

Regional Forester, Objection Reviewing Officer
Pacific Northwest Region, USDA Forest Service
Attn: 1570 Appeals and Objection
P.O. Box 3623
Portland, OR 97208

June 9, 2022

**RE: Objection to the Twisp Restoration Project Draft Decision and Final EA; Methow Valley
Ranger District, Okanogan-Wenatchee National Forest; Authorized by Kristin Bail,
Supervisor, Okanogan-Wenatchee National Forest**

Dear Objection Reviewing Officer:

This Objection to the Twisp Restoration Project (“TRP”) is submitted jointly on behalf of the North Cascades Conservation Council (“NCCC,” or “Lead Objector”), and Richard Bailey as an individual (together, “Objectors”). We have read and followed the Opportunity to Object Guidelines sent by the Methow Valley Ranger District to ensure that this Objection complies with 36 CFR 218(A)(B); 36 CFR 218.2; 36 CFR 218.5; and 36 CFR 218.8(b)(c) and (d).

Objectors each submitted both Scoping comments, and comments on the Draft EA for the TRP. These have been the only opportunities to comment on the public record for this project. Objectors have on occasion met in person, and/or via teleconference with Supervisor Bail, and Methow Valley District Ranger Chris Furr to discuss the TRP and related issues.

This Objection is timely, as the legal notice was published in the Wenatchee World on April 30, 2022. The 45 day Objection period thus expires on June 14, 2022. This Objection and supporting documents were mailed on June 9, 2022. We also submitted several attachments via email prior to the deadline.

We object specifically to the following aspects of the Decision: **(1)** An undisclosed amount of timber removal in four timber sales impacting 21,971 acres, removing trees up to 25 inches diameter; **(2)** Construction of 2.8 miles of road, reopening 6.0 miles of now-closed road, opening to motor vehicle use 8.0 miles of “unauthorized” roads that will be added to the Forest road inventory, and construction of 4.8 miles of temporary roads; **(3)** a total of 102.6 miles of new hand and/or machine-created fire line; **(4)** Removal of “danger trees” along 110.8 miles of existing roads; **(5)** Prescribed burning of 23,167 acres; and **(6)** Implementation of “Conditions Based Management.”

We also object to Service’s NEPA process for the TRP, and we raise additional concerns with the Endangered Species Act (“ESA”), and Federal Advisory Committee Act (“FACA”).

Preface/Summary

1) Rejection of Offered Alternatives: We object to the denial of the opportunity to submit reasonable alternatives to be included in the EA.

2) Inadequate Range of Alternatives and Inaccurate “No Action” Alternative: We object to the inclusion of only a single action alternative and the “No Action” alternative in the EA, and the misrepresentation of the conditions that would result from implementation of the No Action Alternative.

- 3) Project Funding is Not Guaranteed: The Decision does not articulate how the project Needs would be met for the 20-year project duration given the admission in the economic assessment that funding sources to complete the project are not identified nor confirmed, and may be difficult to obtain.
- 4) No EIS, Faulty FONSI: Objectors believe an EIS is required, and object to the “Finding of No Significant Impact” as stated in the Draft Decision.
- 5) No Disclosure of Anticipated Future Actions: Objectors contend that after completion of the TRP, further action would be necessary to maintain desired conditions, and that such actions must be disclosed.
- 6) No Public Comment Period After Changes to the Project: Objectors contend that the Forest Service should have re-opened the public comment period after major changes were made to the TRP.
- 7) Segmentation of Connected Actions and Failure to Adequately Analyze Cumulative Effects: We object to the segmentation of the TRP from the adjacent Midnight Restoration Project (which was originally a part of the TRP) which would be authorized under a separate NEPA analysis after the TRP is implemented, resulting in no cumulative impacts analysis.
- 8) Inequitable Public Process: Objectors contend that organizations and interests composing the North Central Washington Forest Health Collaborative have been given exclusive access to information and influence, while all other publics have been denied information, and limited to receiving information and providing comments when the NEPA public record was open.
- 9) The Effectiveness of Logging in Reducing the Risk of Large Wildfires Has Not Been Validated: Objectors contend that the unique attributes of the Twisp River Watershed have not been identified in the finding that the forest does not meet the HRV or desired conditions, and that the science generally articulating unnaturally dense forests is conflicting.
- 10) Conditions Based Management is Not Warranted: We object to the implementation of Conditions Based Management, and contend that the inclusion of this provision denies public access to actual logging prescriptions that will, or could be implemented.

1) Rejection of Offered Alternatives

NCCC’s comments on the Draft EA included an offer to prepare a second action alternative: “If the USFS is not prepared to develop this type of Alt. 3, NCCC in consultation with others is willing to draft an independent alternative...” (Copy enclosed as Exhibit 1)

In his response to the TRP Scoping Notice, Bailey submitted written comments dated December 6, 2019 (copy enclosed as Exhibit 2). These outlined an alternative for management of the Twisp Corridor, including recreation improvements, silvicultural recommendations, and road decommissioning. Bailey again referenced this alternative and his intention to submit it for inclusion in the EA in his Draft EA comments (copy enclosed as Exhibit 3).

Subsequently, the March 17, 2021 edition of the *Methow Valley News* published an op-ed by Bailey (copy enclosed as Exhibit 4) describing his alternative. In its March 24, 2021 Edition (copy enclosed as Exhibit 5), the newspaper published a front-page headline story about Bailey’s alternative.

However, in an e-mail dated June 3, 2021 (copy enclosed as Exhibit 6), Methow Valley District Ranger Chris Furr denied Bailey’s request to include the alternative in the Final EA, informing him that: "...comments, including any suggested alternatives, must be submitted during the comment period for

consideration.” Bailey had in fact submitted his alternative during both comment periods. Later that month, Bailey requested a meeting with Okanogan-Wenatchee National Forest Supervisor Kristin Bail, which request was turned down via a phone call from Supervisor Bail’s staff.

During an in-person meeting on July 6, 2021 with Ranger Furr and TRP project leader Eireann Pedersen, Bailey again disclosed his desire to submit his alternative. Furr acknowledged that he had seen Bailey’s op-ed and read the story in the *Methow Valley News*, but reiterated it was too late in the process for an independent alternative to be considered. Furr again told Bailey his alternative would not be considered during a December 8, 2021 telephone conference that included Phil Fenner, NCCC’s President.

Further, Bailey’s disclosure of intent to submit an alternative for inclusion in the EA was not mentioned in the EA section on “Alternatives Considered but Eliminated from Detailed Study.” The EA states: “Some public comments received in response to the proposed action provided suggestions for alternative methods for achieving project needs. The following alternatives were considered but dismissed from detailed consideration for the reasons summarized below.”

However, the EA does not note which alternatives were dismissed, it only dismisses suggestions for changes in project actions while ignoring Bailey’s offered alternative, the only actual alternative offered to Objector’s knowledge.

In her Draft Decision, Supervisor Bail dismisses consideration of additional alternatives: “There are no unresolved conflicts that necessitate the development of another action alternative.” The Scoping and Draft EA comments from Objectors bring to light a number of conflicts, including the absence of more than one action alternative. These unresolved conflicts have not been addressed and appear to have been ignored.

Specifically, Bailey’s alternative included a proposal to decommission and rehabilitate Road 4420 on the west side of the Twisp River. This proposal was designed to eliminate erosion impacts from one of the two roads that parallel the Twisp River and would directly contribute to the satisfaction of the first stated “Need” for the proposal: “Protect and maintain aquatic, riparian, and hydrologic resources and restore areas impacted by past management. Increase watershed resiliency to existing and anticipated disturbances, including those tied to predicted changes in climate.”

Bailey’s proposal included mitigation for reduced access to recreation trails on the west side of the Twisp River by constructing a pack bridge on the east side of the river. This alternative directly addresses the Needs, and is a reasonable proposal. Yet it is not mentioned in the Decision, nor was it mentioned in the EA.

NEPA requires the Forest Service to “...rigorously explore and objectively evaluate all reasonable alternatives and to briefly discuss the reasons for eliminating any alternatives that were not developed in detail.” (40 CFR 1502.14). The Decision does not consider Bailey’s alternative, nor does it discuss the reasons for refusing it out-of-hand other than the incorrect assertion that it was not timely.

In *Native Ecosystems Council v. U.S. Forest Service* (428 F.3d 1233 (9th 2005)), the Ninth Circuit Court of Appeals found: “So long as ‘all reasonable alternatives’ have been considered and an appropriate explanation is provided as to why an alternative was eliminated, the regulatory requirement is satisfied...”

Service foreclosed opportunities to include alternatives in the EA offered during scoping and in comments to the Draft EA. It did so prior to the Final EA and publication of the Draft Decision. It rejected the offered alternatives with no explanation. See *Environmental Defense Center v. Bureau of Ocean Energy*

Management, 2022 WL 1816515 at *14 (9th Cir. 2022) (“The existence of a viable but unexamined alternative renders an [EA] inadequate.”) (alteration in original) (quoting *Western Watersheds Project v. Abbey*, 719 F.3d 1035, 1050 (9th Cir. 2013)).

2) Inadequate Range of Alternatives and Inaccurate “No Action” Alternative

The Service’s obligation to consider a reasonable range of alternatives is at the “heart” of NEPA. *Dep’t of Transp. v. Public Citizen*, 541 U.S. 752, 757 (2004). NEPA requires the Service to do so in an Environmental Assessment (“EA”), not just in an Environmental Impact Statement (“EIS”). *Environmental Protection Information Center v. U.S. Forest Service* (“EPIC”), 234 Fed.Appx. 440, 443 (9th Cir. 2007). Under NEPA, the Service must “study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.” 42 U.S.C. § 4332(2)(E). Project alternatives derive from the “Purpose and Need” statement, which briefly defines “the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action.” *City of Carmel-By-The-Sea v. U.S. Dept. of Transp.*, 123 F.3d 1142 (9th Cir.1997); 40 C.F.R. § 1502.13. The stated goal of a project necessarily dictates the range of “reasonable” alternatives, and an agency cannot define its objectives in unreasonably narrow terms. *Id.* at 1155. The Ninth Circuit consistently holds that failure to consider a reasonable alternative is fatal to an agency’s NEPA analysis, even in the context of an EA. *E.g.*, *EPIC*, 234 Fed.Appx. at 443.

In short, providing only one action alternative defeats the purpose of NEPA, which is to provide a number of options to address a specific “Purpose and Need” with selections that would achieve objectives while minimizing or eliminating specific environmental impacts.

In its Draft EA comments, NCCC contended that at least one additional action alternative is necessary due to the then-30-year (now reduced to 20 years) duration of the project; unproven long-term funding; more “surgical” silvicultural prescriptions; and attention to expanding forest ecology information. Further, NCCC stated that the EA fails to provide an objective comparison of the effects of the two alternatives presented, the no action) and preferred alternatives, and that an EIS is required for a project of this magnitude and level of controversy. See, e.g., *Bark v. U.S. Forest Service*, 958 F.3d 865, 870 (9th Cir. 2020) (“Substantial expert opinion presented by the Appellants during the administrative process disputes USFS’s conclusion that thinning is helpful for fire suppression and safety.”).

NCCC also raised several issues the present action alternative fails to address. These include unanticipated, but likely natural occurrences such as wildfire that would necessitate changes in the project; the absence of a viable monitoring plan; and no consideration of the increased impacts from climate change. The failure of the single action alternative to address these concerns, and the absence of a range of alternatives, has left these concerns unanswered.

NCCC also noted that the comparison of the two alternatives is inaccurate, as it fails to consider the benefits that would result from no action: “The extensive interventions under Alt. 2 (preferred) purport to substitute management actions for nature’s own self-healing restoration as a result of natural succession, but there is no analysis that compares the outcomes of the two alternatives in the detail that is needed to make an informed choice.”

Conflicting science as to the effectiveness of fuels reduction treatments in reducing wildfire risk (see *infra*, “The Effectiveness of Logging in Reducing the Risk of Large Wildfires Has Not Been Validated”) is another reason the Forest Service must provide a range of alternatives. Additional Alternatives must address whether logging is a viable solution to alleged unnatural fuel loading and what other options or alternate means of treatment exist, and also the question as to whether fuel loading in the Twisp River

Watershed is in fact outside the Historic Range of Variability (HRV). For example, an alternative should have been developed that identifies naturally-occurring dense stands of timber and protects them for habitat, while concentrating thinning only in previously logged areas where dense timber stands evolved as a result of past logging.

Further, the Draft Decision states: “Some northern spotted owl habitat will be temporarily removed, downgraded or degraded by thinning treatments, but no permanent loss of habitat will occur.” This statement could be applied to virtually any stand of old growth owl habitat. Eventually, even a clear-cut would likely return to “owl habitat” (presuming there are any owls remaining), but it would take at least a century of undisturbed growth following replanting. An alternative should have been developed that would preclude thinning in matrix stands that provide owl habitat. Such an option would eliminate admitted impacts to an ESA listed species that continues to decline despite habitat protection measures implemented via the Northwest Forest Plan. The Endangered Species Act does not permit temporary degradation of habitat for listed species.

With only a single plan of action, the deciding officer and the public receive no presentation of options that exist to fulfill the project Needs while reducing or eliminating environmental impacts. A range of alternatives should provide for: diverse silvicultural prescriptions; different options for areas of logging and prescribed burning entries; alternate options for road construction and decommissioning; standards for governing removal of trees; an option that precludes implementing “Conditions-Based Management;” and a means of addressing long-term funding issues.

Finally, the consequences of the no-action alternative are presented as an exaggerated scenario. The Decision arbitrarily limits responses to ongoing issues involving roads, culverts, Road’s End Campground, and forest structure to doing nothing, thus allowing alleged damage to continue.

To present a valid scenario of taking no action with regard to forest health, the EA should, for example, describe the various fire scenarios that could occur, and how each would impact the forest and the downriver property owners—if a fire were to occur—with and without fuels reduction treatments.

It should also disclose the reasons three fires that impacted the Twisp River Drainage over the past eight years have been effectively controlled, and what the ecological impacts and benefits of the fires were. The reality of recent fires being effectively controlled suggests at least part of the rationale for fuels reduction actions proposed in the TRP is unjustified.

These concerns were referenced in both NCCC’s comments on the Draft EA and in Bailey’s Draft EA comments.

3) Project Funding is Not Guaranteed

The economic study that was prepared for the TRP was for the 77,000-acre project, not the revised 24,000-acre project. Therefore, the revenue generated would be far less, due to the decreased area where commercial logging would occur. This leaves many unanswered questions, most important, how will the aspects of the project that don’t involve logging be guaranteed?

The economic report by Matthew Avery, dated October 5, 2020, over a year before the TRP was changed, makes clear that funding to complete the non-timber cutting aspects of the TRP is not guaranteed. He even notes that funding is lacking for existing, necessary management actions apart from the TRP: “The proposed action would require a level of investment that may not be possible with the current or expected levels of appropriations...”

Further, there is no board-foot estimate of how much commercial timber would be removed, so there is no way to determine how much revenue logging will generate. If funding runs short, the project could be left half-finished, with only the logging aspect (the revenue generating aspect) completed. This would not satisfy the Needs as articulated in the EA and Decision.

Under “Project Issues and Concerns,” the Economic Report lists only one concern, the revenue generated from logging. However, many commenters, including Bailey, raised the issue of impacts to recreation use due to log truck traffic, and the noise, dust and other impacts of commercial logging operations.

The report does not ascribe revenue lost to the local community associated with the degradation of recreation quality in the Twisp Corridor due to logging activities and the alteration of the natural setting. Recreation use in the Twisp Corridor has particular value to the town of Twisp, as the recreation use that occurs from people outside the community must travel through the middle of town to access the six campgrounds and nine trailheads in the Corridor.

4) No EIS, Faulty FONSI

The Finding of No Significant Impact (“FONSI”) for the TRP, given the scope and nature of the project, was arbitrary and capricious. An EIS should have been prepared as a matter of law. As recently confirmed by the Biden Administration, an EIS is required if “the effects of the Project are highly controversial and uncertain” from a scientific point of view. *Bark*, 948 F.3d at 870; *see also* NEPA Regulations Revisions, 87 F.R. 23453 (confirming that NEPA analysis requires “decisions informed by science”). The TRP takes place over tens of thousands of acres containing no fewer than seven ESA-listed species. 40 C.F.R. § 1501.3(b)(1). The FONSI and EA contain no “convincing statement of reasons to explain why [the TRP’s] impacts are insignificant,” *Bark*, 948 F.3d at 869, in light of the TRP’s size and impact.

The Draft Decision describes:

An undisclosed amount of timber removal in four timber sales. We could find no description of the volume of timber that will be removed in board feet, nor number of trees to be removed. The impacts of removing trees up to 25 inches diameter, including fire-resistant ponderosa pine and Douglas fir over 21,971 acres, cannot be evaluated unless the amounts to be removed, and their locations are disclosed. No trees that were present prior to fire suppression and commercial logging in the project area should be removed, but we found no provisions protecting trees of the age class that indicate they are naturally-occurring and not due to fire suppression and logging. Moreover, the application of Based Management precludes accurate depictions of trees to be removed (see *infra*, “Conditions Based Management is Not Warranted.”)

Construction of 2.8 miles of road, reopening 6.0 miles of now-closed road, opening to motor vehicle use 8.0 miles of “unauthorized” roads that will be added to the Forest road inventory, and construction of 4.8 miles of temporary roads. The opening/construction of new roads totaling 21.6 miles can produce a variety of adverse environmental consequences, including erosion impacting listed trout and salmonid populations, weed spread, wildlife harassment, human-caused fires, and increased unauthorized ATV use. The impacts of construction and opening of these roads are potentially highly significant and were not given adequate review in the EA, nor are said impacts mitigated by the proposed closure of other roads. The Decision states: “The project area includes many unauthorized roads that are causing resource concerns.” How then, can incorporating eight miles of unauthorized roads into the Forest system, opening six miles of now-closed roads, and construction of 7.6 miles of new road be justified?

A total of 102.6 miles of new hand and/or machine-created fire line. The impacts of these proposed fire lines, an undisclosed amount being bulldozed, to contain prescribed burns or create permanent fuel breaks

are not adequately evaluated, and their locations are not revealed. Long-term impacts, including compaction and creation of conditions favorable to weeds, and use of fire line “trails” by off-road vehicles post-project, are not objectively considered.

Prescribed burning of 23,167 acres. The burning itself, and the potential for loss of control of these burns constitutes a significant threat to the project area that is inadequately analyzed and evaluated.

The proposed removal of “danger trees” along 110.8 miles of existing roads. Standards for determining danger trees are not sufficiently outlined, and there appears to be no documentation of actual danger posed by standing trees via presentation of information describing harm to people or property damage from falling trees on the Okanogan-Wenatchee National Forest.

As previously noted, the Decision states: “Some Northern Spotted Owl habitat will be temporarily removed, downgraded or degraded by thinning treatments...” A purported “temporary” reduction in habitat within areas designated as Matrix under the Northwest Forest Plan, with the claim that habitat may be improved at some point in the future, does not constitute an acceptable risk given immediate owl habitat needs. The TRP would have a *significant impact* on owl habitat.

The Decision notes that seven ESA listed species exist in or near the project area. It also states with regard to listed fish species: “Two actions included in Alternative 2 (preferred) may cause short-term, adverse effects to these species that could result in a “Take...” Such risk constitutes a significant impact. Habitat for all seven species will be extensively modified, and the activities proposed, even if they proceed as planned with no issues such as prescribed burns escaping containment, there will be unavoidable impacts.

All of these proposed actions cannot be brushed aside as having “no significant impact,” particularly when the EA fails to adequately consider their environmental consequences. Also, Conditions-Based Management will allow departure from the projected impacts of proposed logging activities. These oversights and omissions cast a pall over the FONSI decision. The impacts of the project cannot be quantified as Conditions Based Management negates any realistic projection.

Objectors have a major concern over the EA’s overall lack of depth in evaluating ecological impacts that would be ameliorated by a properly prepared EIS. The Preferred Alternative would essentially reconstruct the forest of the Twisp Watershed to conform to a condition that is not adequately validated as “unnatural,” nor outside the Historic Range of Variability (HRV). Depictions of present conditions do not appear to be based on complete scientific investigation of what the conditions were prior to the advent of modern firefighting and the logging practices of the past within the Twisp Watershed. An EIS would incorporate a broader variety of information regarding historic forest conditions that could present scenarios of an HRV that is specific to the Twisp River Watershed. If no such information exists, the depiction of present forest conditions as undesirable is purely speculative.

Objectors cannot agree that the actions proposed in the TRP will have no significant impact on ESA-listed species, existing habitat for a number of other forest-dependent wildlife species, water quality, or impacts to recreation use in a popular recreation corridor. Log truck traffic, displacement of recreational use due to logging activities, and alteration of forest conditions from semi-primitive to logged, including skid trails, slash, stumps and other accouterments of commercial-scale logging, will have impacts in a highly popular recreation corridor that cannot be dismissed as insignificant.

The EA states: “Treatments...would have a beneficial long-term impact on economic sustainability and sustainable recreation by promoting resilience to expected disturbances from wildfires, insects and disease, and climate change ...” However, the document fails to articulate why a forest that *might* be

impacted by a fire, or insects and disease, is less desirable for recreation than a forest that *will* be logged, and thus show accompanying unnatural characteristics. When so many of the over 1,000 comments on the Draft EA expressed concerns over the project's impacts to recreation use, what basis is there for this conclusion? Local residents walk, bike and access their property on Twisp River Road, but the impacts of extensive traffic from log trucks and heavy equipment movement have not been quantified. An objective analysis would provide figures for present use of the road, and the projected increase in traffic due to logging and other related operations.

In its Draft EA comments, NCCC expressed concerns related to the failure to prepare an EIS in the context of the project time frame. It cites the EA's economic report that indicates unstable funding sources that could preclude or hamper the proposed project duration. An EIS would provide presently missing "escape plans" to alter management scenarios based on the lack, or absence of funding in the future. NCCC's Draft EA comments state: "The commitment to an undefined sequence of actions through the Draft EA for a period of 30 [since reduced to 20] years is not a responsive nor responsible planning process under NEPA."

Finally, given the magnitude of the TRP in area, scope and time, a watershed-level EIS is needed, so that multiple alternatives can be developed, reasonable independent alternatives can be included, listed species will be protected through adaptive monitoring, and a more thorough analysis can be conducted.

The need for an EIS is noted both in NCCC's Draft EA comments and in Bailey's Draft EA comments.

5) No Disclosure of Anticipated Future Actions

Realistically speaking, we question the viability of the assertion that the Forest Service can reverse the alleged impacts of over 100 years of fire suppression and high-grade logging in one fell swoop. That aside, the EA fails to disclose future actions that will be necessary to keep the forest in its remanufactured post-project condition. There is no articulation of how the TRP will meet the stated project "Needs" over the long term. If there are no future actions, the Needs will ultimately not be met, because the EA fails to explain how conditions contrived by the project will sustain, or emulate the centuries-long processes of natural forest succession. It should be assumed the forest will return to its present condition.

The EA does not articulate whether naturally-ignited wildfires will be allowed to burn post-project. If they will not, how will the conditions produced by the TRP to correct problems created by past fire suppression be maintained? Or, if naturally-ignited fires will be allowed to burn, thus resuming fire's role in forest succession, what measures will be taken to reduce the risk of unnaturally large wildfires? If the Forest Service claims the forest is going to remain static, it must validate this assumption by disclosing what future actions, including further silvicultural treatments, will be needed.

The EA discloses no "end game," where the forest will be impacted only by natural forces, or conversely, if perpetual forest management/manipulation via logging, prescribed burning, or other human actions will be necessary. The failure to disclose future actions violates NEPA. 40 C.F.R. § 1501.3(b); 40 C.F.R. 1508.1(g)(3) (defining "[c]umulative effects"); *see also Tinian Women Association v. U.S. Navy*, 976 F.3d 832, 838 (9th Cir. 2020) ("The rationale for evaluating cumulative impacts together is to prevent an agency from 'dividing a project into multiple actions' to avoid a more thorough consideration of the impacts of the entire project.") (quoting *Native Ecosystems Council v. Dombeck*, 304 F.3d 886, 894 (9th Cir. 2002)).

