Testimony Presented to the Forest Practices Board

By

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Good day Chairman Bernath and members of the Forest Practices Board. My name is Vic Musselman and I am President of the Washington Farm Forestry Association.

The Preliminary Cost-Benefit Analysis of the Proposed Water Typing System Rule prepared by Industrial Economics, Incorporated (IEc), April 30, 2019, indicates that the proposed new Water Tying Rules will be a heavy burden for Small Forest Landowners (SFLs). Depending on the Option being analyzed, IEc projects that the new Rules would impact SFLs by a margin of 29% to 42% more than large forest landowners. This is definitely an unacceptable effect, particularly in view of the fact that the mitigation allowed SFLs for the dis-proportionate effect of the Forests and Fish Act has yet to be fully implemented by this Board twenty year later.

Therefore, I urge you to strongly consider fast tracking the completion of Lidar based water type maps and revisit the definitions of the default stream physicals to bring them more in line with the type F/N breaks that will result from the use of the new FHAM protocol. In addition you should direct that more assistance be given to SFLs to apply the new FHAM protocol.