



Washington State Chapter

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Seattle, WA 98109

July 29, 2024

Brian McNeil
Acting District Ranger
Snoqualmie Ranger District
902 SE North Bend Way Bldg. 1
North Bend, WA 98045

Submitted via Email

RE: Carbon River Landscape Analysis project #65083, Scoping Notice dated July 1, 2024

Dear District Ranger McNeil:

On behalf of the Washington Chapter of the Sierra Club, we appreciate the opportunity to submit comments to Mt Baker-Snoqualmie National Forest regarding the content of the proposed Carbon River Landscape Analysis (CARLA) project #65083, Scoping Notice dated July 1, 2024.

The Washington State Chapter of the Sierra Club includes over 100,000 members and supporters, working to protect communities and the planet. With over 3.5 million members nationally, the Sierra Club has the largest membership of all environmental public advocacy groups in the United States. We are the oldest engaged and enduring grassroots environmental organization in the United States.

Members of the Washington Chapter have had a long history of working to protect federal lands within the Mt Baker-Snoqualmie National Forests dating back to the White River Land Use Study and the RARE (Roadless Area Review and Evaluation) I and II studies during the 1970's. We commented on the Mt Baker-Snoqualmie Land and Resource Management Plan Draft EIS and Final EIS of 1990. More recently, we participated in the development of the Northwest Forest Plan (NWFP) of 1994 and its subsequent implementation, including several timber sales prepared pursuant to its direction on this Forest.

Early Forest Service comments on this CARLA planning process characterized the Carbon River Area as a 'working forest'. We take exception to such a description of this forested area of the National Forest System. The unfortunate recent past of the area is a strong indication that this forest was worked much too hard and has suffered for the opportunity. Please respect the remaining natural values of this important area and produce a Landscape Analysis that recognizes and retains the area's natural values.

We have reviewed the Scoping Letter and supporting documentation and are offering comments requesting clarification and attention on a number of issues that are described below. We ask that these matters be addressed in the CARLA Environmental Assessment (the "EA"). In particular, we note the apparent intention of the Forest to reopen a long-decommissioned road in the sensitive area of Chenuis Creek that forms an ecological connection between the Clearwater Wilderness and Mount Rainier National Park. Keep this road decommissioned and do not plan timber sales of any type in Chenuis Creek.

We start with an extensive discussion on Roadless Inventories, and then proceed to comment on particular sections of the Scoping Letter and the proposed management actions described in the Scoping Letter, page by page, including but not limited to Chenuis Creek and Roads Management.

Please find our detailed comments on the Scoping Letter below:

Inventoried and Un-inventoried Roadless Areas

1. The EA must provide mapping at sufficient scale so that inventoried roadless areas (IRAs) as well as roadless areas that are not inventoried are clearly shown in the EA.

The Figure 1 Map is not drawn to sufficient scale to allow an accurate assessment of what is roadless and what is developed. Please create and provide a new map at sufficient scale that clearly shows inventoried roadless and roadless areas.

The Sierra Club is concerned that the RARE II inventory as well as the status of roadless lands as shown in Appendix C to the FEIS to the Land and Resource Management Plan (LRMP) is not accurate in several cases as noted below. The inaccuracy of the maps depicting the CARLA IRAs can be readily verified by reviewing the Google Earth satellite images.

Please note that not all IRAs, and not all unroaded lands that are contiguous to either IRAs or the Clearwater Wilderness, are identified on the project map of the Planning Area dated June 16, 2024.

2. In particular, we call your attention to the unroaded condition, both Inventoried and uninventoried, of the following locations, all of which should be added to mapped Roadless Areas and NOT subject to harvest cutting or other treatment:

A. **Areas of MA 1D (matrix)** which should be added to the Figure 1 map as Inventoried Roadless Areas and not be cut or thinned as they include currently undeveloped lands that should be shown as Inventoried Roadless Areas ("IRA"):

- In Township T18N-R7E, Section 34, currently classified as MA 1D (matrix) and MA 15 (AW), ensure the existing IRA boundary is defined as located immediately adjacent to Forest Road R7810.
- In Township T18N-R7E, Section 26, classified as MA 1D (matrix), the existing RA boundary should be defined as including all lands adjacent to the Clearwater Wilderness on either side of Kennedy Creek.
- In Township T18N-R7E, Section 24, classified as MA 15 (AW), the existing IRA boundary is incomplete and should include all unroaded lands in the SE corner of the section.