6) No Public Comment Period After Changes to the Project

During the Forest Service's January 26, 2022 public presentation, the public was first informed of major changes to the TRP. However, the public record was never re-opened to provide for comments on the changes prior to publication of the Final EA. The decision not to reopen the TRP for public comment violates NEPA, as the current TRP is significantly different from the original proposal and contains significantly different elements and impacts. 40 C.F.R. § 1500.3(b)(1). This is the antithesis of federal decision-making informed by the public, as the public was afforded no opportunity to comment on the TRP as currently planned.

NEPA requires Service to "[m]ake diligent efforts to involve the public in preparing and implementing their NEPA procedures." *Id.* § 1506.6(a); *see also id.* § 1506.6(b) (setting out additional NEPA requirements for public involvement and notice). Objectors fail to see how Service could have complied with NEPA's public notice and comment procedures by failing to reopen the comment period following the drastic changes shown in the EA for the current TRP.

The original Scoping Notice and Draft EA proposed and analyzed a 77,000-acre TRP. It was reduced to 24,000 acres, and several significant changes were made purportedly due to the Cedar Creek Fire. The Forest Service should have allowed public comment after the Cedar Creek Fire burned 10,600 acres of the project area and "other considerations" necessitated a major change in the project.

The changes to the TRP were outlined in a description that included a change in the size of the project from 77,000 acres to 24,000 acres, reduction of the project timeline from 30 years to 20 years, and the elimination of designated Late Successional Reserves and roadless areas from the project. Yet how those changes were integrated into the other aspects of the project are not disclosed in the Draft Decision.

The announced TRP changes are not just a matter of scaling down the project with exactly the same elements. It is a changed TRP with different elements and substantially different environmental impacts and purported benefits than were contained in the original proposal. For example, review of the 2020 and 2022 maps of treatment units show significant changes in the logging prescription boundaries within the same area. The public should have had the opportunity to comment to allow input that informed the decision-making process, as required by NEPA.

The document describing the project changes indicate it was altered primarily due to the 2021 Cedar Creek Fire. Yet the EA does not fully explain why the project was subsequently reduced by 53,000 acres when the fire had only burned 10,600 acres. If it was due to the elimination of the roadless areas and LSR's, the reason for their elimination, and also for their initial inclusion in the project area, must be explained.

The Decision does not describe how the project objective of reducing the risk of wildfire by altering the forest structure will be achieved when the scope of fuels reduction was shrunk by 53,000 acres. The Draft EA claimed that the "landscape-level" expanse of the original project was integral to the achievement of its objectives.

This issue arose only after the Draft EA comment period was closed. Therefore, it is by rule exempt from the requirement that issues raised in this Objection must have been raised in previous comments: "...unless the objection concerns an issue that arose after the designated opportunity(y) for comment...". 36 C.F.R. § 219.53(a).

7) Segmentation of Connected Actions and Failure to Adequately Analyze Cumulative Effects

The current EA and FONSI for the TRP fails to analyze the effects of, or even mention, the known projects that will occur in the area eliminated from the original TRP. By doing so, Service failed to

adequately account for an analyze the cumulative effects of the TRP. 40 C.F.R. § 1508.1(g)(3). Cumulative impacts analysis requires an agency to “give a sufficiently detailed catalogue of past, present, and future projects, and provide adequate analysis about how these projects, and differences between the projects, are thought to have impacted the environment.” *Lands Council* 395 F.3d at 1027. “A proper consideration of the cumulative impacts of a project requires some quantified or detailed information; general statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided.” *Klamath-Siskiyou Wildlands Ctr. v. Bureau of Land Management*, 387 F.3d 989, 993 (9th Cir.2004) (internal quotations omitted).

The standard of analysis is not reduced because the NEPA document produced is an Environmental Assessment, rather than an EIS. *Kern v. U.S. Bureau of Land Management*, 284 F.3d 1062 (9th Cir.2002) (“Given that so many more EAs are prepared than EISs, *adequate consideration of cumulative effects requires that EAs address them fully.*”) (quoting Council on Environmental Quality, *Considering Cumulative Effects Under the National Environmental Policy Act* at 4, Jan. 1997) (emphasis in the original). Therefore, case law applicable to cumulative impacts analysis in an EIS is equally applicable to the current TRP EA.

In *Lands Council*, the court described an EIS that failed to meet the standard of an adequate catalogue of past, present and future actions. The court said the EIS:

. . . generally describes the past timber harvests, gives the total acres cut, with types of cutting, per decade, and asserts that timber harvests have contributed to the environmental problems in the Project area. But there is no catalog of past projects and no discussion of how those projects (and differences between the projects) have harmed the environment. Apart from a map in the Project file that shows past harvests, with general notes about total acres cut per watershed, there is no listing of individual past timber harvests. Moreover, there is no discussion of the connection between individual harvests and the prior environmental harms from those harvests that the Forest Service now acknowledges. Instead, the Final Environmental Impact Statement contains only vague discussion of the general impact of prior timber harvesting, and no discussion of the environmental impact from past projects on an individual basis, which might have informed analysis about alternatives presented for the current project.

Id. at 1027. The court found that this level of disclosure failed to meet NEPA’s purpose of providing “a sufficiently detailed statement of environmental impacts . . . to permit informed decision making.” *Id.*

Similarly, in *Klamath-Siskiyou Wildlands*, the court found that, although the two EAs under consideration contained sections of over a dozen pages labeled cumulative effects, “a close read reveal[ed] that those sections [did] not adequately discuss the subject” because they only discussed the direct effects of the project” in their own “minor watershed.” 387 F.3d at 994. The court found that a table, described as presenting in graphic form the cumulative effects of the project on an extensive list of criteria, did “not actually provide a useful analysis of the project” because it only provided an analysis of direct effects of four timber sales on their own watersheds, and provided no larger analysis of the significance of these effects as a whole. *Id.*

In this case, Service has indicated its intention to proceed with NEPA analysis of the Midnight Restoration Project. In her April 4, 2022 letter to Phil Fenner, OWNF Supervisor Kristin Bail states: “Midnight Restoration will be a new project that is developed as a result of the reduction of the Twisp Restoration Project footprint.” (Copy enclosed as Exhibit 7.)

The Midnight project will encompass the area that was eliminated from the original TRP. The Wilderness Society, a member of the North Central Washington Forest Health Collaborative (NCWFHC), commissioned a study in March 2022 that makes specific recommendations for silvicultural treatments within the area eliminated from the TRP (study sent via email). These were based on discussions with the Forest Service at the November 3, 2021 meeting of the Collaborative.

Segmenting the TRP from the planned Midnight Project will result in two separate NEPA analyses for conjoined actions. The Forest Service has already established that the two projects are connected, as what is now the Midnight Project was originally part of the TRP as a single action. *See* 40 C.F.R. § 1501.3(b) (“Agencies should consider connected actions consistent with § 1501.9(e)(1).”; *id.* § 1501.9(e)(1) (“[Agencies shall consider a]ctions (other than unconnected single actions) that may be connected actions, which means they are closely related *and therefore should be discussed in the same impact statement.*”)

The revised TRP EA does not consider its impacts on habitat and watershed values conjoined with the impacts that will result from the Midnight project. Proceeding with the TRP decision and following with the planned Midnight project under a separate decision would preclude analysis of both project’s cumulative impacts. Thus, the TRP decision violates NEPA, since it does not reference the Midnight project. Its impacts will be irreversible, and given its 20-year duration, impacts from the TRP will continue after the Midnight project decision is completed, assuming it will be completed within the next 20 years.

The TRP decision excludes 10,600 acres originally planned for treatment due to the Cedar Creek Fire. However, the impacts of the actions proposed in the TRP have not been analyzed with consideration for the impacts of the fire, and the commercial logging that occurred as part of the firefighting effort. The logging operation during the fire removed what appeared to be around two million board feet of timber, with no NEPA process. The cumulative impacts of the fire, the logging, and actions planned in the TRP must be considered. For example, if the fire and the logging created increased soil erosion, this must be considered when assessing the potentials for increased erosion with the TRP.

Originally, what is now called the Twisp Aquatic Restoration Project (TARP) was part of the TRP. It was suddenly separated, and a 20-day comment period was allowed. However, no Objection period was observed. NCCC commented on TARP, and the response from project manager Lance George indicated there would be a commercial logging component that was not mentioned in the decision. Originally, the only tree removal was for instream structures. However, Mr. George corrected that statement and said there would not be a commercial logging component. Still, the cumulative impacts of the timber removal for instream structures for the now-ongoing TARP with the TRP were not considered.

The issues in this section of our Objection were brought to light only after discovery of the existence of the Midnight project, the segmenting of the TARP, and after the Cedar Creek Wildfire and the logging that accompanied it had occurred. These were discovered only after the close of the Draft EA comment period. As previously noted, the EA comment period was never re-opened to allow concerns to be raised over the joint analysis of the Cedar Creek Fire, the logging, and the TRP. However, on page 9 of his Draft EA comments, Bailey notes that disclosure of future actions needed to maintain contrived forest conditions is necessary.

8) Inequitable Public Process

Our primary concern with public process is over a November 3, 2021, presentation by Methow Valley District Ranger Chris Furr to the North Central Washington Forest Health Collaborative. At this meeting, Ranger Furr announced major changes in the TRP and sought the Collaborative’s input. After NCCC discovered this, we convened a teleconference with Furr that occurred on December 8, 2021. We

requested that he provide the information he had disclosed to the Collaborative to the rest of the public. Ranger Furr refused to do so.

We then convened a January 18, 2022 telephone conference with OWNF Supervisor Kristin Bail. NCCC and Bailey objected to Ranger Furr's refusal. She declined to pursue corrective action to resolve the issue. (We are forwarding a transcript of this conversation via email.)

On or about March 20, 2022, NCCC discovered that during the November 3, 2021 meeting, Ranger Furr also disclosed the existence of the aforementioned Midnight Restoration project to the Collaborative.

In an April 18, 2022 letter to Supervisor Bail (copy attached as Exhibit 8), NCCC objected a second time to the special access given to the NCWFHC with regard to the Midnight Restoration project. Her response is cited above. She found Ranger Furr's actions were appropriate.

However, as far as we can tell, the Midnight Restoration project still has not been revealed to the public, despite a question from a participant at the January 26, 2022 presentation as to what plans might exist for the areas eliminated from the original TRP. Service responded that no plans were presently in the works for that area.

The changes to the TRP were finally revealed to the public at the January 26 presentation, but as explained above, Service declined to re-open the public record. Thus, the Collaborative was given special opportunities to influence both the TRP and the Midnight project, but no other publics were allowed to be involved in, or comment on either one.

At the April 13, 2022 meeting of the NCWFHC Steering Committee, Mike Anderson of the Wilderness Society (co-chair of the NCWFHC) made the following statement. Ranger Furr was in attendance, and spoke after Anderson's presentation in support of his propositions:

"On Midnight (restoration project)...we did want to...revisit the discussion we had within the Steering Committee back in December...(actually November 3) when the Forest Service came to us and asked if we wanted to take on a collaborative Midnight Restoration Project, and we didn't reach consensus at that point, but some within the Collaborative did move forward with the development of a pre-NEPA landscape analysis and prescription, which was prepared by Sean Jeronimo with Resilient Forestry under contract with The Wilderness Society...and I think as a general consensus from those concerned about Midnight project is that next steps are to develop a proposed action...a purpose and need statement...based upon the landscape prescription that Sean Jeronimo has put together...I've gotten a cost estimate for them to kind of lead us through the development of the purpose and need and the proposed action, and so I think if we do have consensus from the steering committee for working together on those next steps leading up to the actual beginning of a NEPA process with the scoping..."

This transcript was made from a recording of the meeting by virtual attendee Phil Fenner. (We have forwarded the recording via email.) Methow District Ranger Chris Furr was in attendance and spoke in support of Anderson's propositions following the presentation. At present, the Collaborative has not posted minutes of the meeting, and has not responded to our requests for minutes, so we do not have that documentation as yet.

A February 2, 2022 story in the Methow Valley News states: "The [Methow Valley] Ranger District and North Central Washington Forest Health Collaborative met in November to discuss their options. They considered two approaches: keeping the boundaries [of the TRP] the same and evaluating the fire impacts as part of the overall environmental analysis; and eliminating watersheds burned in the fire and relying on the original analysis for the unaffected areas...they chose option 2." (Copy enclosed as Exhibit 9.)

We strenuously object to what appears to be a conscious attempt to cut the public outside the Collaborative out of the public process. The Forest Service has provided the Collaborative with information that was later denied to the rest of the public. It has provided NCWFHC with opportunities to influence the TRP and Midnight projects that other publics have not had. The Collaborative is assuming the Forest Service's role in coordinating the NEPA process for Midnight. The rest of the public can only react to an already-developed project after the Collaborative has had exclusive, preemptive opportunities to be directly involved.

The public outside the Collaborative can only react at some unforeseen time to a proposed action that has already been created between the Forest Service and a select group of publics as represented by the Collaborative. The Collaborative thus has an inside track on project development, and has "buy-in" that will make it more difficult for other publics to inspire meaningful changes.

This one-sided process has allowed the Collaborative to create specific silvicultural prescriptions via the Resilient Forestry recommendations, and will allow it to facilitate the NEPA process for Midnight, when other publics were told no further plans were in the works for areas eliminated from the original TRP, and have not even been informed that a project is being considered. Objectors have only been allowed to obtain information and provide input on the record during the TRP comment periods, but the Collaborative has been able to assist in the development of the project pre-NEPA, and outside the public record.

As soon as Service made the decision to proceed with the Midnight Project, it should have allowed all publics to be involved. The decision should have triggered a public scoping notice in November 2021.

If the record would have been re-opened after the announcement of changes to the TRP, and the Midnight project would have been scoped, Objectors would have provided comments that could have influenced revisions. NCCC would have sent an information alert to its membership and informed Service that the impacts of the Cedar Creek Fire and the commercial logging operation that occurred during the firefighting effort required a supplementary NEPA analysis. Objectors would have again asked for our alternatives to be included in the EA.

It would appear based on the above facts that the Collaborative is acting more like a FACA Committee than a Resource Advisory Committee under the 2009 Collaborative Forest Landscape Restoration Act [Title IV PL 111-11 Omnibus Public Lands Management Act, and PL 106:393 (Section 205) Resource Advisory Committees (Title IV)].

Whether or not this relationship violates black letter law, we contend it is unacceptable and must be addressed by Service. Unquestionably, the public process for the development and advancement of the TRP has been undemocratic and may raise issues with the First Amendment of the U.S. Constitution's right to petition the government, and the Constitution's guarantees of equal protection. At the very least, Service's relationship with the NCWFHC undermines NEPA's mandate to foster and encourage meaningful public participation in determining how to proceed with environmentally sensitive proposals such as the TRP and Midnight projects.

Objectors have been denied equal access to information and opportunities to influence decision-making despite our good faith involvement in the process since we first learned of Forest Service plans that would impact the Twisp River Watershed. Nor has the rest of the public been given equal opportunity to be involved in the development of a project that could have grave impacts to a highly treasured place of tremendous public importance and concern—the Twisp River Corridor.

Our discovery of the relationship between Service and the NCWFHC occurred only after the close of the comment period for the TRP Draft EA and all other comment periods.

9) The Effectiveness of Logging in Reducing the Risk of Large Wildfires Has Not Been Validated

The TRP EA provides neither adequate nor objective, site-specific information to illustrate how the forests of the Twisp Watershed are unnaturally overcrowded, nor has Service shown how the forests have otherwise departed from the HRV. If the claim is that past fire suppression has altered the natural forest composition, then Service must disclose the history of fire suppression in the Twisp Watershed. We found no such information in the EA.

We also found no site-specific information indicating what the natural frequency of dense stands composed of different tree species was in the Twisp Watershed prior to fire suppression and logging activities.

The HRV as presented in the EA is not based on complete historic information, it is an estimate based on limited historical records and projections. Even if accurate depictions of pre-logging and fire suppression forest conditions were available for the Twisp River Watershed, past forest conditions cannot be accurately quantified via snapshots from a frozen point in time. There must be consideration of natural forest succession. Parts of the Twisp forest went through divergent stages of evolution over a vast time frame.

Moreover, the EA has not delineated naturally occurring dense timber stands from those occurring due to past logging. As for dense stands that resulted due to fire suppression, it would not be possible to objectively quantify those that might not have otherwise existed, because modern fire suppression may not have been occurring for a longer period of time than estimated fire frequency for the Twisp forest.

To address fire risk reduction, the EA fails to validate its claim that the Twisp Watershed does not meet “desired conditions,” or that the existing conditions, and not climate change, are creating an unnaturally extreme fire hazard. The EA fails to establish that the forest is more susceptible to wildfire, due to past logging and fire suppression, or that it could experience a larger wildfire than would naturally occur.

The EA states: “The ID Team used the Okanogan-Wenatchee National Forest Restoration Strategy (USDA 2012) by applying the Ecosystem Management Decision Support framework (EMDS) to compare existing landscape characteristics to likely historical conditions and projected conditions under future climatic settings. These management directions and guidance helped identify several needs in the project area, described below with specific instances of current conditions that have departed from desired conditions.”

The Decision states: “...no research has been published that provides a strong basis for countering the research used in this analysis.” We disagree.

Since the publication of the 2012 Restoration Strategy, new information has emerged that contradicts the portrayal of “desired conditions,” and that delineate “desired” conditions from actual historic conditions. These can be referenced in a paper called “*Everything you wanted to know about wildland fires in forests but were afraid to ask...*” (Ingalsbee, DellaSala, Hanson, 2018; sent via email.) This paper states: “Over historical timelines, recent amounts of forest acres burned and high-severity burned acres each year are still within the natural range of variation for the past century, and far below the normal tens of millions of acres burned before the 20th century...”

In its Draft EA comments, NCCC contends that the portrayal of unnaturally dense stands of timber and excessive fuel loading differs across the Twisp Watershed, and that these differences are not identified, nor have the impacts of climate change been adequately evaluated for its role in recent large wildfires. There are locations that don't meet the criteria of not meeting the HRV, or satisfying desired conditions. There are few or no goals for different sites and conditions to be achieved.

There is also no articulation in the EA of the unique character of the Twisp forest due to its geographic location: a "wet" ponderosa pine/Douglas fir ecosystem that experiences relatively heavy amounts of precipitation compared to other semi-arid forests, and which has adapted to fire in ways distinct from other ponderosa pine/Douglas fir forests. The EA makes no notation that the Twisp forest is naturally more dense than other east-side ponderosa pine-Douglas fir forests, thus increasing the natural frequency of dense timber stands.

The EA also disregards studies that show the project could actually facilitate forest conditions that would be more conducive to an unnaturally large wildfire. In particular, a study by Curtis Bradley, et al, "*Does Increased Forest Protection Correspond to Higher Fire Severity in Frequent-Fire Forests of the Western United States?*" (copy sent via email), surveyed 1,500 wildfires over a 30-year period. It found forests that had been selectively logged, including specific fuels reduction treatments, experienced more severe fires than areas that had never before been logged.

In a paper titled "*Adapt to More Wildfire in Western North American Forests as Climate Changes,*" Tania Schoennagel at the University of Colorado, and eleven other forest ecologists found that "...fuels reduction cannot alter regional wildfire trends." (Copy sent via email.)

We cite the above documents to illustrate that the EA is inadequate, that the alternatives offered do not address conflicting scientific information, that the Needs as described will not likely be met, and that the project may exacerbate fire danger. *See also Bark*, 958 F.3d at 871 ("Appellants thus have shown a substantial dispute about the effect of variable density thinning on fire suppression.")

It is clear that the TRP's validation for its claims that the project will reduce wildfire risk is inadequate, or at the very least in scientific dispute. Logging as proposed in the TRP would have a significant impact on the forest ecosystem and on downriver homeowners because it will remove live trees, reducing carbon storage, thereby exacerbating climate change. It will remove the more fire-resistant trees, up to 25 inches diameter. Logging will open the forest canopy resulting in quicker and more thorough drying of ground fuels due to increased exposure to hot winds and sunlight.

The existence of contradictory studies cries for a suite of alternatives in an EIS that considers all the various scientific information, and proposes diverse solutions to meet the stated Needs. The impact of thinning a critical mass of dense stands on species that require dense stands for habitat has not been considered in the EA. The TRP Decision claims: "Outside of mature stands, the landscape will become more open, emulating pre-suppression era habitat conditions, which will improve retention of large trees." However, the Decision fails to disclose that reduction of an uneven forest canopy, including the removal of medium-sized trees characterized as "ladder fuels," will result in more direct impact to large trees from wind, and thus will increase the potential for blowdown. Prescriptions in the Decision call for tree densities of 15 trees per acre, leaving the remaining trees susceptible to wind damage.

Removal of "medium-sized" trees will also reduce old growth recruitment. This will in turn result in decreased habitat for old growth-dependent species over the long term, and increased dry ground fuel loading.

Finally, the EA claims the TRP will reduce the risk of destructive wildfire to the ecosystem and downriver properties, yet it fails to identify the type and intensity of wildfire the project is supposed to protect against, or what might result from alternate treatments. For example, if a firestorm of the magnitude that has become common in the age of climate change were to occur, the project would not likely have any positive effect. Conversely, if a fire of lesser magnitude were to occur without the alleged benefits of the project, it might be beneficial to the ecosystem by naturally clearing ground fuels and dense timber stands resulting in decreased fire danger, and reduced risk to downriver properties.

Bailey notes the inadequate documentation of departure from natural forest conditions in his Draft EA comments.

10) Conditions Based Management is Not Warranted

Our comments regarding Conditions Based Management (CBM) during TRP comment periods were limited because we found neither a strict definition nor any published standards for this practice.

During the January 26, 2022 Methow Ranger District presentation on the TRP, project leader Eireann Pedersen explained CBM is a provision that allows flexibility in the removal of trees meeting certain conditions that might not have otherwise been designated for removal in the project prescription.

Our inquiries have revealed common descriptions indicating that CBM defers logging prescription applications and ground-based examination until after NEPA analysis is complete, and allows departure from logging prescriptions laid out in NEPA analyses. If this is accurate, due to CBM, the public has no idea how and where logging will actually occur until after the NEPA process for public comment is closed.

The public can only comment on what it can see based on the EA and Decision depictions. If projected forest management scenarios are subject to alteration as the project is being implemented on the ground, there is no surety that the desired conditions will be met, or that what the public was shown during the comment periods was even accurate.

CBM appears to exclude the public from site-specific decisions, and reduces transparency. In *Ohio Forestry Ass'n v. Sierra Club*, 523 U.S. 726, 729–30 (1998) the court ruled that Service must provide the public with “notice and an opportunity to be heard” in the analysis of “specific areas in which logging will take place, and which logging methods will be used.”

During the January 26, 2022 presentation on the TRP, the project manager said she and other staff have repeatedly been over “every acre” of the project area. This should indicate that Service personnel have seen all they need to see and that the CBM provision is not warranted.

Since the contractors would be paid with trees, the CBM provision allows removal of larger “money trees,” which are also the most fire-resistant, and provide present and future habitat. Incentive to remove more, larger trees exists to meet contractor needs for value-added timber to increase profits from the project. CBM provides an open checkbook to depart from the conditions the project was designed to facilitate. The alleged need for CBM is not validated, nor is its implementation adequately explained or analyzed.

Bailey expressed concerns over Conditions-Based Management in the form of a question to the Forest Service at the January 26, 2022 virtual meeting. If a comment period would have been provided after the changes in the TRP were announced on January 26, 2022, Objectors would have expressed further concerns about CBM.

Suggested Remedies

Objectors contend that from the outset, the Twisp Restoration Project has been tainted with inequitable public involvement opportunities, marginalization of the NEPA process, inadequate scientific validation for proposed actions, and inadequate evaluation of environmental impacts. Since our concerns are procedural as well as substantive, we see no relief that can be provided merely by adjusting the activities proposed in the TRP.

We request that the Forest Service begin the NEPA process anew if it wishes to proceed with silvicultural and other related actions in the Twisp River Watershed. Secondly, we contend that if the Forest Service wishes to proceed with forest management actions in the Watershed, including but not limited to the TRP and the Midnight project, it must prepare an EIS for a project of this magnitude.

