

## Craig Zora

I'm a salmon fisherman and former WDFW stream surveyor who is in strong support of this draft rule change.

"Type Np" streams in Western Washington's forestland are non-fish-bearing perennial streams, meaning they flow year-round but don't support fish populations.

The primary driver for this rulemaking is the goal of reducing stream warming and preventing temperature pollution. Existing regulations restrict timber harvesting near these streams and require a continuous 30-foot equipment limitation zone, with half the stream length having 50-foot buffers on both sides.

The new rulemaking, initiated by the Forest Practices Board in 2023, aims to strengthen these protections. The proposed changes would: 1) Increase the width of buffers along Type Np streams from 50 to 75 feet, depending on site conditions. 2) Require more trees to be left around these streams to maintain cool water temperatures and prevent temperature pollution.

The changes are based on scientific findings indicating the need for increased protection to prevent warming in these streams.

The proposed rule focuses specifically on a subset of harvestable forest land in Western Washington, estimated at less than 3% of the roughly six million acres covered by the Forest Practices Habitat Conservation Plan.

The proposed rule still allows for flexibility, including site-specific alternative plans for harvesting, cutting corridors for cables, and building roads through riparian areas when necessary for timber access.

A cost-benefit analysis found that the probable benefits of the proposed rule are likely to outweigh the probable costs. There will be reduced risk of stream temperature increases, improved terrestrial habitat, and enhanced tribal cultural values.

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