B: **Areas of MA 23A (matrix)** which should be added to the Figure 1 map as inventoried as roadless and not be cut or thinned as they include currently undeveloped lands that should be inventoried as roadless:

- In Township T18N-R7E, Sections 15 and 22 currently classified as MA 23A (matrix) and is surrounded by or adjacent to MA LSOG (LSR). This unroaded area includes an unnamed drainage that empties into the East Fork of South Prairie Creek (confluence in Section 9), a drainage that heads up in the Clearwater Wilderness. This area should be inventoried as roadless.
- In Township T18N-R7E, Sections 11, 12, 13 and 14, are currently classified as MA 23A (matrix), MA 1B (AW), MA 15 (AW), MA 1B LSOG (LSR), and MA 17 (matrix). The unroaded character of that portion of these lands that are uncut should be inventoried and recognized as roadless so as to include undeveloped areas up to the edge of existing clear-cut boundaries.

C. **Areas in the vicinity of Cedar and Coplay Lakes** appear to include uninventoried roadless areas:

- In Township T18N-R8E, Sections "PB42," the uncut and unroaded lands (MA 23A-matrix) near Cedar Lake that are between Road 7740 and contiguous to the Clearwater Wilderness should be inventoried as roadless where they are undeveloped or uncut. These lands should not be subjected to the non-commercial thinning treatment that is noted in the Figure 2 Map on page 14.
- In Township T18N-R8E, Sections "PB45" and 20 are classified as MA 1D (matrix), MA 1B (AW), MA 15 (AW), and MA LSOG (LSR) near Coplay Lake do not appear to have

identified all uncut and unroaded lands as shown on the Figure 1 Map. Please correct the inventory to classify all undeveloped and uncut lands as roadless and do not schedule treatments on where timber harvest is not scheduled or permitted. The Figure 1 Map is extremely hard to read and should be redrawn for clarity in the EA.

- In Township T18N-R8E, Sections “PB46” and “UP29” are classified as MA 1D (matrix), MA LSOG LSR), MA 15-LSR (AW) and MA 15 LSOG (AW) and do not appear to include all uncut and unroaded lands southeast of Coplay Lake and near adjacent road corridors. Please correct the inventory.

D. Areas in Chenuis Creek are roadless and uninventoried:

In Township T18N-R8E, Sections “PB47”, “PB48”, “PB49”, “PB50”, and “PB51”, are classified as MA IB-LSR (LSR), MA LSR, MA 15 LSR (AW), and MA 1D (matrix) in the Chenuis Creek:

- The roadless inventory for this extremely sensitive area must ensure that all of the boundaries of all uncut and undeveloped lands are extended to the edge of existing clear-cut boundaries.
- This concern applies to both sides of the decommissioned road R-7840. Please correct the inventory to conform to the noted criteria.
- In PB50 and PB 51, the area between the Clearwater Wilderness and the old cutting units near decommissioned road R-7840 is unroaded and uninventoried. Please correct the inventory to reflect the full extent of the undeveloped nature of this area.

E. Trail Head at Celery Meadows and Access Road are In an Inventoried Roadless Area

- The area in the vicinity of Celery Meadows Trailhead and the existing road access to it are undeveloped, and in an Inventoried Roadless Area. The road should be pulled back to a more suitable location for parking and to reduce usage pressure on the adjacent Wilderness resource and pressure on the IRA.
- We agree that the toilet at Celery Meadows would be installed within the existing opening and no trees are expected to be removed

F. Wildlife Structured Enhancement must be limited in Inventoried Roadless Areas; any habitat enhancement and thinning treatments in Inventoried Roadless Areas (described on pages 17-18) must follow the strict limitations listed in the Roadless Area Conservation Rule 2001, Section 294.13 (b)(1) (i).

The Management Direction Section on page 4 Requires the Addition of a Discussion of the Roadless Area Conservation Rule of 2001

The Management Direction is incomplete without addressing the National direction contained in the Roadless Area Conservation Rule of 2001. The status of roadless areas must be recognized in this landscape analysis.