We also have a suggestion with respect to the TRP EA's Forest Plan amendments. What faith is the public supposed to have in the Forest Planning process when the agency will arbitrarily dilute or eliminate the protection provisions in the Plan to allow logging, as is proposed in the TRP?

With respect to the inequitable public process, even if Service does not believe its exclusive disclosures to, and input from the NCWFHC are technically illegal, Service concede that this relationship has been unfair to other publics. It cannot be allowed to continue or to be an enabling aspect of the TRP decision. We request that decisive action be taken, and documented, ensuring that all publics will have equal access to information from Service, as well as the ability to influence proposed actions at the same level of the project development phase as all other publics, including the NCWFHC.

This concludes our Objections. We look forward to your response.

Respectfully Submitted,

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Enclosures
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Midnight Restoration Project

Landscape Evaluation and Prescription



Photos by Derek Churchill



RESILIENT
FORESTRY

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March 14, 2022

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The purpose of this document

This is a landscape evaluation and prescription for the Midnight Restoration Project area. In this context, a landscape is a collection of sub-watersheds composed of forest and non-forest patches. The Midnight planning landscape is approximately 67,000 acres in size, with individual patches ranging from about 10-200 acres.

A landscape evaluation describes how the current ecosystem conditions differ from the desired conditions.

A landscape prescription describes the management actions that are needed to move the ecosystem from its current conditions to the desired conditions.

Since these analyses are closely related, this document treats them as one unified task. The results of this analysis are answers to the following questions:

- How many acres of this landscape should be treated to restore the ecosystem?
- What kinds of treatment are needed?
- Where are the most important places to treat?
- Where might social, policy, and operational filters affect what work can actually be done?

These answers allow forest managers to clearly express the landscape restoration purpose and need. This is also a starting point for creating a proposal for management actions that will address the treatment need.



Executive summary

The Midnight Restoration Project landscape has a need for treatments to reduce forest density and change the spatial patterns of trees across about 8,850-12,500 acres, or 13-19% of the landscape. Among the three sub-watersheds that compose the Midnight planning area, about 20% of the treatment need is in Upper Twisp, about 50% is in Middle Twisp, and about 30% is in Little Bridge Creek. All of these acres are currently inhabited by young, dense forest with multilayered canopies. The goal of treatments would be to transition these forests to a more open canopy condition, restore surface fuel loads, and reintroduce the frequent fire that historically maintained this landscape.

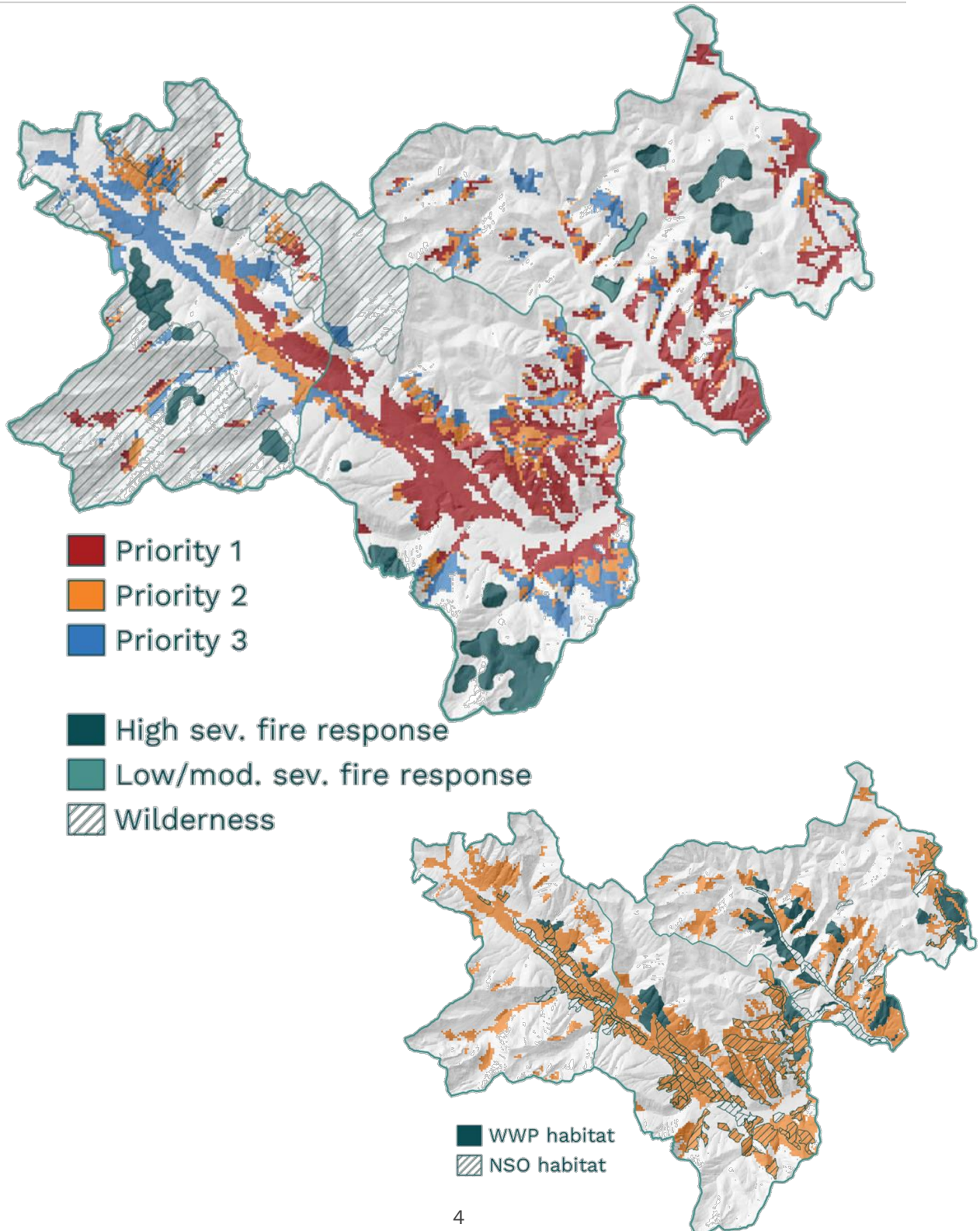
There are opportunities to enhance habitat for wildlife indicator species while performing this work. There is a need across the landscape to consolidate white-headed woodpecker habitat through restoration of open-canopy dry pine forests, especially in Little Bridge Creek. There are variable needs for northern spotted owl habitat, but an emphasis is retaining dense, complex forest where it will be sustainable into the future given threats from fire and drought. Parts of Upper Twisp and north-facing slopes of Middle Twisp offer the best options.

The majority of areas in need of treatment are outside of inventoried roadless areas, but some higher priority areas (500-1000 acres) fall within these zones. There is a significant need for treatment within late-successional reserves (LSR): potential treatment locations are roughly evenly split between LSR and Matrix. There is no way to address the landscape treatment need without treating in LSR.

Given recent fires in the area (2018 Crescent and 2021 Cedar fires), there is a need for some specific post-fire management actions. About 8,000-15,000 acres are in need of post-fire recovery, including assessing natural regeneration and potentially planting additional trees. Within the Cedar fire footprint, about 150-300 acres would benefit from post-fire thinning of green and/or dead trees to leverage the work of wildfire in accomplishing restoration objectives.

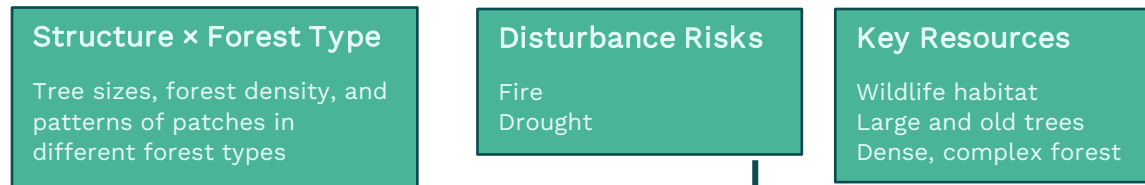
Summary map

This map shows a summary of the landscape prescription. Priority 1 represents the minimum number of treatment acres that would address the landscape need. Priorities 1 and 2 together address the maximum number of acres needed. Priority 3 represents lower priority acres that can be substituted when Priority 1 and 2 acres are ruled out for practical reasons. Habitat overlays for indicator species are shown below for context.



How it works

1. Collect the data



2. Evaluate

Resilience Assessment

How does today's landscape differ from its historical resilient condition?

How does the future need to look different from the past to respond to climate change?

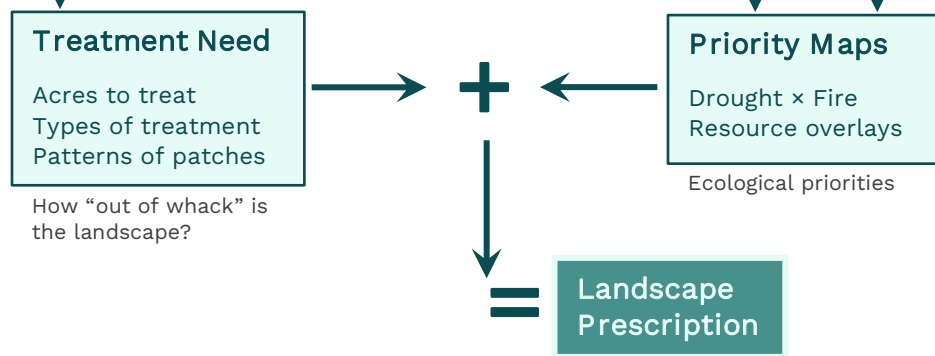
Severe Disturbance Assessment

Where are the biggest risks to landscape function?

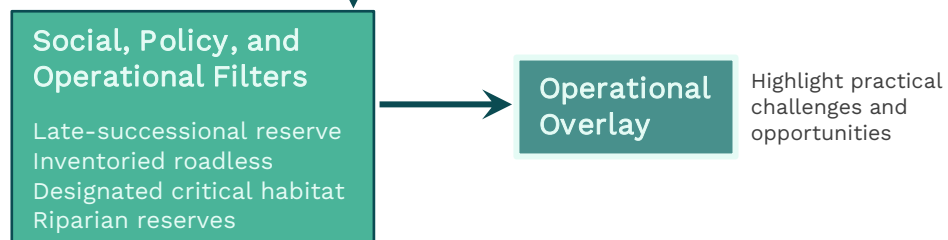
Key Resource Assessment

Where are the important things that are hard to replace?

3. Combine



4. Reality check



Incorporating Forest Restoration Principles

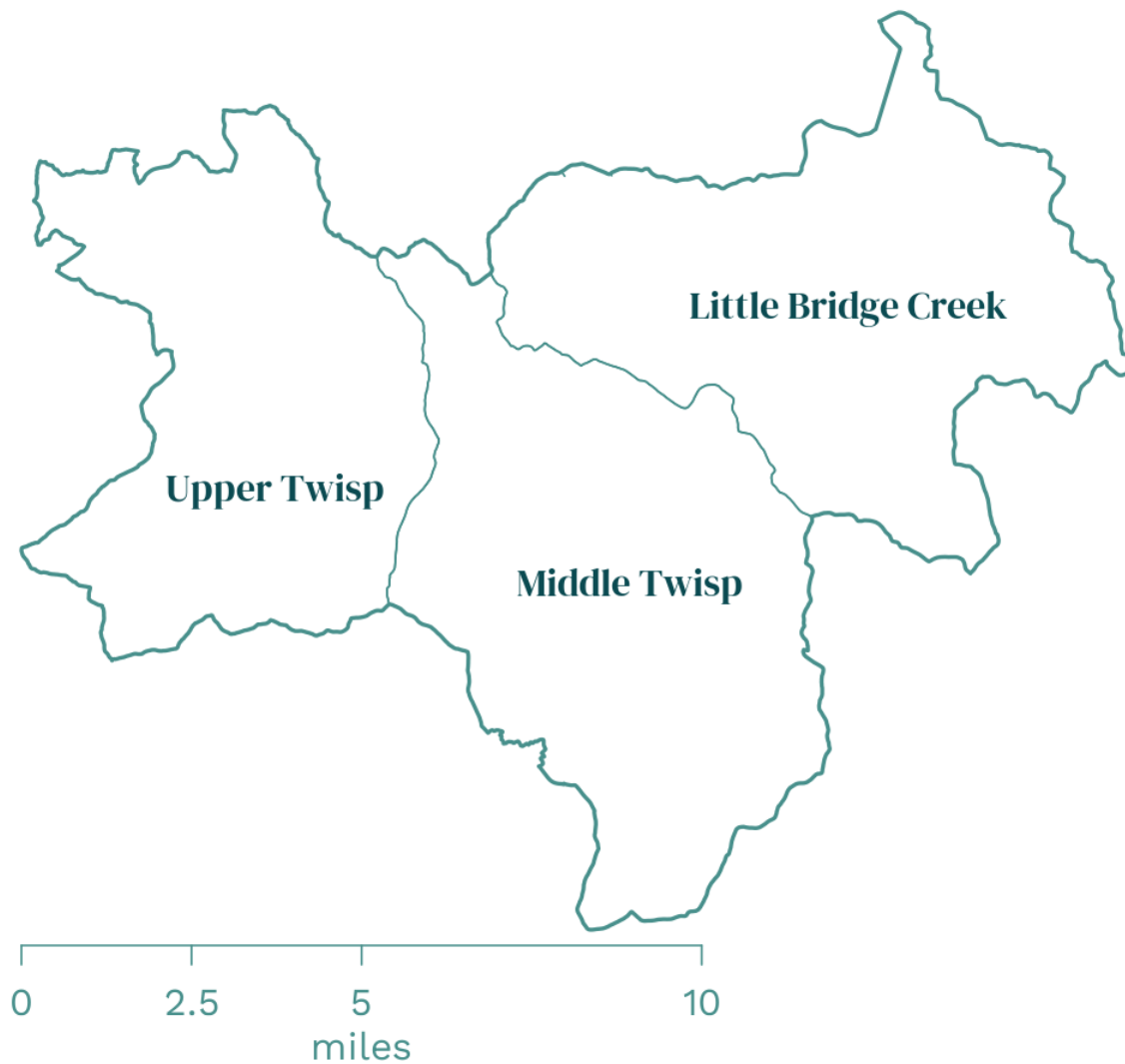
The analysis presented in this document is based on the Okanogan-Wenatchee Forest Restoration Strategy evaluation process. In support of this type of analysis, Hessburg and others published a 2015 article describing seven core principles for forest restoration in dry, fire-dependent ecosystems of the inland Northwest. This landscape evaluation and prescription follows the seven principles. Here, we explain how the management guidance from these principles is used in this analysis.

Guidance	How it is used here
Management must have coherent links across spatial scales from trees to landscapes to regions	This analysis is just one piece (i.e., the mid-scale) of landscape restoration planning. Planning areas like this one are identified in the context of the greater watershed/region. The next step is stand-level planning guided by this landscape prescription.
Use topography as a template to guide restoration	The Resilience Assessment (pgs 7-9), Drought and Fire Prioritization (pgs 10-11), and Large Tree Sustainability (pg 13) all aim to better match vegetation to the topographic template.
Restore disturbance regimes and vegetation patterns; the rest will follow	The Resilience Assessment (pgs 7-9) and Drought and Fire Prioritization (pg 10) are designed to put the right vegetation types in the right places and allow natural disturbances to re-establish.
Restore the natural configuration of forest patch sizes and patterns	The Resilience Assessment (pgs 7-9) is designed around comparing current forest patches to the sizes and patterns that would be found under resilient conditions.
Within stands, focus on restoring variable tree clump and gap patterns	This occurs at a finer scale than the Landscape Evaluation is concerned with, but the recommended treatments in the Landscape Prescription (pgs 17-19) are intended to accomplish this goal.
Retain and promote large trees, snags, and logs	The Large Tree resource (pg 13) makes this a priority.
Work across ownership and management allocations	This analysis applies social, political, and operational filters only as an interpretive lens after assessing the ecological needs of the landscape (pg 22).

Landscape evaluation overview

Each element of the landscape evaluation is presented in sequence. The elements are then brought together to form the final landscape prescription. The descriptions in this section are intentionally brief. For those interested in more detail, see the Midnight Restoration Project Data Detail Supplement.

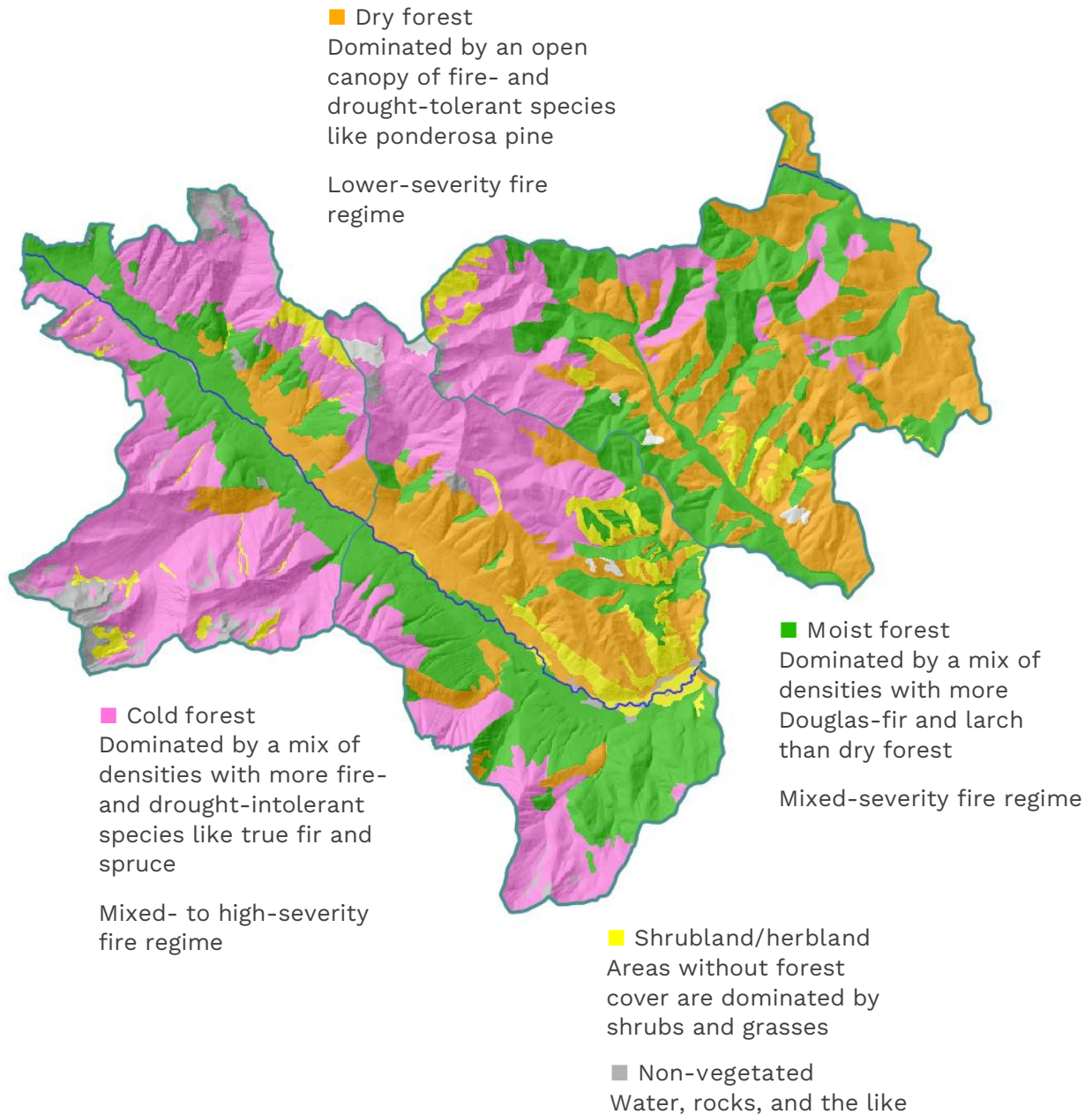
The Midnight Restoration Project planning area is composed of roughly three sub-watersheds, shown below. The sub-watershed referred to as Little Bridge Creek throughout this document also includes sections of the Wolf Creek and Thompson Creek sub-watersheds.



Resilience assessment

Forest type

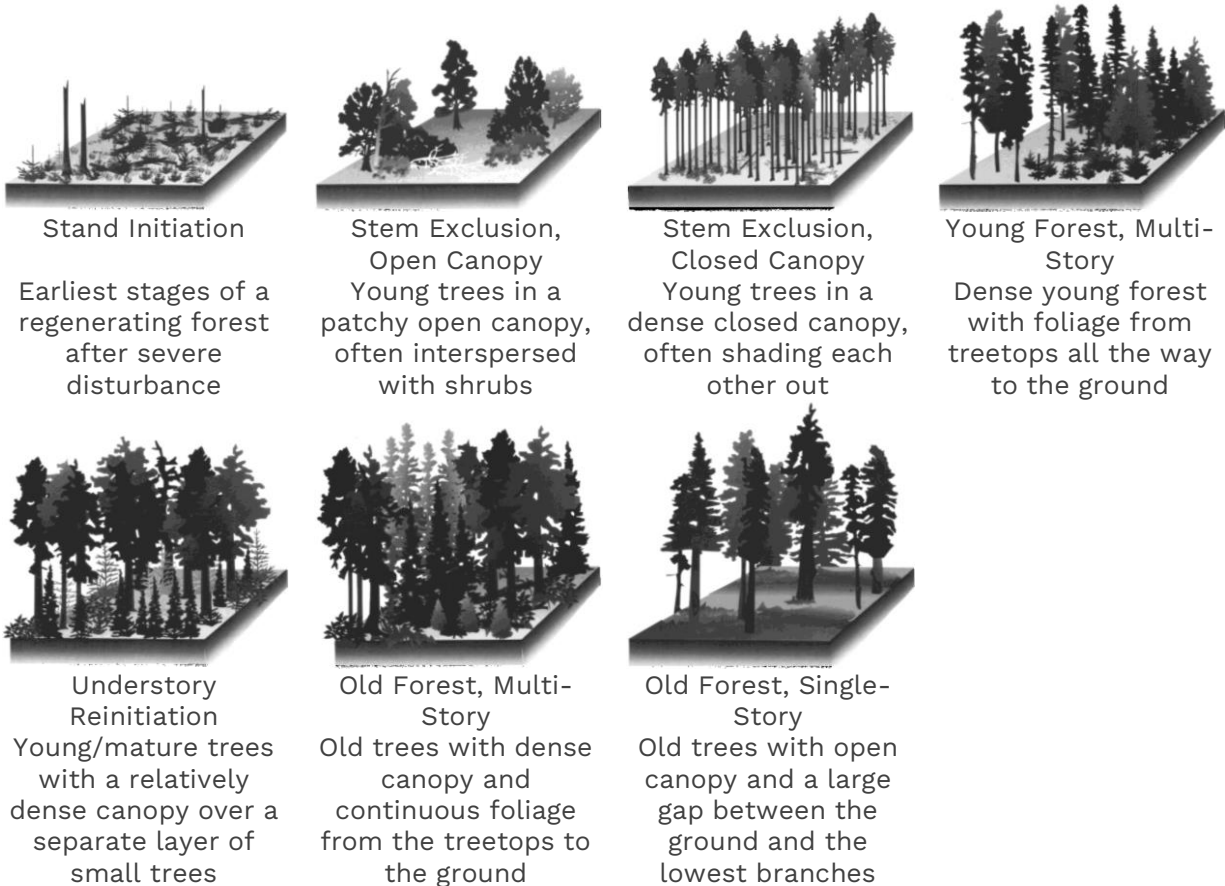
Different environments support different forest types. In a resilient landscape, species composition, forest structure, and disturbance regimes are tightly coupled with the environmental setting. This means that a restored forest looks different in a dry valley than it does high in the mountains. For this reason, the three major forest types are split apart when evaluating treatment needs. Below, each forest type is described in terms of its characteristic resilient conditions.



