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Okanogan-Wenatchee National Forest
Wenatchee River Ranger District
c/o Justin Gelb
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October 20, 2023

Dear Justin,

Thank you for the opportunity to comment on the Chumstick to Lower Peshastin (LP) Project Scoping Notice. The planning area is approximately 115,316 acres (of which 84,216 acres are forested) located in the vicinity of the towns of Leavenworth, Peshastin, and Cashmere in Chelan County, Washington. The landscape is evenly divided between public and private ownership, with 51% of the total being US Forest Service-managed land.

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 National Forest land managers and other stakeholders to strike a balance between ecological restoration, wildlife habitat protection, high severity wildfire risk reduction, community protection, and consistent timber production.

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. 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.

Hampton Lumber supports the three-pronged purpose of this project to: 1) reduce elevated risks of wildfire to communities who reside within the wildland urban interface, while increasing opportunities for effective fire suppression across the project area; 2) restore forest structure and composition to more sustainable conditions, and; 3) reduce the risk of large-scale habitat loss from severe wildfires. We also support the stated need for treatment based upon the WA Department of Natural Resources (DNR) landscape evaluation, field reconnaissance, and local

knowledge. The Chumstick to LP Project will, if properly implemented, benefit the regional economy, increase forest health, reduce wildland fire severity, protect wildlife habitat and communities, and help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

The planning area is defined by the DNR as a “priority landscape” due to its “very high to extreme fire risk”, representing some of the highest risk areas in eastern planning area Washington. Additionally, projected warming over the next 20-40 years is projected to shift climate conditions into a much drier state pushing currently moist forest towards dry forest conditions and shifting some low elevation areas from forest to shrub-steppe¹.

The need for treatment is backed by the planning area’s active fire history and difficulty controlling fire, the high amount of wildland urban interface (WUI) and abundance of structures, high spruce budworm susceptibility and drought vulnerability, coupled with the current forest structure conditions (i.e., low % old forest, high % young forest multistory).

We commend the District for making quick use of the Western Firesheds Emergency Action Declaration (EAD) under the Bipartisan Infrastructure Law on the Chumstick to LP. We understand this may limit actions proposed to those authorized emergency actions under the EAD, such as thinning and prescribed fire treatments to reduce hazardous fuels and reduce fire risks. We support accelerated treatment to meet the project’s emergency response driven purpose. We also support fuels breaks (regardless of land allocation) to reduce the risk of catastrophic wildfire on adjacent communities, valued assets, or resources; provide for safe ingress and egress, and as wildfire suppression anchor points. We want to amplify our whole-hearted support for protecting human life, above other concerns.

Although aquatic restoration projects and travel management are not a part of this project’s proposed action, we understand they are or will be analyzed in other NEPA documents. Regardless of how those connected actions are analyzed, we encourage the District to seek alternative funding (outside of a timber sale) to support their implementation so that the cost does not fall wholly on the sale purchaser. Doing so can make a bid package more attractive to potential bidders. Aquatic organism passages and road decommissioning are good candidates for stewardship items using retained receipts to help keep costs from outweighing the value of the sale.

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. ERFO, GAO, and the like, as well as any available Region 6 funding, should be considered to limit the burden of an extensive road package on potential purchasers. We would appreciate seeing onsite rock quarry development as a proposed action, as developing on-Forest rock sources provides a long-term solution to costly commercial rock outsourcing.

Hampton Lumber supports the Forest in updating its approach to restoration using a condition-based management (CBM) approach, as determined through lessons learned experience,

¹ <https://foresthealthtracker.dnr.wa.gov/PriorityLandscape/Detail/7524>

applying the latest science, and following Northwest Forest Plan, Wenatchee Forest Plan guidance. CBM aims to collect “the right data at the right time for the right activity to meet the land management decision”, as described in the USFS’s CBM FAQs². This is done by examining, “known or expected environmental conditions and a range of possible management activities...using mid-scale and site-specific data...Then, once a decision is documented and prior to implementation, current site conditions are confirmed in specific locations and the appropriate management activities are assigned”. We recognize that while there may be a time savings during the NEPA analysis phase, the District will still have to do all required survey work prior to implementation. We commend the District for using all of the tools at its disposal to implement treatments in a quick and efficient manner to meet the purpose and need.

The Northwest 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. 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. 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 economy, on a predictable and long-term basis, though it could be as simple as adding a need “for sustainable timber supply to contribute to the local and regional economy” tied to the byproduct of the risk reduction activities proposed.

Along with adding a socioeconomic need statement, we request you 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 economy, on a predictable and long-term basis. 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.

We encourage the District to consult with Industry partners to aid in the determination of what is truly a limitation in logging systems that inhibit mechanical treatments due to economic feasibility, as technologies are ever evolving within the Industry and the logging contractors are the foremost experienced determiner of what current logging systems are capable of. Helicopter logging is not economically feasible unless it is coupled with extremely consistent high-volume ground-based logging units. Consider tethering or other methods to treat these areas, and consider making helicopter units “optional” to increase potential bids for sales where helicopter units are necessary to meet the stated purpose and need.

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² https://www.fs.usda.gov/sites/default/files/2022-04/%27CBM_FAQs_24JAN22%27%20of%20%27AR-%20Project%20Development%27.pdf