



# OFCO News

December 2005

**The Newsletter of the Olympic Forest Coalition**

*Protecting and restoring Olympic forests*

## Roadless Areas: Still Up For Grabs

*by Bonnie Phillips*

Washington's unprotected public wildlands are in need of a powerful champion, and have gotten just that in Governor Gregoire. A broad coalition of statewide conservation, recreation, sportsmen, and religious groups applauded the governor's decision on November 2, 2005 to file a petition under the Administrative Procedures Act (APA) to amend regulations finalized in May by the Forest Service which effectively repealed protections for nearly 60 million acres of roadless forests - 85 thousand acres of which are found on our own Olympic National Forest.

The APA petition specifically asks the Bush Administration to amend its roadless regulations to allow governors to retain protections for roadless forests in their states as provided in the 2001 National Forest Roadless Area Rule without the added cost and effort currently required by the more recent Bush regulations adopted in 2005.

The original Roadless Area Conservation Rule was enacted at the end of the Clinton administration after three years of official review and public participation. The Forest Service held over 600 public meetings, including more than two dozen in Washington state. An astonishing 1.7 million official comments were received and more than 95% of these comments supported the strongest possible protection for all of our nation's roadless areas.

Once the Bush administration took office, they did everything possible to kill the rule. Finally, on May 5, 2005, the administration formally repealed the rule, thus

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Happy Holidays to all OFCO members, supporters and friends.

## Protecting Washington State's Public Forests: Round II

by Bonnie Phillips

OFCO and partners Washington Environmental Council, Audubon Washington and Conservation Northwest won big in court to prevent a drastic increase in logging on our state forests. This is a major victory for the future integrity of the Olympic Experimental State Forest (OESF), a 200,000 acre-plus Department of Natural Resources managed area on the west end of the Olympic Peninsula, which OFCO has chosen to monitor.

In September 2004, the Board of Natural Resources chose, under their new Sustainable Harvest Calculation, to significantly increase logging. Our four conservation organizations took them to court.

King County Superior Court Judge Sharon Armstrong ruled on September 27, 2005 that the state Board of Natural Resources and Commissioner of Public Lands Doug Sutherland violated the law by boosting logging in Western Washington state-owned forests by 30 percent without determining the consequences of their decision. Armstrong invalidated the state's new logging target, finding that the state failed to consider impacts from logging next to salmon streams and in older forests and failed to consider less destructive means to achieve its goals. The majority of the logging under the plan was slated to be clearcutting, and to meet the increase, logging would have to take place in environmentally sensitive areas that protect water quality and provide important wildlife habitat.

Judge Armstrong specifically noted the potential harm to spotted owls and salmon in her finding that the environmental review of the 10-year logging target was insufficient, including the new policies and procedures that allow the increase. Judge Armstrong also found that the Board and Commissioner Sutherland failed to consider other, less environmentally damaging approaches.

In mid-December, Judge Armstrong will hear from both parties in the case about steps that will be taken to rectify the problems she has found. In the meantime, the state has returned to the logging policies in effect before the cut level was raised last fall.

Although the logging levels were to increase 30% on state-owned land in Western Washington, the Olympic Region, consisting of Grays Harbor, Clallam and Jefferson Coun-

ties, would have seen a far more extensive increase. This is due to a number of factors, including the removal of spotted owl protection in the Straits area (NOT part of the OESF). OFCO is committed to building a strong program in this Region, which would monitor timber sales and also work cooperatively once the Region begins their mandated landscape management plans. This is a big job and we would welcome any interested readers to join our team. Contact Bonnie Phillips (360) 456-8793 or [Bonnie@Olympicforest.org](mailto:Bonnie@Olympicforest.org) for more information.

## ***SPEAK UP!***

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### **(Roadless, continued from p. 1)**

taking away protection for millions of acres of roadless areas. Under the new policy, if governors wish to protect roadless areas in their respective states, they must complete an expensive and burdensome petition that may or MAY NOT be accepted by the Forest Service.

