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

Washington FARM FORESTRY ASSOCIATION

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November 10, 2021 Re: RCW & WAC intent relative to SFLOs

Washington State Forest Practice Board
P.O. Box 47012
Olympia, WA 98504-7012

Chairwoman Smith and members of the Forest Practices Board:

My name is Ken Miller, co-representing SFLOs and Washington Farm Forestry Association along with Steve Barnowe-Meyer on the TFW Policy Committee. I'm delighted to report that finally after 22 years of avoidance the Adaptive Management Program, including the FPB, is almost ready to begin discussions (hopefully leading to consensus recommendations to you), regarding the intent of an RCW and WAC relative to SFLOs & "low impact". "Almost" because one caucus is not yet ready to allow this conversation on the TFW Policy agenda.

Below is the key RCW & WAC language. It's my hope you will read them before this week's meeting and form your own common language interpretations before I verbally share some related thoughts during the General Public Comment period.

From the Legislature in 1999:

> **RCW 76.13.100 (2)** partial – "The legislature further finds that small forest landowners should have the option of alternate management plans **or alternate harvest restrictions on smaller harvest units that may have a relatively low impact on aquatic resources.** The small forest landowner office should be responsible for assisting small landowners in the development and implementation of these plans or restrictions."

From the Forest Practice Board in 2001:

> **WAC 222-12-0403-** "The (Board) manual should include: . . . . (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."

Whatever your own interpretation of this RCW, and the Boards WAC request to include some clarifying "criteria" language in the Board Manual, I hope you agree its past time for the AMP & ultimately this Board to have those discussions.

Sincerely,

Ken Miller
Washington Farm Forestry Association
[redacted]

Addendum to my November 10, 2021 testimony re: RCW & WAC intent relative to SFLOs as verbally presented.

"Chairwoman Smith and members of the Forest Practices Board:

I refer you to the letter I submitted earlier re RCW & WAC intent relative to SFLOs.

RCW 76.13.100 (2): says in part: "**small forest landowners** should have the option of alternate management plans or alternate harvest restrictions on **smaller harvest units** that may have a **relatively low impact** on aquatic resources

The Forest Practice Board in 2001 recognized this RCW meant something special regarding **SFLOs** & **low impact** so enacted language in WAC 222-12-0403 to further clarify the RCW intent by requiring that "The (Board) manual should include:

> (3) Template Prescriptions . . . ." 2 templates have been completed, another is in the AMP so this part of the WAC is being implemented.
>
> "(5) Criteria to assist the department in determining whether a **small forest landowner** alternate plan qualifies as a **low impact** alternate plan." This Criteria for "low impact" as it relates to SFLOs does not yet appear in the AP Guidance.
>
> DNRs SFLO AC spent 2 years reaching consensus on draft language to meet this WAC. DNR staff was unable to convert this recommendation into a PI and bring it to you or the AMPA, so WFFA did so August 11th – with copies to you.

The AMP process requires that unless directed by the Board, new items for the Policy agenda must be approved by 100% consensus. One caucus member voted against accepting this Advisory Committee recommendation as a Policy agenda item for review and advice back to you. A Dispute on this non-consensus agenda item vote has been called.

I can walk you through the steps if you wish but its possible/likely you may be required to decide this Policy Agenda request. You couldn't get the dispute until your May or August meeting, depending on how long it takes us to get through this procedural Dispute – about whether, or not Policy should even discuss the Advisory Committee recommendation. Our caucus just wants to have the 20+ year's overdue conversation about RCW & WAC intent! This avoidance/procedural Dispute could be settled today by you simply directing TFW Policy to take up the PI and make recommendations back to the Board so we can actually have the discussions. I'd be happy to provide any additional clarifications.

Sincerely,

Ken Miller
Washington Farm Forestry Association

From: Phil Hess
To: ANDERSON, PATRICIA (DNR)
Cc: DNR RE FP BOARD
Subject: FPB Testimony for "general public comment" agenda item
Date: Monday, November 8, 2021 9:46:50 AM

External Email

My Name is Phil Hess and I am a long time WFFA member on the DNR Small Forest Landowner Office Advisory Committee. (SFLO AC).

I have committee notes going back to 2010 where the committee has attempted to address the 1999 legislative commitment to define and develop criteria for "Relative Low Impact on Aquatic Resources" - RCW 76.13.100(4) and the related 2001 FPB rule in –WAC 222-12-0403.

For whatever their reasons, the TFW stakeholders have resisted WFFA AC members attempt to address this RCW and WAC.

But recently there has been progress: The SFLO AC has unanimously adopted a definition and criteria for "Relatively Low Impact on Aquatic Resources".

This is not a proposal for rule change! It is simply language to be included in the Sec 21 board manual and subsequently in the Forest Practices Application (FPA) instructions and FPA form.

I am requesting that you direct the TFW Policy Committee and all participating stakeholders to implement the "Relative Low impact" definition and criteria that has been unanimously approved by the SFLO AC.

Thank-you,

Phil Hess, Member
SFLO AC

P.S. To me: It is very clear in RCW 76.13.110 (4) that the RCW established Advisory Committee can make rule recommendations directly to the forest practices board. Again, what is being proposed is not even a rule !

LEAGUE OF WOMEN VOTERS® OF WASHINGTON

Empowering Voters. Defending Democracy.

November 9, 2021

Forest Practices Board

Department of Natural Resources

RE: Comments on Type Np Buffer Potential Rulemaking

The League of Women Voters of Washington has long established positions on forest management practices. League positions are consistent with the best-available-science, adopted through a rigorous study process.

> All benefits of the forests—ecological, human and economic—are inextricably interconnected. Healthy forests are essential to habitat for a diversity of plant and animal life, to the hydrologic cycle, and to carbon storage to mitigate global warming. In addition, healthy forests are essential to a forest products industry with the jobs and goods they provide, and to the economic and aesthetic values of their recreational opportunities.
>
> Riparian zones are an integral part of the forest ecosystem and must be regulated adequately to protect the streams and the wildlife dependent upon the streams.
>
> Forest management must be responsive to scientific research and knowledge and should include: • mapping, classification and protection of all streams, • more and better data—including total watershed analysis, • evaluation of cumulative effects of various activities in the forest in the consideration of individual forest practice permits, and • planning for sustainability of forest ecosystems.
>
> The State should consider ecological protections the most important factor in deciding which activities to allow on state forest lands.

