



2020 AFRC Annual Meeting: Celebrating 20 Years of Success

Registration is now open for the 2020 AFRC Annual Meeting, April 14-16 at beautiful Skamania Lodge in Stevenson, WA. This year we are celebrating our 20th year, our accomplishments, and the men and women who have led our association and contributed to our success! [Click here to register on-line, review the agenda and book your room.](#)

The AFRC Annual Meeting brings together leaders in industry and government for focused discussions and interactive panels on public lands management. We are pleased to announce that Chief of the U.S. Forest Service Vicki Christiansen will provide a keynote address to share her vision for America's public lands. Other headliners include Dr. Brooks Mendell of Forisk, who will provide an energizing and educational presentation on the role and potential of public timber in the West, and what it means for the forest industry market. Washington Commissioner of Public Lands Hilary Franz will share her vision for Washington's DNR trust lands including her legislative and policy priorities.

Once again, the Annual Meeting will kick off with the AFRC Golf Open, but with a twist. This year's open will be held at Elk Ridge Golf Course in Carson, featuring panoramic views and challenging 18 holes. Back at Skamania Lodge, you will hear engaging panel discussions on the potential of wood products as a climate solution; the power of cross-boundary partnerships to accelerate forest management; and the beneficial relationship between outdoors recreation and active forest management.

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The Annual Meeting includes all the popular staples, including Travis Joseph's State of the Association address and the Public Forests Managers' Breakouts with personnel from the U.S. Forest Service, Bureau of Land Management and Washington DNR. Scott Horngren from the Western Resources Legal Center will join our legal team for a special presentation on the tremendous power that federal courts have in forest management decision-making, and how AFRC and its partners have strategically invested time and resources in some of the most important natural resources legal conflicts in the region and country.

Attendees will also receive an update from leaders of the U.S. Lumber Coalition, an alliance of large and small softwood lumber producers from around the country focused on resolving the longstanding U.S.–Canada conflict over lumber trade practices. Last but not least, Federal Forest Resource

Coalition's Bill Imbergamo and our own Heath Heikkila will return to provide timely political updates. This year, the "Bill and Heath Show" will provide an overview of Congress, the White House and the 2020 Election.

Don't miss this opportunity to network with colleagues in the industry, learn about key issues and policy innovations affecting federal forest management, and meet with key federal land management executives and decision makers. [Click here to register and reserve your room](#) as soon as possible. Space is limited.

/Nick Smith

Washington, DC Update

Hearing on Wildfires. Two subcommittees of the House Energy and Commerce Committee held a [joint hearing](#) on January 28 entitled "Out of Control: The Impact of Wildfires on our Power Sector and The Environment." Witnesses at the hearing included Bill Johnson, CEO of PG&E Corporation; Dr. Anthony Davis, Interim Dean of the College of Forestry, Oregon State University; and David Markham, President and CEO of Central Electric Cooperative in Redmond, Oregon.

Like other recent Congressional hearings dealing with wildfires, the focus of most Democrats was on the need for comprehensive legislation to address climate change, while many Republicans focused on the need for better forest management to reduce the size and severity of wildfires on federal lands. The issue has become very real for many Californians as PG&E has instituted blackouts to reduce the risk of sparking more deadly and destructive fires like the 2018 Camp Fire that leveled the town of Paradise.

During the hearing Representative Greg Walden (R-OR), ranking Republican on the full Energy and Commerce Committee, told his colleagues "the evidence remains overwhelming that intense fire seasons are driven by the decades of poor management that has left our federal forests overstocked with trees." Walden's opening comments are available [online](#) and focused on the impacts of the poor forest health on federal lands and the urgent need for reforms to pave the way for more active forest management. Representative Cathy McMorris Rodgers (R-WA), another member of the committee, also [spoke](#) about the need for reforms to restore the health of our federal forests and highlighted the progress being made on the Colville National Forest.

House Democrats Release Climate-Focused Infrastructure Bill. On January 29, Democratic leaders of three House committees released a proposed \$760 billion infrastructure package under the headline of "Moving America and the Environment Forward: Funding our Roads, Transit, Rail, Aviation, Broadband, Wastewater and Drinking Water Infrastructure." The legislation would direct \$760 billion over the next five years at a myriad of infrastructure investments, including \$434 billion for highways and transit programs, according to an [outline](#) of the framework and a related [fact sheet](#).

