HAMPTON LUMBER MILLS
WASHINGTON, INC
DARRINGTON - DIVISION

P.O. Box 487
Darrington, WA 98241
Telephone 360.436.2947 Fax 360.436.2977

May 20, 2022

Greta Smith
Darrington District Ranger
Mt. Baker-Snoqualmie National Forest
Submitted Electronically: https://cara.fs2c.usda.gov/Public//CommentInput?Project=61659
RE: North Fork Stillaguamish Landscape Analysis Scoping Letter

Dear Greta,

Thank you for the opportunity to comment on the North Fork Stillaguamish Landscape Analysis. We appreciate the information that was presented in the Forest's public meeting earlier this week, as is was well organized and easy for the public to understand. It was clear that you were well prepared and have put much effort into the pre-planning phase of the project.

As you well know, Hampton Lumber is a family owned organization with deep ties to many of the smaller communities around the state of Washington where our manufacturing facilities are located. We are a committed, efficient, small community oriented company with a long term vision for the future. We directly employ 500 people at our sawmills at Darrington, Morton, and Randle along with our reload and remanufacturing facilities in Arlington and Napavine. Our ability to support these communities and source our manufacturing facilities is highly dependent on the availability of raw material from the USFS timber sale program and or stewardship projects. The absence of the USFS timber sale program or a decline in raw material outputs from the national forest timber sale program would jeopardize our ability to continue to operate and severely strain the well-being and social fabric of the small rural communities in which we operate.

Our sawmill in Darrington is directly linked to the raw material outputs from the Mount Baker Snoqualmie National Forest. The family-wage employment we provide along with the indirect employment provided by the presence of our manufacturing facilities benefits schools, businesses, and the overall economic wellbeing of Darrington and surrounding region.

Hampton would like to extend our thanks to the Darrington Ranger District for being proactive in the outreach to the local community and interest groups. We actively engage in collaboratives in the state of Washington, and serve on the board of the Darrington Collaborative, who has been engaged with this project during the pre-NEPA data collection phase. We support a fully proactive approach to forest management as forest conditions in the project area must be restored to maintain and improve forest health and resiliency, in addition to healthy and functioning watershed conditions, while improving access for future forest management and recreation alike. We are happy to see the District take on a landscape-approach to restoration through ecologically

HAMPTON LUMBER MILLS
WASHINGTON, INC
DARRINGTON - DIVISION

P.O. Box 487
Darrington, WA 98241
Telephone 360.436.2947 Fax 360.436.2977

driven forestry, with the direct benefit of increasing timber supply and stimulating our town's economics.

Hampton fully supports the stated intent to "improve the health and vigor of forest habitat communities while providing renewable forest products, enhancement of fish and wildlife habitat, reducing impacts to water quality, support tribal treaty rights, and the management of sustainable recreation opportunities across the project area" (MBS, 2022, Scoping Letter). We appreciate the District acknowledging forest products as one of the project's objectives, and ask you to consider the direct benefits of commercial timber production, which includes improved forest health and resiliency, water quality, wildlife habitat, as well as indirect socioeconomic benefits realized by local job creation, supporting mill infrastructure and continued operability, and generation of additional future restoration funding through stewardship contracting and Good Neighbor Authority (GNA), through offered timber sales and potential volume to regional mills.

To fully support this objective, on par with other resource values, we strongly encourage you to include a **purpose** of *sustaining the health and economic well-being of people* and a **need** *for forest products via a sustainable timber supply that will help maintain the stability of local and regional economies, and contribute valuable resources to the national economy, on a predictable and long-term basis.*

These needs were reflected by President Clinton at the Forest Conference when he spoke of the need "to protect the long-term health of our forests, our wildlife, and our waterways." and of "the human and the economic dimensions" of the problem and asked for a plan that would "produce a predictable and sustainable level of timber sales and non-timber resources" (NWFP 1994 ROD p.26).

The Final SEIS selected alternative under the NW Forest Plan (NWFP) 1994 ROD, responds to multiple needs, the two primary ones being the need for forest habitat and the need for forest products. Complementary purpose and needs cannot be understated in the Yellowjacket Project and are appropriately accounted for 1994 ROD p.26 which states:

> *The congressionally directed purposes for managing the National Forests include both conserving the ecosystems upon which species depend, and at the same time* ***providing raw materials and other resources that are needed to sustain the health and economic well-being****…*
>
> ***The need for forest products from forest ecosystems is the need for a sustainable supply of timber and other forest products that will help maintain the stability of local and regional economies, and contribute valuable resources to the national economy, on a predictable and long-term basis.***

While watershed function is vitally important, the stability of local and regional economies from forest products is equally as important. A focused socioeconomic purpose and need is essential to ensure proper alignment with and full realization of intended outcomes of the NWFP. We depend on

HAMPTON LUMBER MILLS
WASHINGTON, INC
DARRINGTON - DIVISION

P.O. Box 487
Darrington, WA 98241
Telephone 360.436.2947 Fax 360.436.2977

the availability of raw material from projects like this. We ask that the draft EA place an emphasis on economics in the defined purpose and need, sending a strong signal of the importance of the local and regional manufacturing facilities, along with the loggers that will be supporting and performing watershed and forest health treatments on the ground.

