Public Comment: Tier II Analysis
To: Forest Practices Board
From: Aimee Powell, Generational Steward
Date: August 18, 2025

Subject: Public Comment on Tier II Analysis of Forest Practices Draft Rules

Thank you for the opportunity to submit comments on Ecology's Tier II Analysis. I strongly support expanding protections for Type Np streams to safeguard water quality, cool downstream fish habitats, and protect wildlife like amphibians, insects, and birds.

As climate change accelerates, it is imperative that Washington's forest practice rules evolve to protect the ecological integrity of our non-fish bearing (Type Np) streams. These headwater reaches are not only vital for downstream water quality but also for maintaining watershed resilience in the face of intensifying heatwaves, drought, and sediment pulses.

I endorse the Board's proposal of enhancing riparian protections for climate resilience but oppose the prescribed fixed-width methodology. Drawing on four centuries of Bavarian forestry heritage, where adapting practices to microsites not only safeguarded the forests but also fueled regional economic growth, I urge the Board to enhance Washington's adaptive management leadership by adopting the following:

Four Actionable Recommendations

1. Precision Buffers in High-Impact Zones

Focus initial implementation in degraded lowland watersheds where temperature risks and pollution converge, using collaborative vulnerability mapping. Prioritizing these areas maximizes cooling and filtration benefits per protected acre while advancing equitable ecological outcomes.

2. Climate-Resilient Canopy Standards

Transition from fixed-width buffers to site-specific multi-layered shade standards.

This approach:

- Effectively reduces peak stream temperatures through site-adapted canopy density (Garner et al., 2017);
- Stabilizes banks via diverse root systems to reduce erosion;
- Enhances biodiversity through native vegetation layers (canopy, understory, groundcover);
- Maintains flexibility for topography, soil, and wetland conditions while delivering measurable outcomes;

- Builds on Washington-based science (Quick et al., 2024; DeWalle, 2008) where light-thinning maintained soil carbon while accelerating structural complexity - a model for stabilizing riparian zones along Type Np streams.

3. Economic Equity via Carbon Markets

Integrate buffer conservation into Washington's Climate Commitment Act framework. Allow landowners to generate verified carbon credits for exceeding shade targets, sustaining family forests through ecological stewardship.

4. Adaptive Management Loop

Require 5-year monitoring cycles for temperature and bank stability, using:

- Temperature tracking in high-risk reaches;
- Community-involved data review processes;
- Science-guided adjustments.

Why This Works for Washington

- Cold Water Protected: Targeted shading meets temperature reduction goals.
- Ecosystem Enhanced: These buffers will directly protect the amphibians, insects, and birds that rely on Np streams - a critical step for biodiversity.
- Working Forests Sustained: Carbon revenue offsets harvest impacts without
- compromising timber viability.
- Accountability Built-In: Regular monitoring enables adaptive management.

Heritage Stewardship Informing Policy

Heritage stewardship teaches that diverse landscapes demand flexibility. These measures protect streams while honoring rural livelihoods, ensuring our forests remain ecologically resilient and economically vibrant for generations.

Thank you,

Aimee Powell
Generational Steward