Governor Gregoire has not yet announced whether she will go that route; rather she submitted a petition through the APA. She has two choices. One is to file a lawsuit (or join a number of states that have already filed), which would claim the Bush rule is illegal. Second, she can choose to petition to protect roadless areas under the Bush rule.

A large coalition of environmental organizations is also sponsoring an APA petition drive, asking for protection of all roadless areas.

What happens to roadless areas will be a hot button issue in 2006. OFCO will keep its members informed via our web site and in our newsletters. A link to the citizens' petition drive can be found at [www.olympicforest.org](http://www.olympicforest.org).

# Shooting Range Clouds Future of Salmon Stream

By Josey Paul

**M**AJESTIC, Wash. (20 miles west of Port Angeles) – It's not uncommon for dark clouds to roil the skies over the forested headwaters of Sadie Creek. In any given year, seven feet of water drops from these clouds, creating and nourishing a sprawling wetland that is laced with small streams, many only a foot or two wide.

In the summer, the wetland is noisy with birds and insects. Streams sparkle like crystal goblets under a canopy of devil's club and salmonberry. Baby salmon are busy snatching every hapless bug that comes their way.

Winter brings the serious clouds, the brooding clouds of Pacific storms that blow in off the ocean and set the streams to running bank full. These storms also bring the salmon back from the ocean. The salmon first show up as sleek shadows that splash and crash up riffles and linger in the deeper pools. These fish are mostly fall coho, cutthroat trout and winter steelhead. The biggest fish run two feet or longer. They are ridiculously large for these little streams.

The Sadie Creek headwaters have been this way for thousands of years. But this year, the ominous clouds have nothing to do with winter rain.

This year theam County commissioners have set in motion a plan to develop these wetlands into a 320-acre shooting-range complex, complete with a 1,000-yard sniper range, two or three rifle ranges, a pistol range, a quick-draw cowboy range and a skeet range for shotgun enthusiasts.

**A**side from the usual devastating effects of filling and developing a wetland with target-access roads, safety berms, buildings and culverts, shooting ranges also are notorious for contaminating the land and water with toxic compounds of lead and other heavy metals.

It may seem like hyperbole to say that the commissioners plan to turn this wetland into a toxic waste site, but that's exactly what will happen. Shooting ranges – all shooting ranges – become toxic waste sites. A study by the Environmental Working Group, using EPA data, found that “outdoor

ranges put more lead into the environment than nearly any other industrial sector.” It takes just three years for the typical outdoor range to become as contaminated with lead as a five-acre Superfund site.

This kind of contamination is commonplace even at the smallest shooting sites.

For example, on the east side of Port Angeles, at an informal shooting site used by hunters on Department of Natural Resources land just off Cassidy Creek Road, state investigators took soil samples at random spots around the shooting site. Under state law (Model Toxics Cleanup Act Regulation Chapter 173-340 WAC), cleanup requirements are triggered when

*It takes just three years for the typical outdoor range to become as contaminated with lead as a five-acre Superfund site.*

lead contamination reaches 250 parts per million. The federal Superfund requirement is 400 ppm.

At this site, levels of lead contamination were much higher. Every sample had at least twice the lead that could trigger a Superfund cleanup. The average soil sample had 1,260 ppm of lead.

At a shooting range near Eugene, Ore., stream sediments were found that had 7,200 ppm of lead.

The Massachusetts Department of Environmental Protection reports that lead continues to poison waterfowl at old shooting sites, even those that have been closed for decades. Fish and wildlife weakened by lead poisoning fall easier prey to raptors and other predators, and these predators in turn suffer secondary lead poisoning, according to the department.

A published, peer-reviewed study (J. Environ. Qual. 32:526-534, 2003) out of Florida found that “lead contamination at shooting range soils is of great environmental concern.” The study measured extremely high levels of lead at target areas and at firing lines, where lead is exhausted out of the barrels and breaches of the weapons.