The Roadless Rule directs that no treatments be applied to these unique landscapes or that roads of any description, temporary or otherwise, be planned for Inventoried Roadless Areas.

In addition, uninventoried unroaded or undeveloped lands whose characteristics qualify them as roadless in character must be identified and inventoried as part of this project. Of particular interest are lands that are contiguous with existing National Parks and/or designated Wilderness.

We have identified a number of gaps in the roadless inventory for this planning unit. Please note our detailed comments on the prior pages, and make corrections as requested.

Northwest Forest Plan Land Allocation Descriptions (page 7)

Late-Successional Reserves (LSR):

- The EA must explain that no cutting is to be planned in LSR stands over 80-years old, at the time of logging per the direction of the NW FP.
- While the NWFP allows for cutting in younger stands, it also explicitly states that “Road construction is not recommended.” Such direction certainly applies to reopening decommissioned roads and especially roads that have been decommissioned for an extended period of time. Reopening R7840 would be out of conformance with the Aquatic Conservation Strategy (ACS) objectives in a Tier 1 watershed.
- CARLA is located largely within a Tier 1 watershed. We are strongly opposed to the reopening the long-decommissioned road R7840 in Chenuis Creek given the sensitive nature of this location. And we are certainly opposed to keeping this road open once the project is complete.

Riparian Reserves (RR): Treatments must conform to NWFP direction on stream buffer widths. See further discussion below in this letter for references to the NWFP direction on stream buffers.

MBS Forest Plan MA/NWFP Land Allocation Descriptions (pages 7 & 8)

Semi-primitive Non-motorized (1B) Administratively Withdrawn and Semi-primitive Non-motorized (1B), Late Successional Reserve (LSR and LSOG): We agree that no timber harvest should be permitted in these LUAs including all thinning treatments.

Roaded Natural (1D), Matrix: While timber harvest is generally permitted, timber harvest is not permitted in both Inventoried Roadless Areas (IRA) and undeveloped lands that are contiguous with either designated Wilderness or IRA. Such lands are included in Section 26 and 34 in T18N-R7E.

Mountain Goat Habitat (15), Late Successional Reserve and LSOG: We agree that timber harvest and roads are not permitted in this LUA.

Other Municipal Watersheds (23A), Matrix: While timber harvest is generally permitted in this LUA, timber harvest should not be permitted in undeveloped lands that are contiguous with either designated Wilderness or IRA.

Proposed Actions, Terrestrial Restoration, Commercial Harvest Thinning (pages 11-14)

Page 10: The Section titled “*Enhance the development of late-successional and old-growth forest habitats*” on page 10 of the EA includes the following statement:

“.....facilitate[s] the development of late-successional and old-growth forest characteristics such as structural complexity, biological diversity, habitat productivity and resiliency.”

We request that the **EA provide explicit substantiation as to how the proposed treatments and management will actually facilitate the development of the listed features and characteristics of late-successional and old-growth forests.** If the subject forests and stands exhibit those emerging characteristics and are expected to fully develop those characteristics, to then cut down those forests and stands would mean restarting the process with younger trees that will then take longer to fully achieve late-successional and old-growth characteristics. The species to be protected under the NWFP in LSR cannot wait for new stands to achieve those characteristics at an even later time.

Page 11: We request that the EA statement that in Matrix, “*Stands 80 years or older would not be harvested.*” will be **based on the stand age as of date the stands would be cut.** Stand age dating must not utilize the date of the Final Decision in a NEPA process since such steps are often years ahead of logging commencement dates.

Please clarify the **management for LSRs** on page 13:

- The EA must include a prohibition on cutting trees older than 80 years old; and
- stand dating for LSR be based on the stand age as of date the stands would be cut. Stand age dating must not utilize the date of the Final Decision.

Page 14-Figure 2, Map, Proposed Stand Treatments in Carbon River Landscape Analysis

Project Area. We object to non-commercial cutting in following areas shown in Figure 2:

- Inventoried Roadless Areas (IRA).
- uninventoried roadless areas in South Fork Prairie Creek and Chenuis Creek as well as other areas discussed above on pages 2 – 4 in the section addressing uninventoried roadless areas.
- LSR in Chenuis Creek that would be accessed by reopening a decommissioned road.

Average Tree Size Page 15: Please clarify the following statement regarding LSRs:

“We propose to conduct non-commercial thinning in stands where the average tree size is below merchantability (below 9” DBH on the MBS).”

