



Contact: Jim Flott, President
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Re: Draft Restoration Plan for South Hill Bluff Restoration

Dear South Hill Bluff Restoration Core Team:

Community Forestry Consultants, Inc. (CFC) has been retained by Mr. Randall Bracher to evaluate and determine the amount of damage caused to the family's property because of an unauthorized road bulldozed through the property on April 11-12, 2017. This work is being conducted as part of the damages and recovery suit Mr. Bracher filed against Swedberg Contracting. Mr. Bracher has asked that we work as quickly as possible to complete our work so restoration can be undertaken when weather and soil conditions are present to ensure a successful restoration and plantings that thrive not merely survive.

On May 4, 2017, I made an initial site visit to walk the roadway on Mr. Bracher's property and observe the general nature and extent of damage to the property, surrounding site conditions, and the type and condition of vegetation. I am scheduled to conduct an inventory and assessment of the damaged area on May 19 and 20.

Mr. Bracher has also asked that I review and comment on the Draft Bluff Road Restoration Plan (DBRRP) prepared by Land Expressions and made available for public comment on May 5, 2017. As you know, Mr. Bracher owns Parcel No.35314.0007, on which approximately ¼ mile of the road is located.

First, the most significant deficiency of the DBRRP is the proposed restoration date. The optimum time for most species to restore and plant new trees, shrub, and forbs is late summer, early fall to take advantage of the seasonal precipitation. Based upon my site observations and third party information, there is no immediate need to undertake restoration activities. The site has been secured to minimize public access and erosion control measures have been put in place. It is my understanding that the erosion control measures have been successful. A fall planting typically provides the best opportunity for survival of new plantings and overall success of the DBRRP. In the interim a wilderness grass seed mix applied now could be used to inhibit some weed invasion with full restoration and planting to take place in the fall.

Severe human intervention damaged the site and a similar intervention is required to restore the site. Salvage or replanting of damaged or downed vegetation is not an

acceptable blanket specification for the site restoration. There is a low survival rate when attempting to restore trees that partially failed.

The DBRRP includes the basic components for a site restoration process. However, there is significant detail not included or specifications describing the field work. Essentially, we request details of any material proposed for use on the site and specifications for application of that material to the site be provided. This information is necessary to determine if the overall DBRRP will restore the Bracher property back to its original condition prior to the excavation. Some examples of the specifications we request are listed below.

- 1) Size, type and number of trees, shrubs, and forbs to be planted.
- 2) Estimated spacing and location of plantings, by species and size.
- 3) Description of the type of plant material (e.g. B&B, container, bare root).
- 4) Minimum survival rate and replanting schedule.
- 5) Frequency of watering following plantings.
- 6) Description of the seed mix to be applied.
- 7) Description and specifics of topsoil to be imported to the site.
- 8) Budget for new plantings and monitoring.
- 9) Extend the monitoring and replacement period for 3 years to 2019.

It is well documented and known that cheatgrass, dalmation toadflax, thistles, mustards, hairy vetch, filaree, tansy, and knapweed often invade sites following disturbances such as fire, logging or excavation. There is no specific detail to address this threat. Further, a common forb, arrowleaf balsamroot is missing from the list included in the DBRRP. It is present on the site and illustrated in the lower left photo #4 picture of the draft DBRRP.



As stated above, I am scheduled to conduct a complete assessment of the Bracher property on May 19 and 20 and will have more detailed recommendations regarding restoration measures shortly thereafter. Furthermore, I understand that Avista's Restoration Team is drafting or has drafted a detailed permitting plan for DBRRP. To provide a detailed assessment and comments on the DBRRP, I need to get a copy of the detailed plan, and time to review it.

On behalf of the Bracher family, we request that the DBRRP be revised to include specifications with details for materials, material installation, and maintenance and monitoring practices as described above and the schedule for restoration be postponed until the fall as this is the optimum time to conduct restoration and plant new vegetation. Any interim plans to move forward at a minimum should be postponed until my site work on May 19 and 20 is completed, and full implementation of the DBRRP be completed in the fall of 2017.

Please contact me if you have questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Flott".

Jim Flott, President
Community Forestry Consultants, Inc.
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