Team)
 - a. No cut zones along streams (100' to 1300')
 - b. Improve road maintenance and timber management practices.
2. Restoration Measures
 - a. Road eradication and conversion
- Roads to Trails Program
 - b. Road maintenance or upgrading; bridge & culvert installation or replacement
 - c. Fisheries habitat rehabilitation

Rationale:

Restoration of anadromous and resident fish stocks mandates both protecting and rehabilitating habitat. This requires improving water quality and maintaining shade and other habitat factors. Removing roads in preserves will eliminate one of the greatest sources of sediment in streams. It will also reduce habitat fragmentation, enhance large ungulate (elk, deer) habitat and decrease poaching. Projects will require many skilled workers and will result in increased recreation and tourist resources. Priority should be for watersheds with stocks at risk of extinction and those in designated preserves.

Reference:

Washington Trails Association and Sierra Club Roads to Trails Program, letter to Regional Forester (April 8, 1993)

LSOG Panel Report (1991)

Scientific Advisory Team (SAT) Report (1993)

E. Eastside Forest Health

1. Initial Units of Ancient Forest Preserve System
 - a. All unroaded areas
 - b. Old growth forest groves > 80 acres
- Eastside forest type definitions
2. Interim Protection
 - a. Moratorium on cutting large or old ponderosa pine (> 20" dbh).
 - b. Limit on salvage timber sales
 - c. Limit on road construction
3. Implement LSOG Panel watershed protection measures in all watersheds.
4. Institute scientific study of forest health.

Rationale:

Initial decisions can be made to preserve forests that are still undisturbed. These are the healthiest parts of these forests and would be designated and managed as Ancient Forest Preserves (see I.B.). Riparian areas are degraded and old ponderosa pine are rapidly being eliminated. Both are in need of immediate additional protection. The timber sales quantity must be reduced to account for revised management direction. The proposal allows for further study to prepare plans for re-establishing natural ecological processes including fire, with interim management direction. Current Forest Service restoration proposals for Blue Mountains and Colville NF are inadequate, with no provisions for preserves, and heavy reliance on salvage logging.

Reference:

Restoration proposals for Colville, Umatilla et al (USFS 1993)

F. Landscape Management

1. Institute new forestry principles on federal lands outside of preserves.
 - a. Leave snags and large woody debris
 - b. Maintain structural diversity
 - c. Provide for native tree species mix
 - d. Maintain full range of age classes
2. Improve forest practices on private and state-owned lands.
 - a. Incentives for private/public forest management plans.
 - basin plans
 - b. Strengthen state forest practices regulations.
 - incorporate new forestry techniques
 - c. Establish forest reserves on other public lands.
3. Enhance biodiversity on previously managed sites
 - a. Replant, interplant to restore species diversity
 - b. Thin to increase structural diversity
 - c. Encourage production of quality wood products (long rotations)

Rationale:

The landscape between the preserves must be properly managed to achieve goals of ecosystem management. This would include the full range of age classes and vegetation types. Standards must be sufficient to insure dispersal of all species and protection of watersheds and fisheries.

Reference:

Scientific Advisory Team Report (March 1993)

LSOG Scientific Panel Report (October 1991)

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II. LABOR & COMMUNITY ASSISTANCE

A. Measures to Increase Predictability of Timber Supply

1. **Revise and Implement Forest Plans (BLM & USFS)**
 - a. As modified by this proposal
 - b. Incorporate recovery plans
 - c. Adjust ASQ to new sustainable levels
 - d. Submit plans for approval by federal courts.
2. **Restrict Log Exports**
 - a. Levy Tax on NW species of trees during first 10 years
 - annual exemption for first 100,000 BdFt per forest land owner
 - funds generated to be used for economic assistance and investment programs
 - b. Eliminate tax deductions for export of raw logs
 - c. Provide incentives for domestic manufacture
 - d. Eliminate direct and indirect substitution
 - e. Limit log exports if necessary
3. Incentives to reduce loss of private forest land base to urbanization or agriculture.
4. Increased incentives for good forestry for woodlot owners.

Rationale:

A comprehensive plan provides a more predictable supply of timber from both public and private lands that is sustainable. Maintaining private lands in forestry is necessary to maintain supply, as they are the primary producer of timber. Diverting log exports to domestic mills increases jobs.

Reference:

Ancient Forests and the Future of the Pacific Northwest (Lawler, March 1993)

B. Assistance for Communities in Transition to Long-Term Economic Viability

1. **Alleviate Short Term Economic Dislocation (2-3 years)**
 - a. Jobs Program accomplishing restoration work in I.C. above and B.3. below.
 - Family wages plus benefits
 - significant time will be in training
2. **Worker Training/Education Programs**
3. **Investment in infrastructure (e.g., highways, harbors, utilities)**

4. **Economic Diversification Program**
 - a. **Value-added Manufacturing Program**
 - Investments, loans, expert advice.
 - b. **Research Program and Facilities**
 - Manufacturing, marketing
 - Development of new products
 - Timber management (not management/regeneration of old-growth)
 - c. **Community economic development assistance**
 - d. **New or expanded industries**
5. **Maintain county receipts at average 1985-90 level for five years (federal appropriations)**

Rationale:

The above are options that appear to provide the needed support for communities and families during the transition. Other environmentally sound packages could also be implemented. Each local area would determine their own needs and direction.