LSR/AMA Thinning
To increase the volume harvested in LSR, and thereby improve economic feasibility of sales, we recommend layering skips with design feature buffers, such as protected wildlife habitat areas, riparian areas, leave trees/snags, etcetera. The very nature of the allocation should allow this to be an easy overlay, while maintaining acres that are appropriate to leave in and increase treatment across the overall landscape. If there are units with low volume, pair them with higher volume units using other prescriptions to ensure overall timber sale feasibility. Try to limit skyline units in this lower volume thinning, and avoid helicopter to ensure successful timber sales.

We support gaps of an appropriate size for the land allocation along with heavy thinning as a means to restore a more dynamic natural landscape and ask you to analyze the added economic benefits associated with added timber volumes.

Regeneration Harvest
Where land allocations allow, and the need for treatment supports larger gaps, we ask you to consider analyzing regeneration harvest as an excellent tie to the need for forest products via a sustainable timber supply that will help maintain the stability of local and regional economies, and contribute valuable resources to the national economy, on a predictable and long-term basis, as noted above. These focused harvests, which can maximize timber volume, also meet the above suggested purpose of sustaining the health and economic well-being of people.

We would like to reiterate our support consistent with the Darrington Collaborative as "the Collaborative is interested in exploring opportunities to create complex early seral habitat which is characterized by greater retention of snags, large trees and downed logs and takes longer to develop into a young forest stage and other successional stages than plantation forestry models using replanting, clearing and treatment" (Darrington Collaborative Scoping Comments, May 2022). We ask you to consider regeneration harvest with legacy features, along with heavy thinning, skips and gaps to create landscape-scale appropriate complex early seral habitat, which we understand is currently underrepresented on the landscape.

Additionally, much of the planning area has developed through successional stages in dense, competitive, plantation-like growing conditions, and therefore lacks the ability to produce trees with the habitat characteristics required by the Northern spotted owl, as a focal species. Regenerating stands and replanting with wide, dynamic spacing (including clumps and gaps) should be analyzed to allow for the necessary large trees, with large wolfy inconsistent limb

HAMPTON LUMBER MILLS
WASHINGTON, INC
DARRINGTON - DIVISION

P.O. Box 487
Darrington, WA 98241
Telephone 360.436.2947 Fax 360.436.2977

structure, to develop to meet the purpose and need for improving and maintaining wildlife habitat over the long term. This is also suggested as appropriate by the Collaborative's Scoping Letter, stating "given the goal of the Finney AMA towards late successional habitat, resetting a mature stand to complex early seral using variable density harvest would be most relevant to a stand that would otherwise not respond well to a traditional thinning application" (p.6).

Temporary Roads, Landings, Revegetation
As part of our engagement in the Darrington Collaborative, we have commented in Forest field tours and in MBS quarterly, and District Ranger attended meetings, that we are more than happy to review preliminary logging systems and designs, as well as temporary roads to share our knowledge and industry expertise.

As part of the North Central Washington Forest Health Collaborative, I chair an Economics Subgroup dedicated to finding out-of-the box solutions, identifying previous hurdles and determining modifications to remedy these hurdles to ensure collaborative projects are implementable and, above all, economically viable. We are currently working with the Okanogan-Wenatchee National Forest to develop a strategy for successfully implementing the first sale on the Upper Wenatchee Pilot Project, and will share lessons learned as the process progresses. We invite you and other interested Forest staff to attend an upcoming Economic Subgroup Brushy DxP Sale field tour this spring to see the process firsthand.

Drop and Leave Thinning and Down Wood and Snags
Drop and leave thinning should only occur in pre-commercial stands within LSR. We do not support this prescription on matrix or AMA, as it is not appropriate to provide for a sustainable supply of timber. If drop and leave thinning or creating down wood and snags is done by the timber sale logging contractor, ensure that it happens at the time of the sale, while work is occurring at the active sale location, to avoid multiple mobilizations or entries to achieve these objectives. Alternatively, include these items in a separate contract (apart from commercial harvest), or as an optional stewardship item in areas that make sense for a stewardship sale so that the burden is not on the purchaser.

