

Nancy Churchill

Thank you for the opportunity to comment on this proposed rule. I think the Forest Practices Board should reject Ecology's Tier II Analysis. Here's why:

- 1) Ecology has misused the Tier II review process. This misuse contradicts past practice and law.
- 2) Ecology ignored laws requiring the least burdensome alternative and misused its antidegradation authority.
- 3) Ecology cherry-picked worst-case temperature readings, while ignoring evidence that stream temperatures stayed below the legal limit 90% of the time.
- 4) Failure to properly balance harm/benefit.

Ecology ignored smarter, less costly options that would still protect water quality. Their economic analysis failed to account for the impact on small landowners and used inflated assumptions to justify a preferred outcome.

- 5) The process was rigged to develop a preferred outcome: Science-based alternatives from the AMP were blocked.

In summary: The Forest Practices Board should reject Ecology's Tier II analysis, the proposed Np buffer rule, and restart the process.

Thank you for considering my concerns.