In 2018, a 12-year Adaptive Management Program (AMP) study concluded that current forest practices increase temperatures in certain western Washington non-fish bearing streams beyond the temperatures allowed under the Clean Water Act.

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info@lwvwa.org | www.lwvwa.org

Furthermore, three years have passed since the AMP determined timber harvests in headwater streams are causing temperatures to increase above levels allowed in the state's Water Quality Standards.

The State Auditor's office completed an audit of the Adaptive Management Program in February 2021. A statement from the summary concludes:

Without change, the program will continue to languish, putting Washington at risk for litigation. The Adaptive Management Program was created to facilitate cooperative solutions and avoid costly litigation. However, if the program does not improve its processes, the state risks penalties for failing to meet federal requirements. The program is falling behind on meeting Clean Water Act milestones. Furthermore, a representative from a federal oversight agency says the program is not meeting requirements of the Habitat Conservation Plan. Finally, participants agree lawsuits are a likely consequence of program failure.

We ask the Forest Practices Board to urgently proceed with formal rulemaking process to establish new rules for timber harvests in Western Washington's headwater streams. Establish a timely schedule for completion, and commitment to respond to the AMP study results.

Sincerely,

Sherri Dysart (she/her)
League of Women Voters of Washington
Issue Chair-Forests

JMurray
FORESTRY
Growing Value Through Innovative Forestry

Joseph F. Murray • *Forester*
246 Patterson Road • Port Angeles, WA 98362
abies@olypen.com • www.jmurrayforestry.com
360.460.4928

November 9, 2021

The Washington State Forest Practices Board
Olympia, Washington

Dear Board Member:

Thank you for the opportunity to communicate with you about the Adaptive Management Program (AMP). My name is Joseph Murray. I have 41 years of experience in forestry on private land in Washington State. I have been involved with the AMP since the year 2000 as a Riparian Scientific Advisory Group (RSAG) member and co-chair. During my tenure on the RSAG committee, we have participated in several studies including the Desired Future Conditions (DFC), the Bull Trout Overlay, the Hard and Soft Rock Studies, the Hardwood Conversion Study and Riparian Extensive Vegetation and Temperature Monitoring. These studies have taken a number of years, and in some cases they have resulted in changes to the regulations. Essentially the Adaptive Management Program is working but would benefit from some changes.

There are many effectiveness studies that look at a limited number of sites, but there is no extensive monitoring program that provides AMP with spatial and temporal context to the effectiveness studies.

The current science-driven AMP is working. It needs the addition of extensive monitoring to provide context to the existing science. The current science needs this context before we make new rules. This will take some time and it is important not to rush into rulemaking with arbitrary timelines and constraints. We are managing resources for the long term and we should take the time it requires to make informed decisions.

Please contact me if you would like to discuss this further.

Sincerely,

Joseph F. Murray
JMurray Forestry LLC
Principal Forester

Washington State Forest Practice Board
P.O. Box 47012
Olympia, WA 98504-7012

November 10, 2021

Subject: Re; RCW and WAC intent relative to SFLO's

Chairwoman Smith and members of the Forest Practice Board:

My name is Richard Alescio, President of Washington Farm Forestry Association. WFFA and the Small Forest Land Owners appreciate that our issues around regulatory promises are finally getting on agendas, and we ask that the board be supportive of TFW Policy having a substantive and meaningful conversation that has been avoided for years, as required by RCW and WAC.

We at WFFA are basically a volunteer organization that is trying to look out for our fellow Small Forest Land Owners. As such, we have been striving for 22 years to be granted the due process that we were promised in RCW 76.13.100 and WAC 222-12-0403-5. I have seen some of our principal dedicated Small Forest Land Owners go to their graves while striving with DNR for what was mutually agreed upon as fair treatment for all the Small's. I have attended numerous meetings and given hundreds of hours of volunteer time to no avail, while watching other Small Forest Land Owners do the same. If this was the Corporate World with a board of directors and stock holders, there are no circumstances under which this would stand.

We very much appreciate your fair and honest consideration of: our Westside Template; our Relatively Low Impact Proposal initiation; our Right to Fair Use of Our Property consistent with RCW 76.13.100 and the Four Equal Tenets of the Forests and Fish Law; and Affirming the Current Science Based Adaptive Management Process by Filing the CR-101 Pre-proposal Without Arbitrary Time-

lines and Constraints to allow the Science to continue working and not be rushed or abbreviated.

Very truly yours,
Dick Alescio
President
Washington Farm Forestry Association
[redacted]

WASHINGTON FOREST PROTECTION ASSOCIATION
724 Columbia St NW, Suite 250
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360-352-1500 Fax: 360-352-4621

November 8, 2021

Laura Watson, Director
Department of Ecology
300 Desmond Dr SE
Lacey, WA 98503
Laura.watson@ecy.wa.gov

Washington Forest Practices Board
1111 Washington St SE
PO Box 47012
Olympia, WA 98504-7012
Forest.practicesboard@dnr.wa.gov

Re: CWA Assurances

Dear Director Watson and Forest Practices Board Members:

WFPA respectfully submits the following comments regarding the Clean Water Act (CWA) Assurances expiration on December 31, 2021, and Ecology's decision on whether to extend the assurances. By way of background, WFPA's prior comments submitted to Ecology and the Forest Practices Board (FPB) in November, 2019[1] and May, 2021[2] are incorporated by reference.

