Washington Farm Forestry Association (Elaine Oneil)

I'm Dr. Elaine Oneil executive director of the Washington Farm Forestry Association, representing small forest landowners across the state. I'm going to say this thing has been a bit of a boondoggle since the beginning when Mark Hicks first brought it to the adaptive management program somewhere around 2018, 2019. At the time we argued that no measurable change—that that is the 0.3 degrees centigrade limit—was inconsistent with the forest and fish 8 CP which specifically allowed for temperature change in NP streams and it was also likely—unlikely to be biologically significant. But Ecology persevered.

There was a lot of argument in the adaptive management program, there were a lot of fighting went going on there were some grandstanding at the Forest Practices Board and et cetera et cetera and we are where we are today.

It was only in May that we found out that in fact this 0.3 degrees centigrade limit was in fact just a a goal and not a limit as Mister Briggs put forth in May. But, we also found out that it was inconsistent with Tier II water allowances under the Clean Water Act where the limit is the goal for cold water which is 16 degrees.

So we're going to I'm going to say there's been a complete inconsistency in how and why this Tier II analysis came into being. That said we're here now and I want to challenge the veracity and conclusions of the NP rule cost benefit analysis that you're using in this and in your Tier II analysis. We're especially concerned about how benefits supposedly accrue to the state as a whole, but the costs are borne by poverty-stricken census tracts in our rural counties. This doesn't seem to comport with the HEAL act requirements at all.

I want to talk a little bit about the cost benefit analysis using willingness to pay to estimate its benefit. That's a standard method used in economic analysis and it's used to create a numeric values for ecosystem services where there is no market so that you can calculate a cost benefit ratio and figure out if it's better than what it the due benefits exceed the costs.

Using the NP rule willingness to pay values provided in that cost benefit analysis and their low-cost estimate shows in fact that cost exceed benefits not the other way around. Even based on their faulty analysis

using low quality irrelevant data from regions with no similarity to our West Coast forest.

Better data exists for costs and benefits. Independent analysis by U dub shows the costs are absolutely astronomical. 200,000 acres 4.1 billion board feet 2.3 billion in immediate loss of asset value 250 million dollar increase in FREP liabilities and a $90 million reduction in forced excise tax to counties. A 6 billion dollar economic hit to our rural economy.

I wanna talk about the real costs and benefits. We had an independent analysis done by U Dub. Much larger costs, 2.3 billion in immediate lost asset value, plus some of these other numbers that people have talked about, the 6 billion in economic hit to the rural economies, 5 to 8 billion.

That's twice the upper cost estimate of the cost benefit analysis that you're relying on. Now we actually have excellent data on payment for ecosystem services that better represents our forest. That's our Forest Riparian Easement Program. Over the past 25 years FREP has paid--that's FREP we call that FREP— has paid for a portion of the timber required to be left standing to support ecosystem services inherit and buffers on eligible small forest land owners' forested lands. The program has dispersed an average of 1.6 million per year of state appropriated funds and so that accurately represents what our state citizens are willing to pay for ecosystem services these riparian buffers provide and we know that because they don't just give it to us, we have to lobby for it, especially when times are lean so if you take that 204 thousand acres removed by the rule, if you're harvesting it on a 40-year rotation that would be 320 bucks an acre, 50 year rotation it's 400 bucks an acre, compare that to the almost $8900.00 per acre of current timber value. So your real data shows that your ecosystem service benefit, the value of that it's generating—the ratio would be about 0.03 or 0.04. In other words 96 to 97% of the purported benefit is either qualitative or fake. So we have a cost benefit analysis that has so many problems associated with it, the primary one being that they assert benefits exceed costs and there's no way that that can be justified or verified. So I'm going to say giving us overwhelmingly bad cost benefit analysis ratio, what overriding public interest are we serving by advancing this rule towards implementation? I think that's a core question that needs to be answered in this Tier II analysis should you redo it. And I will be submitting a more detailed comments for the record. Thank you so much.