

AUG 06 2025

WATER QUALITY PROGRAM



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Washington Forest Practices Board
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Re: Np Buffer Rulemaking

Dear Board Members,

Thank you for the opportunity to provide comments on the proposed Np Buffer Rule. I am a silviculture forester with 50 years' experience. I have also participated in the Forest Practices Adaptive Management Program for the last 25 years. I recommend that you stop the rule making process because more investigation is needed to better understand the complex ecology of Type N Waters and its impact on state and local communities.

The following is a list of concerns that render the proposed rule inappropriate and of poor quality:

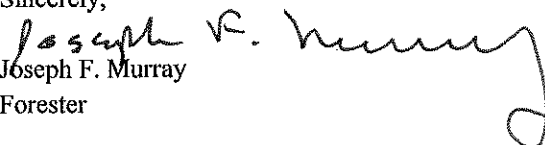
- The sample size of the studies that the proposed rule is based on was very small.
- The study sites were not randomly selected.
- The study did not allow for consideration of current forest harvest practices around Type N Waters.
- The uniqueness and diversity between the individual sites were not adequately considered.
- The study did not establish an impact on fish.
- It is unknown what portions of the Type N streams go dry during the year.
- The uncertainty of the economic impact needs further investigation; it is estimated that 200,000 acres of private forest land will be removed from the commercial forest land base without compensation.
- The rule will likely reduce the forest products manufacturing infrastructure by an estimated two sawmills and 2000 direct jobs.
- There will be significant reductions to tax revenues.
- The proposed rule will eliminate the construction of 15,000 houses per year, exacerbating the housing shortage.

In the early 1990's, the listing of the spotted owl caused significant social damage to the fabric of our rural communities, not only because of the loss of jobs, but because of the loss of community wellbeing and self-esteem among the families of those who became unemployed.

I urge you not to approve the proposed Type N Buffer Rules.

Thank you for the opportunity to provide comments.

Sincerely,


Joseph F. Murray
Forester