



## MEMORANDUM

April 28, 2015

**TO:** TFW Policy

**FROM:** Hans Berge, Adaptive Management Program Administrator

**SUBJECT:** Recommendations for response to WFFA alternate plan template for RMZs along typed waters

At the 10 February 2015 Forest Practices Board meeting, WFFA (Washington Farm Forestry Association) presented a proposal for consideration as a small forest landowner alternate plan template to conduct harvest activities within the western Washington forest practices riparian management zones (RMZs). WFFA requested the Forest Practices Board (Board) accept and forward the proposal for consideration by the AMP (Adaptive Management Program) as specified in Board Manual, Section 22. The Board accepted their request for review, and have directed the AMPA (AMP Administrator) to, per direction in Board Manual, Section 22, to present proposed tracks for TFW Policy Committee concurrence then bring a recommended timeline and strategy for evaluation of the template to the Board at the 12 May 2015 regular meeting.

In summary, the WFFA proposal seeks to reduce buffer widths contained in the Forest Practices Rules within the western Washington RMZs to provide more options for small forest landowner harvests adjacent to Type F and N waters. The intent of the alternate plan template is to provide small forest landowners flexibility for common situations that are repeatedly addressed, while continuing to meet resource objectives. The language WAC 222-12-0403 is as follows:

***WAC 222-12-0403 Cooperative development of guidelines for alternate plans***

*The department will develop the section for alternate plans (WAC [222-12-090\(21\)](#)) to submit to the board in cooperation with representatives of the small forest landowner office and advisory committee, the departments of ecology and fish and wildlife, United States Fish and Wildlife Service, National Marine Fisheries Service, and affected Indian tribes.*

*The manual should include:*

*(1) As required by RCW [76.13.110\(3\)](#), the small forest landowner office recommendations for alternate plans or alternate harvest restrictions that meet riparian functions while generally requiring less costly regulatory prescriptions;*

*(2) The effectiveness of strategies for meeting resource objectives and protecting public resources;*

*(3) Template prescriptions designed to meet resource objectives to address common situations that are repeatedly addressed in alternate plans or strategies to simplify the development of future plans or strategies, including low impact situations and site-specific physical features;*

- (4) *Appropriate recognition or credit for improving the condition of public resources; and*
- (5) *Criteria to assist the department in determining whether a small forest landowner alternate plan qualifies as a low impact alternate plan.*

The first step in the AMP evaluation of the template is to determine the applicability to the AMP by assessing resource implications that may arise from the implementation of the proposal. The assessment includes resource considerations (e.g., riparian functions), spatial and temporal scales of the proposal, landowner and agency costs associated with changes, and potential programmatic costs (Board Manual M22-8).

In Board Manual Section 22, the process for the AMP specifically identifies two tracks for proposal development: scientific or policy (Board Manual M22-9 and 10). From the Board Manual, the following direction is given:

*“The **science track** evaluates currently available science, collects new information through research and monitoring, and synthesizes the best available information into a technical summary for Policy consideration.”*

*“Proposals seeking to change or clarify policies or change the way existing science is implemented in the rules are directed toward the **policy track**.”*

After receiving verbal comments at the 10 April 2015 TFW Policy Meeting in Spokane, and reviewing WAC 222-12-0403, it is clear that a two part approach is necessary to address this proposal. First, a “science track” is necessary to set the context in understanding whether or not riparian functions are being met by the alternate plan template proposal (WAC 222-12-0403 subsection 2). Second, a “policy track” is necessary to determine if the proposal is addressing “common situations” addressed in alternate plans and other elements identified in subsection (3) and (4) of WAC 222-12-0403. To address these important topics, I recommend the following concurrent steps be taken to review the alternative plan template proposal from WFFA.

- 1- A literature synthesis conducted through the AMP (CMER) to evaluate the five forest practices functions of the riparian zone (sediment filtration, shade, LWD recruitment, leaf and litterfall, and bank stability). This literature review will make use of the WDFW Priority Habitats and Species Program’s current Riparian Update, but will focus upon the literature relevant to forest practices. This review will not explicitly address the WFFA proposal, but will provide important context as a scientific foundation to review future proposals, and provide CMER with a best available science document on riparian functions. I expect this work would start in September 2015 after WDFW’s Riparian Update is available for review, and would be completed by March 2016. Given the overlap with WDFW’s work, this literature review costs should not exceed \$30,000.
2. A review from the TFW Policy Committee to determine whether the alternate plan template proposal meets the criteria outlined in WAC 222-12-0403 for “alternate plans”. This step should take no more than 6 months after it is initiated. I would request that Policy begins discussion on this topic no later than October 2015.
3. A written response with recommendations to the Forest Practices Board at the May 2016 meeting that succinctly describes the results of both the “science” and “policy tracks”. This response would include addressing subsection (5) of WAC 222-12-0403.