Forest structure

The sizes, density, and pattern of trees is referred to as forest structure. The size and arrangement of patches of similar structure determines a lot about how an ecosystem functions: whether trees have enough water, how fire moves across the landscape, what habitat is available for wildlife, and more. Patches are the basic unit of analysis for this evaluation; we analyze the abundance, size, and pattern of different types of forest patches to understand how much of the landscape needs restoration and what kinds of work need to be done.

To simplify talking about forest structure, each patch is assigned a structure class. The seven structure classes used in this evaluation are:



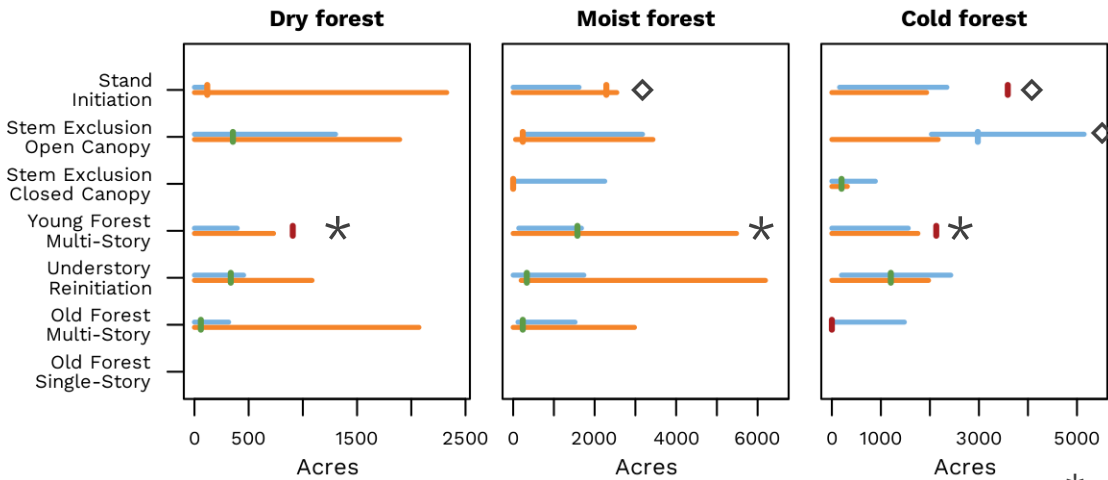
Past research has identified ranges of forest structure associated with landscape resilience for historical forests and for future conditions, incorporating ongoing and expected climatic changes. The following charts compare current conditions for each sub-watershed within the planning area to these ranges of variation. The horizontal bars represent the range of resilient conditions under historical and future climates. The small vertical bars represent the current acreage of each structure class in the sub-watershed. Where the current acreage is too high, a * indicates a departure that will be recommended for treatment in the landscape prescription and a ♦ indicates a departure that requires letting the forest grow over time. Where the current acreage is too low, the goal is to create more of that class as a result of treatments or to let patches grow over time to develop into the given structure class.

— Historical range of variation (HRV) — Future range of variation (FRV)

Current values:

● In HRV, not FRV ● In FRV, not HRV ● In both ● Out of both

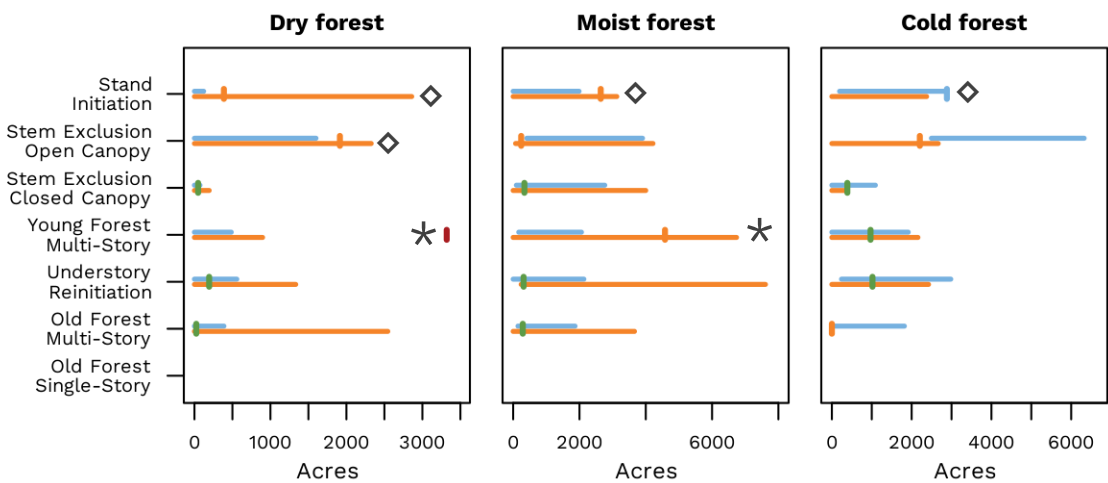
Upper Twisp



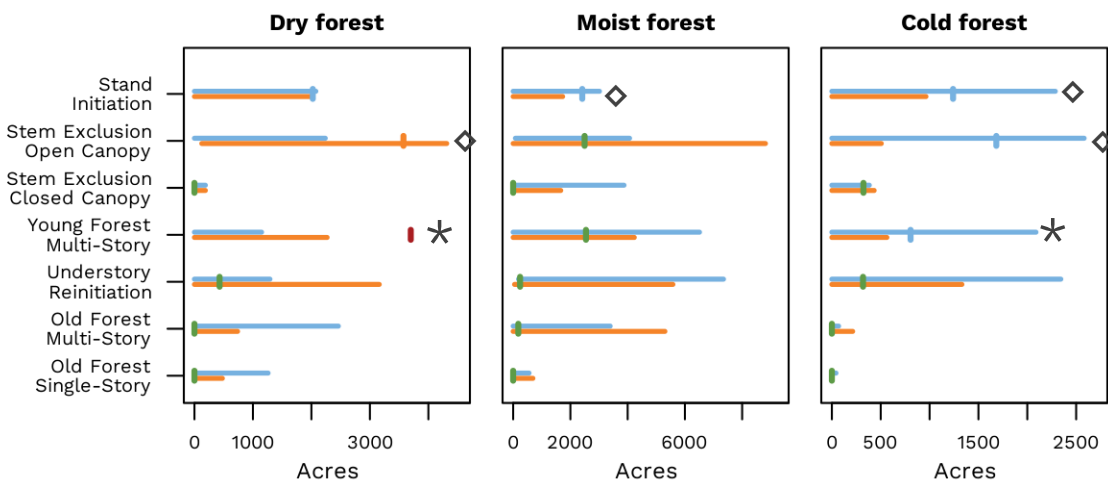
* = treat

◇ = grow

Middle Twisp



Little Bridge Creek

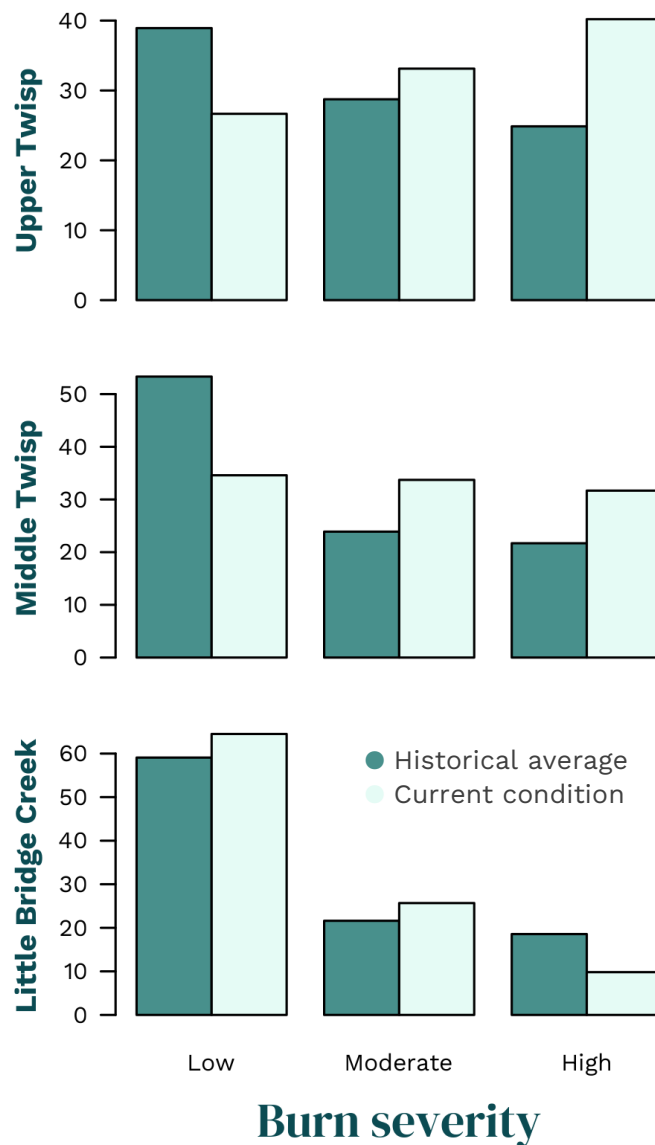


Severe disturbance assessment

Fire

Fire is a key factor shaping western forest landscapes. In this evaluation, it is a priority to reduce the risk of high-severity fire, especially where it endangers key resources such as old trees or critical habitat.

The Midnight Restoration Project planning area has burned relatively recently (see “Post-fire management” section). Based on current vegetation conditions, Upper and Middle Twisp are primed to burn at higher severities than would have occurred historically, while Little Bridge Creek is set to burn at lower severities on average.

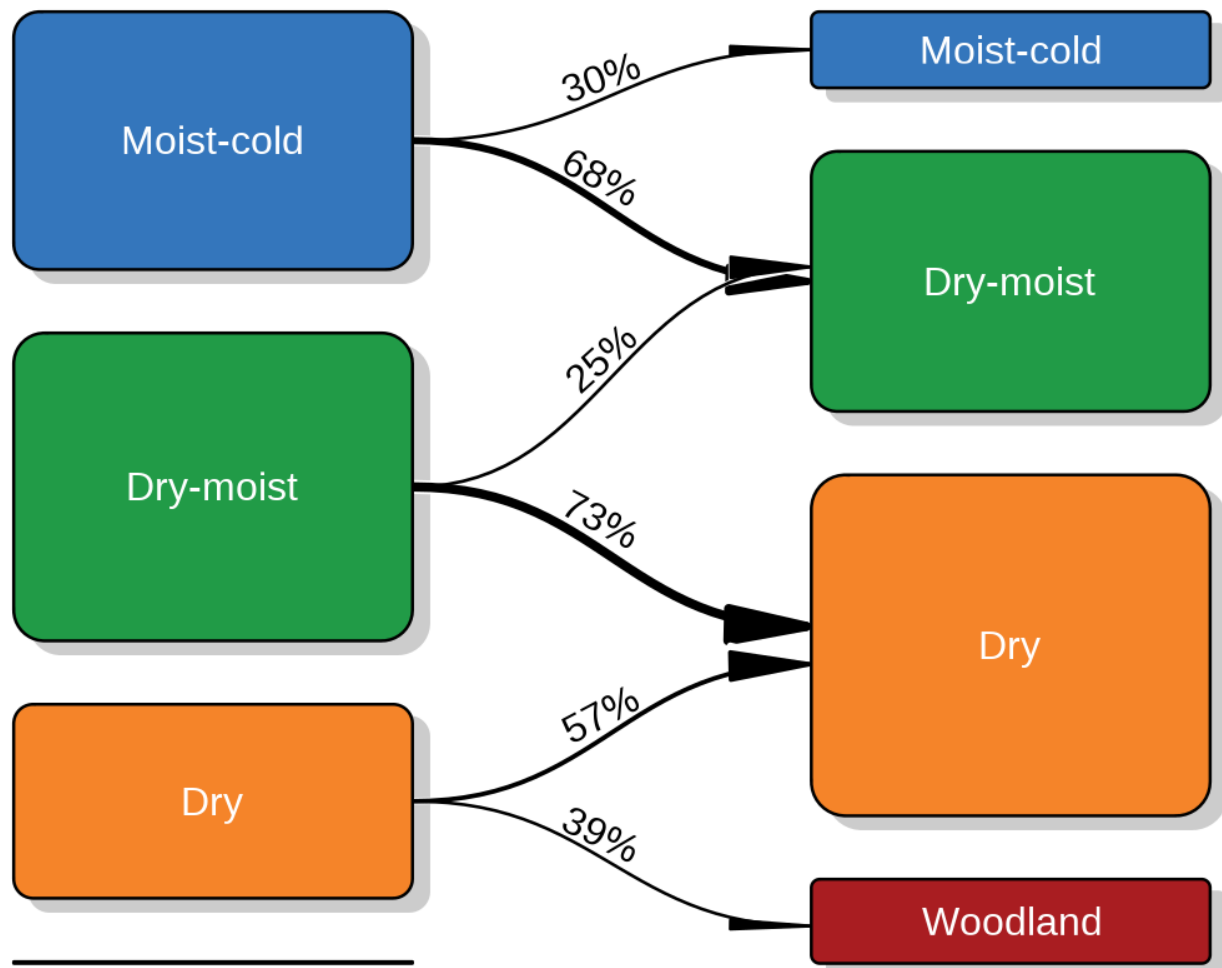


Drought

As climate changes, suitable zones for a given forest type have begun and will continue to shift around. If natural vegetation changes do not keep up with climate shifts, local forest conditions can become stressed as they are no longer supported on a site. In this evaluation, it is a priority to anticipate forest type shifts and treat to re-align vegetation with its environment.

Across the planning area, over one-third of Dry Forest is expected to become Woodland (or grass/herb land) by ca. 2055. Even more strikingly, three-quarters of the moist and transitional forest ("Dry-moist" below) is expected to become Dry Forest.

Forest Type Transitions



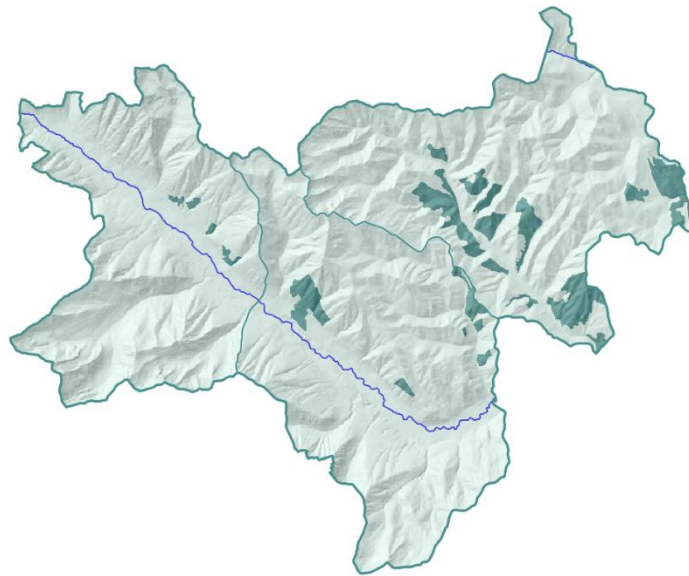
Key resources

Wildlife habitat

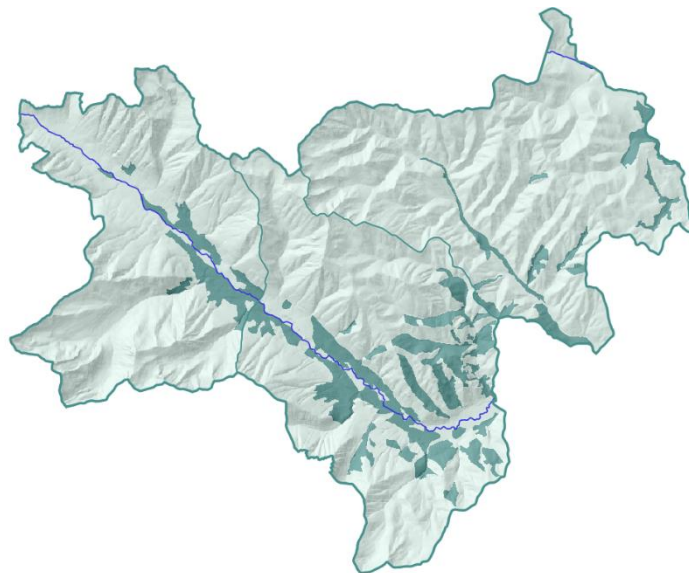
Some wildlife species use habitats that take a long time to develop and are hard to replace. It is a priority in the landscape evaluation to protect and restore habitat for certain species. However, protection and restoration may look different for different species.

For this planning area, we focused on two indicator species: the white-headed woodpecker (WWP) and the northern spotted owl (NSO). The WWP uses open pine forests with solitary large trees, while the NSO uses dense forests of tall trees. Protecting WWP habitat is likely to involve thinning and prescribed fire treatments, while protecting NSO habitat is more often accomplished by treating around the most important locations to provide a buffer from fire.

White-headed woodpecker habitat



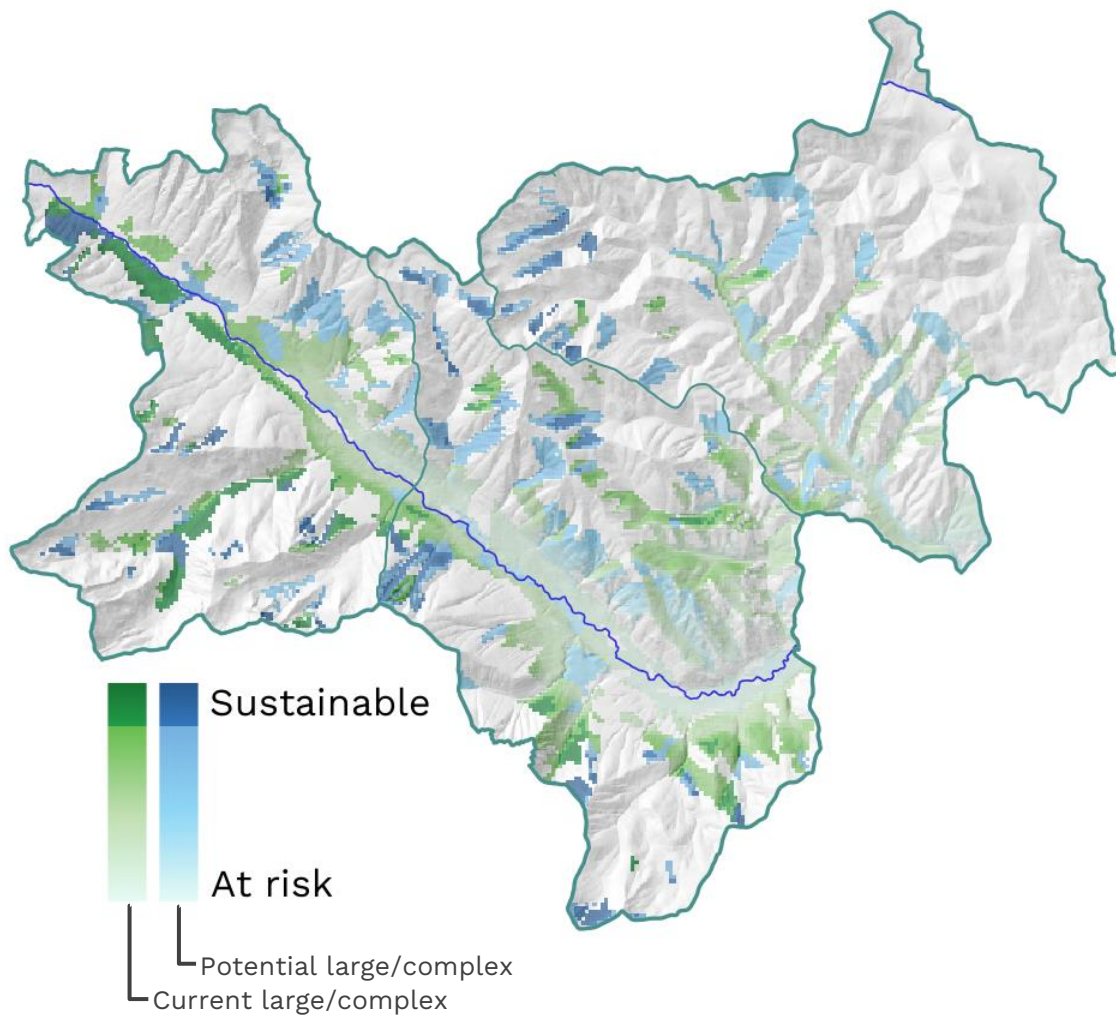
Northern spotted owl habitat



Large tree complex forest

Large trees perform a disproportionate amount of work toward many ecosystem services compared to small trees. They are more resistant to disturbances, they sequester more carbon, and they can regulate thousands of gallons of water per day. Large trees growing in dense, complex forests are an important element of the forest landscape, providing a unique and varied habitat for a range of organisms. However, dense, complex forest on too dry of a site can lead to very high risks for mortality from drought and fire, so it is important for these patches to be sited in sustainable locations given current and future climate.

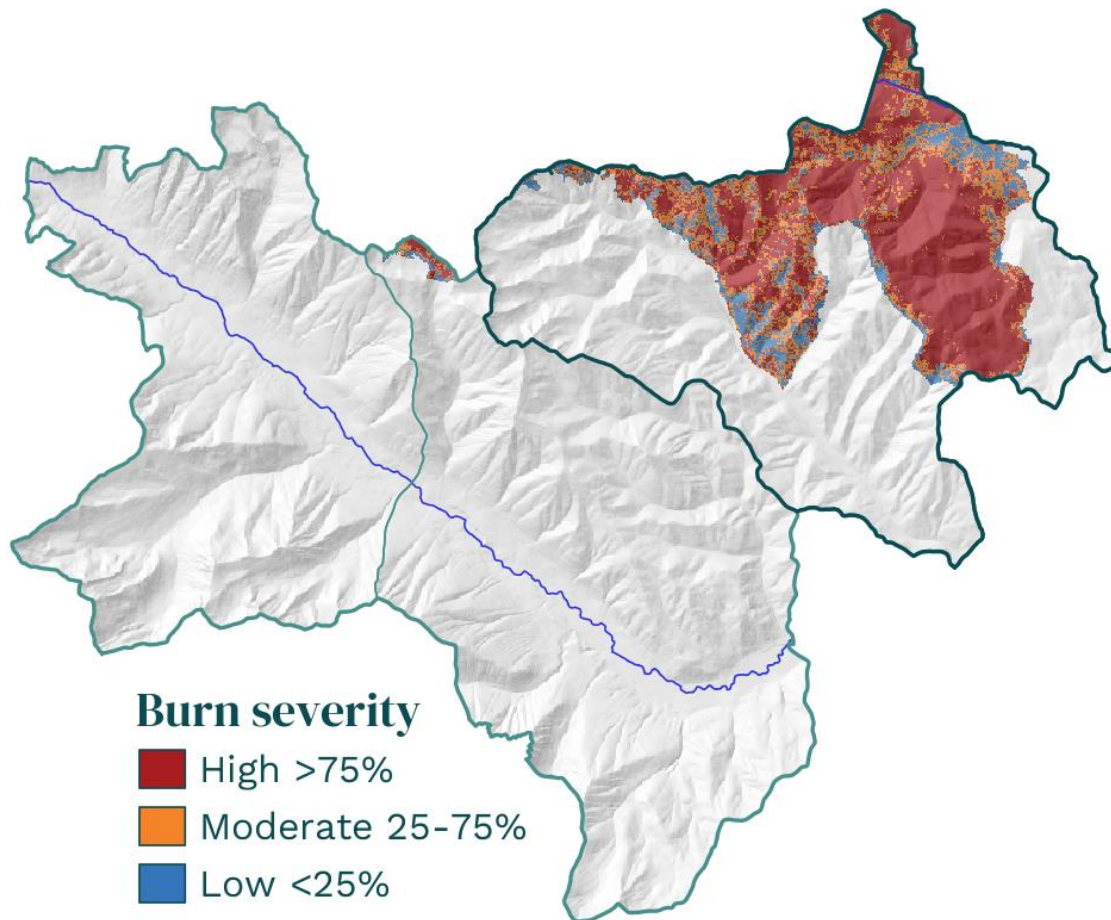
In this evaluation, an emphasis is placed on protecting sites with large trees in complex forest where this structure will be sustainable into the future.



