August 12, 2025

Via E-mail: Forest.practicesboard@dnr.wa.gov

Washington Forest Practices Board
1111 Washington St SE
PO Box 47012
Olympia, WA 98504-7012

Dear Members of the Forest Practices Board,

The Association of Western Pulp & Paper Workers Union (AWPPW) represents thousands of working men and women in Washington's pulp and paper sector—union members whose livelihoods and family stability depend on the continued operation of our mills. For many of our members, these jobs have been the foundation of their communities for generations.

When a mill runs, it sustains more than just paychecks. It keeps small businesses open, funds local schools, supports emergency services, and anchors rural economies. When a mill closes, the loss is immediate and devastating—good jobs disappear, local tax bases collapse, and communities face a decline that can last decades.

The proposed Type Np stream buffer expansion threatens to trigger exactly those kinds of losses. By placing over 200,000 acres of Washington forestland off-limits**,** this rule would remove an estimated 112 million board feet of harvestable timber every year**.** For our industry, that translates to the loss of tens of thousands of tons of essential wood chips and hog fuel**—**critical to both the manufacturing of pulp and paper and the production of renewable energy that many mills rely on.

This sector has already been under severe strain. Six pulp and paper mills have closed in Washington since 2015**,** eliminating hundreds of union-backed, family-wage jobs each time. Each closure sends shockwaves through the community—workers forced to relocate, students pulled from schools, and once-thriving main streets left struggling.

We are equally concerned about the Cost-Benefit Analysis (CBA**)** underlying this proposal. The extreme range of estimates for acres impacted, timber value forgone, and economic losses makes it impossible to have confidence in the conclusions. At its high end, the projected regional economic loss is in the billions of dollars over the first timber rotation—a level of risk that demands far more precise analysis before such a rule is considered.

The AWPPW urges the Board not to adopt the proposed rule in its current form. Instead, we recommend returning to the Adaptive Management process to work toward solutions that protect water resources while also preserving the economic lifeline provided by Washington's pulp and paper mills. Our members are committed to sustainability and responsible forestry, but we cannot support measures that disregard the human cost to the workers, families, and towns that depend on this industry.

We also stand in solidarity with the concerns raised by other organizations representing the forest products sector, including the Washington Forest Products Coalition, Washington Forest Protection Association, American Forest Resource Council, and Washington Farm Forestry Association.

Thank you for considering the perspective of the workers who keep this industry running. For us, this is not just about raw materials—it is about the survival of our jobs, our communities, and our way of life.

In solidarity,

Joshua Estes
Policy Advisor & Lobbyist OR/WA
Association of Western Pulp & Paper Workers Union (AWPPW)