CWA Assurances and Milestones:
As explained in our written comments to the FPB, we believe initiating a CR-101 for Np stream rule making at the November 2021 meeting is out of step with the required Forest Practices Act and Rules process (RCW 76.09.370 & WAC 222-12-045), long standing FPB practice, and unduly influences the outcome of Adaptive Management Program (AMP) deliberations. However, we are willing to go along in the spirit of TFW/F&F cooperation. Accompanying the CR-101 is our expectation of a CWA Assurances extension from Ecology. There are several principles which should be made clear in any CWA Assurances extension:

- There cannot be arbitrary timelines placed on the AMP or FPB rule making process. In our estimation, under ideal circumstances, it is likely three years to get to a CR-102, should that be the TFW Policy recommendation. There are required procedural steps which need to occur inside and outside of the AMP. Those steps cannot be rushed or ignored based on arbitrary timelines associated with a discretionary decision. Doing so would undoubtedly increase litigation risks. If the CWA assurances extension is contingent upon an arbitrary and unreasonable timeline, Ecology will likely find itself in this same position again, which could reinforce and perpetuate conflict;

- It should not be predetermined that a CR-102 will be the outcome of the AMP process. Adaptive Management could result in different recommendations, prejudicing the AMP process and the FPB's independent authority is highly improper;

1 bc_fpb_publiccomments_20191113.pdf (wa.gov)
2 bc_fpb_writtenpubliccomments_20210512.pdf (wa.gov)

- Any decision must be based on sound science and reasonable costs/benefits. The Forest Practices Act requires the FPB to consider protection of public resources AND economic viability through efficient/effective regulation which preserves operating flexibility (RCW 76.09.010). The Administrative Procedures Act requires that the Board consider the marginal costs and benefits of any proposed rule and determine the benefits of a proposed rule outweigh the costs, AND select the least burdensome alternative that accomplishes the goals and objectives of the regulation (RCW 34.05.328)

- The FPB cannot be compelled to "regulate more" to satisfy stakeholders or help Ecology with appearance of action on water quality without considering whether the regulatory action is excessive cost, low or no benefit, or unnecessarily burdensome.

Ecology's decision on CWA Assurances is a heavy one, the future of F&F collaboration could hang in the balance. Are we going to sustain a science based, cooperative system which can serve as a model of how landscape scale conservation can be accomplished on private working lands, or are we going to allow the politics of the moment overrule all the positive contributions and send us down a path of conflict and divisiveness? We are hopeful Ecology chooses the former. WFPA stands ready to work diligently, collaboratively, and constructively, in the AMP and a principal's table, to find solutions in a mutually acceptable and respectful manner with our partners in Timber, Fish & Wildlife/Forests & Fish (TFW/F&F) who are willing to reciprocate.

Thank you for your consideration, should you have any questions I can be reached at dcramer@wfpa.org or (360) 280-5425.

Sincerely,

Darin D. Cramer
Sr. Director of Forest & Environmental Policy

WASHINGTON FOREST PROTECTION ASSOCIATION
724 Columbia St NW, Suite 250
Olympia, WA 98501
360-352-1500 Fax: 360-352-4621

November 8, 2021

Washington Forest Practices Board
1111 Washington St SE
PO Box 47012
Olympia, WA 98504-7012
Forest.practicesboard@dnr.wa.gov

Re: Type Np Rulemaking Update, CR-101 for Type Np Streams, Water Typing Committee Update

Dear Forest Practices Board Members:

Washington Forest Protection Association (WFPA) is a forestry trade association representing large and small forest landowners and managers of nearly four million acres of productive working forests, including timberland located in the coastal and inland regions of the state. Our members support rural and urban communities through the sustainable growth and harvest of timber and other forest products for U. S. and international markets. For more information about WFPA, please visit our website at www.wfpa.org. WFPA respectfully submits the following comments for the Forest Practices Board's (FPB) November 2021 meeting.

Np Buffer Alternatives Update
TFW Policy accepted the Np Workgroup report in June and has been working through the information and recommendations contained within the report since July. Several caucuses recently proposed Np stream buffer alternatives, some of which are loosely based on the Np workgroup's recommendations. The landowner caucus is also developing alternative Np stream buffer proposals for consideration. However, unlike other caucuses, we are modeling the effect of different alternatives at different spatial scales to estimate the costs/benefits of different approaches before submitting proposals to the Adaptive Management Program (AMP) for consideration. Once the landowner caucus submits proposals, TFW Policy will have ~15 or more different Np stream buffer alternatives to sort through and hopefully narrow down to a few which all caucuses can support. We are anticipating receipt of the Hardrock Phase II and Softrock study/findings reports within the next month or two and need to give those reports adequate consideration prior to completing our work.

The Conservation Caucus triggered Dispute Resolution (DR) at the November 4th TFW Policy meeting, ostensibly due to lack of progress towards finalizing Np stream buffer recommendations to the FPB. Two other agenda topics resulted in DR being triggered at the same meeting, for a total of four. While frustration with the pace of work in the AMP is understandable, triggering DR at this stage of the Np stream buffer deliberation will not likely speed up progress. TFW Policy has several new Np stream buffer alternatives to evaluate, all submitted within the last couple of months, including one from the Conservation Caucus, and multiple DRs to work through simultaneously.

Funding availability necessary to support stage 2 of each of the disputes, should that be necessary, is uncertain and will not be known for a few months. In addition, we currently have four AMP staff vacancies at DNR, the remaining staff are all relatively new to their positions. Our history of working through DR consistent with WAC 222-12-045 timing requirements is not good, even when we are doing one at a time. Emotions are high and there is not much common ground amongst TFW Policy participants on these topics. This combination of factors means there's high risk of a complete breakdown, fracturing of relationships, and a continued exodus of AMP staff and participants. This should be unacceptable to all of us, no AMP topic is worth that price.

The irony in this is TFW Policy is generally consistent with the overall timeline contained within the Np workgroup charter approved by Policy in June 2019 and accepted by the FPB (including former Ecology Director Maia Bellon) in August 2019[1]. That charter estimated TFW Policy would begin deliberations on Np stream buffer alternatives in September 2021.

The current dynamic in the AMP results from of a lack of common understanding, assumptions, and objectives amongst AMP participants, and it has been playing out for years now. Conflict on Water Typing, WFFA's and WFPA's AMP proposal initiations, Np stream science and proposed buffer alternatives, and now CMER project and AMP budget prioritization are all symptoms. Many caucuses, even the State Auditors' performance audit report, fault the process for the current situation. I will be the first to acknowledge our process is not perfect, no multi-stakeholder, collaborative, consensus-based process will ever be perfect. However, our challenges are much less about process and more about people and caucus positions. While our process could always be better, it is the execution of the process that stumbles. It stumbles because it is made up of people who make choices based on different understanding, assumptions, and objectives about Forests & Fish (F&F) and how the AMP should function. We also struggle with lack of requisite experience and/or decision-making authority amongst AMP participants. Continuing to expect the current participants to solve this problem is not working. As recommended many times in prior testimony and written comments, there needs to be a leadership level reset of the commitment to Timber, Fish &Wildlife (TFW)/F&F foundational principles, common understanding of the objectives, and clear direction/oversight going forward into the future. The long-standing pattern of complaining about the AMP being broken, yet leaders being unwilling to engage and assist in resolving the challenges has run its course. Our understanding is Commissioner Franz will soon be convening a TFW/F&F Principal's meeting to begin this conversation. WFPA enthusiastically supports Commissioner Franz in this effort.

