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August 2, 2020

Washington Forest Practice Board
P.O. Box 47012
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Re: SFLO Template proposal does not meet the
criteria of a template "in whole"

Chairman Bernath and Members of the Board:

The purpose of this testimony is to add context to this consensus recommendation. The July 23, 2020 letter from the TFW Policy Co-chairs was very thorough and at some level perhaps more information than you are able/desire to digest. At a minimum it shows a picture of all the torturous "process" turns this 2015 proposal has undergone over the last 5 ½ years. We are looking forward to entering into a more structured/mediated Dispute Resolution process which I'll touch on during the General Public Comment agenda item.

The first page paragraph of the 7/23/20 letter starting "The recommendation is driven by" is the best professional judgement of the Co-chairs, but for the record is not a group consensus about why Policy made the consensus recommendation quoted above that paragraph. I mean no disrespect to the Co-chairs, nor is it fruitful/helpful diving into the nuances of what drove Policy to the consensus recommendation before you. Suffice it to say there had already been 2-3 non-consensus votes in response to the Boards question about whether our " . . . alternate plan template proposal meets the criteria . . . ". Attached was our year earlier response to this "eligibility" impasse that never received much/any discussion in Policy or the Workgroups. I've attached this "eligibility" response not for you to weigh in, merely to show the question was contentious, likely unresolvable, and subject to all the vagaries in WAC language. Bottom line: Policy was at an impasse leaving us an unpopular choice of taking this question through the 6 month mediated Dispute Resolution process & perhaps to the Board for resolution, OR find a nuanced way to answer the Boards question.

Prior to reaching consensus on the motion before you, WFFA had indicated we were open to prescriptions being in a format other than the proposed "template" – we preferred a "rule" but proposed a "template" because it included safeguards to other stakeholders we hoped would allow more perceived risk – we also were in the process of considering a potential prescription vehicle called "experimental". Additionally it was (painfully ☺) obvious that our entire/"whole" proposal wasn't going to fly in Policy, and similarly unlikely at the Forest Practice Board. These changed circumstances rendered the Boards 2015 question moot by last December, or certainly not worth more arduous processes for Policy &/or the Board so we resolved the question by consensus that gave everyone something with the phrase "in whole".

We urge the Board to accept this recommendation for what it is, nothing more, so we can move forward on the more recent consensus to move a portion of our proposal into the Dispute Resolution process with an eye towards consensus preferably, or non-consensus recommendations finally back to you by Feb or May 2021.

Respectfully,

Ken Miller
SFLO Co-representative at Policy



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Small Forest Landowner Westside Template Proposal Policy track eligibility pursuant to the requirements of WAC 222-12-0403 and the Legislative intent of RCW 76.09.368

Submitted August 18, 2018 by Ken Miller and Steve Barnowe-Meyer, Small Forest Landowner Co-representatives, TFW Policy

The Small Forest Land Owner (SFLO) Template Proposal (hereafter SFLO Template) is intended to meet the 1999 Legislative intent of RCW 76.09.368 which in part reads:

“The legislature intends that small forest landowners have access to alternate plan processes or alternate harvest restrictions, or both if necessary, that meet the public resource protection standard set forth in RCW 76.09.370(3), but which also lowers the overall cost of regulation to small forest landowners including, but not limited to, timber value forgone, layout costs, and operating costs.”

In support of the Legislative intent we provide herein multiple eligibility assessments of our SFLO Template relative to the pertinent language of WAC 222-12-0403 (3):

“Template prescriptions designed to meet resource objectives to address common situations that are repeatedly addressed in alternate plans or strategies to simplify the development of future plans or strategies, including low impact situations and site-specific physical features;”

Although the SFLO Template was initiated for the Science track, we posit that it also meets the Policy track requirements based on DNR data on Alternate Plans (AP) which were used as received – i.e. without correcting apparent errors on a few of the data points:

1. Data supplied by DNR for previously approved SFLO alternate plans indicate:
 - a) There have been well over 200 approved AP with a wide range of RMZ management prescriptions, activity in close proximity to BFW, and often along relatively long stream reaches with potential impacts on RMZ functions.
 - b) Summarizing these AP Forest Practices Applications (FPA) generates the following metrics:
 - i. “No Cut Buffers” averaged 44.7’ with a range of 0’ to 146’ (likely error?) on 221 data points - somewhat comparable to the likely average SFLO Template metrics.
 - ii. Length of RMZ affected (one or both sides) averaged 899.5’ with a range of 50’ (likely error?) to 6,000’ on 218 data points.
 - c) Regardless of the specific reason for these individual alternate plans, the RMZ functions associated with the prescriptions met the Alternate Plan Approval Standard in either the short or long term and were approved by DNR. In most, if not all, cases they included the concurrence of Inter-Disciplinary (ID) team members.

d) Data collected for this assessment cover all SFLO western Washington AP that were not templates. Some AP had missing data, but all AP with data for BFW, no cut buffers, and length of RMZ were included in our summary statistics below. There are additional data in the comments that can be used for more exploratory analysis. It appears there are some errors in the data (e.g. conflicting information in comments vs data columns) but our review suggests that they are not likely significant to averages due to compensating errors. Parsing these data by BFW (TYPE F and Np combined) show that for:

i. **Less than 5' BFW:**

- 1) "No Cut Buffers" averaged 43.6' with a range of 0' to 113' with 71 data points.
- 2) Length of RMZ affected (one or both sides) averaged 718' with a range of 85' to 2640' with 67 data points.

ii. **5' to 15' BFW:**

- 1) "No Cut Buffers" averaged 41.8' with a range of 0' to 146' (likely an error as the activity column indicates this data point is actually 30'). We found 92 data points.
- 2) Length of RMZ affected (one or both sides) averaged 946' with a range of 50' (error??) to 3,400'. We found 93 data points.

iii. **Greater than 15' BFW:**

- 1) "No Cut Buffers" averaged 50.7' with a range of 0' to 145' (likely an error as the activity column indicates this data point is actually 25'). We found 54 data points.
- 2) Length of RMZ affected (one or both sides) averaged 1,033' with a range of 200' to 6,000'. We found 58 data points.

iv. **Np Streams** (12 data points pulled out of above data)

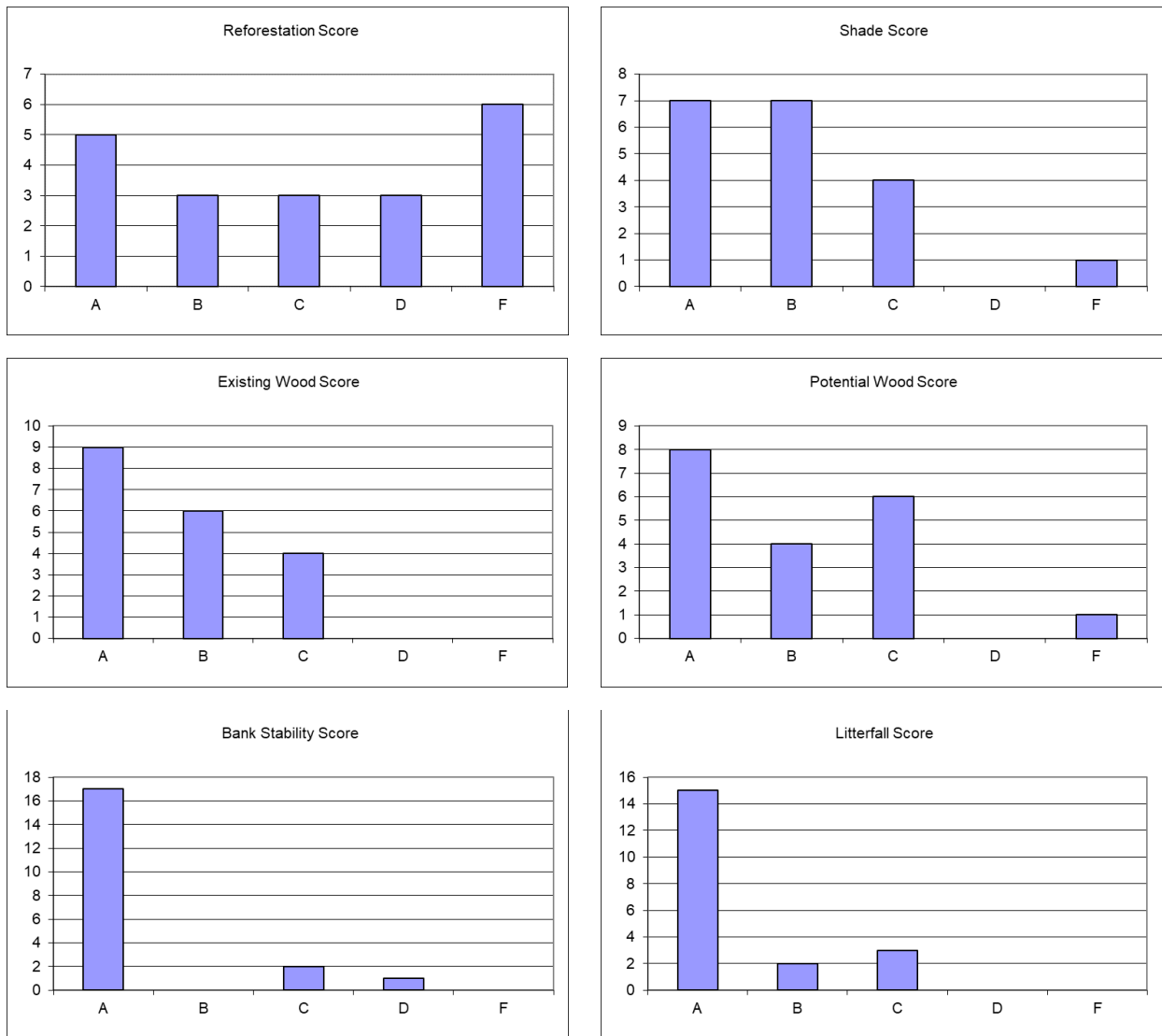
- 1) "No Cut Buffers" averaged 28.3'.
- 2) Length of Stream Reach affected (one or both sides) averaged 605'.
- 3) Weighted "No Cut Buffers" averaged 25.5'