Work of wildfires

Wildfires do ecological work. Some of what happens during a wildfire is helpful for landscape restoration, like consuming surface fuels, thinning the forest canopy, and selecting for fire-resistant trees. Other fire effects result in additional need for restoration, particularly large high-severity patches where future regeneration is uncertain.

The Little Bridge Creek sub-watershed burned in the 2021 Cedar Fire:

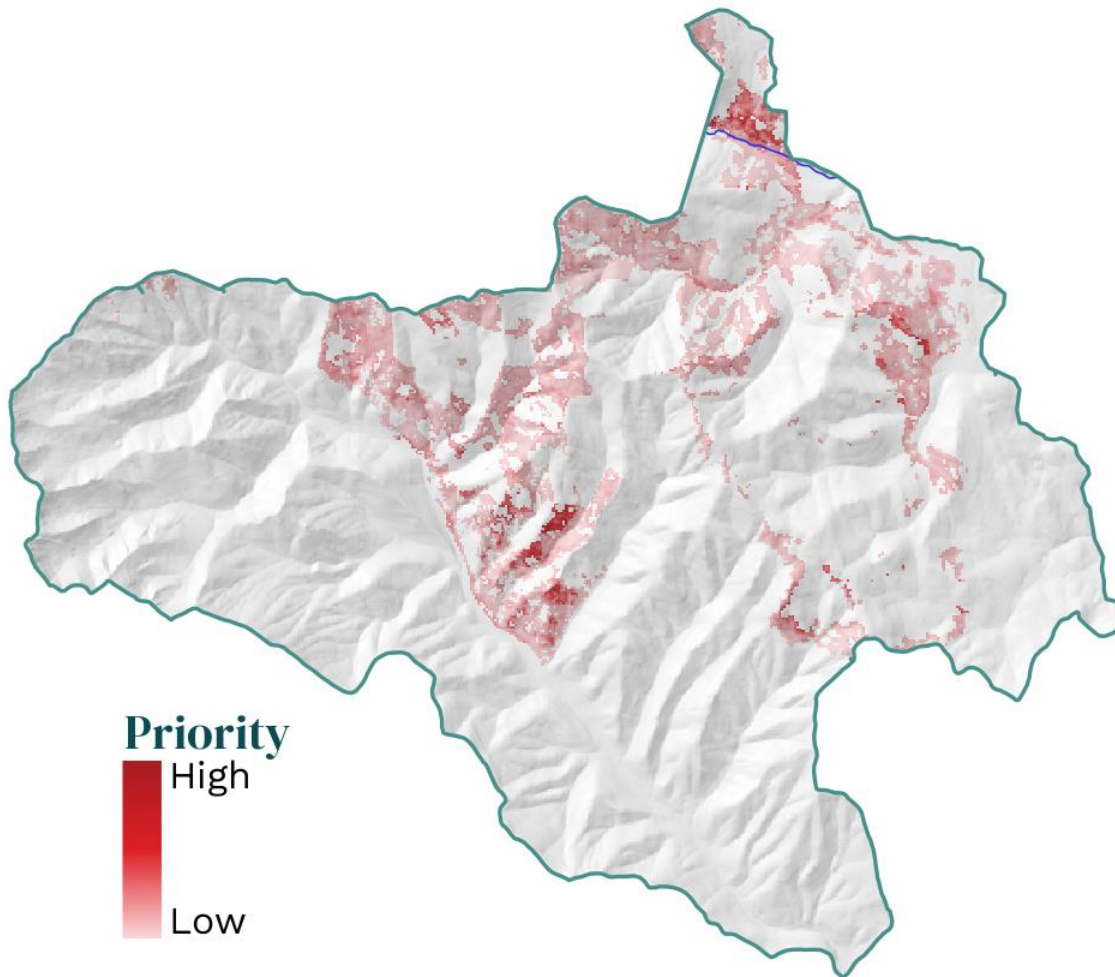


As part of this landscape evaluation, we are analyzing the immediate fire effects to incorporate short-term fire response into the landscape prescription. In low- and moderate-severity burned areas, the focus is to finish the job that wildfire started. Priorities are areas where the pre-fire forest had high density or species ill-suited to the site, and the prescribed work will be to further reduce fuel loads and shift species composition.

In high-severity burned areas, the focus is on ensuring forest regeneration into the future. We distinguish between areas where we expect that climate will or won't continue to support forest. In places where regenerating forest cover is unlikely, the goal is to transition to native grasslands or shrublands. Where forest cover is sustainable, the goal is to determine the most important locations to plant trees to ensure forest recovery.

Low- and moderate-severity areas: finish what wildfire started

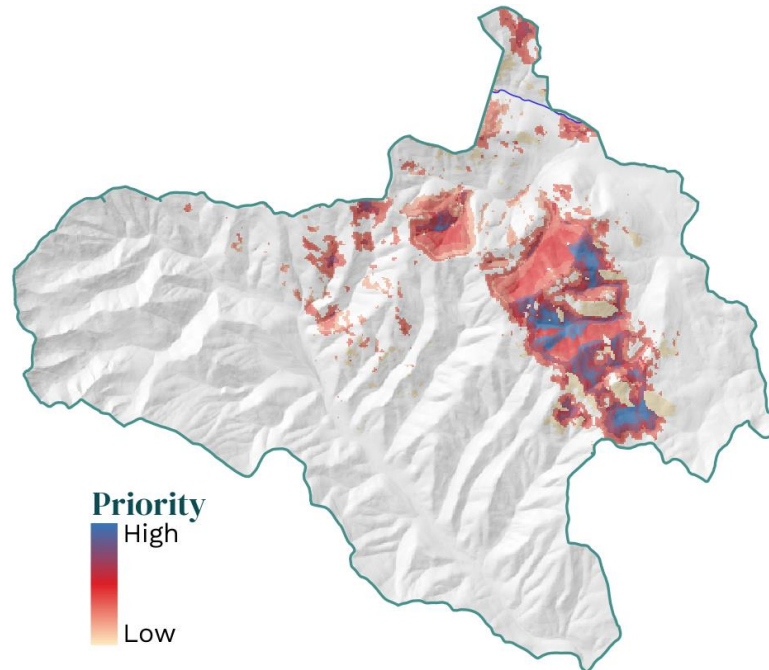
High priority locations shown here should be considered for post-fire management to leverage the work that wildfire has begun. Just like pre-fire forest restoration treatments, this work would include thinning green and/or dead trees with a focus on re-establishing resilient density, spatial patterns, and species composition. The difference here is that the fire has already accomplished some of the work, presenting an opportunity to create larger patches of restored landscape with lower costs than usual.



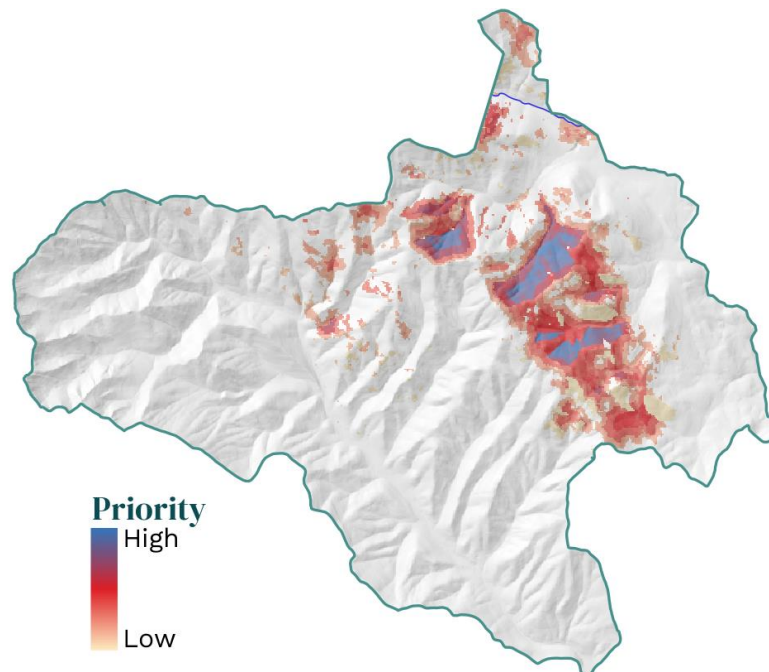
High-severity burned areas: replant to ensure continued forest cover

The following two maps show areas where fire killed all or almost all of the trees across large areas. Without tree planting, these locations may take a very long time to become forest again. In some places, it might not happen at all.

Priorities on the first map emphasize dry places, showing where planting trees could help resist some climate change effects by establishing seedlings in strategic borderline locations.



Priorities on the second map emphasize places expected to have adequate water into the future. This is where planted trees are most likely to be successful.



Landscape prescription

Treatment types and amounts

The treatment needs described here come from analyzing forest structure within different forest types. The lines that begin “Treat X acres...” indicate the kind of work that is usually accomplished with mechanical thinning treatments. The other lines indicate needs that require some other kind of management, such as planting and protecting seedlings.

A cheat sheet for the abbreviations used in this table is included at the end of the document.

Upper Twisp

Forest type	Treatment need	Notes
Dry forest	Treat 500-700 acres of YFMS, break up large patches	Shift some to medium-sized SEOC patches, favor PP <ul style="list-style-type: none"> Consolidate WWP habitat, grow into OFSS Shift some to medium-sized UR patches, favor DF Consolidate NSO habitat and grow into OFMS
	Maintain NSO habitat	Grow/connect larger patches
	Facilitate growth of SECC from SI	Protect from HS reburn
Cold forest	Treat 500-1300 acres of YFMS, but retain and build larger patches	Shift to UR, grow into OFMS Marten habitat
Cold and Moist forest high-severity burn areas	Goal of 4000-6000 acres of forest recovery	Avoid very large patches growing into SECC
	Assess amount and species of regeneration, plant fire/drought-adapted species if needed	
	Protect desirable patches of regen from high-severity reburns	
	Promote small-medium sizes patches of shrub/herbland; allow creation with reburns	

Middle Twisp

Forest type	Treatment need	Notes
Dry forest	Treat 2500-3000 acres of YFMS, break up large patches	Shift some to medium-sized SEOC patches, favor PP <ul style="list-style-type: none"> Consolidate WWP habitat, grow into OFSS Shift some to medium-sized UR patches, favor DF Consolidate NSO habitat and grow into OFMS
	Treat 2500-3400 acres of YFMS, reduce number of patches	Shift some to medium-sized UR patches, grow into OFMS Shift some to medium-sized SEOC patches, favor PP, grow into OFSS
	Reduce NSO habitat	Fewer, more compact patches in most sustainable locations
Cold and Moist forest high-severity burn areas	Facilitate growth of SECC from SI	Protect from HS reburn
	Goal of 2000-5500 acres of forest recovery	Avoid very large patches growing into SECC
	Assess amount and species of regeneration, plant fire/drought-adapted species if needed	
	Protect desirable patches of regen from high-severity reburns	
	Promote small-medium sizes patches of shrub/herbland; allow creation with reburns	

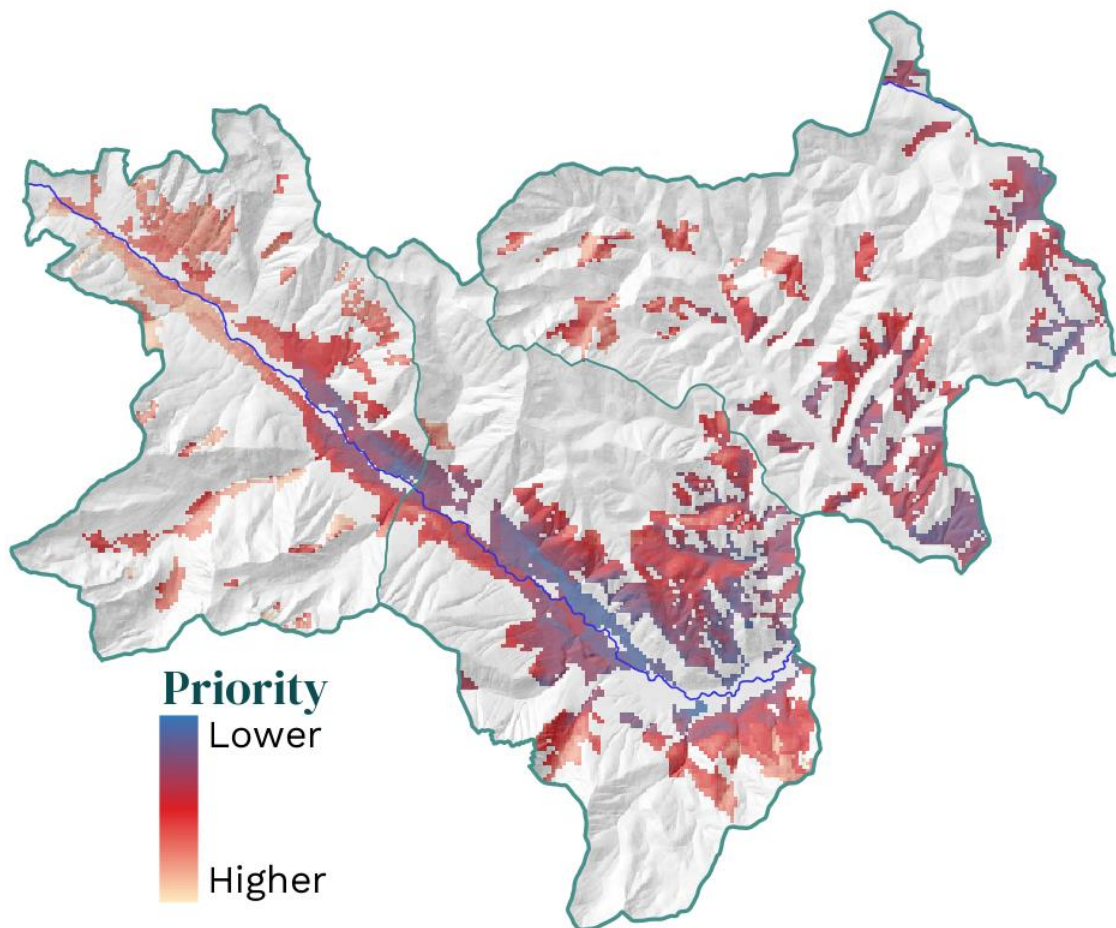
Little Bridge Creek

Forest type	Treatment need	Notes
Dry forest	Treat 2500-3100 acres of YFMS, break up large patch	Shift to medium-sized SEOC patches, favor PP <ul style="list-style-type: none"> Consolidate WWP habitat, grow into OFSS
Moist forest	Maintain NSO habitat	Grow and connect more compact patches
	Facilitate growth of SECC from SI	Protect from HS reburn
Cold forest	Treat 250-500 acres of YFMS, break up largest patches	Reduce SAF, favor AL, LP, PP Shift to UR, grow into OFMS
	Break up largest patch of marten habitat into smaller patches	
Cold and Moist forest high-severity burn areas	Goal of 2000-3500 acres of forest recovery	Avoid very large patches growing into SECC
	Assess amount and species of regeneration, plant fire/drought-adapted species if needed	
	Protect desirable patches of regen from high-severity reburns	
	Promote small-medium sizes patches of shrub/herbland; allow creation with reburns	

Treatment priorities

This map shows locations where treatment could help meet the needs identified in the table above, with colors to signify lower or higher priority. Higher priority areas are those where treatment could do the most to reduce risks to the forest from fire and drought.

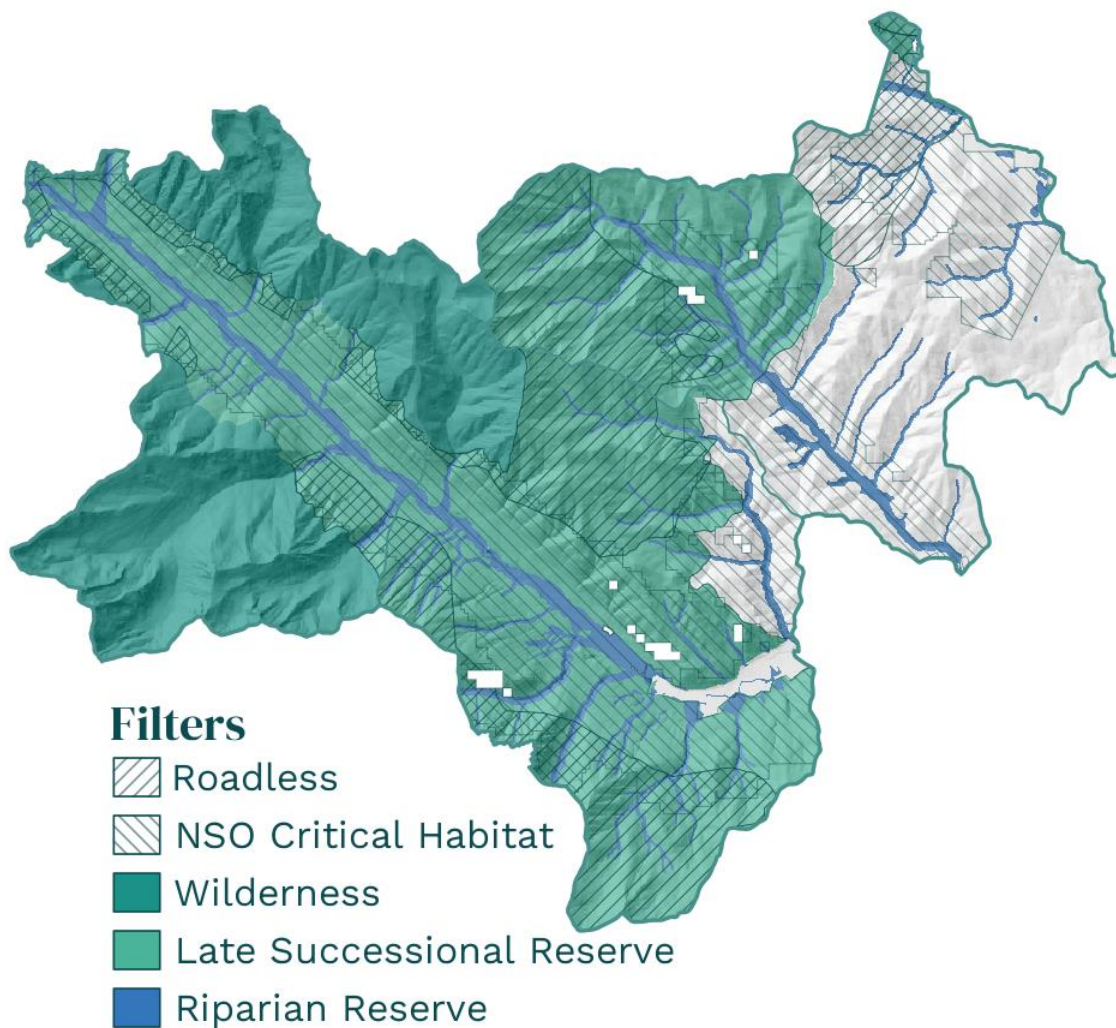
This priority map, which combines forest resilience with risk of severe disturbance, can also be overlaid with the Wildlife habitat and Large tree and complex forest maps to see how these key resources interact with other facets of forest restoration. For example, spotted owl habitat in the Middle Twisp valley and the southern part of Little Bridge Creek has a higher treatment priority and less sustainability for large tree complex forest compared to habitat in the Upper Twisp sub-watershed.



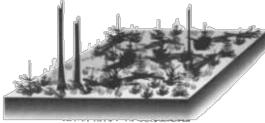

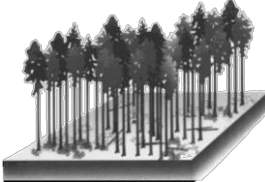
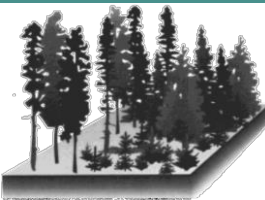
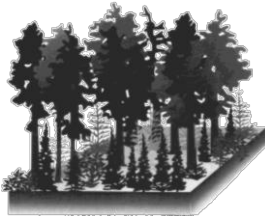
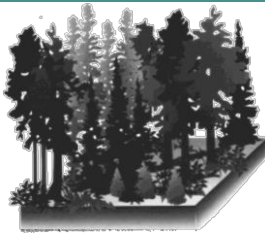

Social, policy, and operational filters

The landscape evaluation and prescription is focused on the ecological needs of the landscape. But ecological needs aren't the only thing determining management actions. The needs of society, law and administrative regulation, and practical constraints on operations in the forest all place filters on what work is realistically achievable and where.

This map shows some of the most important filters present on this landscape. Other than Wilderness, all of the filters shown do allow varying degrees of active management, including selling logs as byproducts of restoration treatments. When designing a forest landscape restoration project, it is up to the project team to balance the ecological needs of the landscape with social sentiment and the regulatory environment.



Abbreviations cheat sheet

Abbreviation		Meaning
Stand development stages		
SI	Stand initiation	
SEOC	Stem Exclusion, Open Canopy	
SECC	Stem Exclusion, Closed Canopy	
YFMS	Young Forest, Multi-Story	
UR	Understory Reinitiation	
OFMS	Old Forest, Multi-Story	
OFSS	Old Forest, Single-Story	

Other abbreviations	
WWP	White-headed woodpecker (<i>Leuconotopicus albolarvatus</i>)
NSO	Northern spotted owl (<i>Strix occidentalis caurina</i>)
PP	Ponderosa pine (<i>Pinus ponderosa</i>)
LP	Lodgepole pine (<i>Pinus contorta</i>)
AL	Alpine larch (<i>Larix lyallii</i>)
WL	Western larch (<i>Larix occidentalis</i>)
DF	Douglas-fir (<i>Pseudotsuga menziesii</i>)
SAF	Subalpine fir (<i>Abies lasiocarpa</i>)
HS	High severity, in reference to fire effects

00:00:00.000 --> 00:00:02.170

Bail, Kristin - FS

For that where we've got a backup.

00:00:03.270 --> 00:00:03.960

Philip Fenner

OK great.

00:00:04.820 --> 00:00:07.300

Philip Fenner

Listen did you get teams to work on your computer?

00:00:07.410 --> 00:00:14.860

Lisa Bergman (Guest)

Yeah, amazingly. I just clicked on the thing and boom. So I'm going to go and see how Dave is doing. He thought he could too. But I don't see him yet.

00:00:15.250 --> 00:00:17.710

Philip Fenner

No well it says guest by waiting to join.

00:00:15.990 --> 00:00:16.580

Lisa Bergman (Guest)

So.

00:00:18.130 --> 00:00:18.640

Lisa Bergman (Guest)

Oh.

00:00:19.950 --> 00:00:22.460

Philip Fenner

So maybe Kristen just needs to let him in or.

00:00:21.940 --> 00:00:22.410

Lisa Bergman (Guest)

OK.

00:00:23.630 --> 00:00:25.440

Philip Fenner

And then Rick was gonna call him by phone.

00:00:25.900 --> 00:00:26.380

Lisa Bergman (Guest)

Alright.

00:00:27.910 --> 00:00:30.130

Bail, Kristin - FS

Yeah, and I'm I'm waiting for.

00:00:30.990 --> 00:00:32.810

Bail, Kristin - FS

The pop up to let me in.

00:00:35.530 --> 00:00:38.880

Philip Fenner

Like it's it's letting me look at the lobby and we've got.

00:00:39.100 --> 00:00:40.410

Bail, Kristin - FS

Oh, there, we go I got it now.

00:00:40.770 --> 00:00:43.450

Philip Fenner

You got the phone call in there that must be Rick.

00:00:45.010 --> 00:00:46.310

Lisa Bergman (Guest)

Oh yeah, the little red thing.

00:00:48.600 --> 00:00:51.640

Philip Fenner

I don't know if I can let him in oh now everybody is sideways.

00:00:58.150 --> 00:01:00.830

Philip Fenner

It's alright I could turn my phone around if that's the way it has to be.

00:01:02.240 --> 00:01:07.940

Philip Fenner

Yeah, I couldn't get it working on my computer. But as soon as I went on my iPhone. It just started so that's good.

