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RE: Yellowjacket Revised Draft Environmental Assessment

Thank you for the opportunity to comment on the revised Environmental Assessment (EA) for the Yellowjacket Restoration Project. We appreciate the Cowlitz Valley Ranger District's (CVRD) continued engagement throughout the planning process and look forward to moving into implementation. 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 to increase the pace and scale of restoration; providing education and outreach; and giving an economic boost to rural communities that rely on steady, family-wage jobs in the forest sector.

As you may know, Hampton Lumber is a family owned business with deep ties to many of the smaller communities around the state of Washington where our manufacturing facilities are located. We are an efficient, forward-thinking, community-oriented company. 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 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



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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. Locally, our sawmills at Morton and Randle are directly linked to the raw material outputs from the CVRD.

Our stud mill in Randle is less than a half hour drive from our mill in Morton. Together, these two facilities are known as our “Cowlitz stud mills.” Morton has an annual production capacity of 250 MMBF (100% Douglas fir). Randle has an annual production capacity of 260 MMBF (60% Hem-fir, 30% Douglas fir, 10% other).

Our Cowlitz stud mill products include studs, export grades, and kiln dried lumber in the following dimensions:

- 2×3 to 2×6 8' to 10'
- 4×4 to 4×6 8' to 10'

Need for Proposal

We understand the need for the Project includes actions to address climate change vulnerability and adaptation; precipitation change; commercial timber production; forest health; old-growth forest habitat; habitat improvement; huckleberry habitat; and transportation infrastructure.

The planning area will see projected temperature increases between 4.3 and 6.4 °C by the end of the 21st century, and changes to precipitation patterns, as well as those during the growing season (June, July, August). We appreciate the need to modify vegetation structure, composition, and patterns to develop, maintain, or restore healthy stand structures that respond to disturbances, such as wildfire and climate change, in a resilient manner and consistent with historic and future ranges of variability. Ensuring the forest is conserved, restored and made more resilient to climate change is an important aspect of the project. However, we ask that you note that conservation can include active management to address stand structure needs into the future, which includes the sustainable harvest of such stands, in perpetuity.

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). We appreciate the District clarifying the Yellowjacket Restoration Project’s (Project) need for commercial timber production to provide local job opportunities and to support rural economic development as one of the project’s objectives, consistent with the NWFP need for a sustainable supply of timber that will help maintain the stability of local and regional economies on a predictable and long-term basis.

There will be direct benefits from commercial timber production, such as improved forest health and resiliency, water quality, wildlife habitat, as well as indirect socioeconomic benefits realized by local job creation and sustaining local forest product industry jobs, supporting mill infrastructure and continued operability, and generation of additional restoration funding through stewardship contracting and Good Neighbor Authority (GNA). 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.

Hampton Lumber directly employs over 300 people at our sawmills in Morton, and Randle along with our remanufacturing facility in Napavine. 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 Lewis County. 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.

We support the need to increase structural diversity of stands and address the overabundance of dense, mid-seral forest stands. Doing so will increase forest health and resiliency to climate change, pests and pathogens, drought, and wildfire, while also reducing burn severity, thereby minimizing fire risk and impacts to habitat and local communities.

Hampton Lumber agrees with the need to increase early seral forest conditions that support huckleberry habitat within the project area. Additionally, we believe that early seral conditions should be created within the Adaptive Management Areas (AMA) where open stand conditions are underrepresented, where these conditions would be maintained long-term, as well as within matrix lands, where openings could be allowed to progress through successional stages naturally. Doing so improves wildlife habitat for early seral-associated species, along with increasing biodiversity and economically benefiting communities by creating jobs and maintaining current forest product infrastructure.

We support the need to accelerate the development of old-growth forest characteristics within the project area. However, we request that you add the need to “protect and enhance” both late seral and old forest stands to reduce the risk of large-scale habitat loss from high severity or catastrophic wildfire.