Representative Peter DeFazio (D-OR), who chairs the House Transportation and Infrastructure Committee, is a key player in the effort. AFRC has been working with Chairman DeFazio and his staff to increase the funding available to address the massive road maintenance backlog facing the Forest Service. Current federal transportation programs provide little funding for road maintenance activities on federal lands. The Forest Service receives a fraction of the funding compared to the Park Service, which faces its own road maintenance backlog.

The legislative outline notes that funding levels for roads on federal lands would be increased under the proposal. We will review the proposal to determine if it would increase the Forest Service's share of that

funding. AFRC has been working on this effort with the Federal Forest Resource Coalition, which has developed a helpful [fact sheet](#) on the funding currently available for Forest Service roads. /Heath Heikkila

Washington State Department of Natural Resources Update

In early January, AFRC joined four Washington counties and a coalition of school and fire districts in filing a legal challenge to the Washington State Department of Natural Resources (DNR) Marbled Murrelet Long Term Conservation Strategy (LTCS) and the Sustainable Harvest Calculation (SHC) for state trust lands ([December 2019 newsletter](#)). Combined, the plans reduce annual harvest levels on DNR trust lands by 85 million board feet over the next several years, resulting in the annual loss of almost \$30 million in timber revenues to support public services and agency management costs.

DNR is now promoting a proposal to set aside an additional 38,000 acres through the Solutions Table. The [Solutions Table](#) was created by [House Bill 2285](#) in 2017. At the October 28 meeting, Commissioner Hilary Franz and DNR staff formally embraced a [proposal](#) from environmental groups to set aside an additional 38,000 acres of state trust lands for the Marbled Murrelet – above and beyond the final LTCS - that were contained within Alternative G. In January, DNR staff [produced a list](#) of planned timber sales that would be impacted by the proposal totaling about 132 million board feet of timber worth over \$44 million in revenue over the next three years.

Solutions Table members recently debated a potential [\\$7 million budget request](#) by DNR to the legislature, most of which would be spent to withdraw many of these upcoming timber sales. The group was unable to reach agreement as AFRC and other solutions table members expressed their opposition to the proposal since it would further harm timber volume, jobs, and rural economic activity – in conflict with the intent of House Bill 2285.

Rather than proposing to remove more DNR trust lands from sustainable timber harvests, industry and community representatives have urged DNR to focus on quantifying the impacts of the LTCS – revenue to beneficiaries, timber harvest, and jobs, – and make recommendations to the legislature for possible approaches to mitigate these impacts. It is unclear if DNR will submit this proposal to the legislature or seek to administratively withdraw or modify these sales. Stay tuned for additional updates. /Heath Heikkila

Industry Carbon Bill Introduced in Washington Legislature

AFRC has partnered with the Washington Forest Protection Association (WFPA) and others to help introduce bipartisan legislation ([HB 2528/SB 6355](#)) recognizing Washington’s forestry sector – working private forests, loggers, sawmills, and other wood products manufacturers – as a net sequesterer of carbon. The legislation is a proactive effort to get out in front of the carbon and climate change narrative. It is also supported by a study from the University of Washington finding that in 2015, between the carbon stored in wood products and net growth on private forestlands, the state’s forestry sector offset about 12% of the state’s annual carbon emissions that year.

The legislation seeks to ensure state policies recognize the role the entire industry plays in achieving these carbon benefits, rather than promoting policies that might benefit one segment of the industry while harming other segments and ultimately threatening the industry’s economic viability and carbon sequestration benefits. In addition to establishing this important policy in state law, the legislation would direct the Department of Commerce to promote Washington’s wood products and establish a grant account for afforestation and reforestation activities, which could be funded through a future carbon market.

On January 28, the legislation received committee hearings in both the House and Senate where it received strong support from across the forest products sector. DNR and environmental groups expressed support for the intent of the legislation, but signaled that they had concerns with certain aspects of the bill. We are waiting to better understand their specific concerns. Lobbyists representing manufacturers of other building materials such as steel expressed concerns with a state program promoting the use of wood in buildings.

