



**HAMPTON LUMBER MILLS  
WASHINGTON, INC  
DARRINGTON - DIVISION**

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May 26, 2023

Jody Weil, Forest Supervisor, Responsible Official  
Mt. Baker-Snoqualmie National Forest  
2930 Wetmore Avenue, Suite 3A  
Everett, WA 98201

RE: North Fork Stillaguamish Landscape Analysis Project Objection

Pursuant to 36 C.F.R. Part 218.8, Hampton Lumber files this objection to the Draft Decision Notice and Finding of No Significant (FONSI) for the North Fork Stillaguamish Landscape Analysis Project. Jody Weil, Mt. Baker Snoqualmie Forest Supervisor is the Responsible Official. The North Fork Stillaguamish Project occurs on the Darrington and Mount Baker Ranger Districts of the Mt. Baker Snoqualmie National Forest.

**Objector**

Hampton Lumber  
9600 SW Barnes Suite 200  
Portland, OR 97225

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 believe ensuring a vibrant future for our federal forests, the local wood products sector, and the communities where we live and work requires dialogue, understanding, and trust among a wide array of stakeholders. We are committed to collaborating with Washington state federal forest managers and other stakeholders to strike a balance between ecological restoration, wildlife habitat protection, and consistent timber production.

Hampton Lumber is the largest employer in the Darrington community, providing 170 direct family-wage jobs; \$13.9 million in wages and benefits; and a total of \$448,000 in state and county taxes. Our Darrington mill is able to produce 300 million board feet of lumber each year, shipped to domestic and international markets. Our cogeneration system burns mill residual wood waste to produce steam for drying our lumber. This steam is also converted to electricity and sold back to the local utility as renewable energy.

Our ability to support Darrington and surrounding communities, and to source our Darrington sawmill is increasingly dependent on the availability of raw material from the Mount Baker Snoqualmie (MBS) timber sale program. 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 Skagit and Snohomish counties. The North Fork Stillaguamish Project will, if properly implemented, benefit the regional economy, forest health and wildlife habitat, and help ensure a reliable supply of public timber in an area where the volume is greatly needed.

**Objector's Designated Representative**

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**Reasons for the Objection**

The content of this objection below is based upon the prior specific written comments submitted by Hampton Lumber in response to Scoping, the Draft EA, public meetings and tours, which are hereby incorporated by reference.

- 1) None of the alternatives analyzed within the EA meet the Need of providing forest products on a predictable and long-term basis in alignment with the MBS Forest Plan and Northwest Forest Plan. In addition, it fails to meet the Forest Service multiple use and sustained yield mandate under the Multiple-Use Sustained-Yield Act of 1960.**

The Northwest Forest Plan (NWFP) provides guidance for a balanced approach to “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” of local and regional economies (USDA, 1994, ROD, p.26). The NWFP 1994 Record of Decision responds to multiple needs, the need for forest habitat and the need for forest products. Additionally, the Mount Baker Snoqualmie Forest Plan Purpose and Need states “the guiding principle for each alternative is multiple-use and sustained-yield management. Each alternative is evaluated to determine its potential to provide a sustained yield of goods and services in a way that maximizes net public benefits, in an environmentally sound manner”.

As part of the North Fork Stillaguamish Project scoping process, we commented that Hampton fully supported the Scoping Notice’s 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”. We had appreciated the Darrington Ranger District acknowledging forest products as one of the project’s objectives, and asked that the Draft EA place an emphasis on economics in the defined need for proposal.

We specifically asked that you 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”. We restated this need in our Draft EA comments, asking that you mirror the NWFP’s congressionally directed purposes for a



sustainable supply of timber and other forest products, and yet the selected alternative lacks this vital component.

During Scoping, we also asked you to consider the direct benefits of commercial timber production, of which benefits include: improved forest health and resiliency, water quality, wildlife habitat, and socioeconomic benefits realized through local job creation, supporting mill infrastructure and continued operability, and generation of additional future restoration funding through stewardship contracting and Good Neighbor Authority (GNA), and timber sales providing potential volume to regional mills.