We also support the need to address the transportation system maintenance needs, environmental risks and long-term funding expectations within the project area, so long as the costs of these activities are supplemented appropriately and do not fall solely on the timber sale purchaser.

Proposed Action

Overall, we support the Project Proposed Action which includes:

- Low and high intensity thinning
- Huckleberry enhancement
- Regeneration harvest
- Creating snags and augmenting instream wood
- Pond restoration and beaver dam analogs
- Improving road conditions and access
- Decommissioning, closing & stabilizing roads
- Rerouting a floodplain road segment
- Campground redesign

Thinning and Regeneration Harvest

The Gifford Pinchot National Forest encompasses approximately 1.3 million acres on the western slope of the Cascades. Of these acres, approximately 72 percent are available for scheduled timber harvest; with 393,370 acres in Matrix, 140,811 acres in Adaptive Management Areas, 11,670 acres in Managed Late Successional Area, and 425,867 acres in Late Successional Reserves (LSR). Yet, these “available acres” have not yet been paired down by Riparian Reserves (which overlay all land use allocations), wildlife, other designated buffers, stand age, or tree diameter (all limiting factors under a host of regulations, policies, and protective guidelines). In fact, as described in numerous NEPA analyses conducted on Washington state Forest Service-managed forests, actual on-the-ground, implementable harvest occurs on less than 50 percent of acres proposed for treatment. Timber harvest is proposed on approximately 4,651 acres in this Project, with the primary treatment type being a “thin from below” treatment.

We support creating a mosaic across the landscape of different forest types to better represent the historic range of variability and in recognition of the future range of variability. However, 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 late-successional/old growth dependent species. Thinning of rotation-age timber LSR stands will not be the best option to create late successional habitat and accelerate old forest characteristic development. Dense stands of second growth timber at age 60 plus have had complete canopy closure for at least 20 years and crowns have diminished significantly. The best option for some of the very dense LSR stands is to reset the stand and start fresh by planting trees with a lower number per acre. This will create up to 100 percent crown and allow the limbs to become “wolfy” at an earlier age. As the trees age, naturally the lower limbs will die off and the crown will recede to 40-50 percent. It is very difficult to try to create this on a monocultural stand that is already at 80 years old.

While we are not asking for vast regeneration units within LSR, we certainly suggest adding regeneration into the “diversity” mix of options. We have experienced seeing where 10 to 15-acre gap cuts can help create a true mosaic. Regenerating stands and replanting with wide, dynamic spacing (including clumps and gaps) should be analyzed to allow for large trees to grow with the type of limb structure that supports old growth and late successional habitat.

Additionally, the nature of the AMA land allocation in the project area, in particular, is an opportunity to experiment in a limited number of stands that would not respond favorably to a restoration thinning on their “journey” to the late successional forest stage and may need to be reset (through regeneration or larger gap cuts) in order to develop characteristics of an old growth stand.

We support doing the right thing in the right place, where it makes sense, to meet the project’s intended purpose. We ask that the District consider 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, where regeneration harvest does not occur. In thinning units, we request that you analyze creating gaps consistent with the NWFP (i.e. 5 to 40 acres) to create a varying mosaic of successional stages and habitat types.

Riparian Reserve Treatments

Past harvest practices have left many of these riparian areas in a structurally simple state. Sound science shows that thinning in riparian areas actually accelerates the stand's trajectory to produce large conifers and has minimal effect on stream temperature with reasonable buffers. Removal of suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large instream wood, which is what provides the real benefit to aquatic habitat.

Furthermore, *in a synthesis of science to inform land management within the Northwest Forest Plan (NWFP) area* Reeves et. al. 2018 state,

the potential of federal lands to contribute to the recovery of listed fish, particularly Pacific salmon, in many parts of the NWFP area is likely more limited than was recognized when the Aquatic Conservation Strategy (ACS) was developed. The primary reason for this difference is that, in many situations, federal lands (figs. 7-1 and 7-2) have a limited capacity to provide high-quality habitat for some of the listed fish. Federally managed lands are generally located in the middle to upper portions of watersheds, which tend to have steeper gradients and more confined valleys and floodplains, making them inherently less productive for some fish (Burnett et al. 2007, Lunetta et al. 1997, Reeves et al. 2016a)...The numbers of Pacific salmon and other anadromous fish returning to freshwater in the NWFP area are strongly influenced by ocean conditions, which are highly variable over time (p.465-466).