2. The primary purpose/goal of the Forest and Fish regulations and Alternate Plan Guidance is to maintain RMZ functions consistent with the four goals of Forest and Fish. The only known review of prior approved SFLO AP was Galleher (2008) (submitted with this supporting document). This **after harvest** review was conducted by an ID Team that provided very detailed metrics (again similar in many ways to the SFLO Template) along with a **consensus** report card on how well the Functions were being protected after harvest:

- a) The average Bank Full Width "no cut" buffer on 21 stream segments was 50', which is similar to all SFLO APs of 44.7' (above).

- b) Average Stream Reach (including several 2-sided harvests) approved was 1,128', although the actual harvested average reach was 947' which is similar to the average for all 218 stream segments of 899' when looking at all SFLO AP.
- c) Most importantly, are the ID Team consensus score summaries regarding how well the Functions were actually protected as required in Board Manual Guidance for Alternate Plans (Figure 1: Panels 1-6)

Figure 1: Hardwood Conversion Field Assessment Qualitative Score Frequencies (from Galleher 2008)



This field study did uncover some significant reforestation follow-up issues (Figure 1, Panel 1 (upper left)) that can/will be addressed in the SFLO Template. Note the two functions most

related to buffer width requirements (shade & LWD [existing and potential]) scored very well confirming “relatively low impact” as required in RCW and WAC for SFLOs.