Reference:

Washington Timber Team 1992 Annual Report (Nafziger)
Lawler Report

III. AGENCY COORDINATION

A. Compliance with Environmental Laws

1. **USFWS and NMFS expedite listing, critical habitat designation and adoption of recovery plans for endangered and threatened species (includes northern spotted owl, marbled murrelet, lynx, and salmon). Coordinate habitat and recovery plans with FS, BLM and state agencies.**
2. **Revise forest plans as necessary to fully comply with NFMA, ESA, Clean Water Act and legislation proposed above.**
3. **Reauthorize Endangered Species Act with additional provisions to encourage ecosystem protection.**

Rationale:

In order for agency coordination to achieve its stated purpose, each agency must comply with the laws. This compliance will lead to resolution of current lawsuits and provide insurance against future litigation.

B. Reform Agencies

1. Forest Service

- a. Restructure organization and transfer staff to accomplish shift from timber program to ecosystem management approach
- b. Revise budgets to provide incentives for ecosystem management
 - eliminate below cost timber sales
 - increase funding for functions that meet ecosystem objectives
- c. Revise appeal regulations
 - withdraw and revise to provide efficient but fair system for public review of agency decisions

2. BLM (Oregon State Office)

- a. Restructure organization and transfer staff and funds to accomplish shift from timber program to ecosystem management approach

Rationale:

Budget and staff must reflect new direction (ecosystem management). Only when staff considers these as objectives, rather than as constraints, will they achieve the new goals.

C. Executive Office

1. Presidential orders as needed to implement proposal
2. Preparation of legislation
3. Oversight by Office of Environmental Policy

Rationale:

President has ability to insure plans are comprehensive and coordinated and can submit proposed legislation. Executive oversight would insure agencies implement program properly.

D. Revise O&C Lands Mandate

1. Explicitly incorporate Multiple Use/Sustained Yield, ESA, etc. in mandate.

Rationale:

In order to avoid the conflicts with other federal land managers, and resource manager, these lands must have consistent direction (see SAT discussion on BLM's Jamison Strategy.)

IV. ISSUE AREAS

The following discussions are highlights of issues that should be addressed in the administration's briefing papers.

A. Regional Economic Concerns

The northwest economy is generally healthy with major segments in agriculture and foreign trade. Despite the recession jobs are being created. Rural communities, however, are disproportionately hit. Jobs in the timber industry continue to shrink as a portion of total jobs. Jobs related to fisheries have been severely impacted by land use decisions, including forestry. The outlook for tourism and recreation is bright, if natural features are still intact. Change is occurring all the time. Effects on timber communities are only accelerated by the change in federal forest policy.

B. Salmon/Fisheries Management

Habitat degradation is a major reason for decline of anadromous fish (salmon, steelhead). This is especially true in coastal streams with no dams. Further listings of endangered or threatened stocks are probable. See American Fisheries Society Report (Nehlsen *et al*, 1991). Resident fish are also at risk (e.g., bull trout) from habitat degradation.

C. Log Exports/Imports

High prices lure private land owners to export logs, while Japanese trade barriers discourage exports of finished products to that market. This creates the paradox of full log trucks driving past mills to load onto ships to Asia. Imports of logs (Siberia) could be part of a solution, but there are grave concern over introducing alien pests. Substitution and sourcing areas continue to be significant problems for independent mills.
(see also section II.B.)

D. Regional Timber Supply

Timber supply can stabilize at near current output levels, primarily off private lands. Federal timber sales will never again approach the levels of the 1980s. Private lands have increased cutting recently, taking advantage of current high prices. Prices for lumber is expected to level off and home building costs no higher than in 1976 (adjusted for inflation). Diverting raw logs from export docks to domestic mills is one way to offset the reduction in federal timber supply.

Reference:

Lawler Report

Congressional Research Service Report (Gorte 1993)

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E. Eastside Forests

(see section I.D.)

A century of overcutting pine and replanting with fir, over-aggressive fire suppression and road construction has created a major ecological disaster. This has created a danger of catastrophic fires and insect epidemics. However, this should not be an excuse to salvage every snag or dying tree. Further logging only exacerbates the problem---created by timber management. Lack of a comprehensive northwest forest solution will put increased pressure on already stressed eastside forest ecosystems.

CONCLUSION

The proposal outlined above attempts to meet the President's criteria for a solution to the forest issue of the Northwest. It is comprehensive, including eastside forests and private lands, and addresses the full range of species. The combination of permanence and long term investment in forest management provides a solution that is sustainable over time. By providing for a full range of resource uses and consideration of both urban and rural populations it strives for the elusive balance of ecological and economic benefits.

