



The Confederated Tribes of the Colville Reservation

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Tuesday, August 12, 2025

State of Washington
Department of Ecology
Water Quality Program
PO Box 47600
Olympia, WA 98504-7600

Subject: Ecology's Tier II Analysis of the Forest Practices Board's Proposed Western Washington Type Np Buffer Rule

To Whom It May Concern,

On behalf of the Confederated Tribes of the Colville Reservation, we respectfully submit our comments on the Draft Tier II Antidegradation Analysis WWA Type Np Buffer Rule. We appreciate the opportunity to engage in this important conversation and wish to emphasize the imperative for region-specific consideration in the development and implementation of buffer rules, particularly as they may pertain indirectly to eastern Washington.

The proposed buffer rule in Western Washington, though not directly applicable to the Central Region of Washington, may have indirect impacts across the state. If proven effective, it could serve as a regulatory precedent for other regions, prompting consideration of similar measures to protect water quality and habitat. Changes in timber industry practices resulting from the rule could influence market dynamics throughout Washington. Additionally, research and adaptive management arising from its implementation may be used to drive potential strategies for consideration in the Central Region.

Through decades of experience managing lands and waters on the Colville Reservation, we have witnessed firsthand the distinct environmental conditions that characterize eastern Washington. It is clear to us that the climate, vegetation, hydrology, and ecological functions on the east side of the state differ substantially from those found in western Washington. As such, we are concerned that the application of general rules across the state does not fully capture the needs or realities faced by our communities and ecosystems.

Eastern Washington is defined by a drier climate and lower precipitation. Our riparian zones are typically narrower, with sparser vegetation. In contrast, western Washington's lush, dense riparian vegetation supports wider buffers with different management objectives that may not translate effectively to our region. Central and Eastern Washington are also experiencing high severity wildfire in riparian areas, with significant impacts in the areas burned on the Colville Reservation over the last decade.

The hydrological systems of eastern Washington streams tend to be simpler and carry lower flow volumes than those in the west. Our resource priorities often center on protecting water quantity, preventing erosion, and ensuring the sustainability of cultural and ecological resources. Wider buffers

designed for western Washington's complex floodplains and salmon habitat may not reflect the unique needs of our streams and species, which require a tailored approach to management and protection.

The Confederated Tribes advocate for region-specific studies and adaptive management practices that recognize and address the unique conditions of eastern Washington. We urge the Department of Ecology to work with the Forest Practices Board and tribal representatives in conducting thorough evaluations of buffer effectiveness, stream temperature, riparian habitat, and forestry impacts on aquatic life on the east side of the state.

Additionally, the cultural significance of our waterways and riparian areas cannot be overstated. Many of our pre-contact camps, resource gathering areas, and wildlife habitats rely on thoughtful buffer management to maintain both water quality and quantity. The stories of our elders, who have witnessed the ongoing impacts of logging, agricultural water extraction, and loss of beaver populations, underscore the need for careful, locally informed stewardship. It is crucial that any buffer rule applied to perennial non-fish waterways also safeguards these cultural and ecological resources for future generations.

Recommendations:

- Conduct region-specific studies to evaluate buffer rules in eastern Washington, considering local climate, vegetation, and hydrology.
- Modify or supplement the Adaptive Management Program to ensure eastern Washington's unique needs are met in a timely manner with growing risk to loss from wildfire.
- Engage tribal stakeholders and other local entities in decision-making processes to ensure the rules reflect our lived experience and environmental realities.
- Monitor the implementation and effectiveness of buffer rules and commit to revising them as new data emerge.
- Establish additional protections for Tribal cultural resources and recognize the intertwined nature of ecological and cultural stewardship.

We thank you for your attention to these concerns and your commitment to honoring the diversity of Washington's landscapes and communities. We look forward to continued collaboration to ensure forest practices rules truly reflect and protect the distinctive needs of eastern Washington.

Sincerely,



Jarred-Michael Erickson, Chairman
Confederated Tribes of the Colville Reservation

cc: Colville Business Council
Executive Director
Natural Resource Director