CR-101 for Type Np Buffer Rulemaking

Initiating a CR-101 for Np stream rule making at the November 2021 meeting is out of step with the required Forest Practices Act and Rules process (RCW 76.09.370 & WAC 222-12-045), long standing FPB practice, and it unduly influences the outcome of Adaptive Management Program (AMP) deliberations. However, we are willing to go along in the spirit of TFW/F&F cooperation.

The CR-101 needs to be broadly worded, not foreclosing any decision space, acknowledge the FPB cannot act further until the conclusion of the AMP process, and contain no arbitrary timelines. With this understanding we are willing to go along with this approach; however, it cannot become the new normal. We cannot change required process just because one, or even a few caucuses, get impatient

1 bc_fpb_mtgmaterial_20190814.pdf (wa.gov)

with lack of progress towards their desired outcome, especially without thoroughly vetting the landscape scale context of the science provided, and why routine harvest operations may often look different than experimental treatments.

The AMP process is fundamental to F&F, we cannot afford to do lasting damage to that process by allowing arbitrary timelines and political pressure to usurp the requirements of the Forest Practices Act and Rules and the Administrative Procedures Act. Further, the FPB, as an independent state agency, has independent authority. It cannot be compelled to act in the interest of one caucus. Forests & Fish and the AMP were intended to be science based and provide stability and predictability of process. We have let those foundational standards slip away over the last several years, deteriorating to the point where advocacy and politics have become dominant factors determining which process steps are followed, which topics get priority, and the incumbent decision space around those topics. The FPB has experience with such an environment prior to TFW/F&F, it was not constructive and did not result in better outcomes for any interest.

Water Typing Committee Update

The Anadromous Fish Floor (AFF) workgroup is attempting to complete a report and submit it to the FPB's water typing committee by December 3. While we are hopeful, it is unclear at this point if they will be successful in delivering a consensus report. As stated many times in previous public testimony/written comments, this is due to different understanding and interpretation of the performance target for the AFF, and the entire water typing system. Various FPB members have stated their opinions on performance expectations for the AFF, but the FPB has not taken formal action to clarify the expectations, and the opinions are shifting again as we get closer to completing the technical work. The one and only conversation by FPB members occurred at a water typing committee meeting on September 24, 2019[2]. While a start, the discussion was brief, not very specific and lightly attended by workgroup participants. We request the FPB pick up where the committee's discussion left off and formally clarify performance expectations for the AFF in a way which can be measured, both in a spatial modeling environment and in the field.

There have been no updates since last fall regarding the status of a final "screened" Eastern Washington dataset to support Potential Habitat Break (PHB) assessment. As stated previously, due to inconsistency with the fish habitat assessment method (FHAM) and research findings on seasonal/annual variability of upper most fish, use of screened data as proposed will not produce an objective and reliable cost/benefit estimate of PHB alternatives being evaluated. We have similar concerns about the Western Washington PHB assessment and use of data. WFPA requests a progress report from DNR staff on these topics and a discussion at the next water typing committee meeting.

The timelines, costs, and sequencing of proposed CMER studies supporting water typing rulemaking remain unacceptable to WFPA so long as the FPB is entertaining proposals which increase (or decrease) regulatory outcomes on the ground. As currently proposed, supporting science for just a portion of the FPB-identified technical work will not be completed for nearly 10 years[3]. Any assessment of a model as a rule alternative would not even begin until after the proposed work at CMER is completed. There are currently no plans to develop science to support the evaluation of an AFF in rule. No funds are currently allocated for any of this work, which is estimated to cost $4

2 bc_fpb_wtypingcom_mtgsummary_20190924.pdf (wa.gov)
3 bc_fpb_phb_dpc_studydesigns_20211110.pdf (wa.gov)

million for the first phase alone. The FPB has received multiple updates on proposed research studies from ISAG/CMER but has not provided any meaningful review or feedback much less performance targets or objectives that the study results should be measured against. Arguably the FPB water typing committee has oversight responsibility of the CMER studies, yet they have not received one briefing or engaged in the process. We suggest the FPB provide the necessary direction and oversight for the CMER water typing studies or delegate that responsibility back to TFW Policy with the necessary performance targets.

The water typing rule making process continues to provide obvious symptoms of the larger challenges undermining F&F sustainability: unresolved foundational policy issues, prioritizing political agendas over thorough scientific investigation and collaboration, and questionable alignment with required processes. These are all solvable problems if the F&F caucuses want to solve them. Perhaps the accumulation of challenging topics risking a derailment of F&F is what is needed to motivate TFW/F&F Principals to take this seriously and provide the appropriate leadership direction.

Thank you for the opportunity to comment, should you have any questions I can be reached at dcramer@wfpa.org or (360) 280-5425.

Sincerely,

Darin D. Cramer
Sr. Director of Forest & Environmental Policy

11/9/2021

To: Forest Practices Board

From: Wade C. Boyd, Ph.D.

Re: The Adaptive Management Program

Please support a collaborative Adaptive Management Program where Science leads the way.

Allowing for the possibility of imposing arbitrary timelines and constraints on the AMP could empower those who would seek to avoid rigorous (and sometimes time consuming) science- based processes. Good science is the key to long term stability and success of Forest and Fish. CMER is working, do not break it.

As a scientist, researcher, statistician, and forest landowner, I implore you to never allow casual observations (not part of a specific experimental design) to be used as the basis for rule making.

I speak with over 60 years experience in forest management and forestry research and from the perspective of my role as one of the principal negotiators of Forest and Fish. I was President of WFPA at the time of the negotiations.

Federal Assurances were based in no small part on the expected success of CMER and the AMP.

A properly functioning Adaptive Management Program is essential to the long-term viability of Forest and Fish.