00:01:08.330 --> 00:01:09.950

Lisa Bergman (Guest)

I'm gonna go up and see how Dave is doing.

00:01:10.520 --> 00:01:10.920

Philip Fenner

Sure.

00:01:11.180 --> 00:01:13.950

+12*****79

I'm I'm I'm on the phone.

00:01:14.420 --> 00:01:15.020

Philip Fenner

Oh, Hi Dave,

00:01:14.710 --> 00:01:15.180

Lisa Bergman (Guest)

Oh.

00:01:17.390 --> 00:01:19.260

Lisa Bergman (Guest)

OK, Dave you couldn't make it work.

00:01:20.370 --> 00:01:21.850

+12*****79

I'm still working on it.

00:01:22.240 --> 00:01:22.690

Lisa Bergman (Guest)

Alright.

00:01:28.780 --> 00:01:31.260

Philip Fenner

got this nifty little tripod for my phone.

00:01:33.850 --> 00:01:37.080

Philip Fenner

Which should do the trick today hopefully?

00:01:40.090 --> 00:01:45.220

Philip Fenner

Uhm that so that's there's still says there's somebody waiting in the lobby on a phone number.

00:01:49.430 --> 00:01:56.540

Bail, Kristin - FS

Erin it's supposedly it's admitting it's I've got the little spinning circle going so.

00:01:56.760 --> 00:01:58.230

Philip Fenner

Ah, OK good cool.

00:01:59.440 --> 00:02:01.520

Philip Fenner

I hadn't admit button, too, so I hit it.

00:02:05.070 --> 00:02:05.800

Philip Fenner

Never works.

00:02:07.490 --> 00:02:08.380

Philip Fenner

Sideways.

00:02:10.360 --> 00:02:10.640

Philip Fenner

Yeah.

00:02:15.910 --> 00:02:20.150

Philip Fenner

We have 2 people by phone. I know one of them is Dave Fluharty, who's the other one.

00:02:22.380 --> 00:02:24.010

+15*****82

Rick Bailey in Winthrop.

00:02:24.550 --> 00:02:25.560

Philip Fenner

I was hoping it was you.

00:02:26.630 --> 00:02:27.130

Philip Fenner

Alright.

00:02:29.600 --> 00:02:33.040

Philip Fenner

How soon is Dave comes back I think we're pretty close to being hauling?

00:02:34.580 --> 00:02:34.900

Philip Fenner

Right.

00:02:35.810 --> 00:02:37.580

+12*****79

I'm still here, I'm still here.

00:02:38.390 --> 00:02:39.320

Philip Fenner

Oh, OK well.

00:02:40.080 --> 00:02:43.600

Philip Fenner

You wanna just stay on by phone that probably work just as well.

00:02:44.510 --> 00:02:50.620

+12*****79

Yeah, I'll stay on my phone if I get get in otherwise I'll be. I'll switch to that.

00:02:52.640 --> 00:02:56.230

Philip Fenner

OK, well before we do anymore. I'm going to get everybody 's.

00:02:56.980 --> 00:03:01.560

Philip Fenner

Explicit vocal consent to this being recorded in stats.

00:03:02.470 --> 00:03:02.850

Philip Fenner

Which is?

00:03:05.000 --> 00:03:07.540

Lisa Bergman (Guest)

OK, yes, it's fine with me, I'm Lisa Bergman.

00:03:07.860 --> 00:03:08.230

+12*****79

Yep.

00:03:08.650 --> 00:03:09.060

+12*****79

Beyond.

00:03:16.340 --> 00:03:17.470

Philip Fenner

And most importantly.

00:03:16.940 --> 00:03:19.180

David L. Fluharty

And most importantly, Christmas.

00:03:18.110 --> 00:03:18.780

Philip Fenner

Kristen.

00:03:25.090 --> 00:03:46.920

Bail, Kristin - FS

Yeah, so you will get feedback if you have both your computer audio and audio and phone audio on so you might have to turn turn one of those off and yes, I I do consent. In fact, I do have the record button for the teams meeting and I can send that out to you afterwards as sort of a backup in case.

00:03:46.980 --> 00:03:50.500

Bail, Kristin - FS

Uhm failure your phone recording doesn't work.

00:03:49.290 --> 00:03:49.510

Philip Fenner

Yep.

00:03:51.510 --> 00:03:51.960

Philip Fenner

OK.

00:04:00.600 --> 00:04:02.290

David L. Fluharty

So I'm I'm now on.

00:04:01.230 --> 00:04:01.720

Philip Fenner

And I.

00:04:02.580 --> 00:04:10.650

David L. Fluharty

Uh like not yet visible but I'm on and have you I can hear you everyone?

00:04:12.280 --> 00:04:12.730

Lisa Bergman (Guest)

Good.

00:04:13.640 --> 00:04:16.890

Philip Fenner

Oh yeah, the sound your voice sound quality is much better now, Yep.

00:04:19.570 --> 00:04:20.520

Philip Fenner

And we still have Rick?

00:04:22.400 --> 00:04:27.420

+15*****82

Yeah, and I consent to recording inspect encourage it.

00:04:29.150 --> 00:04:29.630

Philip Fenner

Very good.

00:04:31.550 --> 00:04:37.450

Philip Fenner

Well, uh, Kristen I don't know how familiar you are with the North Cascades Conservation Council.

00:04:38.060 --> 00:04:46.310

Philip Fenner

Uh I looked and it looks like your office at least on the mailing list for our quarterly Journal wild does that ring a Bell.

00:04:48.500 --> 00:04:52.050

Bail, Kristin - FS

I don't recall seeing it for awhile, but our office.

00:04:52.680 --> 00:04:58.980

Bail, Kristin - FS

For almost a year has been under construction and our Mail is not.

00:05:00.710 --> 00:05:04.430

Bail, Kristin - FS

You know working and we've been working virtually for.

00:05:04.970 --> 00:05:15.250

Bail, Kristin - FS

Uh yeah for for all cash almost 2 years now, so if it's hard copy. I I may have missed it if it's not hard copy. I have not seen it in my email.

00:05:09.290 --> 00:05:09.760

Philip Fenner

Right.

00:05:16.780 --> 00:05:21.150

Philip Fenner

Well, I'll simplify it for you, then and just give you a quick rundown of what the N 3 sees all.

00:05:20.610 --> 00:05:22.230

Bail, Kristin - FS

Yeah, but please please do.

00:05:22.860 --> 00:05:27.680

Philip Fenner

Yeah, so the The Standard boilerplate that we put at the top of all of our letters.

00:05:28.690 --> 00:05:32.610

Philip Fenner

Is it the North Cascades Conservation Council was founded in 1957?

00:05:33.450 --> 00:05:41.900

Philip Fenner

Our mission is to protect and preserve the scenic cyantific recreational educational and wilderness values of the North Cascades.

00:05:43.670 --> 00:05:48.610

Philip Fenner

NCCC you might also heard it hear it referred to as N 3 C.

00:05:49.680 --> 00:05:56.520

Philip Fenner

Works to protect and preserve the North Cascades lands waters plants wildlife through public participation in legal channels.

00:05:57.750 --> 00:06:01.910

Philip Fenner

We are a single area all volunteer nonprofit organization.

00:06:03.490 --> 00:06:07.760

Philip Fenner

So the unit really unique thing there is the all volunteer part of it, these days.

00:06:09.590 --> 00:06:19.230

Philip Fenner

We believe the North Cascades are a national treasure. We like to refer to them as the American Alps and we believe they're worthy of being safe for future generations to enjoy intact.

00:06:20.380 --> 00:06:29.020

Philip Fenner

So we take action actions to stop damaging timber sales while supporting Responsible Forest Management and protecting forestlands from conversion to Nonforest uses.

00:06:29.690 --> 00:06:33.620

Philip Fenner

We also support their rewilding of previously damaged forest landscapes.

00:06:35.370 --> 00:06:40.540

Philip Fenner

We are independent all volunteer and our work is carried out by our board in approximately 300 members.

00:06:41.260 --> 00:06:45.290

Philip Fenner

They accept donations but no sponsorships in order to maintain our independence.

00:06:46.530 --> 00:06:51.470

Philip Fenner

And we've got a long list of accomplishments guy should be wilderness area North Cascades National Park.

00:06:52.160 --> 00:06:55.480

Philip Fenner

Stopping the proposed open pit copper mine very glacier peak.

00:06:56.610 --> 00:07:08.970

Philip Fenner

Doesn't really 94% of the National Park wilderness stopping high rostrum negotiating environmental Learning Center. Wild Sky Wilderness. Alpine lakes wilderness. Additions most recently, and the list goes on, but I think you get the idea.

00:07:10.310 --> 00:07:10.720

Philip Fenner

Hopefully.

00:07:13.640 --> 00:07:18.890

Philip Fenner

So yeah, we have been keeping an eye on the twist restoration project for some time.

00:07:19.580 --> 00:07:24.030

Philip Fenner

We had a meeting over there last fall like late last summer.

00:07:25.100 --> 00:07:35.590

Philip Fenner

And it coincided coincidentally was right after the fuel break cutting took place along the road. So we went up and took a look at that. That's what was written up in our channel and I'll make sure you get a electronic copy of that.

00:07:36.700 --> 00:07:38.900

Philip Fenner

Like a person until you find interesting.

00:07:40.020 --> 00:07:40.440

Philip Fenner

Uhm.

00:07:41.890 --> 00:07:53.440

Philip Fenner

So I guess the place I would like to start is just to run down the Chronology. So so far. Since then, so they can. We know right where we're where we're at, and we agree on the basic facts here.

00:07:54.300 --> 00:07:54.660

Bail, Kristin - FS

Yeah.

00:07:55.380 --> 00:07:56.040

Philip Fenner

So November.

00:07:55.770 --> 00:08:02.760

Bail, Kristin - FS

Can you just do clarify for me one thing though uh? How how far? How far South does your area of interest go.

00:07:58.790 --> 00:07:59.240

Philip Fenner

Yep.

00:08:03.790 --> 00:08:05.940

Philip Fenner

Oh, you know that's something of.

00:08:05.390 --> 00:08:06.360

David L. Fluharty

Columbia River.

00:08:06.730 --> 00:08:19.550

Philip Fenner

We definitely go all the way to the Columbia River because we talk about Mount Rainier and the wilderness around it with some regularity and so on, although our primary focus. The majority of our efforts are northwest Snoqualmie Pass. But the

00:08:14.920 --> 00:08:15.230

Bail, Kristin - FS

OK.

00:08:20.680 --> 00:08:22.880

Philip Fenner

Columbia River is official Southern Belle.

00:08:24.080 --> 00:08:28.090

Bail, Kristin - FS

OK, no thanks for that 'cause uh, yeah, I wasn't I wasn't clear on that.

00:08:28.670 --> 00:08:30.590

Philip Fenner

And we don't really stop Italian border either.

00:08:31.560 --> 00:08:32.070

Philip Fenner

Because the

00:08:32.720 --> 00:08:42.780

Philip Fenner

or an ecosystem certainly doesn't stop there. So we yeah, so we sessions and initiatives to do with cross border issues. But Luckily that whispers all.

00:08:35.230 --> 00:08:35.760

Bail, Kristin - FS

No.

00:08:43.520 --> 00:08:56.980

Philip Fenner

Local so yeah, November 16. We obtain an excerpt of a NVCC Metal Valley Citizens Council news email stating that the twist respiration project will be reduced.

00:08:57.630 --> 00:08:59.710

Philip Fenner

From 77 to 24,000 acres.

00:09:01.470 --> 00:09:03.920

Philip Fenner

Uh we find no public form of this same notice.

00:09:05.980 --> 00:09:17.770

Philip Fenner

November second we give you text. The lack of transparency asking you know what can we do. To to get higher up your community right or somehow to find these things.

00:09:18.950 --> 00:09:22.940

Philip Fenner

Do you recommend that we speak to them at our district Ranger Christopher about that?

00:09:24.260 --> 00:09:28.680

Philip Fenner

No on 12 8. We have the conference call. Rick Bailey and I have a conference call with Christopher.

00:09:29.470 --> 00:09:32.300

Philip Fenner

Uh dense without any satisfactory answers to us.

00:09:33.380 --> 00:09:41.050

Philip Fenner

And the next day you email us to ask us how the call went and we reply as a little later, saying that you know, we're dissatisfied.

00:09:41.730 --> 00:09:45.850

Philip Fenner

How you replied that he would rather talk live with us then exchange letters?

00:09:46.570 --> 00:09:52.240

Philip Fenner

Uh we agree and only requirement being that'd be recorded and.

00:09:53.670 --> 00:09:54.180

Philip Fenner

Here we are.

00:09:56.000 --> 00:09:56.480

Philip Fenner

No.

00:09:58.230 --> 00:09:59.610

Philip Fenner

Gonna keep moving here, the.

00:10:00.720 --> 00:10:04.280

Philip Fenner

Q&A that we engaged in my letter and email.

00:10:05.560 --> 00:10:06.170

Philip Fenner

Prior to this.

00:10:07.320 --> 00:10:10.130

Philip Fenner

You know there were back and forth, but we ended up with.

00:10:11.880 --> 00:10:20.380

Philip Fenner

Some questions remaining you agreed with us that the collaborative is not responsible for disseminating information about our projects.

00:10:22.010 --> 00:10:22.960

Philip Fenner

About your projects.

00:10:23.880 --> 00:10:30.280

Philip Fenner

As a you know real fundamental issue, there that it, it's the Forest Service responsibility to do so not the collaborative 's responsibility.

00:10:31.190 --> 00:10:31.610

Philip Fenner

No.

00:10:33.790 --> 00:10:37.300

Philip Fenner

If we were to write you again today, but since we're talking to you will just ask you straight up.

00:10:37.890 --> 00:10:41.790

Philip Fenner

It's been over 2 months now since we heard that the project had been scaled back.

00:10:42.690 --> 00:10:44.510

Philip Fenner

To 1/3 of its original acreage.

00:10:45.310 --> 00:10:49.670

Philip Fenner

Uh that 2 months seems too long a delay in making a public announcement of such a major change.

00:10:51.700 --> 00:10:54.950

Philip Fenner

How are we going? How will you reduce or eliminate that delay in the future?

00:10:57.490 --> 00:11:18.300

Bail, Kristin - FS

Well, IA couple things come, yeah, I I did respond with some information about the collaborative.

They're operating procedures and you know just some background about how they're formed and and who who is on that. You know which was embedded in in your in your list of questions. So did you get the press release about the public meeting that's coming up next week?

00:11:21.380 --> 00:11:22.460

Philip Fenner

I didn't did anybody else.

00:11:21.890 --> 00:11:22.620

+15*****82

Yeah, well.

00:11:23.220 --> 00:11:25.340

Philip Fenner

Mean crisper referred to it, but

00:11:26.390 --> 00:11:29.320

+15*****82

Yeah, I I have heard that there is a public meeting on on.

00:11:29.380 --> 00:11:31.080

+15*****82

Yeah, Saturday.

00:11:33.330 --> 00:11:46.190

+15*****82

But you know, I haven't gotten anything official. I I'm going to look in the newspaper. But that's that's what I heard a man and you know just to elaborate. A little bit more on on what bill just said.

00:11:40.540 --> 00:11:40.910

Bail, Kristin - FS

Uh-huh.

00:11:46.700 --> 00:11:52.530

+15*****82

Uh we, we you know, we, we asked Chris during that call.

00:11:53.640 --> 00:11:59.860

+15*****82

If we could get the information that was provided to the collaborative and he told us we'd have to wait for this meeting.

00:12:00.610 --> 00:12:02.920

+15*****82

And that was really.

00:12:04.450 --> 00:12:12.170

+15*****82

Uh objectionable to us and that's one of the reasons that we, we, we're we're taking this very seriously.

00:12:13.850 --> 00:12:20.470

+15*****82

So you know, we what we're really after here if I can paraphrase and go to the bottom line.

00:12:21.050 --> 00:12:28.260

+15*****82

It's just some assurances some acknowledgement of responsibility for this and some.

00:12:29.380 --> 00:12:34.050

+15*****82

Promises or assurances that this will not happen again.

00:12:36.490 --> 00:13:06.340

Bail, Kristin - FS

Yeah, so uh Phil I don't know if you shared out the email response that I provided because I I think a key part of that which does you know speak specifically to this concern is that you know, I did offer that you know, Chris for you know would would make sure that you all were you know updated regularly monthly either. You know as part of a broader group or if you know, nothing had else had been shared that you know, he was able to.

00:13:06.620 --> 00:13:25.930

Bail, Kristin - FS

You know give you an update you know every month 'cause there. There are sometimes months, but you know a month or 2 that passes in between. You know meetings with the collaborative or otherwise sharing information and you know, I I definitely took to heart what you all shared with me and I have spoken to my public affairs staff officer.

00:13:16.190 --> 00:13:16.990

Philip Fenner

it's free.

00:13:26.020 --> 00:13:57.670

Bail, Kristin - FS

Uhm Victoria Wilkins, saying that I did very much you know want to make sure that we were more proactive and frequent with our communications on Twisp River and and you know? Our our activities, particularly upon the Metal Valley Ranger District and you know the timing of the of the public meeting. You know this is Chris is doing without his environment environmental coordinator. Meg trivantis out on another assignment, so this was really the first time that we've been able to put together the broad public meeting too.

00:13:58.010 --> 00:14:13.860

Bail, Kristin - FS

You know share you know the information about the smaller project footprint and next steps moving forward for that landscape and so in the mean time, we've had a lot of internal Forest Service conversation about.

00:14:14.580 --> 00:14:35.660

Bail, Kristin - FS

Uh you know postfire recovery and you know, there's some funding that is being provided to that. So we're articulating what some of our needs are and that's has to go through internal Forest Service

Review and that hasn't been shared and 'cause. We're still in the process of developing that proposal so we're very much.

00:14:35.810 --> 00:15:06.160

Bail, Kristin - FS

I'm also doing work on the postfire recovery piece and what that looks like for for that district so you know a lot going on and and some things get delayed in order to accommodate having to provide information on on different initiatives. So yes, so next Wednesday, is a public meeting and and and if if you aren't able to find that I can certainly send the the press release out, but that is our follow through too.

00:15:06.500 --> 00:15:10.810

Bail, Kristin - FS

And have that public meeting, scheduled and share information broadly.

00:15:11.470 --> 00:15:35.690

David L. Fluharty

So just just to let you know, I'm registered I received scoping notices. I've received everything but you the letter that or the email that you sent I think, to fill or Rick was the first time I'd seen mention of the the January 22nd meeting and I'm very pleased to see that that's happening, but I don't understand why.

00:15:35.740 --> 00:15:43.410

David L. Fluharty

Came up with all the involvement so far. I haven't been notified as an active member of the public so.

00:15:44.720 --> 00:15:52.060

David L. Fluharty

And I've I've I wrote as a representative of M 3 C so I'm there's there's something happening here that.

00:15:53.120 --> 00:15:54.320

David L. Fluharty

Is is?

00:15:55.240 --> 00:15:56.100

David L. Fluharty

Less than perfect.

00:15:57.430 --> 00:15:57.820

David L. Fluharty

Uh.

00:15:58.670 --> 00:16:04.900

Bail, Kristin - FS

Yeah, so there's there's different ways that we share information. There's you know the static project website.

00:16:05.940 --> 00:16:35.670

Bail, Kristin - FS

And then you know, there's you know, people, you know like we get invited to meetings. So so one thing and you all know this. I'm just going to put it into the room is you know the collaborative invites us. We don't invite the collaborative so you know they have their regular meetings. They they run their own agendas and they invite us to meetings and so we you know as we would to any other meeting that people have with us. We will share what we have as far as real time so.

00:16:35.730 --> 00:17:05.130

Bail, Kristin - FS

The The Press earliest kind of comes out in a different way. This is this is through our public affairs office and so, if I can make sure that you all are on that mailing list for any press releases that the forest issues but that's like a broad list. It's not we don't like customize. Our press releases to only one Ranger District. That's like this is on like a a forest wide. You know public affairs lists so there's different ways. You know that you'll you'll get information.

00:17:05.840 --> 00:17:26.970

Bail, Kristin - FS

So you know in terms of if you provided a comment on the EA that doesn't necessarily automatically sign you up for every press release that the forest issues. 'cause you'll hear you'll get a press release about Cle Ellum. You know recreation fees or you know you'll get you'll get everything. Once you sign up for the the public affairs. One, which is fine. Just want to just want to make sure you know what you're getting into.

00:17:23.100 --> 00:17:26.660

David L. Fluharty

Yeah, I I'm I'm saying I'm signed up for that.

00:17:27.020 --> 00:17:27.280

Bail, Kristin - FS

2.

00:17:28.180 --> 00:17:33.680

David L. Fluharty

I am signed up for that, so This is why, why I'm a bit puzzled.

00:17:30.240 --> 00:17:30.720

Bail, Kristin - FS

OK.

00:17:34.350 --> 00:17:34.770

Bail, Kristin - FS

Yeah.

00:17:35.030 --> 00:17:35.630

David L. Fluharty

So.

00:17:35.160 --> 00:17:38.050

Philip Fenner

It's an amazing incidents, but I just got an email right now.

00:17:38.990 --> 00:17:42.570

Philip Fenner

Forest Service news release from Victoria Wilkins just now.

00:17:44.050 --> 00:17:46.230

Bail, Kristin - FS

Well, I'm glad she's not making a liar out of me.

00:17:44.110 --> 00:17:44.500

Philip Fenner

Little.

00:17:48.230 --> 00:17:50.560

David L. Fluharty

Thank you. Thank you, maybe I've got it too.

00:17:48.490 --> 00:17:48.830

Philip Fenner

That's it.

00:17:52.740 --> 00:17:53.870

Philip Fenner

Could that be a coincidence?

00:17:54.380 --> 00:18:04.310

Bail, Kristin - FS

Yeah, no, I just I just got it this morning. So so I I get it. Just break right before the rest of the world does.
But Yes, it's the 26th Wednesday the 26th.

00:18:04.790 --> 00:18:18.200

Philip Fenner

OK, but I mean be all of that as it may the fact remains that the change. That was made to the project was substantial. We're talking about 2/3 reduction in acreage that just changes everything.

00:18:13.480 --> 00:18:13.850

Bail, Kristin - FS

Uh-huh.

00:18:18.780 --> 00:18:19.210

Bail, Kristin - FS

Uh-huh.

00:18:19.380 --> 00:18:24.600

Philip Fenner

It changes a lot and and I heard the changes or can it continue and the question is.

00:18:19.930 --> 00:18:20.270

Bail, Kristin - FS

Yeah.

00:18:21.320 --> 00:18:21.790

Bail, Kristin - FS

Yeah.

00:18:25.870 --> 00:18:32.870

Philip Fenner

How is it that the the collaborative is informed of this stuff months 2 months before anybody else is?

00:18:36.210 --> 00:18:36.820

Bail, Kristin - FS

Well, as

00:18:38.060 --> 00:18:38.900

Philip Fenner

Let me just seems.

00:18:38.790 --> 00:19:08.780

Bail, Kristin - FS

we, we share we share information and you know, Chris you know, basically says this is what we're going to do this is our intent is you know the fact that the part of the project area burned up. You know, we need to take a another look at this and so that's what we're that's what we're going to do. We don't know what's going to happen. Yet with the the portion that is now outside of the twist restoration or in some you know dialogue with our state partner and we're allowed to have one.

00:19:08.890 --> 00:19:22.250

Bail, Kristin - FS

On one conversations with our state partners you know as far as what might what what they might be interested in in. In doing out there and then you know that our public meeting next week is where we'll talk about next steps in relation to.

00:19:16.080 --> 00:19:16.690

+15*****82

Camping.

00:19:22.300 --> 00:19:42.270

Bail, Kristin - FS

Do you know what we do with this smaller area but you know with the fire you know that? Did you know change the existing condition of the project and and you know there was a lot of need to take that step back and recognize that the district is going to have.

00:19:43.110 --> 00:19:49.350

Bail, Kristin - FS

A huge workload both nipa and implementation with postfire recovery and so being able to.

00:19:49.400 --> 00:19:59.160

Bail, Kristin - FS

To focus its work moving forward to allow part of the project area to move forward while longer term.

