Northwest Pulp & Paper
ASSOCIATION

August 12, 2025

Via E-mail (Forest.practicesboard@dnr.wa.gov)

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

Dear Ms. Anderson,

Thank you for the opportunity for the Northwest Pulp & Paper Association (NWPPA) to provide comments on the proposed Type Np Buffer rulemaking.

NWPPA is a 69-year-old regional trade association representing 11 member companies and 13 mills in Oregon, Washington and Idaho, seven of which are located in Washington. Our member mills in Washington provide roughly 4,000 union-backed, family wage jobs in some of Washington's more rural, economically distressed communities. Mills provide a 3:1 job multiplier and are often the single largest taxpayer in these communities, a large portion of which is distributed as funding for schools and emergency services.

NWPPA member mills utilize wood fiber in two significant production applications. The first is the use of wood chips as a key raw material in the manufacturing of pulp and paper. The second is the use of residuals (hog fuel) in the generation of green power.

The proposed changes to the Type Np stream riparian buffers would render over 200,000 acres of forest in Washington unavailable to meet the demand for wood and wood fiber-based products. This is estimated to remove 112 million board feet per year from harvest. For NWPPA's members, this equates to the removal of over 62,900 tons of chips and 27,700 tons of hog fuel (biomass) from the market for Washington's pulp and paper mills.

NWPPA members are required under Washington's Climate Commitment Act (CCA) to reduce anthropogenic greenhouse gas emissions associated with the use of natural gas. The pulp and paper sector can only continue to work toward the goals of the CCA and adjacent policies through the continued and increased use of biomass, recognized as green energy by the CCA and numerous other state and federal policies. This proposed rule jeopardizes the supply of green energy and directly conflicts with the CCA, and creates additional barriers to meeting Washington's ambitious greenhouse gas reduction targets.

Pulp and paper mills in Washington are already struggling to compete domestically and globally. Six mill closures have occurred in Washington since 2015. The proposed rule changes put mills at further disadvantage by creating additional resource constraints on raw materials and fuel sources.

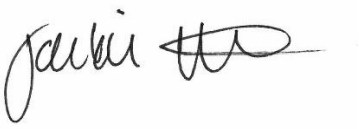
Additionally, NWPPA has significant concerns regarding the cost-benefit analysis (CBA). The range of cost impacts to the regulated community and associated economic sectors from the proposed rule are very broad, reflect a high degree of uncertainty and do not adequately inform decision making. For example, the high-end estimate of acres affected is more than two and a half times the low-end estimate, the high-end estimate of land/timber value forgone is more than three times the low-end estimate, the high-end regional economic impact estimates (jobs, wages, revenue, taxes) are more than four and a half times the low-end estimates. These ranges are too extreme to justify, given that the potential cumulative economic impact of the proposed rule is reported to be billions of dollars over the first timber rotation.

NWPPA believes that the Forest Practices Board should not approve the proposed Np buffer rule and should restart the Adaptive Management process of developing alternatives based on the goals of protecting resource objectives, not disallowing measurable change.

NWPPA also fully supports and echoes the comments submitted by the other members of the Washington Forest Products Coalition, dated August 12, 2025.

Thank you for the opportunity to provide feedback. Please let me know if you have any questions.

Sincerely,



Jackie White
Director of Regulatory and Technical Affairs, NWPPA