What makes this situation even worse is that lead continues to poison people and wildlife for centuries and that so little lead is needed to cause harm. A single 30-30 Winchester round, if fully dissolved, could contaminate an entire day's

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**(Shooting Range, continued from p. 3)**

drinking water supply for a city the size of Seattle – more than half a million people. Even a small range can see hundreds or thousand of bullets fired every day. A state Department of Ecology report found that “the mean residence time of lead in forest litter ranges from 220 to 500 years.”

“In the long-term,” the EWG report concludes, “each firing range in the U.S. almost certainly represents a piece of land so highly contaminated that it would require a massive cleanup effort to be safe for wildlife or any industrial or residential use.”

Because shooting ranges have done so much damage to the environment and to the health of wildlife, people and communities around the nation, the EPA, in cooperation with all 50 states and with the National Rifle Association and other shooting organizations, developed a Best Management Practices guide to help communities locate and operate shooting ranges responsibly.

The strongest recommendation of that BMP is to avoid putting shooting ranges in or near streams and wetlands, especially in areas such as Sadie Creek with high rainfall and shallow groundwater.

Normally, shooting ranges are exempt from one of the EPA’s most comprehensive environmental laws: the Resource Conservation and Recovery Act (RCRA), which regulates hazardous waste, such as lead. However, shooting ranges are exempt from RCRA only as long as the range has an effective lead-recovery system and only if that system prevents lead from migrating off site and getting into surface water or groundwater. And the courts have ruled that shooting into or over wetlands is an automatic violation of the law because no recovery of lead is possible before it reaches surface water or groundwater.

**S**o how are the county commissioners getting away with selecting this site? Basically, they’ve just ignored the problem. The county did no environmental study or review of BMP before choosing this site. The commissioners have ignored numerous questions and complaints by citizens, tribes and local biologists. The local watershed board held a hearing on this project and recommended against it. Citizen members, along with members from corporate logging companies, tribes and local agencies voted against the site by consensus, although the county’s own representative was later forced by county officials to retroactively (and illegally) change his vote to abstain.

The site violates the county’s own critical areas ordinance, too, but even that has not stopped the commissioners. When it was pointed out that shooting lanes are illegal in a Class 1

wetland, a county staffer for the Parks Board said the shooting lanes (which will require target-access roads) could be called trails. Trails are legal in a wetland.

But the bottom line comes down to votes. The local shooting club has a lot of members and has been trying to get the county to build a shooting range for its members for nearly 40 years. But each time that a site was chosen, local residents stood up in opposition and defeated the project.

This time the county commissioners told the shooters to pick a place where nearly nobody lives so that political opposition would be nil.

**A**lthough very few people live in this area, the local community has invested about \$2 million in salmon restoration in this watershed, including five projects on the proposed shooting range itself. Close to 1 million pounds of wood (think 18 logging trucks) have been dropped by helicopter or shovel into Sadie Creek. So much work has been done that the state’s Salmon Recovery Funding Board has picked the Sadie Creek system as one of its scientific study rivers. Scientists are studying effectiveness of all the salmon-restoration work, a study that is supposed to last for 12 to 20 years.

The Lower Elwha Klallam Tribe, which has done most of the restoration work, has long opposed this shooting range, but the tribe is under a lot of political pressure to allow its ancient cemetery at Port Angeles harbor to be turned into an industrial project. To the horror of tribal members, the state Department of Transportation dug up hundreds of skeletons while building a bridge-assembly plant before the tribe managed to stop the work.

The tribe, which is still under intense pressure by the city to allow the bridge project to continue, cannot afford to lose any more political allies. And the county commissioners are putting lots of pressure on the tribe to accept this shooting range.

So as things stand at this writing, just a handful of local citizens are standing up to the county’s drive to develop the headwaters of Sadie Creek. Too bad salmon can’t vote.

*Design for a Monster:*

# The Bear Saddle Sale and the North Soleduck Block

by Kevin Geraghty

**T**he Forest Service is quietly brewing plans for a big -- in fact, a monster -- timber sale in a forgotten corner of the Olympic National Forest.

To understand the dimensions of this unsettling prospect, we need a road trip and a little history.

