

Key Np Buffer Rulemaking Comment Points. **Adaptive Management should start over.**

1. Let science guide smart environmental policy and avoid unnecessary harm

Key Point: FPB should start over – find an alternative that restores science and rejects politics.

- The Majority Proposal puts politics ahead of science. Adaptive Management should start over.
- Private forests already meet the highest standard for environmental management.
- The new rule sacrifices real environmental and economic gains for no guaranteed benefit.

2. The proposed rule harms jobs, housing, climate, and wildfire resilience

Key Point: This rule undermines climate progress and rural livelihoods.

- Would remove 4–7% of the 2023 private harvest—equal to 1–2 sawmills, 2,000 jobs, and wood for up to 15,000 homes/year.
- No fish are present in these streams and no documented water quality harm.
- WA’s working forests store carbon, reduce wildfire risk, and support wildlife habitat.

3. The economic impact will hit rural communities hardest

Key Point: Billions of dollars in economic damage with no real benefit to fish.

- Rule would sideline over 200,000 acres of private forestland.
- Thousands of rural jobs are at risk; schools and services will suffer.
- Less local wood production threatens long-term viability of the forest products sector.

4. Forests & Fish has worked—don’t break it

Key Point: Landowners held up their end of the deal. Olympia is breaking its promise.

- \$2.36 billion cost absorbed by landowners under Forests & Fish Law (FFL).
- 764,000 acres are already set aside with commitment that future changes require Adaptive Management.
- Proposed rule demands another 200,000 acres—without compensation or scientific justification.

5. The rulemaking process was flawed and legally questionable

Key Point: The rule lacks support, transparency, and fairness.

- Only 5 of 13 FPB members voted for the rule—far from a majority.
- The scientifically based Minority Proposal was never fully considered.
- Ecology violated Clean Water Act and Administrative Procedure Act process requirements.

6. Follow science, not politics

Key Point: Current practices are working—don’t disrupt a proven system.

- WA’s private forestlands are sustaining salmon habitat and clean water.
- There’s no evidence this rule improves fish recovery.
- **The Forest Practices Board should reject the proposed Type Np buffer rule and restart the process under Adaptive Management.**

Address for written comments:	FPB Public Hearings:
CR 102 Proposed Rule Making: due 5 pm Aug. 12, 2025 <ul style="list-style-type: none">• Online: To Submit Comments: forest.practicesboard@dnr.wa.gov• By US Mail (postmarked Aug 12, 2025) Attn: Patricia Anderson P.O. Box 47012, Olympia, WA 98504-7012	<ul style="list-style-type: none">• 7/23/25, 4 p.m.-6 p.m. McClelland Center 951 Delaware Street, Longview• 7/29/25, 4 p.m.-6 p.m. Sedro Woolley Community Center 703 Pacific Street, Sedro-Wooley• 8/4/25, 4 p.m.-6 p.m. Vern Burton Gym, Parks & Rec 308 East 4th St., Port Angeles• 8/12/25, 4 p.m.-6 p.m. Office Building 2 auditorium 1115 Washington St. SE, Olympia

<https://workingforestscoalition.com/action/>