AFRC's testimony before the committee highlighted the importance of treating the industry as a mutually-dependent sector – with each part of the sector relying on each other to sequester carbon in working forests and wood products. We also highlighted how federal forests across many Western states are at risk of becoming net carbon emitters if nothing is done to restore their resiliency to catastrophic wildfires, insect and disease infestations through active forest management.

A video of the House hearing is available at [TVW](#). Coverage of the bill starts at 35:40, an industry panel begins at 40:50, and AFRC's testimony begins at 1:10:50. Video of the Senate hearing is also available on [TVW](#). Coverage of the bill starts at 1:15:48. A [one-pager](#) and [talking points](#) on the legislation are available on AFRC's website. /Heath Heikkila

Court to Weigh Remedial Measures in O&C Litigation; Monument Heads to D.C. Circuit

In late 2019, the U.S. District Court in Washington D.C. issued favorable rulings in two major cases enforcing the [O&C Act](#). ([October](#) and [November 2019](#) newsletters). The *Swanson III* case seeks to require BLM to offer its declared allowable sale quantity (ASQ) each year, which is one of the mandates of the O&C Act. The other case involves challenges led by AFRC and the Association of O&C Counties to the 2016 Resource Management Plans (RMPs) for western Oregon BLM lands.

Judge Leon ruled in September, “Every year, BLM *is required* to sell or offer for sale an amount of timber that is not less than the declared annual sustained yield capacity of the timberland subject to the O&C Act.” He also found that “the record establishes that BLM has repeatedly failed to comply with the O&C Act’s timber sale mandate.” In November, he ruled that the 2016 RMPs violated the O&C Act’s mandate that all O&C timberlands “shall be managed” for “permanent forest production” under sustained-yield principles. This is because the RMPs set aside 80% of the land base into “reserves” where harvest is severely curtailed.

The court instructed the parties to file proposals in these cases as to the appropriate remedy, which were submitted on January 27. The plaintiffs’ proposal, incorporating both *Swanson III* and the RMP challenges, involves preparation of an amended or revised plan, an ongoing requirement to sell the ASQ, and interim direction on volume while the plan is being reviewed. The government’s proposals ask in large part for the Court to return BLM to an open-ended administrative process while keeping the existing plans in place. Response briefs will be filed in late February and a final order could be issued any time after that.

In the November ruling, Judge Leon also invalidated President Obama’s expansion of the Cascade-Siskiyou National Monument that encompassed about 40,000 acres of O&C lands. Both the government and intervening environmental groups have appealed the ruling to the U.S. Court of Appeals for the District of Columbia Circuit, also called the “D.C. Circuit.” Resolution of the appeal is likely to take at least 12-15 months. /Lawson Fite

AFRC Appeals Griffin Half Moon Protest Denial to IBLA

Environmental groups commonly appeal protest denials to the Interior Board of Land Appeals to delay the award of a timber sale and halt implementation while their appeal is pending. In rare circumstances, AFRC will appeal protest denials, often to compel BLM to comply with their Resource Management Plan (RMP).

On August 30, 2018, AFRC filed a protest of the Griffin Half Moon Timber Sale Decision Record with the Medford BLM District. The sale would treat 933 acres and generate approximately 9 million board feet. AFRC raised one primary argument: that BLM failed to comply with its 2016 SWO ROD/RMP because it selected an alternative that didn't adhere to the management direction for the LITA land use allocation, which requires that in regeneration harvest units, BLM retain 15% to 30% of the pre-harvest stand basal area in live trees.

Instead, BLM selected an alternative proposing high retention regeneration harvest on 400 acres, with retention of 30% to 40% of pre-harvest stand basal area in live trees, and white fir regeneration harvest that would retain 60% to 80% of basal area on average. AFRC member Murphy Company was identified as the apparent high bidder for the timber sale. Had BLM selected an appropriate alternative, the sale would have retained less trees in the regeneration harvest units and generated more timber for AFRC's member.

BLM denied AFRC's protest on October 23, 2019, determining it had followed the management direction in the applicable RMP and that in some cases "regeneration harvest at 15% to 30% re-harvest stand basal area would likely preclude BLM's ability to successfully reforest at 130 trees per acre," a different management direction under the SWO ROD/RMP, "because of documented reforestation difficulties." AFRC appealed the denial on December 20, 2019.