The 2018 Synthesis of science to inform land management within the Northwest Forest Plan area supports an update to the Northwest Forest Plan based on best available science.

Riparian Reserve treatments help protect aquatic systems, maintain, and restore the species composition and structural diversity of plant communities in riparian areas, and maintain and restore habitat to support well-distributed populations of riparian-dependent species, consistent with the Aquatic Conservation Strategy objectives in the NWFP. It has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers.

Removal of suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large in stream wood, which is what provides the real benefit to wildlife and stream health. The ACS describes the need for treatments that meet the need of multiple habitat types, and we encourage the District to look for ways to incorporate treatments that meet those needs. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives that the ACS mandates should be considered.

The tradeoffs between achieving forest health benefits and potentially having adverse impacts to streams typically include stream temperature, wood recruitment, and sedimentation associated with active management. We would like the District to review the literature cited below and incorporate its findings into the final EA, this will better shape the level of management permitted in Riparian Reserves.

Stream Temperature

Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA. *Forest Ecology and Management*, 270, 302-313.

Key points of the Janisch paper include:

- The amount of canopy cover retained in the riparian buffer was not a strong explanatory variable to stream temperature.
- Very small headwater streams may be fundamentally different than many larger streams because factors other than shade from the overstory tree canopy can have sufficient influence on stream temperature.

Anderson P.D., Larson D.J., Chan, S.S. 2007 Riparian Buffer and Density Management Influences on Microclimate of Young Headwater Forests of Western Oregon. *Forest Science*, 53(2):254-269.

Key points of the Anderson paper include:

- With no-harvest buffers of 15 meters (49 feet), maximum air temperature above stream centers was less than one-degree Celsius greater than for unthinned stands.

Riparian Reserve Gaps

Warren, Dana R., Keeton, William S., Bechtold, Heather A., Rosi-Marshall, Emma J. 2013. Comparing streambed light availability and canopy cover in streams with old-growth versus early-mature riparian forests in western Oregon. *Aquatic Sciences* 75:547-558.

Key points of the Warren paper include:

- Canopy gaps were particularly important in creating variable light within and between reaches.
- Reaches with complex old growth riparian forests had frequent canopy gaps which led to greater stream light availability compared to adjacent reaches with simpler second-growth riparian forests.

Wood Recruitment

Burton, Julia I., Olson, Deanna H., and Puettmann, Klaus J. 2016. Effects of riparian buffer width on wood loading in headwater streams after repeated forest thinning. *Forest Ecology and Management*. 372 (2016) 247-257.

Key points of the Burton paper include:

- Wood volume in early stages of decay was higher in stream reaches with a narrow 6-meter buffer than in stream reaches with larger 15- and 70-meter buffers and in unthinned reference units.
- 82% of sourced wood in early stages of decay originated from within 15 meters of streams.

Sedimentation

Rashin, E., C. Clishe, A. Loch and J. Bell. 2006. Effectiveness of timber harvest practices for controlling sediment related water quality impacts. Journal of the American Water Resources Association. Paper No. 01162

Key points of the Rashin paper include:

- Vegetated buffers that are greater than 33 feet in width have been shown to be effective at trapping and storing sediment.

Dry Forest Types

Messier, Michael S., Shatford, Jeff P.A., and Hibbs, David E. 2011. Fire Exclusion effects on riparian forest dynamics in southwestern Oregon. Forest Ecology and Management. 264 (2012) 60-71.

