

John Gold

Thank you for the opportunity. For the record my name is John Gold.

Your presentation this afternoon was breathtaking. It sounds so rational, but it reminds me of the aphorism about the forest and the trees.

I'm a professional forester with Sierra Pacific Industries. Sierra Pacific is a vertically integrated company in the forest sector. We own over 300,000 acres of forest land in Western Washington, which would be subject to the proposed rule and our 4 sawmills in Washington rely on the sustainable harvest of timber from a variety of other private and public lands.

We are strong believers in the resource protections Washington adopted with the forest and fish law, the HCP which affirms it, and the adaptive management program which ensures that science is the basis for any rule changes.

Alas, the proposed NP buffer rule published in the CR-102 and assessed in your draft Tier II analysis does not uphold that commitment. There are several shortcomings in the rule development and analysis which we believe need to be addressed.

First, the public record is clear that Ecology directed the adaptive management program to develop a rule which prevented any measurable temperature change purportedly because the state water quality standards mandated that. The Ecology representative to the Forest Practices Board blocked consideration or analysis of any alternative rule approach.

Yet now, the draft Tier II analysis states the opposite, that 0.3 degrees is not only allowable but just like the current rule, the proposed rule will result in temperature increases sometimes in some places. The correct standard must be articulated and a range of solutions must be developed and analyzed in a proper analysis.

Second, the rule as written is onerous. It will incur an enormous societal cost for minimal if any ecological benefit. It strikes the wrong balance. The context that the current rule results in waters exceeding

the numeric designated use criteria for salmonids is inexplicably missing from your analysis and must be corrected. The actual impact on beneficial uses must be considered.

Third, it is unclear why Ecology has determined a Tier II analysis is required since there is no new action here. The draft analysis should be revised to explain the new or expanded action.

We will be submitting written comments to supplement this testimony and I thank you for your time.