We stated that “a focused socioeconomic purpose and need is essential to ensure proper alignment with and full realization of intended outcomes of the NWFP” and reiterated our dependence on the availability of raw material from projects like this. However, the EA’s need for the proposal simply leaves forest products out of its mandated “multiple uses”.

### **Resolution Requested**

To remedy this lack of a socioeconomic need, we request that you add a socioeconomic need statement and reexamine the effects analysis to support that need, in line with the NWFP and the Forest Service multiple use mandate. We also request that future vegetation management projects contain a strong economic benefit statement as part of any Purpose and Need statements. Hampton requests that the Forest include what economic metrics and effects it used to determine the level context and intensity of the selected Alternative on the stability of local and regional economies, and how it contributes valuable resources to the national economy, on a predictable and long-term basis.

The Finney AMA Plan summary also states that "successful implementation of the plan will require the development and maintenance of partnerships with research institutions, Indian Tribes, non-governmental organizations, and the timber industry." To date, there has been no attempt to partner with industry, nor is it proposed in either of the action alternatives. In the future, we request developing a partnership with timber industry to provide for a better balance between meeting ecological desired conditions and the desire to provide economic benefits regardless of planning allocations, and actually “develop and test innovative management to integrate and achieve ecological, economic, and other social and community objectives” as directed within AMAs.

- 2) The overly broad application of LSR-allocation restrictions on all land allocations in the AMA directly conflicts with the MBS Forest Plan. While we understand that the Forest maintains the Finney AMA plan and LSR Assessment would need to be updated in order to treat areas within the AMA as non-LSR, the decision to implement Alternative 2 as it stands allows for only one final stand treatment entry with no regard to the Multiple-Use Sustained-Yield Act, the MBS Forest Plan, or the NWFP.**

As stated in our Draft EA comments, “we believe the Forest is erroneously applying Late Successional Reserve (LSR) management across all land allocations in the planning area. We, and other commenters stated that the Draft EA overly defers to and misconstrues provisions in the Finney AMA Plan with respect to LSR management across AMA-R and AMA-NR. The

application of LSR standards and guidelines across all land allocations in this planning area will lead to a significant reduction of raw material outputs and severe strain on the well-being of our timber dependent rural communities. Additionally, future management potential is severely limited, if not impossible due to LSR 80-year-old stand age treatment restrictions.

This project's constraints on the entirety of the North Fork Stillaguamish watershed, coupled with the proposed reduction of road network through road decommissioning and maintenance status adjustments, and the Region's 3+1 plan for building NEPA shelf stock over the next few years, jeopardizes our ability to continue to operate and severely strains the well-being of the rural communities in which we operate, many of which are low income populations who fall under Executive Order 12898, and are in desperate need of economic opportunity and stimulation.

As far as we are aware, there is no legal precedent to manage an AMA using the more restrictive LSR standards and guidelines, and forsaking Forest Plan land allocation designations. As the Draft EA states, these heavier restrictions would apply on a significant area; over 60,000 analysis acres, and over 19,000 treatable acres, as described in the EA and below in Table 3 Forest Plan Management Areas:

	Project Area Acres	Treatable Acres
14 - DEER AND ELK WINTER RANGE (AMA-NR)	1,086	434
17 - TIMBER EMPHASIS (AMA-NR)	7,402	4,947
2B – MIDDLEGROUND (AMA-NR)	1,432	789
99 – FOREST SERVICE LAND ACQUIRED AFTER COMPLETION OF THE FOREST PLAN (AMA-R)	82	0
Total	10,002	6,170
<b>Grand Total</b>	<b>61,849</b>	<b>19,169</b>

The years scientists spent developing the MBS Forest Plan, which is constituted under an actual NEPA decision, should not should not be ignored. The EA references that the Finney AMA Plan is not a NEPA or Decision document, and yet it is being implemented as such —having a direct and adverse effect on the human environment as it relates to socioeconomics, with no plan to minimize said impacts. These effects are not disclosed in the EA.

