Photo 1. Red flag in shadow in upper center of photo demarcates alignment of the route identified as U18PR in my comments, which the Project proposes to reopen to access logging unit 18. The flagged alignment has significant stocking of trees >6 inches dbh, although this is not divulged in the EA. There is abundant downed wood and the soils along the alignment of the proposed road have fully recovered with respect to hydrology and erosion. The alignment is also covered with a variety of vegetation, downed wood, trees, and forest litter. Although it is not made known in the EA, due to the level of recovery on this road, re-opening will basically entail new construction in resulting in severe and persistent soil, riparian, and erosion impacts, contrary to the incorrect assessment in the EA. These impacts will also irretrievably reverse all recovery that has occurred on this alignment over several decades and permanently reduce soil productivity.

Photo 2. Another view of the alignment of the route identified as U18PR in my comments. The red flag in the photo demarcates the alignment that the Project proposes to reopen to access logging unit 18. The flagged alignment has significant stocking of trees>6 inches dbh, although this is not divulged in the EA. There is abundant downed wood and the soils along the alignment of the proposed road have fully recovered with respect to hydrology and erosion. The alignment is covered with a variety of vegetation, downed wood, trees, and forest litter. Although it is not made known in the EA, due to the level of recovery on this road, re-opening will cause impacts akin to new road construction in resulting in severe and persistent soil, riparian area, and erosion impacts, contrary to the incorrect assessment in the EA.

Photo 3. Another view of another part of the alignment of the route identified as U18PR in my comments. The red flag in the photo demarcates the alignment that the Project proposes to reopen to access logging unit 18. The flagged alignment has significant stocking of trees>6 inches dbh, although this is not divulged in the EA. There is abundant downed wood and the soils along the alignment of the proposed road are fully covered with a variety of vegetation, downed wood, trees, and forest litter. Although it is not made known in the EA, due to the level of recovery on this road, re-opening will have impacts akin to new road construction in resulting in severe and persistent soil, riparian area, and erosion impacts, contrary to the incorrect assessment in the EA.

Photo 4. Supposedly closed road that would be reconstructed and opened under the Project. This closed road had revegetated through non-use, although some of the revegatation that occurred with non-use was reversed by vehicular use when the gate on the road was opened. Based on my July 5, 2012 observations, the opening of gate and road use appears to have been done to begin remove trees on the road in advance of the release of the final EA (see following photo). The reconstruction of this road needed to open it will have major adverse impacts on soils, erosion, sediment delivery, and runoff. It will also reverse years of vegetative, soil, and hydrologic recovery on this abandoned road, which will require several many years to attain after decommissioning.

Photo 5. Supposedly closed road proposed to be reconstructed and opened under the Project. This closed road had revegetated through non-use, although some of the revegatation that occurred with non-use was reversed by vehicular use when the gate on the road was opened. Based on my July 5, 2012 observations, the opening of gate and road use appears to have been done to begin remove trees on the road in advance of the release of the final EA The stumps in the center of the photo had plainly been recently cut prior to my July 5, 2012 field visit. The revegetation on the road that occurred with non-use as been reversed by use when the gate on the road was opened and vehicular use ensued. The reconstruction of this road needed to open it will have major adverse impacts on soils, erosion, sediment delivery, and runoff. It will also reverse years of vegetative, soil, and hydrologic recovery on this road.