Respectfully

Wade C Boyd

From: Phyllis Hatfield
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 2:44:29 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Phyllis Hatfield
[redacted]

From: [redacted]>
Sent: Tuesday, November 9, 2021 7:07 AM
To: DNR RE FP BOARD <forest.practicesboard@dnr.wa.gov>
Subject: AMP CR101 Proposal

Dear Forest Practices Board Members:

As a mostly-retired professional forester, former Forest Practices Board member, and small private landowner, I have relied on the Adaptive Management Program to provide science-based research to guide my efforts in rule-making and implementation of the Forest Practices Act Rules and Regulations for the past 20 years. I urge you to oppose and Not Pass the efforts by some to add arbitrary timelines and constraints to the AMP.

The Adaptive Management Program continues to work for all interested parties: landowners, agencies and the public, and is a fundamental component of the Forest and Fish Agreement. While it may seem frustratingly slow and cumbersome at times the AMP is the best way in which proper science-based research can inform the Board and others. The Board should continue to seek ways to improve the AMP without introducing arbitrary timelines and constraints.

I'm sorry that I can't be present at the meeting or by Zoom due to prior commitments. Please honor and affirm the good work of the AMP by filing the CR-101 Pre-proposal without arbitrary timelines and constraints, and allow the Adaptive Management science to continue working.

Sincerely,

Norm P. Schaaf
Former Forest Practices Board Member
[redacted]

-----Original Message-----
From: Darrell Saxton <[redacted]t>
Sent: Tuesday, November 9, 2021 4:39 PM
To: DNR RE FP BOARD <forest.practicesboard@dnr.wa.gov>
Subject: Forests & Fish Adaptive Management Monitoring is Working

External Email

Dear Boardmember Board,

I support a balanced approach on rulemaking for Type Np buffers by approving a CR 101 without artificial time constraints.

The Forests & Fish law is a cornerstone of Washington's Statewide Salmon Recovery Strategy. Sweeping changes to state forest practices rules and regulations have been made to protect aquatic habitat and clean water on 9 million acres of working forests - about 20% of Washington's land base.

The foundation of the Forest & Fish Law is science and adaptive management monitoring, a process to monitor and adapt forest practices rules as new scientific learning becomes available. Forest practices are in high compliance with state forestry rules. The scientific community works collaboratively through the Cooperative Monitoring Evaluation and Research Committee (CMER) to support adaptive management by advancing science recommendations to the Forest Practices Board to determine whether rules need to be changed to protect fish and water.

Some individuals want to rush rulemaking and break from the collaborative process, getting ahead of the Adaptive Management Science timeline. The science is not due to the Board until May 2022. Proposing rules changes without the latest scientific data would ignore the beneficial intent and purpose of the Forests & Fish Law.

Washington's sustainably managed working forests and wood products sector together offset at least 12% of the state's carbon emissions. More than 100,000 living-wage jobs, in every one of the state's 39 counties, are supported by Washington's working forests.

Please support a balanced approach in which science leads the way for adopting forestry rules.

Thank you.

Sincerely,

Darrell Saxton
[redacted]

-----Original Message-----
From: Patricia OHearn <[redacted]
Sent: Tuesday, November 9, 2021 10:15 AM
To: DNR RE FP BOARD <forest.practicesboard@dnr.wa.gov>
Subject: Forests & Fish Adaptive Management Monitoring is Working

External Email

Dear Boardmember Board,

I support a balanced approach on rulemaking for Type Np buffers by approving a CR 101 without artificial time constraints.

The Forests & Fish law is a cornerstone of Washington's Statewide Salmon Recovery Strategy. The foundation of the Forest & Fish Law is science and adaptive management monitoring, a process to monitor and adapt forest practices rules as new scientific learning becomes available. The scientific community works collaboratively through the Cooperative Monitoring Evaluation and Research Committee (CMER) to support adaptive management by advancing science recommendations to determine whether rules need to be changed to protect fish and water.

Proposing rules changes without the latest scientific data would ignore the beneficial intent and purpose of the Forests & Fish Law.

I support a balanced approach in which science leads the way for adopting forestry rules.

Thank you.

Sincerely,

Patricia OHearn
[redacted]

From: Phyllis Hatfield <[redacted]>
Sent: Friday, November 5, 2021 2:44 PM
To: DNR RE FP BOARD <forest.practicesboard@dnr.wa.gov>
Subject: Protect clean water

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Phyllis Hatfield
[redacted]

From: JJ Lindsey <[redacted]>
Sent: Tuesday, November 9, 2021 6:38 AM
To: DNR RE FP BOARD <forest.practicesboard@dnr.wa.gov>
Subject: Protect clean water

Chair Smith and Members of Forest Practices Board,

I am part of a group formed here in Olympia via the Thurston Climate Action Team, which has as its mission the protection and valuation of our TREES. We educate and activate on issues from urban protections for individual elder trees to preservation of forest canopy both urban and rural.
Our climate crisis requires immediate and broad protections be instituted to mitigate carbon and storm water runoff, prevent fire dangers, preserve and increase habitat (such as for salmon), safeguard soils and vast mycelial networks, and allow trees to provide the myriad of benefits they possess.
We need TREES....as many of them as we can get.
AS President Biden just prioritized at COP 26, it is NOW we need to be enacting wholesale protection on our forests.

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include STRONG LANGUAGE in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Thank you~

Sincerely,
JJ Lindsey
[redacted]

-----Original Message-----
From: Jim DeWilde [redacted]>
Sent: Tuesday, November 9, 2021 10:11 AM
To: DNR RE FP BOARD <forest.practicesboard@dnr.wa.gov>
Subject: Support Science-based Process

External Email

Dear Boardmember Board,

As a small forest landowner in Washington, I am directly impacted by Forest Practices Board actions. I ask the Board to continue to take a balanced approach on rulemaking by approving a CR 101 without arbitrary time constraints.

Please do not rush rulemaking and break from the collaborative process, getting ahead of the Adaptive Management Science timeline.

Rules based on sound and tested scientific data will best benefit the intent and purpose of the Forests & Fish Law, forest landowners, and wildlife/reparian habitat.

Thank you.

Jim DeWilde

Sincerely,

Jim DeWilde
[redacted]

From:	Don Brunell
To:	DNR RE FP BOARD
Subject:	Forests & Fish Adaptive Management Monitoring is Working
Date:	Tuesday, November 9, 2021 8:40:10 AM

External Email

Dear Boardmember Board,

I support a balanced approach on rulemaking for Type Np buffers by approving a CR 101 without artificial time constraints.

