Call to Action: Protect Working Forests & Sound Science in Np Buffer Rulemaking

The Forest Practices Board (FPB) is considering a new rule for Western Washington Np stream buffers based on a misapplication of water quality laws and without demonstrating that current practices are failing. This proposed rule would impose massive economic harm — without meaningful benefit to water quality or salmon recovery. **You can help stop this overreach, speak up and tell the FPB to pause the CR102**.

1. Demand Science-Based Rulemaking – Not Misinterpretation of a Procedural Threshold

The FPB is advancing a costly rule based on Ecology's misuse of a 0.3°C procedural trigger — meant to prompt public review, not justify regulation. The rule would remove 4–8% of the 2023 private timber harvest, equal to 1–2 sawmills, 2,000 jobs, and enough wood for 9,000–15,000 homes annually — despite no fish being present and no significant water quality harm. Science shows that current rules already meet water quality standards. **Tell the FPB: Follow the Forests and Fish law — not invented thresholds.**

2. Reject Unjustified Costs – Protect Working Forests

The proposed buffer rule could remove up to 235,000 acres of forestland from production and expand nonfish buffers by up to 120%. Eliminating up to 112 million board feet of timber annually will cost thousands of rural jobs. Landowners have already set aside 15-20% of their land without compensation; now they're being asked to give up even more — without new standards or compensation. **Tell the FPB: These economic sacrifices are real — but the benefits are not.**

3. Insist on Alternatives – Consider the Minority Proposal

The FPB rejected a balanced Minority proposal without evaluation. It offers stream protection with far less economic damage. The law requires rule makers to consider reasonable alternatives. **Tell the FPB: Meet your legal duty — evaluate all options, not just Ecology's.**

4. Hold the FPB Accountable – No Rule Without Justification

There is no evidence that current forest practices are causing water quality failures. Stream temperatures remain well within the 16°C state water quality standard. State law prohibits new rules without showing failure of existing ones. **Tell the FPB: No data, no damage — no new rule.**

5. Stop Rulemaking Drift – Restore Trust in the Forests & Fish Agreement

The Forests & Fish Agreement was built on scientific review, adaptive management, and legal assurances. Ecology's reinterpretation of water quality law breaks that trust. If voluntary conservation agreements no longer provide certainty, landowners will walk away. **Tell the FPB: Don't destroy what's working.**

6. Climate Consequences of Reduced Forest Management

Washington's working forests are a proven climate solution — planting 52 million carbon-storing trees each year. The proposed rule would reduce active forest management, meaning fewer trees planted, less wood produced, and more carbon released into the atmosphere from harvest leakage, and material substitution. **Tell the FPB: Reduced forest management is reduced climate benefit.**

7. Cumulative Effects of Forests & Fish Rules Must Be Acknowledged

Stakeholders accepted the $2.36 billion cost of setting aside 764,000 acres under the 1999 Forests & Fish Law based on a promise: future changes would occur only through Adaptive Management and only in response to significant water quality harm. Now, the Majority proposal would add 167,000–235,000 acres of new restrictions — a further 4–5% of Western Washington's private, commercially viable forestland — despite few temperature exceedances and limited ecological benefit. This comes on top of the 15–20% already restricted, compounding a cumulative loss that threatens the operability of the forest base, reduces log supply, and increases pressure to

convert forests to non-forest uses. With projected regional economic losses of $4.7–$7.9 billion over 45 years, the FPB must consider the broader consequences. **Tell the FPB: Consider the big picture — forestland loss is real, permanent, and growing.**

8. Forestland Loss and Market Risk – Cascading Effect

Washington has lost 2.5 million acres of forestland over the last 85 years — including 400,000 acres since 2007 — with small forestland owners especially vulnerable to conversion. Annual harvest volumes have fallen from nearly 8 billion board feet (Bbf) in the 1970s to 2.5 Bbf in 2024, one of the lowest levels on record. These reductions shrink the harvestable land base, raise management costs, and increase the risk of land conversion. This is the worst possible outcome for forests, habitat, and climate.

In the past five years alone, 7 Bbf were lost to wildfire in Oregon, and over 400 million board feet have been removed from harvest by policy changes in Washington and Oregon. Mill closures are mounting — 6 sawmills in Oregon, and 1 sawmill and 2 pulp mills in Washington have shut down. Additional harvest losses from misguided policy decisions could trigger a downward spiral, crippling the viability of the forest products sector and undermining climate and environmental goals. **Tell the FPB: Additional forest set asides put a healthy forest industry at risk.**

9. Restore Procedural Integrity – Respect Rulemaking Law

Ecology's mishandling of the Tier II antidegradation process has bypassed core legal requirements. By determining that the Majority Proposal is in the 'overriding public interest' and rejecting the TFW Policy-developed Minority alternative before public review, Ecology has undermined the applicant-led, transparent process required under WAC 173-201A-320 and the Clean Water Act. It further stated that it will only release the final Tier II analysis after the FPB votes to begin formal rulemaking — a reversal of the procedural order required by the APA and the water quality rules. This premature commitment erodes trust and jeopardizes the legitimacy of the rulemaking. **Tell the FPB: You are the rulemaker — not Ecology. Uphold your independent authority and the integrity of Adaptive Management.**

SUMMARY

Washington's Forest Practices Board is considering a major rule change that would expand no-cut stream buffers on private forestland in Western Washington. While framed as an environmental protection measure, the proposed rule is based on a misreading of state water quality law and unsupported by scientific evidence. Studies show current forest practices already keep stream temperatures within safe limits for fish and water quality. The new rule would impose massive economic costs — removing up to 235,000 acres from harvest, cutting the timber supply by up to 112 million board feet annually (enough to build up to 15,000 homes each year), and eliminating up to 2,000 rural jobs. Over 45 years, the regional economic hit could be up to $7.9 billion.

This isn't just a forest policy issue — it's a housing, jobs, and land use issue with statewide consequences. The rule risks pushing small landowners out of forestry, increasing forest conversion to development, weakening climate resilience, and destabilizing local economies. Worse, the FPB rejected a more balanced alternative without fair consideration. Washington's working forests are already among the most sustainable in the world. We must demand a smarter approach — one that protects clean water without sacrificing communities, jobs, and the future of our forests.

Bottomline:

The Forest Practices Board must pause this rule and restore integrity to science-based policymaking.