3. The WAC language for template eligibility on the Policy track is not limited to why or what was in prior approved Alternate Plans. This WAC also includes “or strategies to simplify the development of future plans or strategies, including low impact situations and site-specific physical features;”
 - a) Eliminating the requirement for Site Class and multiple zones within the various Site Classes is intended to “simplify the development of future plans or strategies” as intended by RCW 76.09.368 which in part says: “. . .(3), *but which also lowers the overall cost of regulation to small forest landowners including, but not limited to, timber value forgone, layout costs, and operating costs.*”
 - b) SFLOs are presumed to have lower impacts due to SFLOs generally “smaller harvests” and SFLOs relatively low percentage ownership of Type F stream reaches (18% according to the Washington State Forestland Database). From a Policy track standpoint the Legislative intent of RCW 76.09.368 (cited above) reaffirmed their clearly intended deference to SFLOs in RCW 76.13.100 (2) partial: *The legislature further finds that small forest landowners should have the option of alternate management plans or alternate harvest restrictions on smaller harvest units that may have a relatively low impact on aquatic resources.* Additionally:
 - i) In the absence of actual “criteria” for “low impact” determinations as required in WAC 222-12-0403 (5) we are left to use our collective best professional judgement regarding the legislative intent of “relatively low impact” – a balance that WFFA feels they have achieved with a template proposal utilizing a blend of science and policy.
 - ii) It’s also intuitive that the Legislature believed the harvest restrictions in the Exempt 20-Acre (WAC 222-30-023) were “relatively low impact” otherwise they wouldn’t have exempted them from the full Forest and Fish requirements. The SFLO Template was not modeled after the Exempt 20-Acre rules but coincidentally has prescriptions that are similar in many ways. It is also pertinent to the low impact criteria that:
 - a. DNR provided the Federal Services a 5/13/2004 supportive report: “Exempt 20-Acre Parcel Riparian Management Zones: An assessment of Riparian Function” that was to be “incorporated into an Environmental Impact Statement currently being developed to support the Forests and Fish Habitat Conservation Plan” that was ultimately adopted.
 - b. The Federal Services acknowledged/accepted the Exempt 20-Acre prescriptions conditionally with the caveat that these harvests may not necessarily meet the Clean Water Act, and required DNR to monitor the use of this prescription by stream names to help monitor potential impacts.
 - c) The WFFA Template Proposal also meets this WAC eligibility requirement because it has very “site-specific physical features” tying all prescriptions to three different categories of Bank Full Width measurements, consistent with the RMZ function science as presented in our proposal [and supported by common sense].

- d) The Adaptive Management Program and the Forest Practice Board approval of the only other two templates confirm, and set precedent, that the WAC language for template eligibility was not intended to restrict its use to only when there is a specific pattern of prior approved SFLO Alternate Plans. Neither of these previously approved template options had a history of substantive similar prior approved SFLO Alternate Plans.

The eligibility standards of WAC 222-12-0403 (3) are, we believe, intended to be a holistic interpretation about eligibility, grounded in science and confirmed by practice. As such, eligibility is a separate question than whether or not all the actual template metrics meet all the sometimes conflicting RCWs & WACs which require a balance between competing requirements of science and policy.

Our proposal meets the Legislative intent, and the template eligibility test in a variety of ways: prior alternate plans; simplification; site-specific physical features; and “relatively low impact” (Policy & Science tracks). Early discussions by TFW Policy’s Template Sub-Committee confirmed that at least some of the metrics in the WFFA Proposal met this WAC eligibility requirement, therefore the administrative screening hurdle has been met. The remaining metrics will be informed by the science reviews and further TFW Policy discussions. After nearly 4 years languishing in TFW Policy it is time to sit down and work collaboratively on each other’s needs in search of consensus as intended by our legislature, including multiple regulatory deferences to SFLOs due to a finding of disproportionate impacts of Forest and Fish on SFLOs in the SBEIS submitted January 21, 2001.

While WFFA certainly has a responsibility to work collaboratively to address other stakeholder concerns, denying eligibility for this SFLO Template clearly is not supported by the Legislative intent, WAC language, or past practices.

Appendix A

WAC 222-12-0403

***Cooperative development of guidelines for alternate plans.**

The department will develop the section for alternate plans (WAC **222-12-090(21)**) to submit to the board in cooperation with representatives of the small forest landowner office and advisory committee, the departments of ecology and fish and wildlife, United States Fish and Wildlife Service, National Marine Fisheries Service, and affected Indian tribes.

The manual should include:

- (1) As required by RCW **76.13.110(3)**, the small forest landowner office recommendations for alternate plans or alternate harvest restrictions that meet riparian functions while generally requiring less costly regulatory prescriptions;
- (2) The effectiveness of strategies for meeting resource objectives and protecting public resources;

- (3) Template prescriptions designed to meet resource objectives to address common situations that are repeatedly addressed in alternate plans or strategies to simplify the development of future plans or strategies, including low impact situations and site-specific physical features;
- (4) Appropriate recognition or credit for improving the condition of public resources; and
- (5) Criteria to assist the department in determining whether a small forest landowner alternate plan qualifies as a low impact alternate plan.