## The Soleduck Legacy: Blitz and Respite

Driving highway 101 west past Lake Crescent and on into the Soleduck Valley, the unbroken green ridgeline on the north side of the highway draws the eye. This south slope of Snider Ridge, beyond the lower clear cuts on state and private land, forms the southern boundary of a detached block of National Forest land, about 4 miles from north to south and 18 from east to west.

The unmarred condition of South Snider is not what one sees on the other side of the ridge. Large tracts of the federally owned valleys and ridgelines to the north were cut out during the 50's in a fairly rapid blitz. Old-growth logging continued at a slower pace there over the next three and a half decades, until the spotted owl and the Northwest Forest Plan finally put a stop to it.

Today only a modest fraction of primary forest remains north of Snider Ridge, in isolated patches and strips, often on steep, unproductive sites, inner gorges, or burn remnants embedded within younger stands. The south side of Snider Ridge was spared this fate partly because it is relatively young forest--natural regeneration following an early 20th century burn-- and partly because it is visible from the highway. The Forest Service has always taken pains to spare the public from too-frequent contemplation of the ugliest aspects of "multiple use."

An effect of the decades-long exploitation of this block is damaged watersheds and an extensive network of decaying roads, which threaten ongoing aquatic damage from runoff

and debris flows. In 1990, a debris flow originating on a Forest Service road, almost at the headwaters of Deep Creek, swept downstream to within a mile of the river's mouth. For two years following this event the creek left a visible mud plume far out into the Strait of Juan de Fuca. Although a plugged culvert on a high-elevation sidehill road was the trigger for this catastrophe, 40 years of logging right down to the waterline of upper Deep Creek set the stage, by increasing the load of loose material and sediment in the riverbed, and by starving the bed of large logs, which tend to create steps and irregular features in the river bed which could catch and buffer debris flows.

## Years of Recovery

Things have slowly been getting better on the aquatic front. The very visible failure of federal land stewardship, the most prominent among a host of smaller insults visited on the

streams, led to a tribal lawsuit. Settlement of this lawsuit, accompanied by institutional embarrassment, has brought about the decommissioning of some of the most egregious road

*The "Bear Saddle" timber sale would threaten recovering watersheds on which significant restoration and research funds have been expended.*

miles in the block, and a commitment to decommission more. The streams which drain its eastern portion north to the Strait of Juan De Fuca--Deep Creek, West Twin, and East Twin rivers--were selected by the state Salmon Recovery Funding Board for intensive monitoring and experimental restoration work.

One reason this cluster of watersheds was selected is that, although damaged, something remains to be saved: Deep Creek, for example, has surviving stocks of winter steelhead, cutthroat, fall coho, and fall chum. Only chinook are known to have been extirpated. Under the umbrella of this program, Deep Creek and the East Twin have received large numbers of salmon-related projects. The Lower Elwha Klallam Tribe has spent more than \$1 million on restoration, mostly to place woody debris in Deep Creek. Fisheries scientists from mul-

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**(Bear Saddle, continued from p. 6)**

tiple governmental bodies, as well as the University of Washington, are involved in monitoring these streams.

The forests, too, are slowly recovering. The 45-to-55 year-old second-growth which today blankets the scene of the logging blitz has a natural young forest feel, and comprises a surprisingly varied landscape. Most of the logged areas were probably planted uniformly in Douglas fir, but today one would never know it. As one moves through the woods, crossing different kinds of sites, the forest varies accordingly. Dry, coarse-soiled ridgetops or south-facing slopes have Douglas fir growing slowly at low densities. Better mid-slope sites tend to fairly pure closed-canopy Douglas fir. Moving to cooler, moister sites, such as some toe slopes, or higher-elevation north-facing areas, shade-tolerant hemlock and silver fir show up in significant quantity, often leading to forests with little understory. The wettest areas, areas of soil movement and seasonally saturated soil, are mostly alder.

