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

Washington FARM FORESTRY ASSOCIATION

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May 30, 2025 Re: Type Np Rule Making Cost/Benefit Analysis Isn't Credible

Washington State Forest Practices Board

Chairman Young and members of the Forest Practices Board:

For the record I'm Ken Miller, co-representing Washington Farm Forestry Association with Dave Roberts on behalf of the Small Forest Land Owners (SFLOs) on the TFW Policy Committee.

Our forest owners are relying on you Board members to be above partisan politics and think holistically about forest issues, especially when you are considering rules that could have such a devastating effect on thousands of family forest owners. Our Vic Musselman has provided you with ample technical reasons to reject the Preliminary Cost Benefit Analysis. You shouldn't accept such analysis as it clearly fails all credibility by trying to make a case that $ Billions of tangible economic costs are somehow offset by intangible/ "qualitative" benefits where our property is taken solely because it will be increasingly & mysteriously "valued" somehow(?) by the public and tribes. This Cost Benefit "analysis" additionally under-values our real economic losses and uses smoke and mirrors to create economic value where none exists. Would you accept such a "taking" of significant portions of your retirement, just because such a taking would make others happy?

In addition to the SBEIS finding of disproportionate impact on my community there is no mention of how most family forest owners will be precluded from benefiting from the thinning option within the draft rule because it requires full knowledge/access to the entire Np stream reach. . . . access/knowledge few SFLOs have on our smaller parcels.

Accepting this as a valid Cost-Benefit Analysis shouldn't pass anyone's smell test; is very insulting to those of us providing all the environmental benefits; destroys one critical leg of Forests and Fish; and can't possibly meet the legislative intent for actual benefits to matter in rule making. No tangible "Benefits" are even asserted regarding fish or RMZ functional benefits, and Ecology no longer asserts a rule was even broken. <u>In essence, the current draft rule is still looking for a problem to solve.</u>

Continuing with the few current rulemaking options can only be viewed by landowners as uncaring, mean-spirited, shortsighted, and intentionally destructive to the TFW Policy Agreement most of your caucus's made in 1987. The Board has lots of reasons to pause or rethink what's right for the long-term benefits of the resources. It's not too late to make the right Policy decisions.

Ken