[Statutory Authority: Chapter 34.05 RCW, RCW 76.09.040, [76.09.]050, [76.09.]370, 76.13.120(9). WSR 01-12-042, § 222-12-0403, filed 5/30/01, effective 7/1/01.]



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August 10, 2020

Washington Forest Practices Board
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Re: Water Typing and Northern Spotted Owl

Dear Forest Practices Board Members:

Washington Forest Protection Association (WFPA) is a forestry trade association representing large and small forest landowners and managers of nearly four million acres of productive working forests, including timberland located in the coastal and inland regions of the state. Our members support rural and urban communities through the sustainable growth and harvest of timber and other forest products for U. S. and international markets. For more information about WFPA, please visit our website at www.wfpa.org. WFPA respectfully submits the following comments on the water typing and Northern Spotted Owl agenda items.

Water Typing

The WFPA and our member companies have been active in collaborative efforts for more than 20 years to establish effective water typing rules and guidance consistent with best available science and the goals of Forests & Fish Report (FFR). While there are occasional glimpses of progress on some components of the current water typing rule making process, a durable solution all stakeholders can support still appears out of reach. WFPA agrees the rules and guidance should better reflect the negotiated elements of FFR and our evolving understanding of fish habitat utilization; however, it is essential a disciplined process is followed consistent with rule-making requirements in RCWs 76.09.370 and 34.05.328.

Recall there has been no science produced within the Adaptive Management Program (AMP) and rule-making process which evaluates performance of the current rule. Therefore, the current rule-making effort is proceeding in the absence of supporting science as required in law and rule. This absence of supporting science has resulted in a polarized TFW community, with a wide range of constantly evolving positions being taken due to lack of clarity on the goals, objectives, and performance expectations of the water typing system. This is reflected in the widely varying alternatives being considered by the Forest Practices Board (FPB), and lack of a consistent baseline by which to compare alternatives and assess the costs/benefits of any proposed rule.

The absence of science in this rule-making effort is largely the result of a long-standing need for direction and clarification related to the determination and evaluation of fish habitat in the field. There is no consensus among policy and technical participants what fish habitat means. This lack of clarity

on policy objectives and specific metrics for evaluation of performance of alternatives continues to present roadblocks to progress.

The August 6, 2020 memo to the Forest Practices Board (FPB) from staff regarding the work of the FPB's water typing committee is the latest reflection of this dynamic. While the FPB's committee passed a motion regarding use of "screened eastern Washington data" in a revised PHB spatial analysis, WFPA and one FPB committee member is not in agreement with this approach. WFPA made several attempts to explain how the entire datasets could be used in a revised spatial analysis. We also attempted to explain how the screening criteria contain untested assumptions, introduces unknown bias, and disregards results from the eastern Washington water typing research produced by the AMP. Unfortunately, there was little to no interest in further exploring this; the rationale provided in the memo is confusing and raises additional questions. For example, using a screening protocol consistent with proposed rule components and alternatives to evaluate proposed rule alternatives is circular logic inconsistent with rule making procedures of the Administrative Procedures Act in RCW 34.05. Further, excluding data points based on assumptions in conflict with AMP produced science is inconsistent with aquatic resource rule making requirements of the Forest Practices Act in RCW 76.09.

In addition to promoting a technically questionable approach to the revised PHB spatial analysis, the memo does not clearly convey the additional work needed prior to executing the revised spatial analysis, and how that may affect the number of points available. The initial data screening process eliminated more than half the data points available. Once the spatial data for each point is reacquired from the contractor who collected the data, it must be cross walked with availability of high-resolution LiDAR. This step will undoubtedly further reduce the number of data points available for analysis. The tribal data mentioned in the memo has not been evaluated, this must also occur before including in the final dataset. Consequently, the number of points available for analysis and their geographic distribution is not yet known. Finally, synthetic stream layers must be constructed for each point before a revised spatial analysis can be performed. This is a fair amount of work, some of which must be contracted, and according to FPB staff there is no budget to do so. An improvement in the budget situation is likely not on the immediate horizon.