1. The Human Dimension

Programs in Section II address the short and long term social and economic issues. This program strives to manage change in timber communities by providing assistance to families and communities during the transition, investing in long term economic health and allowing for sustainable economic uses of public lands, including commodities.

2. Long Term Health of Forests, Wildlife and Waterways.

The proposals in Section I would provide high to very high levels of viability for terrestrial and aquatic plant and animal species for at least a century. These are indicators of the health of the forest. A long term research and monitoring component assures early notification if changes are needed.

3. Scientifically Sound, Ecologically Credible, Legally Responsible.

Proposals in Section I meet high to very high levels of viability as evaluated by leading scientists. As such, they meet the requirements of NFMA, ESA and other laws. The combination of preserves, watershed protection and landscape management on other public and private lands will provide a credible ecological approach to land management.

4. Predictable, Sustainable Supply of Timber and Other Forest Resources

While federal timber cuts will be below those of past decades, they will stabilize. By permanently establishing preserves, the productive capacity of the remaining forest land can be more accurately determined. By meeting the mandates of the law, the sustainable level will be more predictable as well as not degrading the environment. An open agency decision making process, with ample time for input backed up by an administrative appeals process that is both efficient and fair will avoid protracted court battles.

By implementing the preserve, watershed and new forestry components the non-timber resources can be sustained, as well. The scope of ecological elements of the proposal (preserves, watershed, landscape management) would bring resolution to most forest plan appeals in the region.

5. Agency Coordination

With a foundation of actions consistent with the law, new preserves established by Congress and direction from the President, the current gridlock should be broken. Clear guidelines for management should mandate consistent and coordinated efforts among the agencies.

Initiating eastside forest health measures (Section I.D.) will avoid pushing timber quotas to eastside forest, further exacerbating the ecological damage and polarizing the situation there. Reform of basic structure and approach of agencies will help insure that the situation will not be repeated in the Northwest or other parts of the country.

Note:

Several references have been noted within the text. We assume the teams have the published reports and agency documents. Those documents prepared by the Sierra Club will be submitted to the teams under separate cover.

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NORTHWEST REGIONAL CONSERVATION COMMITTEE

9004 - 20th Avenue N.E.
Seattle, Washington 98115

May 3, 1993

Kathleen McGinty
Director, Office of Environmental Policy
Old Executive Office Building #360
Washington, D.C. 20501

Dear Ms. McGinty:

The Sierra Club has prepared some additional materials for your information as the administration crafts a northwest forest solution. This is supplementary to the *Framework of a Forest Solution* which we submitted last week.

The attached maps show areas of special concern in Washington state that we wish the Ecosystem Management Team to consider.

Several unroaded areas in the Mt. Baker-Snoqualmie National Forest were not included on maps that the Portland Panel of Scientists prepared. This is because they were not included in RARE II or the Forest Plan EIS. The areas outlined on the maps are indeed unroaded and are critical to the protection of the ancient forest in this part of the Cascades. Despite the mixed ownership south of the Alpine Lakes Wilderness, they are still unroaded, though they are rapidly being lost.

The forests in the I-90 Corridor, an area which stretches from the Alpine Lakes Wilderness to the Norse Peak Wilderness, presents a difficult situation for forest protection, but with unique opportunities. The lands within the national forest boundaries are primarily a "checkerboard" of mile square blocks of federal and private lands. They are the result of the railroad land grants of the 19th century and are owned primarily by the Plum Creek and Weyerhaeuser timber companies.

The non-federal lands in the Cedar River watershed are owned by the City of Seattle, as it is their primary water supply. According to City plans, the ancient forest within the area outlined will be preserved by the City, as will the federal lands that will be acquired in a pending exchange. With the cooperation of the City and the critical location of these lands, we urge that they be included in the Ancient Forest Preserve System proposed in our April 26th *Framework*.

Most of the other lands within the proposed Preserve boundaries are intact ancient forest. Salmon spawning, critical owl habitat, murrelet habitat and other values are found here. The I-90 corridor is extremely important ecologically. If cutting patterns continue, the north and south Cascades in Washington will be severed by a wide band of cutover land. Maintaining the remaining large blocks of ancient forest is essential to insuring populations of spotted owls and other species will be able to interbreed across this gap. The Fish and Wildlife Service highlighted this critical situation and listed it as an area of special concern for the spotted owl.

Approximately 45,000 acres of private lands are included in the preserves, most of which are roadless. This is the only significant area of ancient forest in private ownership in Washington of which we are aware. We have proposed that Land and Water Conservation Funds be used to acquire these lands over the next few years. They must be included in the Preserve System now.

Additional lands identified by scientists as important LS/OG forests have been noted as Forest Study/Restoration Areas. These encompass lands that have been severely fragmented, and where the private land has been logged in mile square clearcuts. These lands are in desperate need of restoration work and may not be appropriate for immediate inclusion in the Preserve System. With further study the final disposition of these lands could be made. In the interim, significant restoration measures would be instituted. The few remaining patches of old-growth forests should, however, remain undisturbed as refugia.