On January 20, AFRC filed our Statement of Reasons (opening brief) raising two arguments: First, that BLM failed to justify departing from the binding LITA management direction because it hadn't shown that it couldn't comply with both sets of directions. Second, that BLM erred in assuming that if there is a conflict between the two management directions, the reforestation management direction somehow takes priority. There is no support in the 2016 SWO ROD/RMP for such an interpretation.

In failing to follow its management direction, AFRC remains concerned BLM will not conduct treatments in a manner that achieves its declared ASQ. Treatments proposed in the Griffin Half Moon Project do not conform with the direction for regeneration harvest, and if duplicated, would mean that the agency is not managing O&C lands on a sustained-yield basis. Due to the importance of this issue to future management decisions, as well as the implications to our members, AFRC is committed to pursuing this issue at the highest levels. /Sara Ghafouri

Once Liberal Ninth Circuit Bench Is Leaning More Conservative

The Ninth Circuit has the largest jurisdiction of all the federal appellate courts. Spanning nine states and two Pacific Island territories, it covers 1.4 million square miles and encompasses 60 million people. For that reason, the Ninth Circuit yields significant influence with 10,502 new cases filed in 2018.

Once known as a liberal circuit, the Ninth Circuit is leaning more conservative given President Trump's recent appointments. Of the authorized 29 judgeships on the Ninth Circuit, Trump has appointed 10 active judges, narrowing the margin of Democratic appointees from an 11-seat majority to merely a three-

seat majority. There are now 16 Democratic-appointee judges and 13 Republican-appointee judges. Most recently, Trump has appointed the following three judges to the Ninth Circuit: [Lawrence VanDyke](#) of Nevada, [Patrick Bumatay](#) of California, and [Danielle J. Hunsaker](#) of Oregon. These appointments mean that Trump's appointees now count for one-third of the judges that sit on Ninth Circuit. /Sara Ghafouri

CEQ Proposes Comprehensive Changes to NEPA Regulations

On January 9, the Council on Environmental Quality (CEQ) issued a [Notice of Proposed Rulemaking](#) (NPRM), proposing a major overhaul to National Environmental Policy Act (NEPA) regulations that were originally issued in 1978. This proposed rulemaking is the first significant revision to NEPA regulations in over four decades. The NPRM explains that the “lengthy, costly, and complex” NEPA process has slowed or prevented the development of certain new infrastructure. The proposed rulemaking is aimed at modernizing NEPA regulations and facilitating more efficient NEPA reviews. However, these proposed changes carry a dramatic shift in NEPA review procedures. Congressional Democrats have already pledged to take legislative action (via a Congressional Review Act resolution) in response to the proposal. Here are some of the highlights regarding the proposed changes:

Applicability of NEPA: The proposed rules would revise the definition of a “major federal action” to exclude “non-federal projects with minimal federal funding or minimal federal involvement where the agency cannot control the outcome of the project.” CEQ notes this revision might exclude a project from NEPA review if a small amount of federal funding is provided to help design the project that is otherwise funded through private or local funds.

With respect to categorical exclusions, the proposed rules retain the requirement that agency specific NEPA regulations will provide for extraordinary circumstances in which actions falling within the scope of a categorical exclusion may still have significant environmental effects and, therefore, may no longer be categorically excluded. In addition, agencies may consider whether mitigating circumstances or other conditions will avoid significant environmental effects.

Definition of Effect: The proposed rules eliminate the categories of effects such as “direct,” “indirect,” or “cumulative” that exist in the current regulations. The proposed rules also expressly state the analysis of cumulative effects is not required. Under the proposed effects definition, “effects must be reasonably foreseeable and have a reasonably close causal relationship to the proposed action or alternatives; a ‘but for’ causal relationship is insufficient to make an agency responsible for a particular effect under NEPA.” The proposed rules clarify that effect should not be considered significant if they are remote in time, geographically remote, or the result of a lengthy causal chain.

Page Limits: The proposed rules establish a 75-page limit for Environmental Assessments (EAs) and clarifies that an agency does not need to include a detailed discussion of each alternative or alternatives eliminated from analysis in an EA. For Environmental Impact Statements (EIS), there is a 300-page limit unless a senior agency official provides written approval to lengthen the document.

Time Limits: The proposed rules set presumptive time limits for an agency to prepare an EA (one year) or an EIS (two years) unless a senior agency official approves a longer time period.

