August 7, 2025

To the Members of the Forest Practices Board,

On behalf of undersigned and the 32,000+ farms in Washington State, we are writing to express our deep concern and strong opposition to the proposed rule change for Western Washington non-fish-bearing (Type Np) streams, which the Forest Practices Board recently voted to advance. If adopted, this rule would impose costly, unscientific, and unjustified new buffer requirements on working forestlands—rules that could have devastating, long-term consequences for Washington's agricultural and forestry communities.

This proposal does not reflect credible scientific consensus. It is a politically motivated departure from the principles of the Forests & Fish Law and the Adaptive Management Program—both of which were designed to ensure that science, not ideology, drives environmental policy. The current practices have already achieved significant environmental gains. There is no scientific evidence that additional buffers on Type Np streams (where no fish are present and no documented water quality issues exist) will improve fish recovery or enhance habitat. The proposed rule not only fails to improve outcomes—it actively undermines them.

According to current analysis:

- The rule would remove 4–8% of the 2023 private forest harvest—equivalent to 1–2 sawmills, 2,000 jobs, and lumber for up to 15,000 homes per year.
- It would effectively sideline over 200,000 acres of private forestland with no compensation.
- Rural communities—already under economic stress—would face additional hardship, as school funding, community services, and local economies depend heavily on the viability of our forest and farming sectors.

These impacts are not theoretical—they are real, measurable, and deeply unjust.

The motivation behind this rule appears to be not sound science, but the advancement of an extremist agenda by individuals who have managed to gain influence over a critical regulatory body. When efforts to dismantle agriculture through direct legislative or regulatory action have failed, it seems the tactic has shifted to targeting forestry—one of the most interconnected allies of farming in rural Washington. This is a backdoor attack on our state's agricultural future, setting a precedent that could soon return with full force to directly target family farms.

The process behind this rule is equally troubling. Only 5 of 13 board members voted to advance the rule—far from a legitimate majority. Furthermore, the process appears to have violated procedural requirements under both the Clean Water Act and the Administrative Procedure Act. Such a breach of

process further undermines public trust and confidence in the FPB's ability to act impartially and responsibly.

We respectfully call upon the Forest Practices Board to:

1. Reject the proposed Type Np stream buffer rule.
2. Restart the process under the Adaptive Management Program, grounded in legitimate science and stakeholder engagement.
3. Respect the foundational agreements of the Forests & Fish Law and the economic commitments already made by private landowners—over $2.36 billion worth of compliance costs absorbed to date.

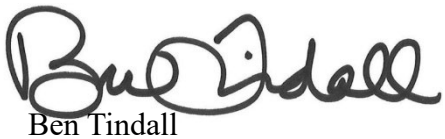
If Washington State is serious about balancing environmental stewardship with sustainable land use, then its policies must be driven by sound science, transparent processes, and equitable treatment of the families, landowners, and industries that make up our rural communities.

We urge you to stand with science, with fairness, and with the communities who are committed to responsible stewardship of our land.

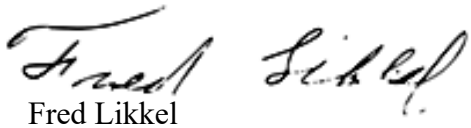
Sincerely,

Markus Rollinger
President of the Board
Save Family Farming

Rich Appel
President of the Board
Whatcom Family Farmers



Ben Tindall
Executive Director
Save Family Farming



Fred Likkel
Executive Director
Whatcom Family Farmers