The LSOG Panel Alternative 12 does not adequately protect all the unfragmented forests in this region. The modifications in our proposal would remedy that situation. These proposals are quite similar to the our 1991 maps submitted to the House Interior and Agriculture Committees in October 1991. The Study Areas were identified then as wildlife habitat connectors.

In the Okanogan National Forest, significant areas of ancient forest were not included in alternative maps prepared by the Portland Panel. We have identified unroaded areas (much of which contain important lynx habitat) that need to be protected in the "westside" component of the ancient forest solution. These maps have been submitted to Jeff Rogers.

We hope this information will be useful as you prepare options for the President. Please call if you have any questions. Thank you again for your close attention to this issue.

Sincerely,



Charles C. Raines
Chair, Ancient Forest Campaign

Enclosures:
Unroaded Areas (Alpine Lakes, Green River) Maps
Proposed Preserves (I-90) Map

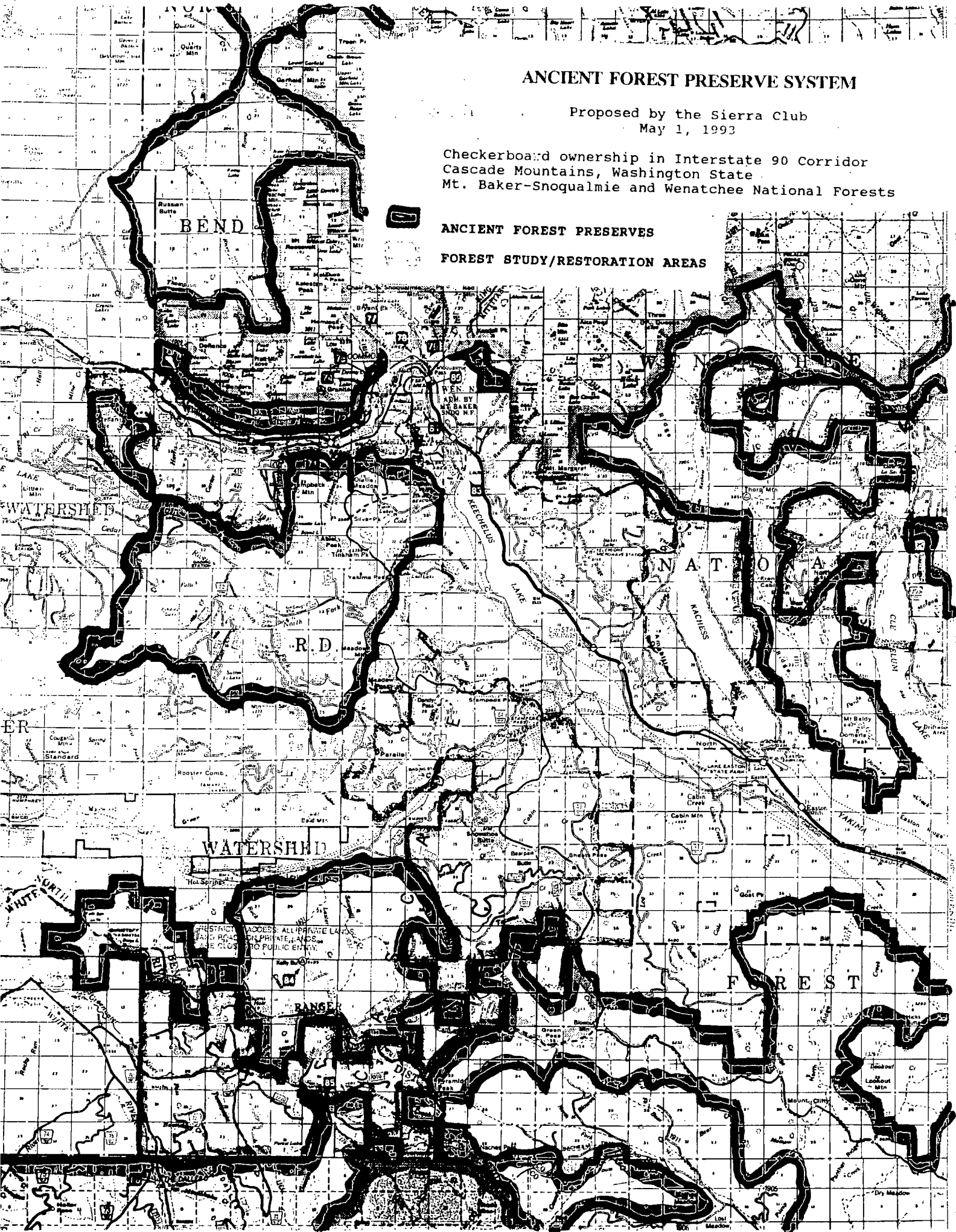
FAX cc: Tom Tuchmann
Jim Lyons
Jeff Rogers

