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

Washington FARM FORESTRY ASSOCIATION

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November 12, 2025 Re: Public Comment – FREP BM 17 Updates

Washington State Forest Practice Board

Chair Allen 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. I'm here to support these Updates to BM 17 that were drafted by DNR staff with the help of the original Workgroup & DNR's SFLO Advisory Committee. The main thrust of these minor changes is to give the department a little more guidance on how to best meet the intent of the RCW in the few areas where they have discretion to make exceptions to the law.

The Board should also recognize the value of all the illustrations in this Board Manual that add much more clarity of some very complex rules & Board Manual language. An example being: some of us were dissatisfied with the original BM 17 version on the Geo-Tech reimbursement option language. . . . sounded like we were going to have a dispute . . . . until KelliAnne drew some new illustrations on the board. . . that clarified the language we were reading differently . . . . the issue was in our minds, not the words! There wasn't enough time for staff to add the new helpful illustrations so I hope you will allow their inclusion in the published version.

I'd also like to recognize how well DNR SFL Office staff is working with the SFLO Advisory Committee with regular updates on FREP progress and seeking SFLO **advice** on issues as they arise. . . . a great example of the openness and problem solving that can occur when the collaborative spirit is alive and well.

Thanks again to the staff for the job well done.

Ken