"Stewards of the land... for generations to come."

Washington FARM FORESTRY ASSOCIATION

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May 9, 2024 Re: Public Comment – 3 "Eastside" Points

Washington State Forest Practice Board

Chairman Young and members of the Forest Practices Board:

For the record I'm Ken Miller, co-representing Washington Farm Forestry Association and small forest land owners (SFLOs) on the TFW Policy Committee. I enjoyed the tour yesterday and appreciate Steve & Eri's efforts & guidance to help SFLOs.

I'd like to make 3 "Eastside" points in my 3 minutes:

1. DNR has a Fire Salvage AP "Template" in their heads – We need to get it formalized to get more benefits to SFLOs, ID Teams, and the resource like we are doing on the westside.
2. Last year the Board updated the AP Board Manual with a special section for SFLOs, and added a section about forest health, particularly for the eastside. **Next year** we should have a similar tour of eastside alternate plans intended to Firewise our important eastside RMZs:
    a. The Legislature has provided the direction for DNR to help SFLOs to "develop", "implement", and "facilitate" SFLO Alternate Plans with the ID Teams, **AND** they have provided the $ for "Regulation Assistance Foresters" to do that work, like DNR was doing before the 2008 recession.
    b. The unburned upstream stand at our last stop was classic overstocking and with the wrong species in the RMZ.
    c. It's way past time to be actually managing our eastside RMZs before they burn!. Manage them for functionality and fire resilience – not timber!
    d. Many SFLOs are highly motivated to do the right thing for their RMZs.
    e. Alternate Plans are intimidating for SFLOs . . . . If DNR is as helpful with Firewise APs as they are with Fire Salvage APs we could create a real paradigm shift for eastside forest health.
3. DNR/NRCS and others have some great cost share programs for Firewise and Fuels Reduction! On the other hand, we have rules &/or rule interpretations that conflict with Firewise. Landowners tell me they do want to do Firewise/Fuels reduction (without any commercial for-profit log sales), but confusing department guidance often precludes effective Firewise treatments! Saboor is looking into this issue, so we are hopeful for more clarity at some point.

Thank you for your attention,

Ken Miller