00:19:59.200 --> 00:20:07.050

Bail, Kristin - FS

Uh you know, kind of reconsideration of what happens in the remainder of the project area. You know that gives us time to have those conversations.

00:20:09.250 --> 00:20:12.330

+15*****82

Well, I I'm Chris bye could I've scuse me.

00:20:13.680 --> 00:20:39.640

+15*****82

Christian if I could just be bold. I mean, I know nobody likes to have their feet held to the fire and I don't enjoy doing this at all but the fact of the matter is that you know, we there was an exclusive release of information important information was exclusively released to one public entity and withheld from other public entities even after there was an admission.

00:20:41.050 --> 00:20:44.640

+15*****82

That that it had been disclosed exclusively to the collaborative.

00:20:45.380 --> 00:20:45.890

+15*****82

So.

00:20:46.570 --> 00:20:47.720

+15*****82

Specifically.

00:20:48.530 --> 00:20:54.200

+15*****82

How how is that going to change? What are you going to do to make sure that doesn't happen again?

00:20:57.580 --> 00:21:27.350

Bail, Kristin - FS

Again, I'll I'll point to what I committed to in my email. Earlier, which was I committed the district Ranger to providing you proactive communication, either through email, or a meeting on a monthly basis, so that and that is that is special treatment. We don't do that. For every group and it. I really wanted you to know how committed I am to providing good proactive communication with folks so you know that that is kind of my.

00:21:27.550 --> 00:21:57.660

Bail, Kristin - FS

My bottom line, you know in terms of you know, my commitment to you know, making sure that you all are are getting the information that you want in a in a timely manner and you know, we'll continue to

work with the collaborative our state partners or tribal partners and our County commissioners are all committed to that, so we will continue to be working with them. But we also want to make sure that you know other other groups that choose not to be a part of that collaborative are also kept kept in the loop.

00:21:57.720 --> 00:22:12.020

Bail, Kristin - FS

And, of course, we have our broader public conversations and the static website where we provide information as to when we have documents and information available, so I know I know you all don't.

00:22:12.350 --> 00:22:21.130

Bail, Kristin - FS

Uh we choose to sit in on on a collaborative meetings. You know, but they are available to folks so that is, is something that.

00:22:21.550 --> 00:22:43.710

Bail, Kristin - FS

Uh you know other people may choose to. You know make that option even though that you that you don't so but as I said. My my commitment was that you would have you know, either either. An email or or a meeting with Chris on a monthly basis to make sure that you know, not only this project. But other projects. You know you're as up to date as everyone else.

00:22:32.460 --> 00:22:32.900

+15*****82

Yeah.

00:22:46.160 --> 00:22:47.750

+15*****82

Would you consider a letter?

00:22:48.500 --> 00:22:56.750

+15*****82

To us and maybe a press release, saying that you acknowledge responsibility for this and that it's not going to happen again.

00:22:57.160 --> 00:22:57.730

Bail, Kristin - FS

No.

00:22:58.780 --> 00:23:03.760

Bail, Kristin - FS

I I I feel that we are always we've been always been acting in good faith.

00:23:03.810 --> 00:23:20.170

Bail, Kristin - FS

If this was never an intent to withhold information and and I&I. Guess I'll I argue with you, a little bit that there was any intention to withhold that district has been through Heckenbach, you know with the fires this year and.

00:23:20.390 --> 00:23:52.450

Bail, Kristin - FS

Uh you know, we attended a meeting at the collaboratives request and shared with them information and have been up to our eyeballs and Postfire Recovery and Kovid and everything else and you know, I certainly will take responsibility for a delay in. In what we wanted to do, which was to sooner have a have a public meeting than what we've been able to schedule. But you know just knowing how hard those people are working and what they've been through.

00:23:53.110 --> 00:24:03.320

Bail, Kristin - FS

I wasn't going to push them into putting on something like that before they were ready and it had a chance to recover after quite a quite a harrowing summer.

00:24:04.900 --> 00:24:22.830

+15*****82

Well, I'm sympathetic to that question, but you know the thing of it is, is you mentioned that there was no intention to withhold but actually there was we asked Chris during that phone call. If you would give us that information that he disclosed to the collaborative and he declined.

00:24:05.450 --> 00:24:05.690

Bail, Kristin - FS

Or.

00:24:23.560 --> 00:24:29.030

+15*****82

We said we'd have to wait for the public meeting so that seems to me to be an intention to withhold.

00:24:30.310 --> 00:25:00.210

Bail, Kristin - FS

Well, I will not sign a letter that throws my Ranger under the bus and a meeting that I wasn't there at, I I. I think that I want to look forward. I want to frame our relationship moving forward and you know, I I certainly have no intention of of withholding information and I'm not going to write a letter saying, You know, my Ranger intentionally withheld anything because I don't know that that's the case and and truly you know if our I think our shared concern.

00:25:00.270 --> 00:25:18.880

Bail, Kristin - FS

Is about the health of these lands you know your your interest in in shaping? How they're managed into the future and you know, I think our our our time together is very well spent on what that looks like and how we can help help you know further. The vision of what you see out there.

00:25:19.440 --> 00:25:29.480

Bail, Kristin - FS

Uh so, so yeah, no, I I I'm I would not agree to a letter like that because I don't feel like it is something that is for the greatest good for all of us.

00:25:32.330 --> 00:25:32.770

+15*****82

OK.

00:25:34.770 --> 00:25:43.080

+13*****92

I'm just for a second to step down into the issue with the collaborative again, you sent us a operating protocol document.

00:25:44.090 --> 00:25:45.100

+13*****92

And UM.

00:25:45.790 --> 00:25:56.220

+13*****92

In there, there's a paragraph that says that with communication to the Forest Service on that topic that we should refer to a memorandum of understanding and demo you.

00:25:56.930 --> 00:26:02.720

+13*****92

It exists, but the MOU wasn't in there, so can, we see that please.

00:26:03.700 --> 00:26:15.770

Bail, Kristin - FS

No 'cause it doesn't exist to my knowledge. There was not an MOU that was affected to my knowledge. Again, I've been here 2 and a half years, so if somebody drags out something from 2014.

00:26:16.760 --> 00:26:46.030

Bail, Kristin - FS

You know, I will stand corrected but there was a letter of intent, which I did share with you, which is you know, my articulation of how I want to work with the collaborative but my understanding based on an email and recollection was at the Mo. You was never finalized and the previous 4 supervisor settled on a letter and I shared with you. The letter that I did a refresh on under my signature, which reflects you know the relationship.

00:26:46.080 --> 00:26:47.460

Bail, Kristin - FS

That I have with the collaborative.

00:26:58.210 --> 00:27:02.620

+13*****92

So how do we? How would we join this meeting that's coming up next Wednesday just as a?

00:26:58.460 --> 00:27:00.330

+15*****82

I've got a couple of things here.

00:27:03.810 --> 00:27:08.120

+13*****92

An aside here with the meeting is coming up on the 26th he said, Is It.

00:27:07.780 --> 00:27:08.250

Bail, Kristin - FS

Correct.

00:27:09.170 --> 00:27:10.260

+13*****92

Available virtually

00:27:11.230 --> 00:27:13.660

+13*****92

that is that in the press release. I just haven't gotten that far yet.

00:27:15.230 --> 00:27:23.580

Bail, Kristin - FS

I I will double check, but I'm almost 100% positive we would not be having an in person public meeting during Omicron so yeah.

00:27:25.780 --> 00:27:32.090

+15*****82

Well, it will it be a uh account 'cause I I would attend if it's you know if it's an in person type meeting.

00:27:32.550 --> 00:27:39.200

Bail, Kristin - FS

No, I I wouldn't I wouldn't authorize an in person meeting at this time, knowing the Kovin environment that we're in with.

00:27:37.980 --> 00:27:38.360

+15*****82

Yeah.

00:27:39.250 --> 00:27:42.760

Bail, Kristin - FS

Uh I I over here in Chelan County and.

00:27:40.300 --> 00:27:48.610

+13*****92

Oh, there, I'm sorry, there is a link down at the bottom of the press release that isn't the first with project website and says all materials information will be there OK.

00:27:46.500 --> 00:27:46.900

Bail, Kristin - FS

Yeah.

00:27:49.200 --> 00:27:57.280

Bail, Kristin - FS

Yeah, Yeah, but no we, we won't be having person in person meetings for a number of weeks now, while we're in the spike of Omicron.

00:27:50.740 --> 00:27:51.390

+15*****82

OK, so.

00:27:58.220 --> 00:28:08.290

+15*****82

No, that's a That's a wise decision and I totally agree with you. But how do we know how to get connected to that meeting is that going to be released?

00:28:09.090 --> 00:28:11.640

+15*****82

In the newspaper or where do we find that?

00:28:13.560 --> 00:28:35.200

Bail, Kristin - FS

Well, there are couple links in the news release. I'm unfortunately, not on my on my email right now, so I can't look at it, but there are some links in there that will have the logistics posted when they're available, so if you if you keep that press release you should be able to access that link when those materials are posted.

00:28:37.100 --> 00:28:40.570

+13*****92

Yeah, the only thing on the press release is just a link to the project website.

00:28:38.060 --> 00:28:38.450

+15*****82

OK.

00:28:41.140 --> 00:28:41.610

Bail, Kristin - FS

OK.

00:28:42.830 --> 00:28:48.260

Bail, Kristin - FS

Yeah, they may not have set it up yet 'cause. It'll it'll have to be its own you know special.

00:28:48.990 --> 00:28:56.950

Bail, Kristin - FS

You know forum and and site and you know? Our public affairs spokesman just not have done that yet since it's a little over a week week out.

00:29:04.080 --> 00:29:10.610

+15*****82

OK, I've got a couple of other requests come if endless Dave and Phil you have anything.

00:29:11.350 --> 00:29:11.940

+15*****82

You wanna

00:29:12.650 --> 00:29:13.420

+15*****82

caution?

00:29:14.610 --> 00:29:18.330

+13*****92

Well, I I would just still like to hear some.

00:29:14.710 --> 00:29:15.070

David L. Fluharty

Good.

00:29:19.160 --> 00:29:26.720

+13*****92

A commitment to reducing information release delays in the future as much as possible, you know just in the spirit of.

00:29:27.640 --> 00:29:28.510

+13*****92

Public engagement.

00:29:30.350 --> 00:29:49.370

Bail, Kristin - FS

Well, I can say with some you know, Scouts honor that I have directed my public affairs officer to ensure that there is proactive in future of proactive and consistent and frequent communication on our projects and as we move forward, particularly with infrastructure bill.

00:29:49.430 --> 00:30:05.510

Bail, Kristin - FS

Uh you know that communication is going to be even more important for the work that it potentially could be included in that. So so I've made a specific ask an expectation to both my Ranger and my public affairs staff officer to make that happen.

00:30:06.350 --> 00:30:33.360

Bail, Kristin - FS

More more than giving a direct you know instruction to my people. I don't know what else I can you know promise other than you know we can have a follow up meeting 6 weeks or 6 months from now and and have a check in to see how it's working from your end in terms of you know reasonable frequency of of communication and again, you know it may be that there's no change. You know from month to month, but you know that's that's OK.

00:30:37.530 --> 00:30:41.560

+13*****92

Yeah, oh definitely suits your meetings are are are going to be real desirable.

00:30:41.610 --> 00:30:49.020

+13*****92

Uh and during that last meeting in November that the collaborative invited you to attend.

00:30:50.030 --> 00:30:52.600

+13*****92

Do you guys have any minutes or?

00:30:53.460 --> 00:30:59.110

+13*****92

Description of what took place in that meeting anything more than just what we've heard Thirdhand from the.

00:30:59.920 --> 00:31:00.770

+13*****92

Community Council.

00:31:02.610 --> 00:31:04.300

Bail, Kristin - FS

I'm what I UM.

00:31:05.080 --> 00:31:06.630

Bail, Kristin - FS

I was not at that one.

00:31:07.620 --> 00:31:16.610

Bail, Kristin - FS

The collaborative has its own meeting minutes so I could ask them to share the November 16th meeting minutes with you.

00:31:17.230 --> 00:31:17.810

Bail, Kristin - FS

Uhm.

00:31:17.600 --> 00:31:18.930

+13*****92

Yes, great.

00:31:19.430 --> 00:31:33.680

Bail, Kristin - FS

Yeah, but that's their their their it's it's their collaborative and they're in charge of of you know the meeting. The meeting notes if if there are any for for that particular meeting and so that's how I that's how it end up sharing them with you.

00:31:29.670 --> 00:31:30.080

+13*****92

OK.

00:31:35.590 --> 00:31:38.020

+13*****92

Yes, if you could do that that would be very helpful. Thank you.

00:31:37.410 --> 00:31:37.740

Bail, Kristin - FS

Uh-huh.

00:31:38.590 --> 00:31:38.910

Bail, Kristin - FS

Yeah.

00:31:44.260 --> 00:31:45.010

+13*****92

Yeah, go ahead Rick.

00:31:46.350 --> 00:31:48.330

+15*****82

OK, thanks, yeah, I just uh.

00:31:49.100 --> 00:32:19.490

+15*****82

Wanted to just try to lighten up here a little bit. You know, I I don't like this at all. I don't like being in an adverse aerial relationship with the Forest Service and I've been involved with the Forest Service since 1977. When I was getting involved in Mount Hood and then of course for many, many, many years on the rollout. Whitman and unfortunately that relationships turned to adversarial and the reason for that was things like this and I don't like it.

00:32:19.580 --> 00:32:30.020

+15*****82

I don't wanna get it all up. It's a trust thing. And when you can't trust the federal agency. Then, who can you trust? I mean, it's it's it's difficult?

00:32:31.150 --> 00:33:01.620

+15*****82

But I'm hoping that that you know, there will be some way if you're not interested in assuring us in writing that this isn't going to happen again. What what other assurances can we have that that you know that this kind of thing isn't going to happen. I mean, this is not going to be continuing policy. I mean, you say it's not and I? I understand that and I believe you but I you know, I mean this? Is this is something that just.

00:33:01.680 --> 00:33:06.570

+15*****82

And here we are still without the information that was given to the collaborative more than 2 months later.

00:33:07.260 --> 00:33:07.840

+15*****82

And.

00:33:09.280 --> 00:33:12.940

+15*****82

You know that's just something that needs to be rectified.

00:33:13.540 --> 00:33:27.370

+15*****82

And there needs to be some sort of an understanding that that that things will be done differently. In the future. And if if you're not going to United Center letter OK? What what do you think?

00:33:28.630 --> 00:33:31.060

+15*****82

Would be appropriate if you were us?

00:33:31.670 --> 00:33:33.940

+15*****82

What would you be suggesting?

00:33:39.960 --> 00:34:00.540

Bail, Kristin - FS

Well, uh you know, and I I feel bold, Yeah 'cause I don't like ever to speak. You know it. You know, but truly articulating you know the the preferred method of engagement and how you want to be in engaged you know, I I've offered up. You know the the uh weekly or excuse me a monthly connection with with Chris fur to provide input.

00:34:01.490 --> 00:34:09.980

Bail, Kristin - FS

You know what I what I'm trying to get my mind around is you know, my understanding from the, The November meeting was a verbal.

00:34:10.730 --> 00:34:15.420

Bail, Kristin - FS

Update as to what the Forest Service was thinking by Chris to the group.

00:34:16.260 --> 00:34:16.860

Bail, Kristin - FS

So.

00:34:18.030 --> 00:34:34.840

Bail, Kristin - FS

You know, do so essentially it is uh something similar to you, saying this is what we're thinking and that's where everyone is right now is you know, we've just shared that this is what we're thinking and our formal you know, kind of launching of the next steps is happening with the public meeting next week.

00:34:35.540 --> 00:34:59.740

Bail, Kristin - FS

So so, so I struggle a little bit is you know, we got and I've created a you know that that monthly connection work risk and tell you the same thing. He told them You know where where were you know going to be changing. Our our strategy. Here to to recognize that you know the landscape has been impacted. We have to you know redo analysis and baselines and all that and and you know, we'll we'll focus on a smaller smaller area.

00:35:00.510 --> 00:35:01.170

Bail, Kristin - FS

So.

00:35:00.880 --> 00:35:06.880

+13*****92

I'm just not sure I'm not sure why you think you could do that on a monthly basis when he didn't do it. The first time we talked to him.

00:35:02.410 --> 00:35:02.870

Bail, Kristin - FS

Yeah.

00:35:08.220 --> 00:35:13.770

+13*****92

It just doesn't seem to be his Mo basically told us to join the collaboratively who wanted to know anything otherwise.

00:35:08.620 --> 00:35:09.110

Bail, Kristin - FS

'cause I.

00:35:14.360 --> 00:35:20.480

+13*****92

You know just wait for us to tell you something like anybody else would read the newspaper you'll find out go away.

00:35:21.620 --> 00:35:22.700

+13*****92

It was we were really.

00:35:21.910 --> 00:35:22.330

Bail, Kristin - FS

Well.

00:35:24.240 --> 00:35:25.890

+13*****92

And I don't I don't like his attitude.

00:35:24.700 --> 00:35:25.750

Bail, Kristin - FS

Well, I I I.

00:35:26.750 --> 00:35:27.580

+13*****92

Conducive to

00:35:26.980 --> 00:35:32.380

Bail, Kristin - FS

I have confidence that if I tell my Ranger and staff office and staff officer to do something that they will do it.

00:35:37.450 --> 00:35:45.990

+13*****92

it's worth a try right you know, I'm not gonna say no. I'm gonna say sure let's give it a try. But I'm just saying I was skeptical at based on the first encounter.

00:35:42.560 --> 00:35:42.900

Bail, Kristin - FS

Yeah.

00:35:47.760 --> 00:35:48.630

+13*****92

Very skeptical.

00:35:48.910 --> 00:35:49.280

Bail, Kristin - FS

Yeah.

00:35:49.350 --> 00:35:49.760

+13*****92

But.

00:35:50.420 --> 00:35:51.960

+13*****92

But OK let's do it.

00:36:02.190 --> 00:36:09.800

Bail, Kristin - FS

So can, we can, we count the 26th visit for as as a as an engagement or would you like something separate scheduled for later this month?

00:36:03.300 --> 00:36:03.740

+15*****82

Yes.

00:36:12.950 --> 00:36:19.130

+15*****82

Well, I I think you know you've answered her questions as best you could and uh.

00:36:19.860 --> 00:36:23.030

+15*****82

You know, I'm I only have one more question for you.

00:36:23.580 --> 00:36:23.960

Bail, Kristin - FS

Uh-huh.

00:36:23.930 --> 00:36:28.720

+13*****92

I'm sorry to 2626 it will be an engagement so we can go a month from there.

00:36:23.980 --> 00:36:24.650

+15*****82

Uh.

00:36:29.370 --> 00:36:29.760

Bail, Kristin - FS

OK.

00:36:29.720 --> 00:36:30.990

+13*****92

In my opinion, yeah.

00:36:31.620 --> 00:36:39.600

Bail, Kristin - FS

Yeah, and I will I will write a I will write a note in my calendar invite to double check and make sure that connection has happened.

00:36:32.150 --> 00:36:32.890

+15*****82

OK. Yeah.

00:36:42.040 --> 00:36:42.510

+15*****82

Good.

00:36:43.300 --> 00:36:47.560

+15*****82

So my last question is a Christian when you were on the Ochako.

00:36:48.340 --> 00:36:50.130

+15*****82

Did you know a guy named Tim little Bo?

00:36:52.980 --> 00:36:53.630

Bail, Kristin - FS

Yes.

00:36:55.070 --> 00:36:55.440

+15*****82

Yeah.

00:36:56.210 --> 00:36:57.590

+15*****82

Yeah, he was my closest friend.

00:36:56.530 --> 00:36:56.890

Bail, Kristin - FS

Yeah.

00:36:59.480 --> 00:37:05.690

Bail, Kristin - FS

Yeah, but you're you're going back a little bit 'cause, I I left the Ochako in 2006.

00:37:07.180 --> 00:37:07.590

+15*****82

Yeah.

00:37:07.640 --> 00:37:13.190

+15*****82

Yeah, well. Tim has been there and done that disputes and Mal here and everywhere else for.

00:37:13.770 --> 00:37:23.240

+15*****82

Since way before that, but yeah, Tim Tim was a very close friend of mine and and uh. Yeah, good guy to work with. He was a lot easier to work with than I am.

00:37:26.000 --> 00:37:27.610

Bail, Kristin - FS

I know and and UM.

00:37:28.480 --> 00:37:58.590

Bail, Kristin - FS

I always you know, my greatest fear is not that people are interested in their national forests and public lands. My greatest fear is that they aren't they become uninterested in our national forests and public lands and you know, and and people start actively thinking about other other uses other than public uses for those lands so I always welcome. You know engagement and people being committed. You know to to working with us together, even if we don't agree as to.

00:37:58.650 --> 00:38:23.040

Bail, Kristin - FS

Exactly you know what needs to be done, but that you know, we are committed to both caring caring about our landscape and and trying to find that common ground where it exists. So you know, I I well welcome your engagement and interest. I'm I'm really glad that you did reach out to me with your concerns and and you know, I do want to find a a good workable way to to ensure that you, you all are connected in the way that you want to be connected.

00:38:23.580 --> 00:38:29.760

Bail, Kristin - FS

And and you know just figure out how best to do that, and and understand you know that.

00:38:30.970 --> 00:38:46.200

Bail, Kristin - FS

You know with with with short staff, you know, I'm I'm going to be leaning on Chris to help me with that as well as you know, Victoria Public Affairs Officer. She she helps with you know, ensuring you know communication materials and and meetings and things are are planned and executed.

00:38:49.790 --> 00:38:50.200

+15*****82

Good.

00:38:49.980 --> 00:38:55.090

David L. Fluharty

So do do you have a few more minutes to answer a couple more questions I?

00:38:54.560 --> 00:38:56.210

Bail, Kristin - FS

Yes, uh I have till 3:00 o'clock.

00:38:56.130 --> 00:39:01.220

David L. Fluharty

Yeah, I I really, really appreciate you spending time with us today and and.

00:39:01.620 --> 00:39:25.660

David L. Fluharty

Uh I'm kind of the policy wonk for for our organization and I. I tend to. I tend to try to go back and read the the legislation that you're operating under and they're and I'm not a lawyer. So this is not. This is not a legal analysis. That's just kind of a question in which you probably have have dealt with.

00:39:22.000 --> 00:39:22.450

Bail, Kristin - FS

Uh-huh.

00:39:25.710 --> 00:39:33.430

David L. Fluharty

Uh at least I hope that you have with respect to this, this change that we've we've been told about.

00:39:33.500 --> 00:39:45.130

David L. Fluharty

Uh and the first one, is the eligibility of an area for a collaborative process requires that the the area be at least 50,000.

00:39:45.600 --> 00:39:47.090

David L. Fluharty

Uhm acres.

00:39:47.800 --> 00:39:55.400

David L. Fluharty

And as you know, we're now down to half of that come with with what what we've been told will be done.

00:39:56.870 --> 00:39:58.780

David L. Fluharty

So I'm I'm curious.

00:39:59.560 --> 00:40:00.900

David L. Fluharty

You know this does he act.

00:40:01.560 --> 00:40:09.870

David L. Fluharty

Somehow pull the rug out from underneath you on these things or is there some wiggle room that you have to continue to.

00:40:09.920 --> 00:40:32.710

David L. Fluharty

We work with a collaborative or work work with this process on on twist. Rest Restoration 'cause. It's it's really quite a quite a change in doesn't seem to fit into what I'm reading here and in the in public law of level 111 11. You know, I'm sure you've memorized it's.

00:40:35.930 --> 00:40:37.340

Bail, Kristin - FS

Well, there is a?

00:40:38.320 --> 00:40:48.810

Bail, Kristin - FS

It you know you could have a collaborative of of all sorts and kinds. I mean, we work with friends groups. We work with you know trail associations you know, we work with.

00:40:49.540 --> 00:40:50.990

Bail, Kristin - FS

Uh you know.

00:40:50.650 --> 00:40:51.540

David L. Fluharty

MPC.

00:40:52.090 --> 00:40:59.920

Bail, Kristin - FS

Yeah, and yeah, and and so uh you know in terms of you know, we don't have like a formal factor relationship with this collaborative.