The Forests & Fish law is a cornerstone of Washington's Statewide Salmon Recovery Strategy. Sweeping changes to state forest practices rules and regulations have been made to protect aquatic habitat and clean water on 9 million acres of working forests - about 20% of Washington's land base.

The foundation of the Forest & Fish Law is science and adaptive management monitoring, a process to monitor and adapt forest practices rules as new scientific learning becomes available. Forest practices are in high compliance with state forestry rules. The scientific community works collaboratively through the Cooperative Monitoring Evaluation and Research Committee (CMER) to support adaptive management by advancing science recommendations to the Forest Practices Board to determine whether rules need to be changed to protect fish and water.

Some individuals want to rush rulemaking and break from the collaborative process, getting ahead of the Adaptive Management Science timeline. The science is not due to the Board until May 2022. Proposing rules changes without the latest scientific data would ignore the beneficial intent and purpose of the Forests & Fish Law.

Washington's sustainably managed working forests and wood products sector together offset at least 12% of the state's carbon emissions. More than 100,000 living-wage jobs, in every one of the state's 39 counties, are supported by Washington's working forests.

Please support a balanced approach in which science leads the way for adopting forestry rules.

Thank you.

Sincerely,

Don Brunell
[redacted]

From: Gerald Yorioka
To: DNR RE FP BOARD
Subject: Forests & Fish Adaptive Management Monitoring is Working
Date: Monday, November 8, 2021 7:40:07 PM

External Email

Dear Boardmember Board,

I support a balanced approach on rulemaking for Type Np buffers by approving a CR 101 without artificial time constraints.

The Forests & Fish law is a cornerstone of Washington's Statewide Salmon Recovery Strategy. Sweeping changes to state forest practices rules and regulations have been made to protect aquatic habitat and clean water on 9 million acres of working forests - about 20% of Washington's land base.

The foundation of the Forest & Fish Law is science and adaptive management monitoring, a process to monitor and adapt forest practices rules as new scientific learning becomes available. Forest practices are in high compliance with state forestry rules. The scientific community works collaboratively through the Cooperative Monitoring Evaluation and Research Committee (CMER) to support adaptive management by advancing science recommendations to the Forest Practices Board to determine whether rules need to be changed to protect fish and water.

Some individuals want to rush rulemaking and break from the collaborative process, getting ahead of the Adaptive Management Science timeline. The science is not due to the Board until May 2022. Proposing rules changes without the latest scientific data would ignore the beneficial intent and purpose of the Forests & Fish Law.

Washington's sustainably managed working forests and wood products sector together offset at least 12% of the state's carbon emissions. More than 100,000 living-wage jobs, in every one of the state's 39 counties, are supported by Washington's working forests.

Please support a balanced approach in which science leads the way for adopting forestry rules.

Thank you.

Sincerely,

Gerald Yorioka

From:	Vanessa Jamison
To:	DNR RE FP BOARD
Subject:	Please take a balanced approach to rulemaking
Date:	Tuesday, November 9, 2021 10:20:09 AM

External Email

Dear Boardmember Board,

I support a balanced approach on rulemaking by approving a CR 101 without arbitrary time constraints.

Some individuals want to rush rulemaking and break from the collaborative process, getting ahead of the Adaptive Management Science timeline.

Proposing rules changes without the latest scientific data would ignore the beneficial intent and purpose of the Forests & Fish Law.

Adaptive Management increases stakeholder participation and engagement because it is built on partnerships among land managers, scientists and other stakeholders.

The predictability of the science-driven rules process has enabled Washington's sustainable working forests and wood products sector, which together offset at least 12% of the state's carbon emissions, to remain productive and competitive. More than 100,000 living-wage jobs, in every one of the state's 39 counties, are supported by Washington's working forests.

Please support a balanced approach in which science leads the way for adopting forestry rules.

Thank you.

Sincerely,

Vanessa Jamison
[redacted]

From:	Mike Hoban, voter
To:	DNR RE FP BOARD
Subject:	PLEASE take a balanced approach to rulemaking
Date:	Tuesday, November 9, 2021 10:20:10 AM

External Email

Dear Boardmember Board,

I support a balanced approach on rulemaking by approving a CR 101 without arbitrary time constraints.

Some individuals want to rush rulemaking and break from the collaborative process, getting ahead of the Adaptive Management Science timeline.

Proposing rules changes without the latest scientific data would ignore the beneficial intent and purpose of the Forests & Fish Law.

Adaptive Management increases stakeholder participation and engagement because it is built on partnerships among land managers, scientists and other stakeholders.

The predictability of the science-driven rules process has enabled Washington's sustainable working forests and wood products sector, which together offset at least 12% of the state's carbon emissions, to remain productive and competitive. More than 100,000 living-wage jobs, in every one of the state's 39 counties, are supported by Washington's working forests.

Please support a balanced approach in which science leads the way for adopting forestry rules.

Thank you.

Sincerely,

Mike Hoban

[redacted]

From:	James Vander Ploeg
To:	DNR RE FP BOARD
Subject:	Please take a balanced approach to rulemaking
Date:	Tuesday, November 9, 2021 10:20:10 AM

External Email

Dear Boardmember Board,

I support a balanced approach on rulemaking by approving a CR 101 without arbitrary time constraints.

Some individuals want to rush rulemaking and break from the collaborative process, getting ahead of the Adaptive Management Science timeline.

Proposing rules changes without the latest scientific data would ignore the beneficial intent and purpose of the Forests & Fish Law.

Adaptive Management increases stakeholder participation and engagement because it is built on partnerships among land managers, scientists and other stakeholders.

The predictability of the science-driven rules process has enabled Washington's sustainable working forests and wood products sector, which together offset at least 12% of the state's carbon emissions, to remain productive and competitive. More than 100,000 living-wage jobs, in every one of the state's 39 counties, are supported by Washington's working forests.

Please support a balanced approach in which science leads the way for adopting forestry rules.

Thank you.

Sincerely,

James Vander Ploeg
[redacted]

From: Jerry Bonagofsky
To: DNR RE FP BOARD
Subject: Please take a balanced approach to rulemaking
Date: Monday, November 8, 2021 7:40:05 PM

External Email

Dear Boardmember Board,

I support a balanced approach on rulemaking by approving a CR 101 without arbitrary time constraints.