- The EA must define DBH limits in terms of maximum diameter. See discussion below re prohibition on cutting over 20 inches DBH. See “Page 24” discussion below in this Letter.
- The statement in the Scoping Letter that the Average 9” DBH applies to the following:
 - LSR,
 - Riparian Reserves (clarify includes RR in Matrix) and
 - All other allocations other than Wilderness,

must be revised so that it does not apply to those Land Use Allocations where cutting is prohibited, including Inventoried Roadless Areas. In addition, such cutting shall not take place with trees that exceed 20” DBH, as defined below in the discussion regarding “Page 24”.

Riparian Reserves treatment in Non-commercial Thinning in LSR Page 15

The Scoping Letter includes the following statement on page 15:

“Treatments would conserve existing late-successional habitat components (snags, dying trees, large logs, old and large trees) and would not occur within no-cut buffers around streams (150 ft for fish-bearing, 50 ft for non-fish-bearing).”

We object to no cut stream buffers in Riparian Reserves that are substantially less than those specified in the NWFP. We refer you to the Record of Decision (1994) for the NWFP, page 9, which defines the initial reserve widths for the Aquatic Conservation, as further discussed and

described in the Standards & Guidelines (1994) for the NWFP, pages B 12-17, and C30 and C31. See below for the equivalent sections in the ROD:

*“Fish-bearing streams - the area on **each side of the stream** equal to the height of two site-potential trees, or 300 feet slope distance, whichever is greater;*

*Permanently flowing nonfish-bearing streams - the area on **each side of the stream** equal to the height of one site-potential tree, or 150 feet slope distance, whichever is greater;”*

[Bolded Emphasis added]

Wildlife Structure Enhancement (Page 17-18) Please *see page 4 of this Letter discussing the limitations of wildlife structure enhancement in Inventoried Roadless Area.*

Fuels Management (pages 18-20)

The Scoping Letter proposes that within 200 feet of centerline of roads, either or both sides of the roads in three target locations there will be treatments to create fuel breaks consisting of the following three categories of treatment for the Fuel Breaks:

- Overstory treatment, removing trees, increasing canopy height; and
- Understory thinning; and
- Ground and surface fuel reduction by burning, chipping or removal

Please provide justification and technical analyses for this seemingly unnecessarily wide cutting swath of tree removal.

In addition, we are concerned that the proposed Fuel Break on Road 7726, near Celery Meadows, is quite near to, and almost adjacent to, the Wilderness Boundary for the Clearwater Wilderness . We also note that the proposed Fuel Break on Road 7726 is quite near and perhaps adjacent to Inventoried Roadless Areas in the vicinity. We have the following requests:

- Please provide a detailed analysis and explanation as to why Road 7726 was selected for a Fuel Break.
- We note that Road 7726 does not get significant traffic and does not seem to meet the egress criteria listed in the Scoping Letter for the location of a Fuel Break; please provide explanation. Certainly the proposed Fuel Breaks in the Evans Creek area have more significant traffic and are part of egress traffic plans.

- Please provide detailed analysis on how the action to create the Road 7726 Fuel Break will protect and not impact the Clearwater Wilderness or IRA lands in the area of the Fuel Break.
- Please provide a detailed map of all proposed Fuel Breaks, including linear distances from the Clearwater Wilderness and adjacent IRAs.

Aquatic Restoration of Trees (page 24)

Where the Scoping Letter states the removing trees 18-30 DBH”, applies to ‘all actions’, please note that no trees over 20” DBH shall be cut in LSRs per the following REO Rule:

REO Memorandum dated July 9, 1996, Memo #694, which states that cutting in LSRs and in Managed Late Successional Areas shall not exceed 20-inches dbh unless multiple conditions are met, including the following:

*“2. West of the Cascades outside of the Oregon and California Klamath Provinces, the basal-area-weighted average age of the stand is less than 80 years. Individual trees exceeding 80 years in those provinces, **or exceeding 20-inches dbh in any province, shall not be harvested except for the purpose of creating openings, providing other habitat structure such as downed logs, elimination of a hazard from a standing danger tree, or cutting minimal yarding corridors.** Where older trees or trees larger than 20-inches dbh are cut, they will be left in place to contribute toward meeting the overall CWD objective. Thinning will be from below, except in individual circumstances where specific species retention objectives have a higher priority. **Cutting older trees or trees exceeding 20-inches dbh for any purpose will be the exception, not the rule.**”*

[Bolded Emphasis added]

The EA should not include any statement that any trees can be cut in LSR exceeding 20” DBH or exceeding 80 years of age (at the time of logging), including but not limited to any trees with root wads to be used in Aquatic Restoration.

