



**WASHINGTON FOREST PROTECTION ASSOCIATION**

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May 18, 2020

**To: Mark Hicks, AMPA**

**CC: TFW Policy Members**

**From: Darin Cramer, WFPA**

**Subject: Smart Buffer Project Proposal Initiation**

This is a follow-up memo to WFPA's Proposal Initiation (PI) submitted April 21, 2020 and your subsequent May 3, 2020 recommendation to TFW Policy. Since we were unable to directly discuss the PI prior to your recommendation being forwarded to Policy, I hope this memo can help clarify assumptions and answer some of the questions raised.

First, WFPA had fully anticipated the study plan would need a technical review to be considered in the Adaptive Management Program (AMP) process. This was not specifically stated in the PI, nor did I describe how a technical review should be accomplished. I considered that to be part of the BM 22 evaluation process, which is explicitly your role. In any case, my assumption is TFW Policy will need appropriate technical review/approval overseen by CMER to consider acceptance.

Second, although WFPA began the project in 2019, there is still opportunity for technical, operational, and policy engagement to refine and clarify the approach. We obviously do not want to sacrifice the investments already made nor substantially drive up costs but are certainly open to ways to improve the project while maintaining the overall integrity of the approach.

We acknowledge considering a PI for a project already underway is not an ideal situation. Given the AMP is currently in the process of considering alternative riparian management zone (RMZ) configurations for Type Np streams, we should already have this information. Unfortunately, apart from the 50' continuous RMZ treatment applied in the hardrock study, the AMP has not intentionally tested different configurations in an operational context that specifically target shade retention. Therefore, the Np workgroup will be primarily relying on outside science and expert judgement to substantiate their recommendations. Given this situation, and the desired timeline of TFW Policy and the Forest Practices Board, WFPA determined we had no choice but to get the project started as soon as possible, in advance of submitting a PI. The time and effort required to coordinate this project amongst our members, along with other workload considerations, precluded us from submitting the PI until this spring.

Third, as stated in the study plan, "the working hypothesis is that buffer locations, widths, and stand densities can be configured to improve effective shading of Np streams equal to or greater than that provided by Np fixed-width RMZs", RMZs will be designed to optimize shade retention, balanced

with operational feasibility and other important considerations (e.g. sensitive site protection, wood recruitment, bank stability). August 1st was chosen as the likely worse case for solar insolation reaching a stream, so RMZs will be designed to mitigate that effect. This is a western Washington only study, there are no sites in northeast Washington. Two of the reference sites are difficult to see on the study plan map due to scale, but there is a reference site in both the Northwest and Olympic regions. Nineteen sites were established in 2019, 16 potential treatment and three reference sites. Ten more sites, five treatment and five reference sites, were added in 2020.

Finally, as outlined in your memo to TFW Policy, WFPA agrees rule changes and new rules must be informed by quality science vetted through the AMP process, and the AMP should produce as much of that science as possible prior to initiating rule making. However, we also recognize the AMP has resource limitations which can at times constrain its ability to produce the science when it is needed. Testing the efficacy of different RMZ configurations at retaining shade and minimizing water temperature changes that may be the result of forest management, is an obvious information gap the AMP should be expeditiously working to fill. WFPA's smart buffer project can advance that effort.