The intent of pointing this out is to remind the FPB of the memo you received from the water typing committee dated November 5, 2019; specifically, recommendation number 1 in that memo:

- 1. Clarifying the goals and targets for the water typing system rule. The target for the rule implementation needs to be consistent with fish habitat as it is defined in rule and the targets for implementation need to also align with the intent of the Forest Practices Habitat Conservation Plan, and be provided to TFW Policy and CMER.*

Work on this recommendation has been notably absent since the FPB received the November 2019 memo. Ignoring this recommendation while continuing to push other water typing work forward is a mistake and will not result in a durable outcome, we have demonstrated this fact in previous water typing rule making efforts. Given the status of the current work and the forthcoming budget challenges, we have a prime opportunity to work towards resolving these long-standing policy issues and better aligning this rule making process with the FPB's expectations stipulated in the August 2015 meeting [fpb_minutes_20150811.pdf](#). WFPA stands ready to work with the FPB and all caucuses in that effort. Moving work on this topic into the next phase of the CPeace process has been advocated by some. However, given the uncertainty around if/when that will occur and future budget challenges, we recommend trying to solve this problem ourselves.

Northern Spotted Owl

Since last November, the FPB has passed two motions related to Northern Spotted Owl (NSO) and the North Blewett SOSEA:

11/13/19 Motion

Paula Swedeen moved the Forest Practices Board deny the petition for rule making related to the Northern Spotted Owl due to lack of authority for a moratorium to harvest. She further requested WDFW work with U.S. Forest Service, DNR and the associated forest landowners to provide additional information and recommendations on alternative solutions at the February 2020 meeting.

5/13/20 Motion

Jeff Davis moved the Forest Practices Board deny the petition for rule making related to the northern spotted owl. Davis further moved the Board encourage DNR and WDFW to continue to work with landowners to develop conservation options for the area of concern and report progress to the Board at the August 2020 meeting. He further moved that DNR and WDFW meet to develop a path forward for reviewing the success in achieving the goals of the North Blewett Pass SOSEA over the last 25 years and report back to the Board on process, timing and resources required.

He further moved that DNR re-convene the northern spotted owl Implementation Team to discuss incentive programs to improve conditions in areas identified by NSO technical team's report to the Board.

Note that both motions direct coordination with landowners to “...provide additional information and recommendations on alternative solutions...” and “...develop conservation options for the area of concern and report progress to the Board.” Very little landowner coordination has occurred regarding the NSO agenda topics for this meeting, thus affected landowners are not privy to the details of what will be discussed. As indicated in previous WFPA testimony at the May 2020 FPB meeting, landowners have worked very well with the agencies on the review of Forest Practices Applications (FPAs) as well as identifying conservation strategies. Landowners must evaluate the status of SOSEA habitat to effectively plan activities and manage their ownership to meet the requirements of the Forest Practices Rules and the Endangered Species Act (ESA). Consequently, landowners typically have more complete/current inventory information than the agencies and may be able to provide information or options which may prove more efficient/effective in this evaluation. This does not appear to be reflected in the current proposal.

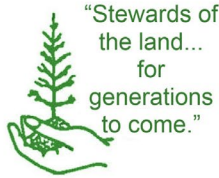
While COVID-19 work restrictions can create barriers, we know the agencies can do better at coordinating with landowners, and request this be improved going forward. We are also waiting to hear from DNR regarding reconvening the NSO Implementation Team or a similar stakeholder group.

Thank you for the opportunity to comment. I can be reached at dcramer@wfpa.org or (360) 280-5425 should you have any questions.

Sincerely,

Darin D. Cramer

Sr. Director of Forest & Environmental Policy



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Testimony by Elaine Oneil to the Washington State Forest Practices Board on August 12, 2020 on TFW Policy Recommendation on the Small Forest Landowner Western Washington Template Proposal Initiation

Chairman Bernath and members of the Forest Practices Board, I am Elaine Oneil, Executive Director of the Washington Farm Forestry Association. I would like to put a finer point on the TFW Policy recommendation report put forth by the Policy Co-Chairs regarding the WFFA Westside Riparian Template. Recall my testimony of November 2019 where I talked about the issue of the so called "process foul" of not moving the completed science through CMER per board manual procedures. There still seems to be disagreement and perhaps a bit of re-writing of history in this summary document.

