



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

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Okanogan-Wenatchee National Forest  
Methow Valley Ranger District  
c/o Meg Trebon  
24 West Chewuch Road  
Winthrop, WA 98862

June 6, 2023

Dear Meg,

Thank you for the opportunity to comment on the Midnight Restoration Project Scoping Notice. As you may 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 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.

Our ability to support the communities in which we operate, and to source our Darrington and Randle sawmills is increasingly dependent on the availability of raw material from the Okanogan Wenatchee National Forest (OWNF) 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 the greater region. The Midnight 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 commodity is greatly needed.

#### Overview

Since the early 1990s, timber harvest volume on federal forestland in the Pacific Northwest has decreased by more than 90 percent. While federal forests make up nearly half of all forestland in Washington and Oregon, they currently account for only 10 percent of wood supply in the region. As a result of this decrease, many mills shuttered and the communities they supported declined. In the past few decades, federal forests have also become increasingly susceptible to disease and megafires, which ravage the landscape threatening life, livelihoods, and critical habitat.

#### Support for and Request for Additional Need for Action

Hampton supports the project's stated needs and associated Forest Plan Amendments including those within FPOG, deer winter range, mountain goat habitat, and LSR.



Perpetuating America's Forest for Products and the Environment

We supported the original treatments in this planning area analyzed in the 77,000-acre Twisp Restoration Project, prior to the Cedar Creek fire, and concur that this new analysis area described as the Midnight Restoration Project is still departed from conditions that would be resilient to disturbance and climate change. We appreciate the new landscape evaluation completed for the project area by Resilient Forestry. However, as we commented during on the draft Twisp Restoration EA and during development of the preliminary proposal put forth by Resilient Forestry, the project does not specifically list rationale and planned analysis for a socioeconomic-specific need.

We understand the primary focus on creating late successional habitat within the LSR allocation, but believe a socioeconomic purpose can be achieved regardless of land allocation so long as the LSR treatments focus on the ecological need and matrix treatments focus on the socioeconomic benefit--It could be as simple as adding a need “for sustainable timber supply to contribute to the local and regional economy”. We request that you add a socioeconomic need statement and carefully examine economic metrics to determine the context and intensity of alternatives 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 in alignment with Northwest Forest Plan (NWFP) congressionally directed purposes. Socioeconomic metrics to consider would include local job creation (for every 1 mmbf produced, 12 jobs are created), 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. Industry partnership to identify and assist in analyzing these metrics would be gladly offered by Industry partners during EA analysis.

#### Proposed Treatments

Prescriptions described in the Scoping Notice are increasingly complex. In learning from other project’s being implemented on the District, the more complex and prescriptive the EA is, the more difficult it is to implement in line with the intent of treatment. The simpler prescriptions can me made, the more likely you are to meet the intended treatment outcome overall.

#### *LSR*

Hampton supports thinning in stands over 80 years to promote, protect, and maintain late successional habitat, while increasing resistance and resilience to insects, disease and high severity wildfire, and increase habitat viability as many of the stands developed in tightly spaced, overly dense plantations. We also support a need to maintain and create dense, complex forests where the LSR allocation will exist in future.

#### *Matrix*

We believe the Matrix allocation should not only be managed to meet conditions in the HRV, but also so that under the FRV it provides a sustainable supply of timber on a predictable and long-term basis in alignment with the NWFP. We question the 21” diameter at breast height (dbh) limits placed on prescriptions within the matrix allocation, of which should only apply to the LSR allocation. We would like to reiterate our comments made on the Twisp Restoration Project prior to the Cedar Creek Fire, where we believe they are still relevant to the Mission Project Area: If any limit is to be placed, we support allowing Matrix thinning up to 30 inches dbh, and LSR thinning up to 25 inches dbh (or more where needed to meet the project’s needs).



Additionally, openings within the matrix allocation are not limited to 1/2 acre to 2 acres. We request that you analyze creating larger gaps (i.e. 5 to 40 acres) as allowed for under the NWFP. This would create a varying mosaic of successional stages and habitat types more representative of the HRV in the short term, and provide added timber volume/economic return.

#### *Riparian*

We support the need to remove conifers to restore riparian forest overstory and understory composition and reduce fuel loads to mediate fire delivery to and behavior in riparian corridors, consistent with NWFP Aquatic Conservation Objectives.

#### *Fuel Breaks*

We support creating shaded fuel breaks (regardless of land allocation) to protect wildlife (e.g. NSO) habitat and communities within the WUI, to provide for safe ingress and egress, and as wildfire suppression anchor points. We recognize and want to amplify our whole-hearted support for protecting human life, above all other concerns. Methow Valley communities have experienced immeasurable pain in losing local lives, even as recently as the Twisp River Fire. All methods to break fuels and create safety for community and wildland firefighters should be applied where necessary to avoid future tragedy.

#### Thinning Methods

##### *Tethered*

We appreciate the District considering tethered logging systems where able and submit the following paper from 2019 to assist the impacts analysis:

Green, P. Q., Chung, W., Leshchinsky, B., Belart, F., Sessions, J., Fitzgerald, S. A., Wimer, J. A., Cushing, T., Garland, J. J. (2019). Insight into the productivity, cost and soil impacts of cable-assisted harvester-forwarder thinning in western Oregon. *For. Sci.* 66(1):82–96

##### *Winter Restrictions*

We applauded the District for presenting opportunities for year-round harvest opportunities in the Twisp EA and maintain the vital importance of this in order to ensure all purchasers can come to the bidding table. The Midnight Scoping Letter notes that “Overstory thinning in most Riparian Reserves may only occur in the winter months to protect soil resources unless the purchaser can provide a plan of operations that provides for the same level of soil protection as winter operations. If Forest Service staff approve such operating plans, harvest in designated Riparian Reserves may occur outside of winter months.”

We appreciate that this allows flexibility for an operating plan to meet the same soil impact mitigation measures. However, Attachment 1 of the Scoping Letter proposes an amendment to a Forest-wide S&G for snowplowing “where any proposed mechanical thinning would likely require winter harvest conditions to minimize or prevent soil compaction and displacement”.

We have need for year-round timber supply and winter-only harvest restrictions disallow Hampton to consider purchasing projects in the District. We ask that in all instances, the District

maintain the flexibility to harvest year-round so long as impacts are minimized to the extent intended under winter-only restrictions.

In addition, Hampton concurs with comments made by American Forest Resources Council regarding limited operating periods that use hard and fast operating restrictions. We ask that the Forest find a way to easily provide a waiver when conditions allow—as opposed to a specified date range that does not account for existing conditions on the ground at time of implementation.

Thank you for your careful consideration of our comments. We look forward to engaging with you further as the project comes along.

Sincerely,

A handwritten signature in blue ink, appearing to read "Anjolene Ngari". The signature is fluid and cursive, with a large initial "A" and "N".

Anjolene Ngari  
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