"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 29, 2025 Re: Type Np Workgroup Needs Do-over with Ecology Reinterpretation

Washington State Forest Practices 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.

The extensive Technical Type Np Prescription Workgroup was limited in what they could recommend by DOE's unequivocal declaration that average temperature increases under current FP Np rule treatments exceeded the WA measurable change standard under the Clean Water Act. I suspect some Forest Practices Board members were likewise supporting a tripling of Np buffers based on that now corrected erroneous declaration, especially considering no other assertions of functional harm were alleged! To their credit, DOE has now withdrawn that declaration which frees all to reconsider tentative options to more collaboratively seek strategies to further protect Np stream temperatures.

The technical workgroup charter required these experts to propose only Np prescriptions with a "**requirement of no temperature increase of 0.3 degrees C**". They were also required to only consider "alternatives on the measurable change standards throughout a harvested reach or harvested basin" precluding standard industry practice to rarely if even harvest entire Np basins. Regardless of these restrictions, these same experts felt obliged to ". . .**convey our perspective that the current rules do provide considerable resource protections**. . .". They also pointed out the obvious paucity of sample sites when they concluded: "**The causal mechanism for meeting or not meeting the stream temperature measurable change standards was indeterminate**."

The technical workgroup and many TFW Policy and Forest Practices Board members were clearly influenced and even directed at specific, & in hindsight, erroneous conclusions. If the Board continues down the current path without at least a do-over by the technical workgroup it seems fraught with legal questions, and for sure ethical issues that will further cloud an already strained rule-making process.

It's not too late for a restart on what has become a very divisive and counter-productive process that could destroy what's left of the Forests and Fish legislation I still want to believe in. Do the right thing for forests AND for those of us caring for those forests.

Ken