WASHINGTON FOREST PRODUCTS COALITION
COMMENTS ON FOREST PRACTICES BOARD
PROPOSED NP BUFFER RULE
AUGUST 12, 2025

Patricia Anderson
Washington Forest Practices Board
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RE: Oppose Proposed Np Buffer Rule/WSR 25-13-101 – Protect Washington's Forest Products Sector

Dear Ms. Anderson:

The Washington Forest Products Coalition was formed in 2024 to promote and protect the use of wood, wood products and sector-related jobs in Washington; protect and develop markets for the state's wood and wood products; and to educate policymakers of how critical the inter-dependency is within the state's forest products sector supply chain.

As members of this coalition, we believe 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.

This rule, as drafted, will directly threaten the long-term fiber supply needed to keep our mills and logging operations running. A reduction of 4 to 7 percent in the annual private timber harvest means less work in the woods, fewer logs for local mills, and dramatically less residual wood fiber—wood chips, shavings, and sawdust— to manufacture paper, packaging, tissue products, and other critical goods. These are not theoretical impacts. Without adequate raw material, mills close and jobs are lost, including union jobs.

The forest sector is an integrated supply chain. If private forestlands are taken out of production—over 200,000 additional acres as projected by independent analysis—the availability of the raw material needed by our industry will plummet. That means rising costs, reduced shifts, job insecurity, and potentially permanent closures. These impacts fall hardest on rural workers and union families. The further loss of milling and logging infrastructure also reduces the markets available for private landowners, which increases the pressure to convert their lands to non-forestry uses, and threatens our ability to treat overstocked federal forests at risk of catastrophic wildfire.

The rule also rests on questionable scientific footing because the Dept. of Ecology misinformed the Adaptive Management process by prohibiting measurable change in water temperature from forest activities. The science-based Adaptive Management development of alternatives was artificially narrowed because of this misguidance from Ecology. Studies show current rules already meet or exceed water quality standards more than 90 percent of the time. Yet, the Board is moving forward without properly assessing real-world fiber supply consequences or transparently considering alternatives. This is not how sound public policy should be made.

Our members are proud to work in one of the greenest manufacturing industries in the country. We rely on a steady flow of logs and fiber from sustainably managed forests. The proposed rule cuts off that supply, jeopardizing jobs, local economies, and Washington's leadership in forest products.

We urge the Forest Practices Board to:

- Reject the proposed Np buffer rule;
- Restart the process through Adaptive Management, as required by law;
- Fully analyze the economic and employment impacts to downstream industries;
- Consider practical, science-based alternatives that protect both water and working families.

Thank you for considering our concerns and the impacts the proposed rule will have on Washington's forest products industry, the state's third largest manufacturing sector.

Sincerely,

WASHINGTON FOREST PROTECTION ASSOCIATION

WASHINGTON FARM FORESTRY ASSOCIATION

NORTHWEST PULP & PAPER ASSOCIATION

ASSOCIATION OF WESTERN PULP AND PAPER WORKERS UNION

AMERICAN WOOD COUNCIL

AMERICAN FOREST RESOURCE COUNCIL

AMERICAN FOREST & PAPER ASSOCIATION

WASHINGTON CONTRACT LOGGERS ASSOCIATION

WASHINGTON HARDWOODS COMMISSION