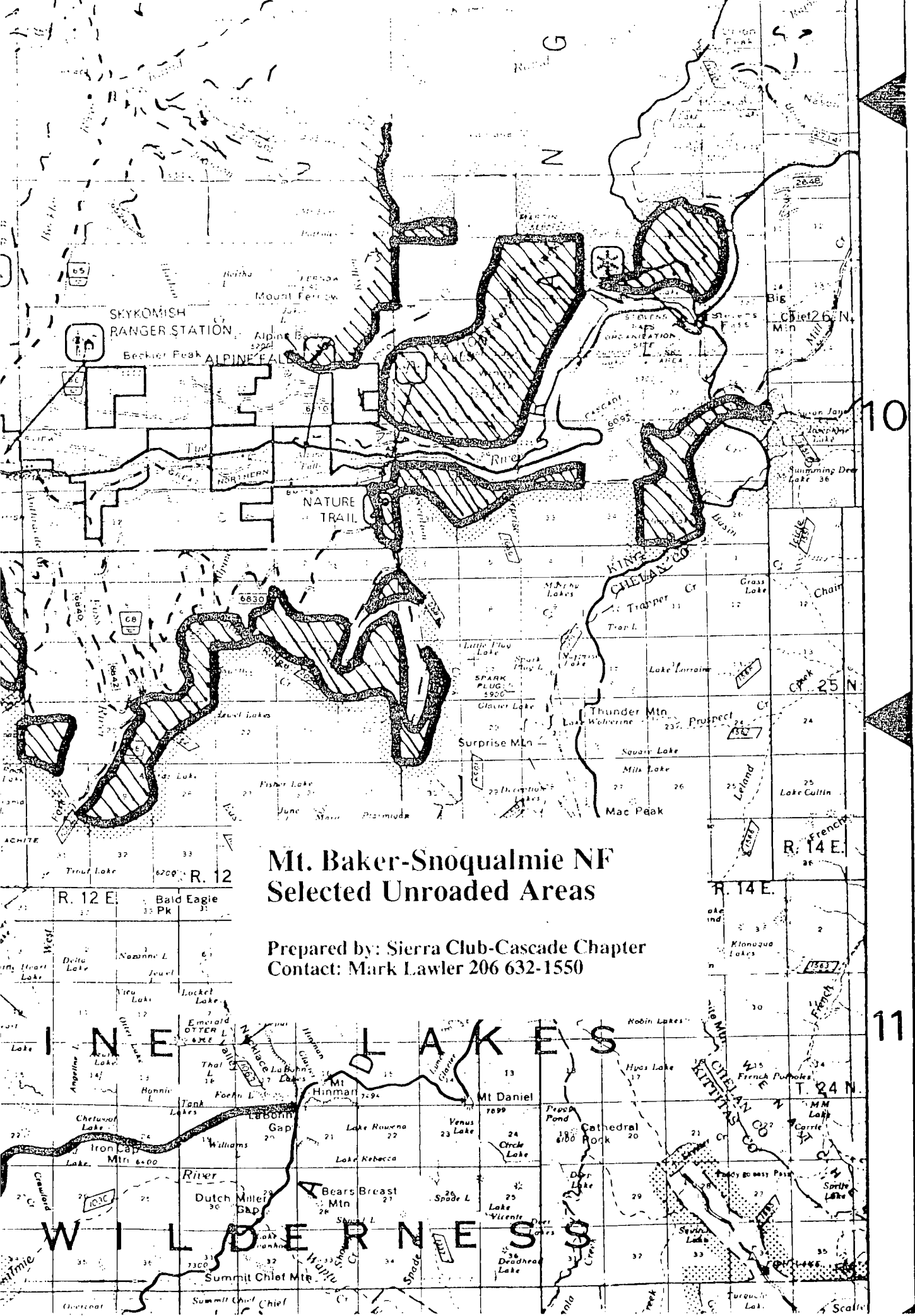
ANCIENT FOREST PRESERVE SYSTEM

Proposed by the Sierra Club
May 1, 1993

Checkerboard ownership in Interstate 90 Corridor
Cascade Mountains, Washington State
Mt. Baker-Snoqualmie and Wenatchee National Forests