In our Draft EA comments, we specifically stated that “the ability to differentiate treatments across land and management allocations seems clear to us in the stated goals for each of the MAs”, especially considering “the Timber Management Emphasis goal in MA17 “to provide for the production of timber products on suitable lands” where “wildlife and fish habitat enhancement may be permitted if timber production is not impaired”. We also commented that where MA17 occurs, regeneration harvest should be analyzed to meet the above suggested need for maintaining a sustainable supply of timber on a predictable and long-term basis.

We question the validity and arbitrary nature of choosing to use more restrictive guidelines for the sake of time. As stated by the Forest in multiple conversations where we have questioned this



choice, the Forest stated that it has chosen not to update the Finney AMA or LSR Assessment due to the time (and capacity) it would take, and in order to keep with the Washington Office 1-year timeframe for NEPA analysis. However, the rationale of time or budget have no place in NEPA.

Unfortunately, this choice comes without the Forest committing to a process that fully meets the project's need to enhance the development of late-successional and old-growth, by outlining a timeline by which the Forest could do such updates (even post-North Fork Stillaguamish EA), and thereby disallows the MBS to provide forest products on a predictable and long-term basis from this vast watershed.

### **Resolution Requested**

The overlap of NWFP and Forest Plan allocations is rare and unique. We request you to identify how the provision for using the most restrictive guidelines of the NWFP has been used in other scenarios. We request that you outline where legal precedent exists to forsake Forest Plan land allocation designations and manage an AMA non-reserved (AMA-NR) as reserved (using the more restrictive LSR standards and guidelines), specifically where the three AMA-NR allocations occur; 14 - Deer and Elk Winter Range (AMA-NR); 17 - Timber Emphasis (AMA-NR); and 2B - Middleground (AMA-NR).

We would like to see the Forest add additional acres to the selected Alternative, including management specifically appropriate for the AMA-NR areas. Managing AMA-NR as Non Reserved could also be analyzed in additional alternative, and with a later update to the Finney AMA Plan and LSRA, could be chosen in a second decision at a later date. This would save additional time and resources, over beginning an entirely new NEPA process down the road.

Though one of these two options would be preferable, we would alternatively consider a review of the Forest Program of Work to understand how, when and where revising and updating the Finney AMA plan and LSRA could fit in, with a commitment from the Forest to do so. We request the Forest to outline a timeframe for such updates and subsequent NEPA analysis to meet the needs and mandates we've described above and in previous comments.

We request that you analyze the direct and indirect and adverse effects of managing these AMA-NR as AMA-R on the human environment as it relates to Darrington community and regional socioeconomics.

### **3. The Selected alternative cannot truly meet the project's stated need of old growth character development, as directed by the MBS Forest Plan and Northwest Forest Plan.**

As stated in our response to Scoping, 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 old growth habitat characteristics. Regenerating stands within the LSR and replanting with wide, dynamic spacing (including clumps and gaps) should be analyzed to develop large diameter trees, with large, wolfy, inconsistent limb structure. Since current stands will not succeed in supporting all life cycle requirements of the Northern spotted owl without treatments to improve growing tree structure and spacing, we had also

commented that we 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 stands developed in tightly spaced, overly dense plantations.

### **Resolution Requested**

We ask you to analyze for regeneration harvest with legacy features to meet the need for creating late successional habitat with the appropriate structure that does not and cannot exist in current stand conditions. In addition, we request that you analyze creating larger gaps (i.e. 5 to 40 acres) as allowed for under the NWFP, along with the proposed heavy thinning, to create a varying mosaic of successional stages and habitat types, consistent with the NWFP and the MBS Forest Plan.

We would like to see the Forest add additional acres to the selected Alternative, including management in LSR allocations within the planning area. Additionally, we want the Forest to disclose how the prescriptions within the Finney AMA explore alternatives or new management options to attain the goals of the Finney AMA plan.

### **Request for Resolution Meeting**

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, Hampton respectfully requests that the resolution meeting be held with all objectors present. Hampton believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, Hampton requests to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. Hampton looks forward to our initial resolution meeting. Please contact me to arrange a date for the resolution meeting.

Sincerely,



Anjoleene Ngari  
Collaborative Forestry Manager