Nature has a way of asserting itself, and federal practices here, which amounted to

little more than planting some Douglas-fir seedlings and leaving, were nowhere near intense or sustained enough to suppress natural forest variability. Aerial photographs of the blitz area are interesting: aside from the roads, the eye seeks in vain for evidence that this is not a natural forest landscape, seeing only the subtle textural shifts and complex boundaries of natural forest. At a more intimate scale, one can find it, of course -- the old cat tracks through the woods, the grooves straight up the fall line along old cable corridors, but it's often subtle, and 50 years of natural recovery have softened and concealed much. The occasional shreds and patches of surviving old growth within this landscape add complexity, and are a valuable reservoir of biodiversity, which will help ensure that these young forests grow in richness and complexity as they age.

**Bear Saddle: Disturbing the Peace**

The "Bear Saddle" timber sale being planned in this recovering landscape would put an end to a 15-year logging holiday in this block and threaten watersheds on which significant restoration and research funds have been expended. The blitz-era second growth is now reaching merchantable size, and the Forest Service has discovered a need to conduct extensive thinning timber sales here to "accelerate late-successional characteristics."

Stretching over the West Twin, Deep Creek, and Bear Creek watersheds-- roughly 12 miles from one end to the other, in,

at current count, 48 separate cutting units and covering roughly five square miles -- this sale can rightfully be called a monster. Bear Creek, a tributary of the Soleduck, drains much of the western end of this North Soleduck block and, like the eastern rivers that flow to the Strait, supports anadromous fish runs. Proposed cutting units along Bear Creek are just a hop and a jump away from spawning gravels containing visible redds. Other units straddle Deep Creek, right up to the final slope break, whence it is possible to inspect evidence of the damaging 1990 debris flow. West Twin also has its share of riparian units.

**...And Yet More Roads**

An ambitious sale like this cannot be carried forward without new roads, even in a landscape which already has too many. At current count, probably six miles of new roads are being proposed: either on entirely virgin alignments or on old, hydrologically mature, undrivable, vegetated road grades

that date back to the original logging. The latter are often indistinguishable from the surrounding forest floor, and on alignments that are frequently too steep and

*Over the next year, we will do our best to cage this beast, and keep it from siring further monstrosities.*

too close to streams to be acceptable to modern road standards. About a half a mile of this "reconstructed" road is within the riparian reserve boundary of Deep Creek; it is not the worst example.

OFCCO accepts the continued existence of a modest commercial timber program on the Olympic, so long as it adheres to the strictures of the Northwest Forest Plan, and as long as a good deal of thought and care is expended to make an inherently destructive activity as benign as possible. Bear Saddle fails this test on multiple counts. Under the Northwest Forest Plan, the Olympic National Forest was to have an average annual cut level -- a "PSQ" -- of 10 million board feet. Bear Saddle, as currently configured, probably represents 30 to 40 million board feet.

**A**nother National Forest sale of equivalent size, the Jackson Sale, near Hood Canal, is being planned nearly simultaneously. To us, this level of road-building and cutting within riparian reserves represents a clear assault on the aquatic conservation features of the Northwest Forest Plan. As for the forests, we think these stands are generally on acceptable natural trajectories, and the proposed thinning is essentially commercial extraction disguised and promoted as "restoration." Real, as opposed to sham, restoration usually costs money rather than generating it. Over the next year, we will do our best to cage this beast, and keep it from siring further monstrosities.

## Five Conservation Groups Concur on Oly and MBS Commercial Thin Protocols

by Linda Winter

As pressures grow for more logging on public lands, and more national forests characterize all or most of their timber sales as "restoration forestry" (that is, ostensibly good for the forest ecosystem), representatives of OFCO, Alpine Lakes Protection Society (ALPS), Pilchuck Audubon Society (PAS) and north Cascades Conservation Council (NCCC) have put forward a position statement on commercial timber sales in the Olympic and Mount Baker-Snoqualmie National Forests. The Olympic Park Associates' Board has also signed on to the statement.