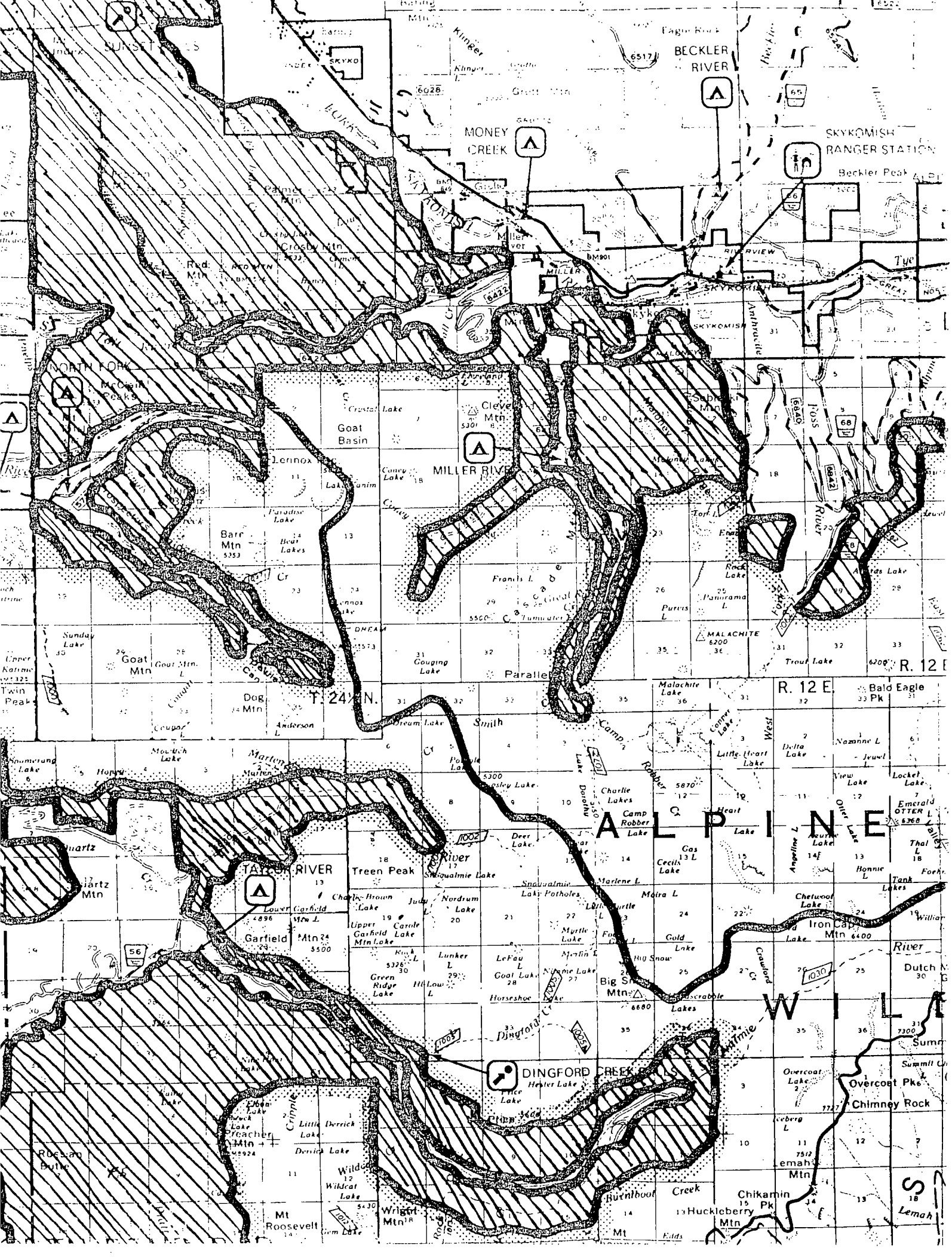
ANCIENT FOREST PRESERVES
FOREST STUDY/RESTORATION AREAS

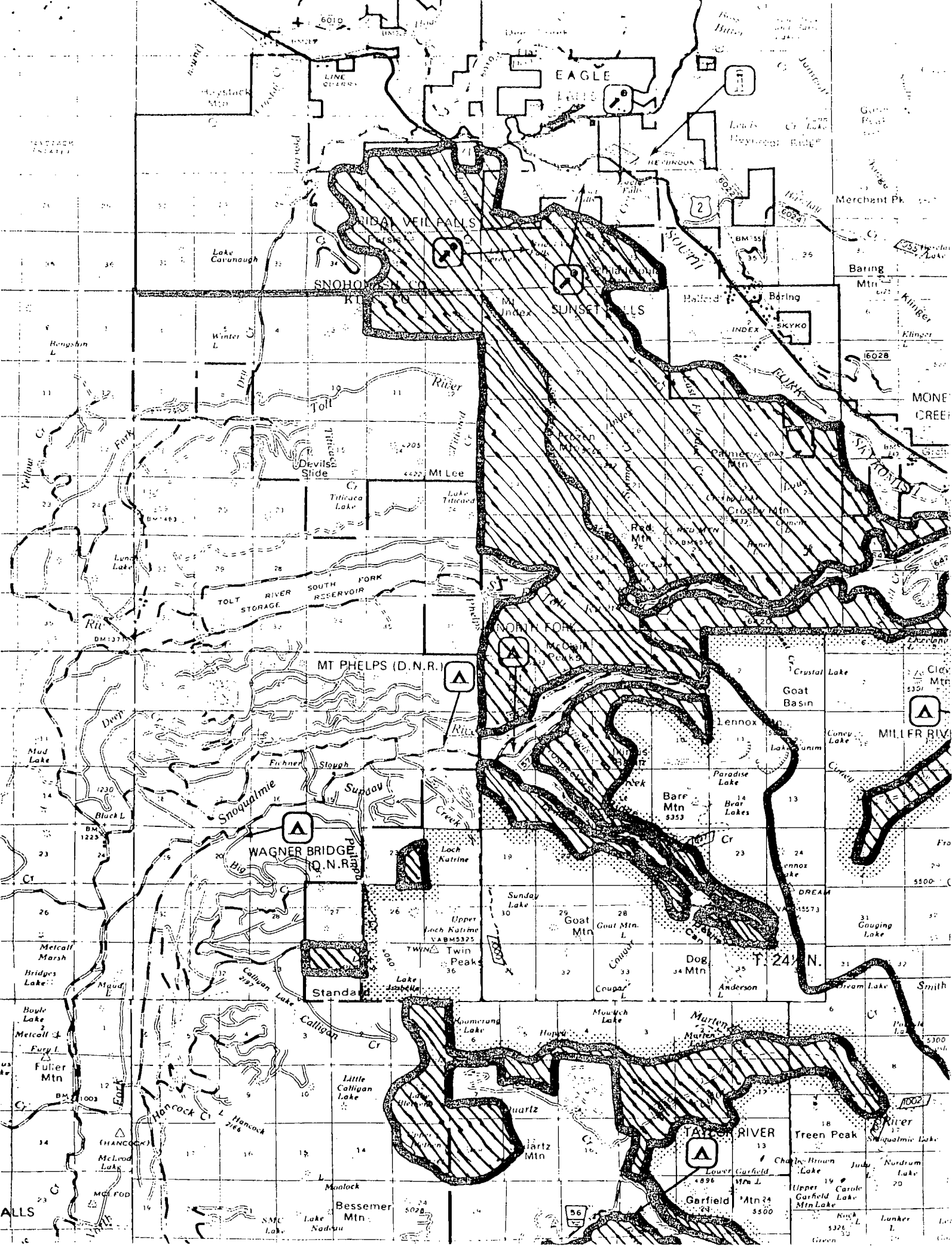


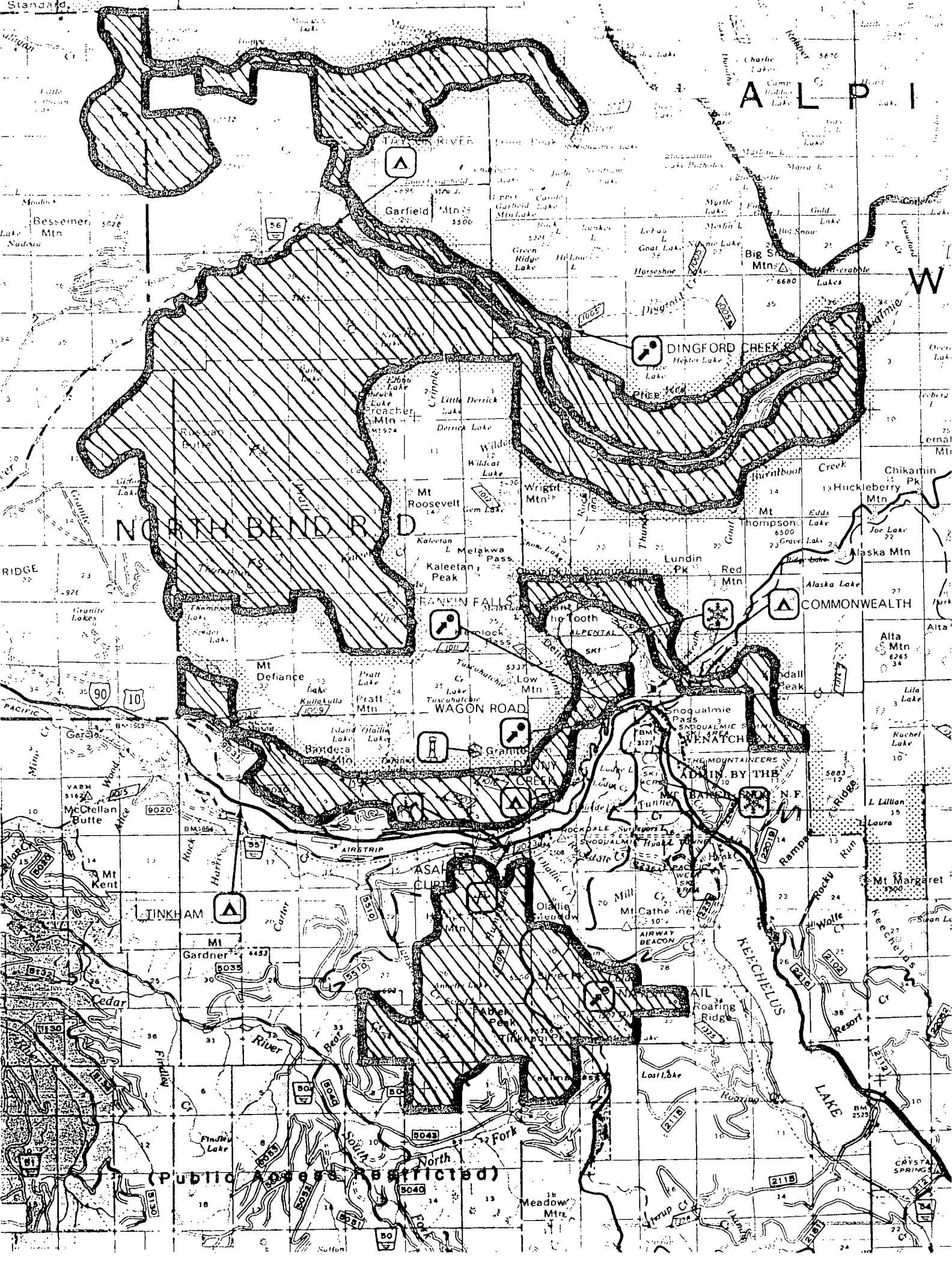


