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

Washington FARM FORESTRY ASSOCIATION

P.O. Box 1010
Chehalis, WA 98532
Phone (360) 388-7074
info@wafarmforestry.com
www.wafarmforestry.com

May 14, 2025 Re: Type Np. . . Not too late to avoid the train wreck!

Washington State Forest Practice Board

Chairman Young 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 still hoping the Board will avoid the Np train wreck! The Adaptive Management Program was created out of a collaborative, shared risk consensus of nearly all of you represented on this Board. We've accomplished a lot.

We lost a lot of the 1987 TFW Agreement spirit years ago when we failed to collaborate on Desired Future Condition rules. Today, TFW Policy has again failed to find the win-win on a far more impactful Np opportunity that now has you poised between two untenable choices: tripling Np buffers for sketchy benefits vs do nothing!

Very simply the issues are: In the rare example of full basin harvests science has confirmed what the Feds predicted all along . . . that partially buffered harvests on Np streams would likely lead to some slight, temporary increased Np stream temperature; there was consensus to try to address the issue; there is a contested assertion a rule was broken albeit without functional harm, particularly to fish; without a pause to rethink rule-making options, the Board is left with extreme win-lose options on Np streams.

In my opinion, continuing down this narrow path risks far more than adherence to a very technical and contested rule, especially without clear or significant functional benefits. Less drastic steps such as a simple 25' full length buffer, or the "minorities" doubling the buffers, should be part of any credible or sustainable cost benefit analysis. Better yet true collaboration would look closer at potential ways to simply shift trees in excessive Fish buffers to the Np streams.

Regardless, there must be better, more collaborative ways to help Np streams without the train wreck we all see coming. Do we continue power politics that risk the future of TFW collaboration so critical to the Adaptive Management Program?

Ken