Transportation System (pages 24-27)

The original White River Ranger District was heavily roaded because of the excessive logging levels carried out on National Forest lands prior to 1990 as well as the roads systems constructed by private owners when more of the original checkerboard ownership pattern was in place.

This history and the NWFP direction that classifies most of the Planning Area as a Tier I Watershed directs the emphasis of CARLA planning to ensure full compliance with the

objectives of the Aquatic Conservation Strategy (ACS) of the NWFP by maximizing opportunities for road decommissioning for the protection of the watershed and aquatic habitats.

The planning area already has considerable access opportunities and clearly does not need more roads, in fact, it needs fewer roads.

We ask that the EA aggressively examine opportunities for further decommissioning across the Planning Area. Temporary roads and legacy roads should be decommissioned, rather than only 'closed and rehabilitated', particularly in an ORV permitted use areas.

We expect that the net result of this landscape analysis will be a smaller Forest Road system.

Transportation System Comments:

- The EA must not consider reopening the long-decommissioned road R7840 that extended up Chenuis Creek almost to the boundary of Mt Rainier National Park. This Corridor between the Clearwater Wilderness and Mt Rainier National Park is extremely sensitive and important for wildlife movement between National Park Lands and the national forest. This decommissioned road accessed no major feature or destination. However, when the road was open, it simply expanded the area available for mischief and illegal behavior that is so evident in the road system in nearby Coplay Lake. The EA must address the reasons for the original decommissioning of this road and explain what conditions have changed that now necessitates the roads' reopening.
 - The EA must specifically address all management aspects of Road R 7840. Why it is necessary to reopen this long-decommissioned road? Will R-7840 remain open after project is completed?
- Pages 24 and 25: The EA must address final disposition of all **decommissioned** roads, particularly roads coded LD, 15.14 miles. These roads are shown on maps in Figures 2, 3, 5. If these roads are to be used for temporary purposes to support this project, the EA should so state.
- Page 24: All **non-system** roads, that may be used temporarily for this project, must be decommissioned at the completion of this project as an integral part of this project.
- Page 24: All **temporary** roads (See Table 5, 16.15 miles) must be decommissioned at the completion of this project as an integral part of this project.
- Page 26: Table 5 shows the 'objective miles' to includes "LD" roads. However, Table 5 'operational miles' tabulation does not include "LD" roads. Since "LD" roads are defined as not part of the National Forest Road System (see page 26), we are confused

as to why “LD” roads are included in the objective miles total. Please clarify and disclose the future plans for all “LD” roads at the individual road segment level of detail.

- Page 26: The Planning Area is in a NW FP Tier 1 watershed where it is inappropriate to expand the road mileage by as much as 16.2%. The EA must identify which roads will be reopened or constructed that produce this mileage increase. Table 5 must be revised to disaggregate each ‘Road Type’ by system road segment number.
- Page 26: Table 5 must identify what LD roads by system number make up the 15.14 miles that produce the increase in ‘objective miles.’ Please provide this data.
- The EA should plan no new roads or temporary roads in management areas MA-1B (AW), MA-1B LSOG (AW), MA-1B LSR (LSR), M-15 (AW), MA-15 LSOG (LSR), and MA-15 LSR (LSR).

Other Specific Road Comments

- Road R7720-415. This road spur (Section 12) should be decommissioned to reduce unnecessary pressure on the Clearwater Wilderness.
- Road 7740 accessing the T1178 Trail Head. The EA should examine opportunities to pull this trailhead away from Celery Meadow to reduce usage pressures on the Meadow.
- Road R7820 south of Coplay Lake. There are opportunities in the upper Cayada Creek Valley for decommissioning and closing several short spur roads. Close R7820 at the junction with Road R7840-310. This general area has become a dumping ground for garbage and a shooting gallery.
- SR7840-312. This spur should be decommissioned.
- Road R7810-210. This short spur should be closed as it leads nowhere and is an artifact from the days when potential yield of the White River Ranger District of 47 mmbf/year. Those days are over.
- The EA should not evaluate or otherwise consider expanding the road system so as to allow any connections between the planning area or areas adjacent to the Planning Area and the Greenwater, Elbe Hills or Kapowsin areas.

