



*SUBMITTED ONLINE ONLY*

August 12, 2025

Watershed Management Section  
Department of Ecology

Submitted online at <https://wg.ecology.commentinput.com/?id=juMmcHx2Ff>

**Re: Tier II Antidegradation Analysis – Forest Practices Board’s Proposed Rule for Type Np Streams Water Buffers for Western Washington**

To Whom It May Concern:

Friends of the Columbia Gorge (“Friends”) has reviewed and submits these comments regarding Ecology’s *Draft Tier II Antidegradation Analysis for the Washington Forest Practices Board’s Proposed Western Washington Type Np Waters Buffer Rule* (July 2025, Publication 25-10-041) (“Draft Analysis”). Friends is a nonprofit organization with approximately 4,500 members dedicated to protecting and enhancing the resources of the Columbia River Gorge. Our membership includes hundreds of citizens who reside within the Columbia River Gorge National Scenic Area.

Friends agrees with Ecology’s measurable change analysis in the Draft Analysis. As Ecology concludes, the Proposed Rule currently under consideration by the Forest Practices Board would cause minor temperature increases in some Type Np streams after adjacent timber harvests—particularly in streams where 50-foot buffers would still be allowed even under the Proposed Rule. To avoid the unacceptable risk of such temperature increases, **Ecology should recommend**, and the Forest Practices Board should adopt, a more protective rule than the Proposed Rule that would establish **a minimum of 75 feet as the buffer width along all Type Np streams** to help protect riparian areas, water quality, and other natural resources from the harmful effects of clearcutting and other forest practices. Such a rule is necessary to meet Tier II temperature standards.

Unfortunately, the timber industry is attempting to obfuscate the applicable legal requirements, for example by falsely asserting that Ecology is not even required to conduct a Tier II analysis of the Proposed Rule. Contrary to that assertion, forest practices, as regulated by the forest practices rules, must comply with the federal Clean Water Act, and revision of stream

buffer requirements, such as the revisions proposed in the Proposed Rule, trigger the requirements for a Tier II analysis given that the stream buffer provisions are a “water pollution control program[] authorized, implemented, or administered by” Ecology. WAC 173-201A-320(2)(d).

In conclusion, Ecology should recommend forest practices rules that would establish a minimum of 75 feet as the buffer width along all Type Np streams. Anything less would fail to satisfy the Tier II temperature standards.

Sincerely,



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