Applicant-Prepared NEPA: With respect to private projects seeking government approval, the proposed rules formalize what is current practice for many agencies, for example, the preparation of EISs and EAs by the applicant or applicant's contractors.

Functional Equivalent: The proposed rules add a new regulation that clarifies that the analysis prepared pursuant to other statutory or Executive Order requirements may serve as a functional equivalent of the EIS and may be sufficient to comply with NEPA.

Public comments are due on March 10. CEQ will hold public hearings in Denver, Colorado (February 11) and Washington D.C. (February 25) before issuing a final rule. AFRC will submit comments on behalf of its members. /Sara Ghafouri

Small Successes for SW Oregon

AFRC's monitoring team works diligently to protect our members' interests and enhance forest health through the NEPA process. We work hard to personally visit and provide substantive written comments on every project proposed by the Forest Service and BLM. Often, these comments include recommendations on how to improve the economic viability of timber sales as well as improve the attainment of project objectives. Recently, several recommendations submitted by AFRC staff regarding proposed treatments on the Rogue River-Siskiyou National Forest (RRSNF) and the Umpqua National Forest (UNF) were adopted.

During the administrative review process for the Upper Briggs Landscape Restoration EA on the RRSNF, AFRC referred to a treatment unit that was misrepresented as having been severely burned in the Taylor/Klondike Fires. Upon field review, the unit did not meet the criteria for removal from the project. In the [Final EA Errata](#) published on July 29, 2019, the Forest Service stated, "Unit 5 was erroneously included in Table 7 for exclusion from harvest as the unit either had no burn or had a low intensity burn as shown in Table 1 of Appendix A. Unit 5 did not have a 50% or greater basal area loss." If AFRC had not noticed this error, it is likely this unburned unit would not have been placed back into the project.

AFRC was also involved in the development of the Skilleem Integrated Resource Restoration EA on the UNF. In our scoping comments, we requested large gaps be included in Matrix stands in order to create early seral habitat and increase species and structural diversity. When the [Draft EA](#) was published, it included gaps in two additional units. In our EA comments, we requested that one of the Project Design Features referencing the allowable number of equipment passes off of a designated skid trail be increased when a slash mat is utilized. When the Draft Decision Notice and FONSI were published on December 16, 2019, an [updated EA](#) was also published. It stated, "Project Design Feature #44 was updated to allow equipment more passes off of designated skid trails should equipment travel on a mat of slash materials, subject to other limitations."

These may seem like small successes for AFRC, but in the world of monitoring, they are reminders that the Forest Service continues to be a partner with all of its publics. AFRC appreciates the time and effort federal agencies take when they respond directly to our comments. Sometimes these simple acknowledgements are important to those working across forests and agencies. These examples are reminders to stay the course, remain hopeful, and work hard because success could be right around the corner. /Amanda Astor

Tahoe National Forest Plan Amendment

Last month, the Tahoe National Forest solicited input from the public on a proposed amendment to their 1990 Land and Resource Management Plan. The Tahoe Wildfire Management Amendment would create opportunities for the Forest Service to manage naturally ignited wildfires on national forest land to achieve resource objectives. The scoping notice indicates the proposed amendment is largely driven by the notion that "fire is an important tool in restoring forest health in fire-adapted ecosystems" and that

“under the existing Forest Plan, Forest Service managers have very limited opportunities for managing naturally-ignited wildfire for resource benefits.”

A “frequently asked questions” document supplemented the comment solicitation letter and indicated that protecting human life will be the first priority of any wildfire suppression decision made by the Forest Service. This document also clarified that this amendment, if approved, will not be tantamount to a “let it burn” policy. The Forest Service assures the public in these documents that any decision to allow a wildfire to burn will be done so in a strategic manner that fully considers all variables including fuel levels, topography, and current and predicted weather.

Despite these assurances provided by the Tahoe, AFRC has significant concerns with both the assumptions outlined by the Forest Service and the unforeseen consequences of allowing these assumptions to drive risky management decisions.

AFRC will submit comments that recognize the role that wildfire historically played in managing fuel loads and how a century of fire-suppression has influenced current fuel densities. Our comments will also recognize the need for Forest Service professionals to use controlled burns planned out in concert with mechanical forest thinning during favorable times of the year to advance desired resource conditions that have been compromised as a result of unnatural fuel accumulation. However, we will emphasize that attempting to remedy these “unnatural” conditions with “natural” wildfire comes with risks, both to the public and to the very resources that the Forest Service is attempting to improve.