Mt. Baker-Snoqualmie NF Selected Unroaded Areas

Prepared by: Sierra Club-Cascade Chapter
Contact: Mark Lawler 206 632-1550







ALP I

W

NORTH BEND R.D.

FRANKLIN FALLS

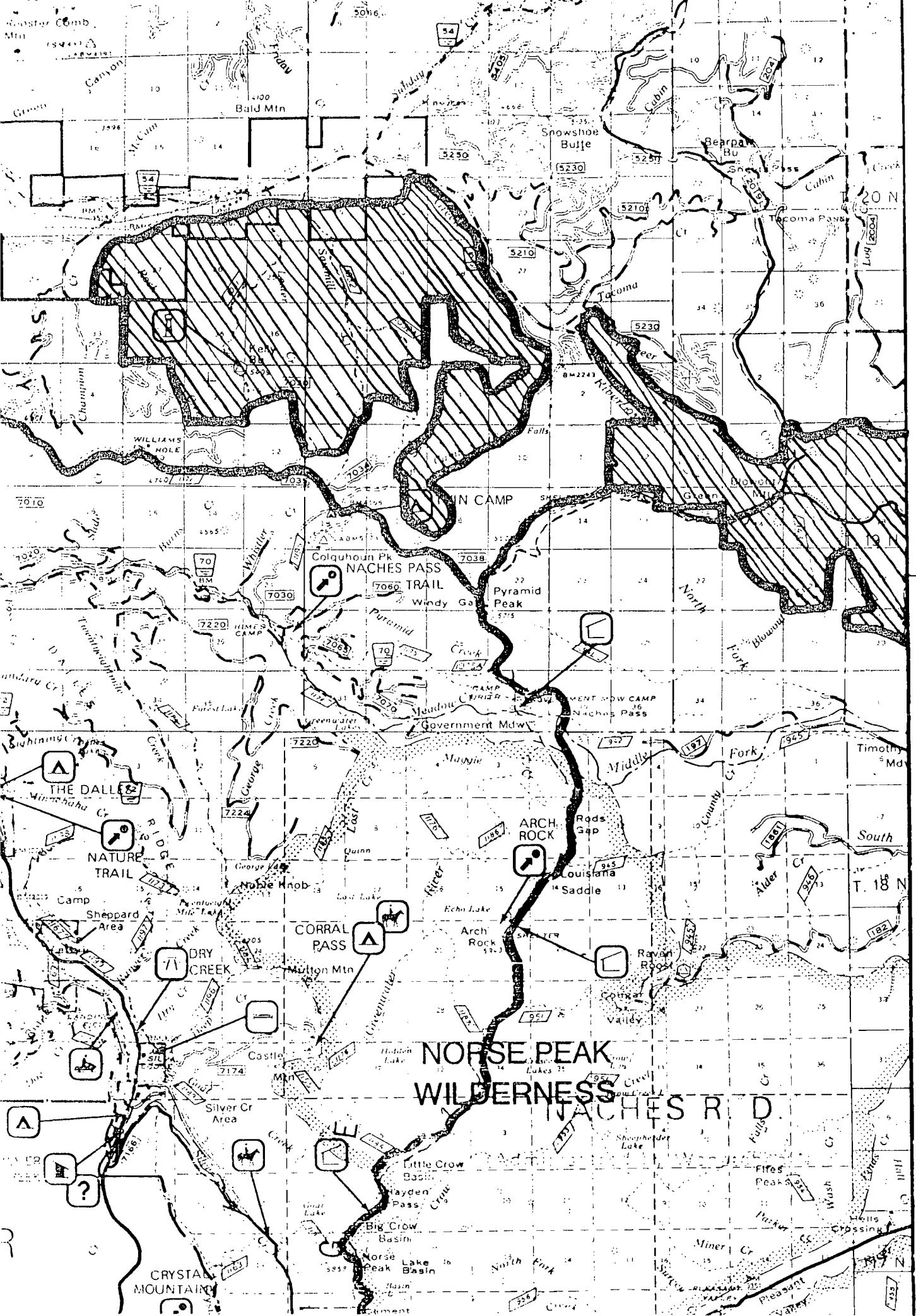
COMMONWEALTH

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WENATCHEE

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