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**Testimony by Elaine Oneil to the Washington State Forest Practices Board on
May 11, 2022 – open public comment period**

Chairman Smith and members of the Forest Practices Board, I am Elaine Oneil, Executive Director of the Washington Farm Forestry Association.

At long last the 2015 Small Forest Landowner Westside Riparian Template proposal decision package is before you for your vote in the November board meeting.

It should be no surprise that we are disappointed with the majority report and the fact that we cannot bring even a single consensus recommendation forward. This is primarily because there is a dramatic difference of opinion with respect to the interpretation of the science, either that commissioned by WFFA or within the AMP process. While our report shows that both scientific analyses provide similar results and are probably within the margin of error of impacts expected under FP rules despite taking completely different approaches to assessing the impacts of the proposed prescriptions, the majority report indicates that they 'believe' both scientific efforts are inadequate. This is even though the ISPR review in CMER found the second study to be unbiased and technically sound.

The decision package identifies significant issues in the AMP, specifically with how it deals with outside science and proposal initiations (PI). The FPB just approved a multi-million dollar biennial budget, but it will still be inadequate to answer all relevant questions. Outside science will always be needed to fully understand these systems and make the best decisions going forward. These issues w.r.t. outside science need to be resolved or the PI process will never function effectively, and we will continue to have ongoing conflict. In addition, from our perspective the inclusion of policy positions in the CMER scientific analysis polluted the process and led to an impasse in moving forward.

While we appreciate the majority recommendation for "*development of additional templates to address site specific conditions to facilitate small forest landowner management of RMZs*" we are puzzled by what is intended as this is exactly what we developed in our template proposal and yet we struggled mightily to get traction on any of the many prescriptions put forth for discussion. If the FPB adopts this recommendation, we believe specific sideboards will be needed to ensure we don't end up in the same place once again.

Expect detailed testimony on specific elements of the PI during your November meeting as there are many small landowners who have been watching this process intently as it has significant impacts on their land management opportunities.