Our comments will specifically highlight the risk of allowing wildfire to burn into dense forest stands prior to mechanical thinning, and the unintended consequences likely to follow such an approach. Introduction of fire into a dense forest prior to mechanical fuels reduction could result in a stand-replacing fire that consumes understory and overstory trees. Such a result is not likely to achieve the Tahoe’s desired outcome. We will also stress the unpredictable nature of weather and the recklessness of making a decision to allow a wildfire to burn on a Monday based on weather forecasts for Tuesday, Wednesday and beyond. With such uncertainty, even the most carefully crafted and strategic plan could go wrong.

Finally, our comments will touch on an alternative solution to the undesirable forest conditions outlined by the Tahoe: focus the agency’s efforts on developing and implementing a proactive and strategic fuels reduction program with an emphasis on mechanical thinning, supplemented with controlled fire during the shoulder seasons (spring and autumn) during favorable weather conditions. Relying on this type of comprehensive, well-conceived plan developed by Forest Service professionals- rather than on a one-dimensional plan that relies solely on haphazard lightning strikes- seems to be the most prudent path forward. /*Andy Geissler*

Colville Forest Planning Second A to Z Project

The Colville National Forest has identified a second landscape project to be managed under the innovative A to Z format, where the contract awardee completes the NEPA analysis, develops a management plan, and performs all tasks during implementation.

The Chewelah A to Z Stewardship Project would encompass 58,375 acres on the Three Rivers Ranger District, within a planning area that includes the Addy, North Fork Chewelah, and South Fork Chewelah planning units. Within the planning area, 52,916 acres are “general restoration acres” as identified in the 2019 Colville National Forest Revised Land Management Plan.

The Chewelah A to Z project will be structured through multiple calls against a Blanket Purchase Agreement (BPA) spanning 15 years. The BPA's are designed to reduce administrative costs to accomplish small purchases by eliminating the need for issuing individual purchase documents. The intent of the project is to reduce the potential of high intensity wildfire by removing and/or rearranging existing fuel loads on selected project areas located on the Colville. It is anticipated that both commercial and non-commercial logging methods may be utilized, but not limited to other complex logging operations and activities. The resulting contracts will be IRTC, IRSC or service call order services with provisions for timber removal.

Work to be completed by the contract awardee may include but is not limited to, completing the NEPA for the project, developing a program of treatment, unit layout, cruising, marking, road and trail maintenance, fish and wildlife habitat improvement, removal of vegetation to promote healthy forest stands, reduction of fire hazards, and the achievement of other land management objectives outlined in the 2019 Forest Plan. Payments would not be made for the NEPA services performed by the contractor. The risk for performing NEPA and pre-treatment services lies with the contractor, and the prime contractor must have sufficient financial assets to support payment for NEPA services. Once a final NEPA decision is made by the Forest Service, the prime contractor conducts work as ordered by the Forest Service through calls. The Forest Service maintains all inherently governmental functions such as selecting the preferred alternative.

The Chewelah A to Z solicitation has two phases. Under Phase 1, the NEPA work must be performed by the contract awardee with all decisions being made by the agency to avoid a conflict of interest. No payment will be made for this line item and stewardship credits will not be accrued. During Phase 2, the single awardee contractor for Phase 1 will have the exclusive opportunity to accept BPA calls in the planning area at advertised rates. The contractor also has the option to accept or decline the BPA call. If declined, it must be done within five working days after issuance of the BPA call solicitation. The government also reserves the right to re-solicit any declined requirements using any appropriate contract vehicles.

The Chewelah A to Z project differs from the initial Mill Creek A to Z project, in that Mill Creek was overseen by the Regional Acquisition Division and used task orders to complete the work. It is anticipated that with Chewelah A to Z, the majority of the work will be accomplished using IRTC contracts, with oversight provided by the Forests Contracting Officer. Similar to Mill Creek A to Z, if there are IRSC or other service contracts needed, oversight will be provided by the AQM Contracting Officer. Bids for the Chewelah A to Z Stewardship Project are due March 6. / *Tom Partin*