Some individuals want to rush rulemaking and break from the collaborative process, getting ahead of the Adaptive Management Science timeline.

Proposing rules changes without the latest scientific data would ignore the beneficial intent and purpose of the Forests & Fish Law.

Adaptive Management increases stakeholder participation and engagement because it is built on partnerships among land managers, scientists and other stakeholders.

The predictability of the science-driven rules process has enabled Washington's sustainable working forests and wood products sector, which together offset at least 12% of the state's carbon emissions, to remain productive and competitive. More than 100,000 living-wage jobs, in every one of the state's 39 counties, are supported by Washington's working forests.

Please support a balanced approach in which science leads the way for adopting forestry rules.

Thank you.

Sincerely,

Jerry Bonagofsky
[redacted]

From:	David New
To:	DNR RE FP BOARD
Subject:	Please take a balanced approach to rulemaking
Date:	Tuesday, November 9, 2021 2:00:10 PM

External Email

Dear Boardmember Board,

I support a balanced approach on rulemaking by approving a CR 101 without arbitrary time constraints.

Yes, I am using a pre-written script for this message, but it says exactly what I believe.

Some individuals want to rush rulemaking and break from the collaborative process, getting ahead of the Adaptive Management Science timeline.

Proposing rules changes without the latest scientific data would ignore the beneficial intent and purpose of the Forests & Fish Law.

Adaptive Management increases stakeholder participation and engagement because it is built on partnerships among land managers, scientists and other stakeholders.

The predictability of the science-driven rules process has enabled Washington's sustainable working forests and wood products sector, which together offset at least 12% of the state's carbon emissions, to remain productive and competitive. More than 100,000 living-wage jobs, in every one of the state's 39 counties, are supported by Washington's working forests.

Please support a balanced approach in which science leads the way for adopting forestry rules.

Thank you.

Sincerely,

David New
[redacted]

From:	Shirley Rheault
To:	DNR RE FP BOARD
Subject:	Please take a balanced approach to rulemaking
Date:	Tuesday, November 9, 2021 2:00:09 PM

External Email

Dear Boardmember Board,

Trees take a long time to grow and there is NO hurry to rush through arbitrary rules. ALL interested parties need to be at the decision-making table! I support a balanced approach on rulemaking by approving a CR 101 without arbitrary time constraints.

Some individuals want to rush rulemaking and break from the collaborative process, getting ahead of the Adaptive Management Science timeline.

Proposing rules changes without the latest scientific data would ignore the beneficial intent and purpose of the Forests & Fish Law.

Adaptive Management increases stakeholder participation and engagement because it is built on partnerships among land managers, scientists and other stakeholders.

The predictability of the science-driven rules process has enabled Washington's sustainable working forests and wood products sector, which together offset at least 12% of the state's carbon emissions, to remain productive and competitive. More than 100,000 living-wage jobs, in every one of the state's 39 counties, are supported by Washington's working forests.

Please support a balanced approach in which science leads the way for adopting forestry rules.

Thank you.

Sincerely,

Jerry Rheault

From: Caitlin Krenn
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Tuesday, November 9, 2021 3:42:14 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Caitlin Krenn
[redacted]

From: Amber Eby
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Tuesday, November 9, 2021 3:00:17 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Amber Eby
[redacted]

From: Barbara Blackwood
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 3:45:29 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Barbara Blackwood
[redacted]

From: Jennifer Valentine
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 3:45:54 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Jennifer Valentine
[redacted]

From: Jody Gibson
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 3:23:17 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Jody Gibson
[redacted]

From: Heather Murawski
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 3:14:10 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Heather Murawski
[redacted]

From: Cheryl Biale
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 3:13:00 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Cheryl Biale
[redacted]

From: Robyn Reichert
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 3:08:16 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Robyn Reichert
[redacted]

From: kathy grieves
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 3:05:34 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
kathy grieves
[redacted]

From: Tania Malven
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 2:49:47 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Tania Malven
[redacted]

From: Querido Galdo
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 2:51:35 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Querido Galdo
[redacted]

From: Jackie Stewart
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 7:03:49 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Jackie Stewart
[redacted]

From: Amy Mower
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 4:32:00 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Amy Mower
[redacted]

From: Sarah Bauman
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 4:54:10 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Sarah Bauman


From: Amy Mower
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 4:33:16 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Amy Mower
[redacted]

From: Amy Mower
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 4:33:16 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Amy Mower
[redacted]6

From: Sandra Geist
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 7:02:37 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Sandra Geist
[redacted]

From: Sarah Bauman
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 4:55:18 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Sarah Bauman
[redacted]

From: Colleen K
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 7:11:57 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Colleen K
[redacted]

From: Amanda Dickinson
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Saturday, November 6, 2021 8:30:34 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Amanda Dickinson
[redacted]

From: Jessica Pate
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Monday, November 8, 2021 5:00:29 AM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Jessica Pate


From: Anne Nequette
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Sunday, November 7, 2021 12:31:56 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting.

However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water--particularly for salmon.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Anne Nequette
[redacted]

From: Peter Kahigian
To: DNR RE FP BOARD
Subject: Protect clean water
Date: Friday, November 5, 2021 7:22:39 PM

External Email

Chair Smith and Members of Forest Practices Board,

Thank you for your work on the Forest Practices Board. I am pleased the Board is considering initiating rulemaking on Type Np streams in western Washington at the November 2021 Forest Practices Board meeting. However, a CR-101 on its own is insufficient to demonstrate the Board's commitment to protecting Washington's headwater streams, which are so important in providing clean, cool water.

I ask that you include strong language in the CR-101 committing the Board to an ambitious, binding timeline to complete rulemaking as expeditiously as possible, and fulfill the promises of the Adaptive Management Program.

Sincerely,
Peter Kahigian
[redacted]

From:	Gary Wood.
To:	DNR RE FP BOARD
Subject:	The current science-driven Adaptive Management process is working.
Date:	Tuesday, November 9, 2021 10:20:09 AM

External Email

Dear Boardmember Board,

We urge the Forest Practices Board to remain committed to our state's collaborate, science-driven, rule-making process.