Recreation (pages 27-32) See prior statements on page 4 above in this Letter about Celery Meadows Trailhead and Access Road being located within in IRA, and requested actions.

Compliance with DEIS/FEIS of NOGA and December 2023 Memorandum from Deputy Chief French

- The EA must recognize the National Old Growth Amendment (NOGA) process and ensure that the proposed action is fully consistent with NOGA as it is currently understood.
- In addition, this landscape analysis plan must be submitted to Deputy Chief French of the Forest Service for review to confirm compliance of the proposed project with Old Growth requirements, wherever OG is found, i.e. LSR, Matrix and LSOG; such review is required pursuant to Deputy Chief French's December 2023 Memorandum.

Timber Planning and Related Data

The Sierra Club requests that the EA include the following analyses and information:

- Maps to locate all forested areas by relevant stand ages for all LUAs, with an emphasis on the following stand age ranges:
 - Stands less than 80 years old;
 - Stands 80--200 years old; and
 - Stands over 200 years old.

Other Comments for the EA

- We support improvements for non-motorized access. The EA should examine opportunities for both more trails and improvements to existing trails where resource damage has been evident.
- The EA should recognize the need to balance recreational usage with wildlife and tribal treaty rights.
- Do not establish a designated shooting area within the Planning Area. Undisciplined shooters pose a hazard to the general public.
- Significant timber harvest on contiguous private parcels, some of it quite recent, already impacts the overall ecological integrity of the planning area and that further degradation on the remaining forested public lands would unnecessarily decrease the integrity of what remains.

Economic Effects Should be Addressed.

The EA must explicitly address and describe the following economic effects generated by this timber sale during the time the sale is being implemented:

- The changes to the timber supply by volume from all ownerships in the eastern Puget Sound Washington Counties that could be generated by this sale over the full period of time the sale is being implemented.
- Analysis of the direct effects generated this proposed timber sale in numeric terms that estimate number of jobs in each timber sector (forestry, logging, wood products manufacturing, paper manufacturing) and that estimate the personal income changes generated by this sale in each timber sector (forestry, logging, wood products manufacturing, paper manufacturing).
- An analysis of the numeric effects that this proposed sale would have on the local timber economy sectors again disaggregated into each timber sector (forestry, logging, wood products manufacturing, paper manufacturing) within the primary economic influence zone (EIZ). This assessment must evaluate numerically how this timber sale would affect local timber sector employment and local timber sector personal income in the EIZ. We believe that is Pierce County is the primary EIZ, although the eastern Puget Sound Washington Counties are also impacted by the Mt Baker-Snoqualmie National Forest timber program.
- The analysis must then evaluate of the numeric effects, estimated above, that this proposed sale would have on the total employment and total personal income of all economic sectors in the relevant eastern Puget Sound Washington Counties.

Our research shows that timber sectors in Pierce County Washington supported about 0.8% of the total wage and salary jobs in the County in 2022. Furthermore, overall growth in Pierce County added over 88,000 new jobs in non-timber sectors since 2001, while timber contracted by over 1300 jobs.^[1]

Since the Mt Baker-Snoqualmie National Forest timber program supported less than 1% of the Pierce County timber supply (measured by volume) in during the period 2018-2022^[2], it would appear the potential economic effects of this proposed sale would be very small.

Consequently, economics justifications are a weak rationale for proceeding with many of the more questionable components of the proposed action of the timber sale.

^[1] <https://headwaterseconomics.org/apps/economic-profile-system/>

^[2] Source: https://bber.umt.edu/FIR/H_harvest.asp

Conclusion

We appreciate the opportunity to comment on these analyses. The scale of the project, the sensitivity of the lands and waters in the project area, require a close analysis of potential actions. We hope that our comments and concerns will provide an opportunity for discussion and improvement of this analyses going forward. Please keep us on the mailing list and informed of future developments.

Sincerely,

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