Culverts
As the high cost of extensive, and/or large upgrades to aquatic organism passage (AOP) can add exponentially to the cost of a timber sale, we encourage the District to seek funding to support any major culvert replacement work. Multiple grant programs exist to support AOPs, and the District should take advantage of working partnerships with Tribes and other partners to develop funding avenues. This will offset the timber value versus cost to operate ratio and help to ensure bidders come to the table at time of sales.

Travel Management

HAMPTON LUMBER MILLS
WASHINGTON, INC
DARRINGTON - DIVISION

P.O. Box 487
Darrington, WA 98241
Telephone 360.436.2947 Fax 360.436.2977

Closing/abandoning, and decommissioning road prisms that incorporate the use of hand tools; power saws, loppers and shovels, is a high cost treatment that should be discouraged when possible. We recommend that lower cost alternatives be explored such as utilization of heavy equipment, or a different strategy of road closure or light abandonment approach especially where these roads may be used in future management. The high cost alternative of decommissioning consumes funds that could be applied in other more cost effective treatments. Decommissioning is a good candidate for stewardship items using retained receipts to help keep costs from outweighing the value of the sale.

Road and Bridge Maintenance
Road construction and maintenance activities should be on par with the volume estimated in order to support the work. The heavy backlog of road needs should not rely solely on a single sale to fix decades of road needs. If there are heavy road maintenance needs, and there is a potential funding source outside of the timber sale, apply for it. Upcoming Infrastructure Funding, ERFO, GAO, and the like, as well as any new R6 funding should be considered to limit the burden of an extensive road package on potential purchasers. We, along with other collaborative partners, are more than happy to assist the District with road building and engineering issues and complexities, as well as to seek funding sources to support these activities.

We ask you to incorporate onsite (within the Forest project area) rock quarry development as a proposed action, as developing Forest rock sources provides a long term solution to costly commercial rock outsourcing.

Condition Based Management
Furthermore, we support the Forest in updating its approach to restoration using a condition-based approach, as determined through lessons learned experience, using the latest science and NW Forest Plan, District Forest Plan, by recognizing some current site conditions depart from historic reference conditions and thus have an intensified need for treatment. In doing so, late and old forest stands will be further developed, enhanced and protected long term. Hampton commends the Forest for advancing adaptive management strategies on this dynamic landscape while using data previously supplied to the Forest by the Collaborative to better inform decisions and the effects analysis. Additionally, we support the Forest's proposal to trade allocations to support the appropriate treatments as conditions inform your specialists.

We also support thinning in stands over 80 years to promote, protect, and maintain late successional habitat, while increasing resistance and resilience to insects, disease and wildfire, and increase habitat viability as many of the stand developed in tightly spaced, overly dense plantations, which will not succeed in supporting all life cycle requirements of the Northern spotted owl without treatments to improve growing tree structure and spacing.

HAMPTON LUMBER MILLS
WASHINGTON, INC
DARRINGTON - DIVISION

P.O. Box 487
Darrington, WA 98241
Telephone 360.436.2947 Fax 360.436.2977

AMA Diameter Allowances
To meet the stated purpose and need, and as allowed within the AMA, Hampton supports commercial treatment criteria in AMA designations to support cutting a larger dbh where doing so would have long term benefits of reduced wildfire loss risk, habitat improvement, stand structure restoration, and overall increased watershed health and resilience. We believe doing so far outweighs the short term effects of harvesting some select trees over non-AMA dbh limits.

Finally, we support maximizing the overall acres treated to maximize the attainment of desired conditions across the project area over time. We suggest the Forest do its best to follow the latest NEPA regulations and streamline the analysis by moving many of the design features (expect those required by law) and equipment specifics into contracting phase documentation, instead of tying your hands at the NEPA analysis phase. Purchasers are well, and sometimes better, equipped to find the most effective impact mitigation through their real-time, most up to date, on-the-ground experience. Please include tethering in your analysis, if logging systems are discussed, as local cable thinning contractors have these abilities, and have research to support the lessened impacts using the latest technology available to them. We encourage you to reach out to us, and our contractors to get the latest information to include in your draft EA proposed action, treatment methods, and effects analysis.

Thank you for your time and consideration,

Anjolene Ngari (Price)
Hampton Lumber
Collaborative Forestry Manager
Mobile: 360-322-0578
Email: anjoleneprice@hamptonlumber.com
Webpage: https://www.hamptonlumber.com/collaborative-forestry/
https://www.hamptonlumber.com/1860-2/