00:41:01.050 --> 00:41:08.590

Bail, Kristin - FS

You know the the collaborative is a a self formed you know group that you know that.

00:41:10.000 --> 00:41:17.850

Bail, Kristin - FS

Runs itself you know this and and makes its rules, and you know chooses what it it works on the Forest Service does not.

00:41:18.460 --> 00:41:23.060

Bail, Kristin - FS

Uh you know set the agenda you know it doesn't you know.

00:41:23.800 --> 00:41:36.500

Bail, Kristin - FS

Uhm say who who how they organize or how they do that. Their work, so let's say. I'm trying to remember 11111 is that the omnibus public lands frustration or public lands act.

00:41:29.170 --> 00:41:29.510

+15*****82

Right.

00:41:37.270 --> 00:41:41.900

David L. Fluharty

Yeah, that's that's the omnibus public Lands Management Act in 2009.

00:41:42.200 --> 00:41:54.900

Bail, Kristin - FS

Yeah, so it's not this isn't a specifically chartered collaborative. It's it's one that was just formed of its own own desire and it's not been formally chartered by the Forest Service.

00:41:54.960 --> 00:42:08.360

Bail, Kristin - FS

So for any specific purpose and that's why there's no charter document. I mean, there's only the documents that the collaborative has created for itself, so maybe I need to see the specific language.

00:42:06.770 --> 00:42:08.140

David L. Fluharty

And then did your letter.

00:42:09.160 --> 00:42:09.850

David L. Fluharty

And your love.

00:42:09.370 --> 00:42:09.770

Bail, Kristin - FS

Pardon.

00:42:11.280 --> 00:42:26.350

David L. Fluharty

Your your letter confirming that you have selected them at and using them as the collaborative or all projects in the Okanogan Wenatchee National Forest, not specific to any any.

00:42:26.500 --> 00:42:43.080

David L. Fluharty

Uh specific collaborative whether it's mission or whether it's the twist or or any of the others. So I mean, it's very, very broad mandate that you're working under but the the question is still.

00:42:43.660 --> 00:42:55.750

David L. Fluharty

Uh we're we're talking now, I mean to be eligible for the funding and to be eligible to be part of this. This collaborative process. The land area, according to what I'm reading.

00:42:56.200 --> 00:42:58.690

David L. Fluharty

Uh she should should be.

00:42:56.270 --> 00:42:59.330

Bail, Kristin - FS

Oh are you talking oh are you talking about CFL RP.

00:42:59.490 --> 00:43:02.330

David L. Fluharty

It should be 50,000 acres, or greater.

00:43:02.990 --> 00:43:03.890

David L. Fluharty

And and

00:43:03.130 --> 00:43:07.130

Bail, Kristin - FS

So are you talking about collaborative forest landscape restoration projects.

00:43:07.620 --> 00:43:09.320

David L. Fluharty

yes, which is.

00:43:08.700 --> 00:43:25.270

Bail, Kristin - FS

OK so yeah, this isn't that collaborative is not is not equivalent to that. They're not formed for CFRP program. The CLR program is completely different and our our existing CFL ERP proposal is well above 50,000 acres.

00:43:27.350 --> 00:43:36.370

David L. Fluharty

But do you reach the original proposal is but what you're now telling us it's been scaled back right and that is what I'm trying to understand.

00:43:35.860 --> 00:43:49.190

Bail, Kristin - FS

Oh yeah, no there. There's a lot. There's stuff all the way down to Wenatchee River Ranger District.

That's in the CFRP proposal. So it goes all the way you know it. It's a much larger area in our CFL RP proposal. Not it's not just twist.

00:43:50.110 --> 00:44:05.480

David L. Fluharty

So so that's why I can't find a a document that you sent to the advisory panel or approval instituting the twist restoration project.

00:44:05.800 --> 00:44:11.540

Bail, Kristin - FS

Yes, no it's it's brought it's much broader than that I can I can come?

00:44:12.160 --> 00:44:18.870

Bail, Kristin - FS

Yeah, they they should it should be on the IT should be on the CFL RP website. You should be able to find our proposal on there.

00:44:12.240 --> 00:44:13.590

David L. Fluharty

But I think.

00:44:19.570 --> 00:44:43.520

David L. Fluharty

I I can find one from LA 2012 or 2014 that is that broad broad thing I couldn't find the one that I was looking for the one thinking that these were separate projects and that that and so, so that is what you're telling me now is that the the larger scheme of things.

00:44:26.710 --> 00:44:27.090

Bail, Kristin - FS

Yeah.

00:44:43.970 --> 00:44:50.860

David L. Fluharty

Uh is makes you eligible and the fact that this one scaled back is is not but.

00:44:52.480 --> 00:45:08.230

David L. Fluharty

So so I I can understand that, but then then the question to me is if if this has been designated that this area is 77,000 square acre 77,000 acres is now a a?

00:45:09.100 --> 00:45:09.770

David L. Fluharty

Uhm.

00:45:10.810 --> 00:45:12.910

David L. Fluharty

Now split into 2 parts.

00:45:13.500 --> 00:45:43.830

David L. Fluharty

Uhm whereas before it was seen as an ecosystem based project. It seems to me like the the need for keeping that ecosystem focus is even greater and that that what it sounds like is your calling that forest restoration plan for the burned burned area and part of the reason we went over there was to see just how the fire had skipped around in there so.

00:45:13.670 --> 00:45:14.070

Bail, Kristin - FS

Uh-huh.

00:45:44.150 --> 00:45:45.130

David L. Fluharty

It seems to me like.

00:45:45.540 --> 00:46:15.930

David L. Fluharty

Uh when you compare that with the other other burnt recently burned areas in the same place where we're losing, it an opportunity to look at this whole thing from a landscape of perspective by by by separating this into 2 prod projects and it. You know is one project now to be funded out of one thing and one out of infrastructure money or are they both going to be eligible for it.

00:46:15.990 --> 00:46:25.100

David L. Fluharty

Infrastructure study, it, you probably don't know the answers. But these these are things that that are really important to to some of us anyway.

00:46:19.200 --> 00:46:19.710

Bail, Kristin - FS

Uh-huh.

00:46:25.740 --> 00:46:33.820

Bail, Kristin - FS

Yeah, Well, you're you're really hitting on you know, there is not a lot of clarity as to what is and isn't funded by infrastructure?

00:46:35.180 --> 00:46:57.820

Bail, Kristin - FS

You know, but one thing is, you know the we still have all the analysis done for the entire T of the twist restoration project 'cause. We were moving towards you know, we had the draft and then you know, we were looking for that way to to you know take what we had heard in response to the draft. All the comments and input and what that was going to look like for the final.

00:46:58.610 --> 00:47:28.900

Bail, Kristin - FS

So we have you know they affected environment. We have all of that. You know basic analysis. You know that doesn't form that landscape. You know level approach and so all that is still applicable to what it is that we think we you know that we think was needed, particularly for that area closest to the

communities. You know that it is in matrix lands and it's giving us and doing this approach, the way we're proposing it. That gives us a little more space to update our analysis. You know for that upper part of the landscape.

00:47:29.190 --> 00:47:59.680

Bail, Kristin - FS

Yeah, where they had a whole lot more LSV. You know, and and you know areas where there was a lot more. You know dialogue that people wanted to have to update the analysis there and to have that additional dialogue. So we wanted to be able to continue to move forward and and do what we feel is going to help protect those communities that were you know, so terribly impacted by fire this summer and still have that a good thoughtful looking analysis for that portion.

00:47:59.740 --> 00:48:16.050

Bail, Kristin - FS

Up there and then of course, we have the whole upper metal landscape analysis that is coming into the into the future that will be working on that could also potentially be funded by infrastructure in the future since infrastructure is a you know a multi year.

00:48:16.110 --> 00:48:27.890

Bail, Kristin - FS

Uhm multi year effort as well as the chief and this is other news that I am just getting the chief has released you know his tenure wildfire strategy.

00:48:28.900 --> 00:48:36.200

Bail, Kristin - FS

And you know as as sharing is sharing that out, now and I can send that information to you.

00:48:36.510 --> 00:48:45.810

Bail, Kristin - FS

Uh you know to you know that just came out today and I did not have a a. A pre uh. A preview copy of it, I got it when everyone else did.

00:48:48.240 --> 00:48:48.770

David L. Fluharty

Right.

00:48:49.180 --> 00:48:49.770

+15*****82

Alex.

00:48:49.620 --> 00:48:49.990

David L. Fluharty

You know.

00:48:51.000 --> 00:48:51.990

David L. Fluharty

So so much.

00:48:51.160 --> 00:49:06.380

Bail, Kristin - FS

Yeah, but it it very different you know, and you know the the bottom part it. Towards the towards the you know the communities is more matrix and the upper part is more LSV and I you know, I&I welcome you know that that conversation about what we might do.

00:49:06.430 --> 00:49:08.340

Bail, Kristin - FS

You too.

00:49:09.850 --> 00:49:19.520

Bail, Kristin - FS

I understand the need the the needs for for self treatment, but understanding also that it's LSV in northern spotted owl habitat and you know, there's been a portion of it impacted by fire.

00:49:20.900 --> 00:49:41.940

David L. Fluharty

Right I mean, this, I mean, one one of the worries that I've had is is that this is the end and we've seen this happen is that this is a formula for going in with salvage logging and you know that's frequently not done with the ecosystem in mind, and So what you're saying is something that.

00:49:41.990 --> 00:50:01.080

David L. Fluharty

Dumb is it I think is is positive. We're going to be out. Obviously watching it, and could commenting is as best we can so just just to let you know that we're we, we would really prefer to see this still together as a as a.

00:49:52.400 --> 00:49:52.790

Bail, Kristin - FS

Uh-huh.

00:50:01.410 --> 00:50:11.020

David L. Fluharty

In a twist restoration project of 77,000 square acre 77, 8000 acres, but

00:50:11.620 --> 00:50:13.090

David L. Fluharty

Well, you know.

00:50:14.230 --> 00:50:17.520

David L. Fluharty

We also understand that fire has changed.

00:50:17.800 --> 00:50:22.060

David L. Fluharty

The the the environment, too, so.

00:50:22.770 --> 00:50:23.190

Bail, Kristin - FS

Yeah.

00:50:22.810 --> 00:50:23.220

David L. Fluharty

Ah.

00:50:23.890 --> 00:50:26.290

David L. Fluharty

But those those are those are.

00:50:27.750 --> 00:50:29.920

David L. Fluharty

You you help me understand.

00:50:31.480 --> 00:50:36.300

David L. Fluharty

Why this reading is incomplete so I appreciate that?

00:50:36.700 --> 00:50:51.890

Bail, Kristin - FS

Yeah, well. I appreciate folks that actually look at the legislative language. You know, and and you know ask those good questions. So so yes, I'll I'll look for the link. But yeah, it won't, it doesn't show up as a twist, you know, see if LRP project. It's

00:50:52.180 --> 00:51:06.470

Bail, Kristin - FS

uh you know a much broader landscape than that and and so that the 50,000 acres is, is well exceeded with what we're moving forward with and has been selected by the secretary for implementation. We're just awaiting funding from Congress.

00:51:07.090 --> 00:51:12.330

Bail, Kristin - FS

Uh you know to to be able to you know start implementing the the the the project.

00:51:12.970 --> 00:51:15.240

David L. Fluharty

Yeah, I mean that that's that dumb.

00:51:15.830 --> 00:51:20.750

David L. Fluharty

You know reading reading this, the the funding and how it's to be used and the sequence.

00:51:21.040 --> 00:51:21.690

David L. Fluharty

Uhm.

00:51:22.910 --> 00:51:40.570

David L. Fluharty

Gives you a really remarkably difficult. UM job because a lot of the supposit ecosystem respiration elements are to be funded in the first 2 years and in in the meantime.

00:51:42.030 --> 00:51:47.620

David L. Fluharty

It was not clear what that is one one of our our major concerns as an organization was.

00:51:48.910 --> 00:51:50.240

David L. Fluharty

This this is.

00:51:51.940 --> 00:52:05.830

David L. Fluharty

This was putting forward a 30 year plan when the the forest landscape restoration thing is a 10 year plan. Obviously, I suppose it could be redone and then it's.

00:52:07.150 --> 00:52:19.180

David L. Fluharty

Under the under the collaborative approach. It supposed to have all of these elements of leveraging local and other funding and I can't find the funding reports.

00:52:19.250 --> 00:52:30.840

David L. Fluharty

Come on, you know for for the other projects, either so this is something that I'm not sure. I'm looking in the right places, but it would be really helpful to be able to.

00:52:30.890 --> 00:52:40.090

David L. Fluharty

You will be able to track because that's how money gets spent is is almost as effective as boots on the ground.

00:52:40.960 --> 00:52:42.550

David L. Fluharty

Knowing what's happening so.

00:52:43.330 --> 00:53:14.810

Bail, Kristin - FS

Yeah, yeah, and it we've been impatiently waiting for us. To actually get funding for our CFRP project so that we can start having you know conversations with all of the folks who are you know have partnered with us. On on that proposal. We do have you know an individual that will serve as our point of contact for SL. But as you very rightly noted you know all these other funding streams are also.

00:53:14.870 --> 00:53:24.680

Bail, Kristin - FS

Going to need to be tracked and sequenced and identified and so you know, we are. We are looking to getting more capacity on the forest.

00:53:24.740 --> 00:53:53.900

Bail, Kristin - FS

And you know, I I sort of coordinator you know to help us with that, so that we can you know share and have it be very clear what's going on? Because you know there's different pots of money coming from different different places that are all all going to start to come into play. So you know, I'm sitting through meetings talking about you know spreadsheets and you know databases and GIS and all that stuff.

00:53:54.800 --> 00:53:58.290

David L. Fluharty

Right right well, more power to you, I mean?

00:53:58.350 --> 00:53:58.560

David L. Fluharty

Yeah.

00:53:59.970 --> 00:54:12.500

David L. Fluharty

I know I know it's it's it's not easy. I've I've I've worked for the Forest Service. One summer, so I'm I'm in Skykomish districts so you know it's it's.

00:54:14.060 --> 00:54:23.340

David L. Fluharty

I I know how hard it is to translate something is comes down from from somewhere else and into into.

00:54:24.070 --> 00:54:34.940

David L. Fluharty

Uh things out things happening on the ground. So now and we've seen huge changes in in the way things are are done and how things were approached I mean, this, this whole.

00:54:28.210 --> 00:54:28.670

Bail, Kristin - FS

Yeah.

00:54:35.840 --> 00:54:40.110

David L. Fluharty

Landscape level uh approach, I think is really dumb.

00:54:40.880 --> 00:54:50.240

David L. Fluharty

Uh really appropriate and you know, one that that particularly with climate change is now.

00:54:51.850 --> 00:55:20.560

David L. Fluharty

You know, we're we're really looking to, I mean, we, as an organization. They're looking for, for for us to become much more of a carbon sink than than anything else and and focus more on by biodiversity and then on so-called forest health, which seems to mean largely tree health, the way that it gets translated so that's where we are at least I think.

00:55:00.710 --> 00:55:01.120

Bail, Kristin - FS

Uh-huh.

00:55:20.620 --> 00:55:33.930

David L. Fluharty

That's where I think we are, and I've got Rick and Phil and and my wife. Lisa were all and as well as our other members who are all doing our best to pitch in.

00:55:36.090 --> 00:55:44.140

Bail, Kristin - FS

Yeah, and I I appreciate the fact that you brought up at the beginning. You know all volunteer organization you know that that that takes a lot of.

00:55:44.960 --> 00:55:59.090

Bail, Kristin - FS

Investment of time talent and probably treasurer to you know keep things keep things going and you know you're doing you're not getting paid to sit in on meetings and you know write write letters and stuff, so I I definitely appreciate your.

00:55:55.380 --> 00:55:55.630

+15*****82

Right.

00:55:59.590 --> 00:56:03.330

Bail, Kristin - FS

Uh you know your willingness to give up your you know personal time to do that.

00:56:04.990 --> 00:56:14.190

David L. Fluharty

Well, the attendee Part 2 is is I mean, we're I. I hate to say it but you know there. There's a are feeling is with the?

00:56:05.890 --> 00:56:06.140

+13*****92

Uh.

00:56:14.700 --> 00:56:26.000

David L. Fluharty

Uh the collaborative as designed the North Central Washington. Help Forest Health Collaborative, which is a derivative of the Columbia Basin. I mean, we know the history but.

00:56:24.980 --> 00:56:25.430

Bail, Kristin - FS

Uh-huh.

00:56:26.330 --> 00:56:38.410

David L. Fluharty

Uhm is has has all the right elements in there, but save when you look at the at you what you have or national organizations that are represented.

00:56:38.840 --> 00:56:47.330

David L. Fluharty

Uh for the environment and they're good organizations, but they tend to feel like they know far better than.

00:56:48.000 --> 00:56:50.760

David L. Fluharty

We volunteers and of course, we volunteers.

00:56:51.890 --> 00:57:02.690

David L. Fluharty

Uh kind of trying to say, Well, you're not you're not really representing you're not holding the line. Here you're you're compromising and and you know our our organization.

00:57:02.740 --> 00:57:21.820

David L. Fluharty

Uh was founded based on the advice of of a Chicago political scientist Graham McConnell and so I don't know if you've ever studied anything about public participation and and the public lands that he's written.

00:57:22.340 --> 00:57:34.680

David L. Fluharty

A powerful advocate for avoiding the agency capture and and things like that that you know are are are so, so.

00:57:35.510 --> 00:57:36.020

David L. Fluharty

Uh.

00:57:37.370 --> 00:57:50.910

David L. Fluharty

You know they they've been part of the history and they're part of the present and you know, making sure that we that that we have that free and open transparent interchange is really the the key to 2.

00:57:52.260 --> 00:57:56.570

David L. Fluharty

Doing that and and it's not easy, but it's it can be done.

00:57:57.320 --> 00:58:00.060

Bail, Kristin - FS

What's his name again? Yeah, yeah, I I'm intrigued by him.

00:57:59.030 --> 00:58:01.250

David L. Fluharty

Wrap wrap the call McConnell.

00:58:02.760 --> 00:58:06.020

David L. Fluharty

You wrote, I probably the best thing is a book he wrote.

00:58:06.070 --> 00:58:06.490

David L. Fluharty

Done.

00:58:07.000 --> 00:58:11.220

David L. Fluharty

The public lands in the public interest or I I can send you the reference.

00:58:11.540 --> 00:58:12.880

Bail, Kristin - FS

OK, yeah, please do.

00:58:11.590 --> 00:58:18.060

David L. Fluharty

Uh and couple couple things that you know it. It's it's you know, he's riding in the 50s.

00:58:19.060 --> 00:58:20.670

David L. Fluharty

And and 60s.

00:58:20.980 --> 00:58:28.440

David L. Fluharty

Uh so you know it's it's but you know the the the issues are are similar today so.

00:58:28.490 --> 00:58:43.250

David L. Fluharty

Uh uh and and we have his granddaughter is a member of our our board, so she's in and she's she's does law, not not public lands law but law so.

00:58:36.630 --> 00:58:37.560

Bail, Kristin - FS

Wow, that's cool.

00:58:42.220 --> 00:58:42.660

+15*****82

Thanks.

00:58:44.910 --> 00:58:51.810

David L. Fluharty

I'm sorry if I'm talking too much now, Flynn and Rick you probably want to close off here we're getting.

00:58:52.980 --> 00:58:53.970

David L. Fluharty

Most of the time.

00:58:53.440 --> 00:58:54.080

+13*****92

Well, I just

00:58:53.670 --> 00:58:59.390

+15*****82

Yeah, I'm done, I'm done, I I wanted to say that I appreciate very much your time, Kristen and.

00:58:55.830 --> 00:58:56.140

+13*****92

3.

00:58:59.980 --> 00:59:02.550

+15*****82

Uh yeah, and thank you for your patience.

00:59:04.510 --> 00:59:07.030

Bail, Kristin - FS

Well, thank you I yeah.

00:59:05.170 --> 00:59:05.750

+13*****92

Yeah, I just

00:59:06.550 --> 00:59:10.220

+13*****92

got the takeaway Christian will ask the collaborative for a minute.

00:59:10.880 --> 00:59:20.450

+13*****92

Uh we will have a scheduled meeting with Christopher at 20:00, 0.6. The February and then we'll talk to you again in talking to 6 months.

00:59:21.690 --> 00:59:22.050

+13*****92

Right.

00:59:23.840 --> 00:59:34.030

Bail, Kristin - FS

Yep, I'm writing writing my To Do List. So I don't forget. I'll put my my calendar reminders and that's that's how I keep things straight so yeah, and and.

00:59:32.160 --> 00:59:32.490

+13*****92

Then.

00:59:33.140 --> 00:59:41.070

+13*****92

And I'm sending you a link to the to the Journal so you can read our our last fall what we said in our Journal about the twist project.

00:59:42.420 --> 00:59:47.240

David L. Fluharty

Read read read read about other things we're not picking on you.

00:59:42.570 --> 00:59:43.990

Bail, Kristin - FS

Yeah, no thank thank you for that.

00:59:49.220 --> 00:59:50.270

+13*****92

Yeah, a lot of other stuff.

00:59:51.570 --> 01:00:17.060

Bail, Kristin - FS

I know I I as I said, I I do appreciate you know when something is not not working being able to have a dialogue and understand you know your interests and and certainly you know, we are. You know, we serve the public and that is in its broadest sense, so you know, I I'm I. I welcome being able to you know share information and look forward to our our public meeting.

01:00:17.100 --> 01:00:35.080

Bail, Kristin - FS

Uh and if and if you're not seeing something you know in a in a few days. Let me know. I'll try to. I'll go onto the website too. And I'll ask my public affairs staff officer. You know what the what the timeline is but I know I'm keeping her busy on a few other things, so.

01:00:36.020 --> 01:00:44.060

Bail, Kristin - FS

So I know it's going to kind of like a duck you know it might look. You know, I think she's paddling really fast underneath the water right now on a on a several items.

01:00:45.910 --> 01:00:49.920

+13*****92

Yeah, I'm looking on the project website right now and I don't see anything other than what was already there.

01:00:47.360 --> 01:00:47.710

+15*****82

Yeah.

01:00:50.660 --> 01:00:53.130

Bail, Kristin - FS

OK Alright I'll I'll monitor that.

01:00:51.970 --> 01:00:52.630

+13*****92

If it is he?

01:00:54.010 --> 01:00:57.860

+13*****92

If you can find the link to the meeting and just send that out that would be very cool.

01:01:00.030 --> 01:01:02.420

+13*****92

Said about Easter egg hunt OK.

01:01:02.300 --> 01:01:17.290

Bail, Kristin - FS

Well, I'll check with her when as to when when to expect that because it it may be that it's intentionally you know sent out closer to the meeting, so it doesn't get buried in someones email from you know a week and a half away or a week away.

01:01:20.030 --> 01:01:20.540

+15*****82

Yeah.

01:01:20.600 --> 01:01:21.140

+13*****92

That happened.

01:01:23.330 --> 01:01:25.690

+13*****92

Alright well, thanks again appreciate the time.

01:01:26.340 --> 01:01:31.370

Bail, Kristin - FS

Thank you and I'm going to end the recording.

01:01:26.840 --> 01:01:27.250

+15*****82

Yes.

01:01:32.860 --> 01:01:34.170

+13*****92

Yeah, me, too, right now.

01:01:34.900 --> 01:01:35.430

+13*****92

Ending.

01:01:35.210 --> 01:01:38.840

Bail, Kristin - FS

And yeah, and I I'll have I'll have to see.

01:01:39.910 --> 01:01:42.240

Bail, Kristin - FS

How how I make it available?

01:01:43.070 --> 01:01:43.680

Bail, Kristin - FS

So.

01:01:44.580 --> 01:01:45.670

+13*****92

Yeah, that'll be really I'm.

01:01:44.600 --> 01:01:46.070

+15*****82

So you so you're good.

01:01:46.930 --> 01:01:52.930

+13*****92

I got bumped off the teams call and call back in by phone. So I missed a couple of these 23 minutes there.

01:01:47.290 --> 01:01:48.180

+15*****82

Yeah, yeah for sure.