Key points of the Messier paper include:

- Fire exclusion has altered the structure, composition, and successional trajectory of riparian forests in fire-prone landscapes.
- Fire exclusion has been associated with increase in tree density and recruitment of shade-tolerant species that may replace large diameter, more decay-resistant Douglas-fir trees.
- A hands-off management regime for these riparian forests will have ecologically undesirable consequences.

Collectively, we believe that this literature suggests that there exists a declining rate of returns for “protective” measures such as no-cut buffers beyond 30-40 feet. Resource values, such as thermal regulation and coarse wood recruitment, begin to diminish in scale as no-cut buffers become much larger. We believe that the benefits in forest health achieved through density management will greatly outweigh the potential minor tradeoffs in stream temperature and wood recruitment, based on this scientific literature. We urge the District to establish no-cut buffers along streams no larger than 40 feet and maximize forest health outcomes beyond this buffer.

Huckleberry Enhancement

On paper this all looks fine, however we have to consider the quality of the wood on the ground, as the timber in areas huckleberries tend to be can be quite defective from snow load and being wind swept. At the Cowlitz mills we have recently upgraded our primary breakdowns with a twin and quad cantor, Randle and Morton respectively. Using “thin from below” harvest prescriptions can be good or bad for procurement at our mills: Good because we utilize a smaller log (more so than ever before), which is what you typically get with a thin from below strategy; and bad because the log can get too small, and in some cases the quality is poor. We really do not desire a bigger log, as the defect can be higher. Overall, logs acquired by thinning from below are of more value to us, but wood quality is a major factor for economic feasibility.

Transportation Infrastructure

While we support bridge maintenance, road maintenance, closure, stabilization and decommissioning (where appropriate and no future work will occur), these costs can outweigh timber values and lead to no bid sales. For example, do not abandon roads that lead to matrix lands that require future treatment.

We request that the District seek alternative funding to supplement road work such as those from the Bipartisan Infrastructure Law or Inflation Reduction Act, retained receipts, Good Neighbor Authority (GNA), Regional Office, Legacy Roads and Trails and other federal funds, such as Emergency Response for Federally Owned Roads (ERFO). Road decommissioning, which can double the cost of the road work package of a timber sale, is an excellent candidate for retained receipts, especially full topographic restoration. 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. Perhaps create some optional improvements that occur only if the timber value supports these road abandonments. Roads improvement necessary for the haul should be required and others could be added into the optional category.

We commend the District for including rock quarry development in the proposed action providing a long-term solution to costly commercial rock outsourcing.

Logging Systems

Helicopter: Any unit with helicopter logging should be reviewed carefully and other harvest systems should be explored before going to helicopter, more or less a last resort.

Skyline: Please remember downhill cable yarding is difficult, it is hard to find contractors who do this, it is unsafe, and its cost is comparable to a helicopter.

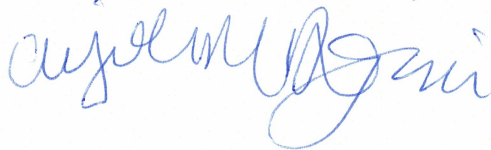
Ground Based: Ground based harvesting systems certainly are less expensive and the overall economics work better when the removals per acre are lower.

Tethered: Our industry is in transition and we are seeing better mechanized ground based, lower compaction, steep slope equipment. We request that the District include tethered logging technology as an option for this planning area, and future planning areas, especially in light of Regional Forest Leadership direction to include tethered systems in analyses.

A blend of uphill skyline and ground based or tethered logging systems is economically feasible provided enough volume per acre is removed. Enough volume per acre needs to be around 3 + loads per acre (rule of thumb). Treatments with removals around one load per acre just do not pencil out, even when 100% ground based, and even in a good market. We believe any of these systems would work in regeneration units (at least on paper) as the pre-post canopy ratio is rather large. 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.

Please note the proper spelling of my name below to update page 46 of the draft EA under *AGENCIES AND STAKEHOLDERS COLLABORATED AND CONSULTED*.

Thank you again for the opportunity to comment,



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