

**WASHINGTON FOREST PRODUCTS COALITION
COMMENTS ON DEPT. OF ECOLOGY'S AIR QUALITY IN
OVERBURDENED COMMUNITIES PRELIMINARY DRAFT RULE
FEBRUARY 13, 2026**

Submitted Via Online comment portal for Ch. 173-448 WAC

Anthony Bruma
Department of Ecology, Air Quality Program
300 Desmond Dr SE
Olympia, WA 98504

RE: Ecology's preliminary draft rules on Air Quality in Overburdened Communities

Dear Mr. Bruma,

Thank you for the opportunity to comment on Ecology's preliminary draft rules on Air Quality in Overburdened Communities ("draft rule").

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 educate policymakers on the crucial inter-dependency of the state's forest products supply chain. The coalition is dedicated to working with state agencies to help them understand and integrate the requirements and findings of RCW 70A.45.090 into rule development.

Nearly 50% of the harvested log becomes biomass co-products (chips, sawdust, hogfuel)¹, and those co-products need a market; either internally or externally, for the sector to remain competitive in its global marketplace. As proposed, the rule penalizes facilities for their use of biomass in all its forms and is therefore wholly inconsistent with RCW 70A.45.090. It also does not align with the expressed intent of the legislature in SB 5126, the enacting legislation of Washington's Cap & Invest Program, which is to **"(a) limit and reduce emissions of greenhouse gas consistent with the emission reductions established in RCW 70A.45.020; (b) minimize the potential to export pollution, jobs, and economic opportunities; (c) support industry sectors that can act as sequesters of carbon; and (d) reduce emissions at the lowest cost to Washington's economy, consumers, and businesses."**. Additionally, a decrease in the use of local biomass co-products would likely result in increased emissions from transportation fuels.

While it is expedient to focus rulemaking on stationary sources that are already heavily regulated, in this case the unintended consequences are likely to result in poorer overall air quality, rather than improvements. That is because penalizing or disincentivizing the use of biomass would compromise these crucial repositories for forest and sawmill residuals. This has a direct, negative impact on Washington's ongoing efforts to mitigate wildfire risks. It would also discourage the retention of working forests and increase the number of vulnerable communities due to job losses and reduced economic opportunities.

¹ See: [LCA-Report-Pacific-Coast-Lumber-Report-Final-072220205.pdf](#)

We ask that Ecology include provisions that uphold the intent of the CCA, integrate existing laws including RCW 70A.45.090, and incorporate the interdependency between end-users of biomass and all upstream activities in carefully crafting solutions that deliver net benefits to the communities that we live and work in.

Sincerely,

NORTHWEST PULP & PAPER ASSOCIATION
ASSOCIATION OF WESTERN PULP AND PAPER WORKERS UNION
WASHINGTON FOREST PROTECTION ASSOCIATION
WASHINGTON FARM FORESTRY ASSOCIATION
AMERICAN FOREST RESOURCE COUNCIL
WASHINGTON CONTRACT LOGGERS ASSOCIATION
WESTERN WOOD PRESERVERS INSTITUTE
WASHINGTON HARDWOODS COMMISSION