The joint statement recognizes that for each of these national forests, the Northwest Forest Plan (NWFP) specifies a commercial timber sale target, defined as the PSQ (probable sale quantity) and currently set at 10 million board feet (mmbf) for the ONF and 7 mmbf for the MBS. The organizations (except for PAS) accept annual average timber sale volumes up to, but not exceeding, these PSQ levels. This acceptance is only for timber targets and not for claimed ecological purposes of the timber sales. We remain unconvinced that these commercial sales will "accelerate" old-growth conditions, or old-growth like conditions, often cited as a major purpose of commercial sales, and as one of the objectives of forest "restoration" activities. We have seen no convincing scientific evidence that thinning will "accelerate" the achievement of old-growth conditions.

The current forested landscapes of both the Oly and MBS national forests are drastically degraded and fragmented from decades of heavy logging and road building. All commercial timber sales should be designed and implemented to minimize further degradation and fragmentation and include aggressive road decommissionings.

This document does not address ways to heal the forested landscape, or "restoration" as it is commonly called, but is limited to presenting our checklist for evaluating commercial timber sales and our positions regarding these sale properties. Our objective in evaluating these sales is to help minimize the attendant ecological damage. The list is by no means exhaustive. It can be viewed, along with the position statement, at our web site (<http://www.olympicforest.org/forestinfo.htm>).

*Dr. Linda Winter, forest ecologist and OFCO board member, was greatly helpful in crafting this invaluable document. Our thanks to Linda for her good work. -- PB*

## Forest Service Agrees: National Forest Logging Costs Taxpayers More

by Bonnie Phillips

OFCO's concern for increased logging is not only ecological. For a number of years, all national forests in Washington state (and most throughout the United States) have been losing money on timber sales. The more they sell, the more taxpayers like you and me pay. Years ago, when the Forest Service documented these losses, government watchdog organizations said they were under-reported. The agency's response, in 1998, was just to stop issuing their annual report--after admitting, the previous year, that many of their costs were hidden in other line items.

Now, a report released by the John Muir Project of the Earth Island Institute in October (and reported by Associated Press writer Scott Sonner on November 25) documents that the amount of money taxpayers lost from Fiscal Year 1997 to FY 2004 was \$6.684 billion. The Forest Service has not questioned this report. Sonner quotes Jim Culbert, a budget assistant for the Forest Service in Washington, D.C., saying that the data and most of the estimates are "reasonable" and that he is "not surprised to see those kind of numbers."

The shift from large-scale clearcuts to commercial thinning of forests has accelerated the government's losses; congressional spending has held steady, sometimes even increasing, while timber harvest levels have fallen. What makes this particularly egregious is that the Forest Service almost always claims their timber sale program is "good for the forest" -- either through salvage logging after a fire or storm event, or, in our area, claiming that logging will accelerate old growth characteristics.

Evidence that any of this is true is wanting, and more and more scientists are skeptical and are speaking out. Conservationists are also frustrated. Steve Holmer, a spokesman for The Wilderness Society in Washington, D.C., told Sonner: "When it comes to commercial timber sales, it's just like a big black hole and they keep throwing more and more money into it."

In the meantime, as our country continues to go into debt, as programs for the poor and elderly are cut, as climate change alters the needed values of our public forests, taxpayers shell out an average of \$835 million annually ...and climbing. To read the full report, researched and written by Rene Voss, go to [www.johnmuirproject.org](http://www.johnmuirproject.org).

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## Forest Board Rejects More Protection for Declining Owls

In the wake of a report from Fish & Wildlife warning about a significant decline in spotted owl populations in Washington State, the Forest Practices Board met Nov. 9 to hear public comment and consider additional protection options. Timber industry operatives faced off with environmentalists in a classic chapter of an on-going dialectic: protection vs. profit. Following the meeting, the Board decided against any significant strengthening of protection for the owls, citing uncertainties about causes of the decline. The role of barred owls invading spotted owl habitat was commonly cited by industry voices, along with data from other states, interpreted to suggest that owls may prefer fragmented and cut over landscapes.

Few were surprised by the FPB's decision, and the process itself raised questions about the objectivity of the board. A Seattle PI article by Robert McClure the same day cited a timber industry memo noting that the FPB chair had promised to oppose the more significant protection options, although his earlier promise to remove those options from consideration had been nixed by Lands Commissioner Sutherland, lest environmentalists bring legal action.

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