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Thank you for the opportunity to comment on the North Fork Stillaguamish Draft Environmental Assessment (EA). 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 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.

#### 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. While we understand that the MBS timber sale program for Fiscal Year (FY) 2023 planned to offer 11mmbf, the Region's 3+1 strategy lowers that target for FY 24 and 24 to 2mmbf. To put that in perspective for our Darrington sawmill, if we were to buy everything offered by the MBS in the next two years, we would only be able to operate for *four days*. This minimal base target comes on the heels of doubling the timber staff on the Forest, and at the final stages of several landscape level NEPA planning processes, including the North Fork Stillaguamish Project. The elongated decline in raw material outputs from the MBS timber sale program jeopardizes our ability to continue to operate and severely strains the well-being and social fabric of the small rural timber dependent Darrington community.

In the face of constantly shrinking National Forest staffing levels and budgets, we engage deeply in collaboratives in Washington State to focus on building capacity within national forests; providing educational opportunities; and giving an economic boost to rural communities that rely on steady, family-wage jobs in the forest sector. In fact, for every one job at our mills, two other jobs are created in the community. From truck drivers to school teachers, loggers to coffee baristas, forest restoration through collaboration supports these small, but mighty industry-reliant towns.

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.

### NEED FOR PROPOSAL

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" (MBS, 2022, Scoping Letter). We had appreciated the 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 purpose and need. We suggested that this could occur following Northwest Forest Plan (NWFP) guidance for a balanced approach focused on 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" of local and regional economies (USDA, 1994, ROD, p.26). However, the Draft EA's need for proposal does not include a socioeconomic focus. We ask that you mirror the NWFP's *congressionally directed purposes 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* (USDA, 1994, ROD, p.26). We also request that the Forest provide a proposal for updating the Finney AMA Plan as soon as possible to ensure the ability for future management, and a long-term sustainable supply of timber.

### SUPPORT FOR ALTERNATIVE 2

We support Alternative 2 in the cutting and removal of trees between 20 and 26 inches DBH to expedite development of desired structural characteristics for old growth associated wildlife species. 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 sale of future timber sales. We also support Variable Density Thinning with the suggested stream buffers within the Riparian Reserves to maintain and restore species composition and structural diversity of plan communities within the Riparian Reserves.

## TIMBER INDUSTRY PARTNERSHIP

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. We suggest developing a partnership with timber industry to provide for a better balance between meeting ecological desired conditions and the desire to provide economic benefits.

## BROAD APPLICATION OF LSR GUIDELINES

We believe the Forest is erroneously applying Late Successional Reserve (LSR) management across all land allocations in the planning area (on over 10,000 acres). We share the primary concern stated by the Darrington Collaborative that "the Draft EA seems to overly defer to and misconstrue provisions in the Finney AMA Plan with respect to LSR management across the two distinct areas within the AMA (AMA-R and AMA-NR)" (Darrington Collaborative Draft EA Comment Letter). 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 community. Additionally, future management potential is severely limited, if not impossible due to 80-year-old stand age restrictions.

We strongly urge you to reevaluate the blanket LSR guideline approach to treat the 10,000 acres of MAs as designated in the 1990 MBS Forest Plan under the current Finney AMA Plan. The ability to differentiate treatments across land and management allocations seems clear to us in the stated goals for each of the MAs, including MA14 Deer and Elk Winter Range intended "to provide improved winter range habitat for deer and elk, using variety of improvement techniques, including planting desirable forage species, fertilization, thinning, and design of timber harvest units, with emphasis on a distribution and specified ratio of habitat types for forage, thermal/hiding cover, and optimal thermal cover", *so long as the emphasis is to improve the habitat range* (1990 MBS Forest Plan, Pg.II-64); and the Timber Management Emphasis goal for MA17 "is 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*".

## TIMBER MANAGEMENT EMPHASIS

Where MA17 occurs, regeneration harvest should be considered. These focused harvests, which can maximize timber volume, also meet the above suggested need for maintaining a sustainable supply of timber on a predictable and long-term basis. We ask you to consider regeneration harvest with legacy features, in addition to 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.

## OLD GROWTH CHARACTER DEVELOPMENT

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 with the LSR and replanting with wide, dynamic spacing (including clumps and gaps) should be analyzed to develop large trees, with large, wolfy, inconsistent limb structure. This is also suggested as appropriate by the Darrington 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).

We would also like to reiterate the importance of first treating stands younger than 80 years old within LSR ensure they do not age out or grow over the 26-inch dbh over the course of project implementation. Cutting up to a 26-inch dbh will have long term benefits of increased forest health and resilience, stand structure restoration, and greater habitat improvement.

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.

#### ROAD 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

We support the Forest in using a condition-based approach, as determined through lessons learned experience, using the latest science and overarching management plans. Hampton commends the Forest for advancing adaptive management strategies on this dynamic landscape while using site specific data to better inform management decisions. Considering it was dropped from the proposal, we ask that the Forest evaluate trading land allocations to support the appropriate treatments over time, as site conditions inform your specialists.

Thank you for your thoughtful consideration,

Anjolene Ngari  
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Collaborative Forestry Manager