We agree that **"Concurrently, though, the associated science delivered in support of the SFL AP template proposal (also referred to as the Martin Report) should have been appropriately directed to CMER for review as completed outside science and the riparian literature synthesis should have been directed to CMER for integration into the workplan – these two actions did not occur."** As noted last November that didn't happen. The question is why. The summary document asserts that **"In that assessment it became clear that both the Board and Policy directed the AMPA on multiple occasions to facilitate, through CMER, the completion of a Riparian Literature Synthesis. That synthesis was purported, through multiple updates, to be the focus of the Cramer Fish Sciences review (the so-called Teply report) when, in fact, a different review was occurring that simply focused on an assessment of the report provided by the SFL caucus and, per the direction of the then-AMPA, did not provide the normal practices of consensus endorsement and review by caucuses."**

Where history might be in question regarding this dispute is that I heard directly from the former AMPA that CMER either couldn't or wouldn't accept responsibility for the science track and in response, TFW Policy oversaw the science track, with review by many CMER members and other caucus members. This is noted in the timeline in the TFW Policy document for the year 2017, specifically **"Workgroup reached consensus on deliverables for contractor review of the submitted PI science justification supporting the prescriptions in the proposed SFL AP template."** Then, according to the timeline, in 2018 the **"workgroup reached consensus on preliminary questions for ISPR review of how well the contractor during the science review met the deliverables"**.

The science is the very basis of this proposal and as you can see TFW Policy are largely through that process based on this timeline. The dispute resolution process we are now in includes a component to complete the science track by answering the 6 questions that complete the CMER process. We anticipate that now that all caucuses are laying out their specific issues with the science, we can use the science to inform the process going forward and hopefully come to reasonable outcomes at the completion of the Dispute Resolution Process.



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August 12, 2020

Washington Forest Practice Board
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Re: SFLO Proposal Initiation Next Steps

Chairman Bernath and Members of the Board:

As indicated, portions of our proposal have now moved into the formal Dispute Resolution process. Marc Engle and Terra Rentz have done a good job of setting this up for success, if that at all possible in Policy on this tough issue. We expect to do our part to show that D.R. can work for Policy – it shouldn't be feared. This means it's now unlikely you will receive any additional recommendations until Feb 2021 at the earliest, and more likely the May 2021 Board meeting. Like you I dread dragging this out into year 7 but I do still believe in the process so have continually been agreeable to every other delay that seemed to have potential for resolution w/o the DR process.

I confess that over a year ago I was positive we would have recommendations for you by no later than today's meeting. So positive, that I had started planning a little demonstration of support for the Rotunda and hallways today recognizing the probability that decisions are likely more Political Science than we try to believe. I intended to allow our SFLOs to actually have some fun with this horrible process with some, hopefully raucous chants about our, and we would hope, your core beliefs. What you would have heard would have been something like this:

A cheerleader would ask: **WHAT MATTERS?** To which the crowd would respond: **SALMON MATTER!** (likely main reason SFLOs came to the 1999 F & F table); with the cheerleader repeating the question between shouted responses: **CRITTERS MATTER! ENVIRONMENT MATTERS! ECONOMICS MATTER!;** **WHAT ELSE MATTERS? SCIENCE MATTERS!** (not just Political Science) **LAWS MATTER! RESPECT MATTERS! APPRECIATION MATTERS! SIMPLICITY MATTERS! SIZE MATTERS!** (Our small size); **WHO MATTERS?: SCIENTISTS MATTER! LEGISLATORS MATTER! TRIBES MATTER! WE MATTER!**

Those are our core beliefs - we expect everyone in these processes also believe these things/people matter. Hopefully we can show you they actually matter by bringing you consensus recommendations.

I'd also like to piggyback on Board member Davis's references to the need for C Peace help by repeating our recommendation that the Board consider asking for Francine's help with the mediated portion of this Dispute Resolution process – because it's important to keeping more forestland forested, but also because she has the skills to use this Dispute Resolution as an example to show us all better ways to get things done as envisioned in Forests and Fish – help us get a fresh start. Thanks for your continued support of Washington's small family forest owners in search of real "win-win"!

Respectfully,

Ken Miller - SFLO Co-representative at TFW Policy