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We have been given trainings these past few years on owning each other problems so I am going to give it a go here. Clearly Director Watson of the Department of Ecology (ECY) has a problem in that a few of the sites in the NP studies exceeded the ECY limit of 0.3C temperature change over a period in the summer for 2-5 years post-harvest. So, the issue we are trying to solve with this proposed rulemaking is one of exceeding a limit established by Ecology. Coincidentally the EPA is mute on the enforcement of the 0.3C limit, or otherwise, on non-point sources as they are not part of the WQS that forms part of CWA assurances. In addition this temperature rise was expected and anticipated in the original F&F agreement BTW. As I said at last April's Principal's meeting, it appears that Director Watson is the only one that this is a problem for because these streams mostly do not hit the threshold of 16 C (the designated use standard) to protect salmon and with a little tweaking could avoid ever doing so.

That hard limit of 0.3C, which has huge measurement uncertainties associated with it, to address situations that are rare on the landscape, creates monumental problems for landowners. The proposal by ECY will cost upwards of an additional half billion dollars in direct lost timber value plus additional costs for extra roads and crossing (which of course increases sediment risk which is another potential detriment), and lost timber jobs. The multiplier effect is staggering. Now, private landowners don't have the ability to create new taxes, or tap into the federal reserve, to bail us out when the need is high. For large landowners it comes out of return to shareholders and reinvestment in the land. For forest workers it comes with increased costs, reduced returns, and an ever shrinking bottom line that is slowly draining the lifeblood from the workforce. For small landowners it comes out of our pocket, our retirement, or our kid's college fund. The cost benefit analysis and small business economic assessment that would be required as part of rule making will have to quantify what beneficial use is being met, with what value, that is equal to this potential massive economic hit to landowners.

Our position is that it seems unreasonable to take Director Watson's problem and drop it solely on our backs to solve. We need to get creative as a community and look for solutions instead of playing 'gotcha' games. BTW - It doesn't help us move forward as a community if every proposal put forth by landowners is shot down based on a position, instead of an interest, before it is even critically examined. So, I am going to encourage you, the Forest Practices Board, to read the entirety of the large and small landowner and county caucus proposal with an open mind. We proffer a number of solutions that still cost a LOT but somewhat mitigate the half billion dollars in lost revenue. We think there are plenty of options besides these to solve this potential problem. We still believe that the beneficial use of maintaining cool clean water for downstream salmon is being met with current rules when we look at all the science that has a plethora of research beyond the 14 sites looked at in these 2 studies that were designed to test rules rather than represent actual operational constraints. I could go on and on about timing and studies needed, but I'll save that for next week. Thank you.

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