- Adaptive management works because it lets the science guide the policymaking.
- The current process applies science-backed findings and tests to determine a sensible approach in forestry practices rulemaking that balances the interests of working forests and ensuring Washington's natural resources are protected.

Proposing rules changes without the latest scientific data would ignore the beneficial intent and purpose of the Forests & Fish Law.

If arbitrary timelines and constraint are put on the rulemaking process, two decades of progress on restoring habitat for salmon populations in working forests, would be jeopardized.

Washington's sustainably managed working forests and wood products sector together offset at least 12% of the state's carbon emissions. More than 100,000 living-wage jobs, in every one of the state's 39 counties, are supported by Washington's working forests.
Please support working forests by taking a balanced approach to adopting forestry rules.

Thank you.

Sincerely,

Gary Wood.
[redacted]

From:	Jim Reed
To:	DNR RE FP BOARD
Subject:	The current science-driven Adaptive Management process is working.
Date:	Tuesday, November 9, 2021 2:00:08 PM

External Email

Dear Boardmember Board,

We urge the Forest Practices Board to remain committed to our state's collaborate, science-driven, rule-making process.

- Adaptive management works because it lets the science guide the policymaking.
- The current process applies science-backed findings and tests to determine a sensible approach in forestry practices rulemaking that balances the interests of working forests and ensuring Washington's natural resources are protected.

Proposing rules changes without the latest scientific data would ignore the beneficial intent and purpose of the Forests & Fish Law.

If arbitrary timelines and constraint are put on the rulemaking process, two decades of progress on restoring habitat for salmon populations in working forests, would be jeopardized.

Washington's sustainably managed working forests and wood products sector together offset at least 12% of the state's carbon emissions. More than 100,000 living-wage jobs, in every one of the state's 39 counties, are supported by Washington's working forests.
Please support working forests by taking a balanced approach to adopting forestry rules.

Thank you.

Sincerely,

Jim Reed
[redacted]

From:	Thomas Keys
To:	DNR RE FP BOARD
Subject:	The current science-driven Adaptive Management process is working.
Date:	Tuesday, November 9, 2021 10:20:08 AM

External Email

Dear Boardmember Board,

We urge the Forest Practices Board to remain committed to our state's collaborate, science-driven, rule-making process.

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Thank you.

Sincerely,

Thomas Keys


From: Derrick Taylor
To: DNR RE FP BOARD
Subject: The current science-driven Adaptive Management process is working.
Date: Tuesday, November 9, 2021 10:20:10 AM

External Email

Dear Boardmember Board,

We urge the Forest Practices Board to remain committed to our state's collaborate, science-driven, rule-making process.

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Thank you.

Sincerely,

Derrick Taylor


From:	Mr. & Mrs. John and Judi Wright
To:	DNR RE FP BOARD
Subject:	The current science-driven Adaptive Management process is working.
Date:	Tuesday, November 9, 2021 1:50:05 PM

External Email

Dear Boardmember Board,

We urge the Forest Practices Board to remain committed to our state's collaborate, science-driven, rule-making process.

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- The current process applies science-backed findings and tests to determine a sensible approach in forestry practices rulemaking that balances the interests of working forests and ensuring Washington's natural resources are protected.

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Washington's sustainably managed working forests and wood products sector together offset at least 12% of the state's carbon emissions. More than 100,000 living-wage jobs, in every one of the state's 39 counties, are supported by Washington's working forests.
We have a small lumber tree farm that will be impacted by this. We are part of a much larger neighborhood of lumber tree farms totaling hundreds of acres. We need constructive, wise decisions based on science.

Please support working forests by taking a balanced approach to adopting forestry rules.

Thank you.

Sincerely,

John and Judi Wright
[redacted]

From: Tom Atkins
To: DNR RE FP BOARD
Subject: The current science-driven Adaptive Management process is working.
Date: Tuesday, November 9, 2021 2:00:08 PM

External Email

Dear Boardmember Board,

We urge the Forest Practices Board to remain committed to our state's collaborate, science-driven, rule-making process.

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Please support working forests by taking a balanced approach to adopting forestry rules.

Thank you.

Sincerely,

Tom Atkins


From:	Steve Polimeni
To:	DNR RE FP BOARD
Subject:	The current science-driven Adaptive Management process is working.
Date:	Tuesday, November 9, 2021 2:00:11 PM

External Email

Dear Boardmember Board,

We urge the Forest Practices Board to remain committed to our state's collaborate, science-driven, rule-making process.

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Thank you.

Sincerely,

Steve Polimeni


From:	Bob Stewart
To:	DNR RE FP BOARD
Subject:	The current science-driven Adaptive Management process is working.
Date:	Tuesday, November 9, 2021 4:40:07 PM

External Email

Dear Boardmember Board,

We urge the Forest Practices Board to remain committed to our state's collaborate, science-driven, rule-making process.

Adaptive management works because it lets the science guide the policymaking.

Over the past 50 years this 68 YO third generation tree farmer has watched as now over 25% of the family's tree farm has been whittled away in stream buffers, all in the name of one species... salmon. Despite this taking of timber rights from landowners, there are less salmon in the streams and rivers than ever before.

Managing for one species in the name of resilience is foolhardy as it only makes the total system more fragile, less robust.

In the medical field, there is a basic tenant to guide all endeavors.... "do no harm"
Fast tracking policy that has serious consequences, both direct and indirect, is a recipe for mistakes and doing harm.

I urge you to reconsider and follow the promised plan as originally proposed.

Proposing rules changes without the latest scientific data would ignore the beneficial intent and purpose of the Forests & Fish Law.

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Please support working forests by taking a balanced approach to adopting forestry rules.

Thank you.

Sincerely,

Bob Stewart

From:	Howard Wilson
To:	DNR RE FP BOARD
Subject:	The current science-driven Adaptive Management process is working.
Date:	Tuesday, November 9, 2021 4:50:06 PM

External Email

Dear Boardmember Board,

My wife and I own 400 acres of Forest land.
Currently we have to provide excessive buffers on 2 foot wide fish streams. We urge the Forest Practices Board to remain committed to our state's collaborate, science-driven, rule-making process.

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Please support working forests by taking a balanced approach to adopting forestry rules.

Thank you.

Howard & Sheena Wilson

Sincerely,

Howard Wilson
[redacted]