Erik Nelson

Respectfully, the Forest Practices Board should reject Ecology's Tier II Analysis which:

1) misuses Tier II review processes, contradicting past practice and law;

2) exceeds its antidegradation authority, ignoring laws requiring least burdensome alternatives;

3) cherry-picks worst-case temperature readings, while ignoring evidence that stream temperatures stayed below legal limits 90% of the time;

4) fails to properly balance harm/benefit, ignoring less costly options which would still protect water quality and neglecting to account for impacts on small landowners by using inflated assumptions to justify preferred outcomes that will cost Washingtonians $8 billion over a single forest rotation;

5) seems effectively rigged to develop a preferred outcome, blocking Science-based alternatives from the AMP.

In sum, the Forest Practices Board should reject Ecology's Tier II analysis, the proposed NP buffer rule, and restart the process.

Thank you.