



Okanogan-Wenatchee National Forest
Cindy Sandeno, Acting Forest Supervisor
c/o Meg Trebon, Methow Valley Ranger District
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Winthrop, WA 98862

May 13, 2024

Dear Meg,

We appreciate the opportunity to comment on the Midnight Restoration Project Draft Environmental Assessment (EA). The need to increase forest restoration and active management on the National Forests is well established, from National guidance such as the 2012 Planning Rule and the Wildfire Crisis Strategy and many others; to the Forest and District level from the Central Washington Initiative, Forest Restoration Strategy, the locally severe, catastrophic and tragic fire history, this specific fire scarred project area, and the associated updated 2022 Landscape Evaluation and Prescription. National guidance focused on *Increasing the Pace of Restoration and Job Creation on Our National Forests*¹ commits the Forest Service to “continue to work toward restoring more acres to accomplish restoration objectives such as clean water and resilient forests. As a consequence, increased outputs of timber and biomass will be realized, adding support to critical wood products and energy infrastructure”, through “a number of key agency actions”¹. These actions include expanding “Stewardship Contracting to develop forest restoration projects that provide timber while using proceeds for related activities such as stream restoration, road improvement and others. Extending this authority and expanding the use of this tool is crucial in aiding in collaboratively restoring landscapes through trading the value of forest products for the services needed to get the full spectrum of resource work completed”, and to “remove low value material”¹. This same 2012 guidance also speaks to ensuring Timber and Stewardship Contract implementation and efficiencies are improved by Line officers and decision makers focusing on “ensuring that implementation of activities, and in particular mechanical treatments, meets the desired condition, identified in forest plans and described in the NEPA documents associated with individual timber sales and stewardship contracts. Conservative silvicultural prescriptions and/or sale preparation often leave more on the landscape than meets the objectives of the desired condition. Implementation of the appropriate forestry prescription for a project can potentially result in removal of more volume, and aid in

¹ USDA USFS. 2012. Increasing the Pace of Restoration and Job Creation on Our National Forests. February 2012.

meeting [targets]. Improved implementation of contracts would also result in fewer entries into the same treatment areas, speeding up the treatment of additional areas”¹.

Further, it deems necessary the use of “designation by description” and other techniques used by other federal agencies, to streamline timber sale preparation and reduce administrative costs of restoration treatments where appropriate, and states that the agency “is also seeking to promote wood – and wood from our national forests in particular -- as a green-building material”¹. A Moseley and Nielson-Pincus (2009) study has shown that “every million dollars spent on activities like stream restoration or road decommissioning generates from 12 to 28 jobs. Restoring the health and resilience of our forests generates important amenity values. Healthy, resilient forests and grasslands are magnets for outdoor recreation, with more than 170 million visits per year to the National Forest System. That in turn leads to jobs and economic opportunity”².

As such, we support the host of stated project needs which support *increased timber outputs adding support to critical wood products infrastructure and promote wood as a green-building material, while creating jobs, and expanding stewardship contracting opportunities to further restoration goals and meet the timber target*. To that end, during scoping, we had requested the Forest fully analyze a socioeconomic need. While the Draft EA includes an Economics analysis, it has yet to flesh out a fully analyzed socioeconomic purpose or need statement in alignment with the Northwest Forest Plan (NWFP) 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 that are needed to sustain the health and economic well-being and the aforementioned guidance. While the NWFP did not include an economic analysis, it provides clearly outlines the balanced approach for responding to multiple needs, the two primary ones being the need for forest habitat and the need for forest products. These complementary purpose and needs cannot be understated this, and other District projects, and are appropriately accounted for 1994 ROD p.26 which states:

The need for forest products from forest ecosystems is the need 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.

The Forest Service mission speaks specifically to sustaining not only the health, diversity, of the Nation’s forests and grasslands, but also oof sustaining “productivity” “to meet the needs of present and future generations”. It goes on to say: “As a Federal agency in service to the American people, the Forest Service cares for shared natural resources in ways that promote lasting economic, ecological, and social vitality. In doing this, the agency supports nature in

¹ Cassandra Moseley and Max Nielson-Pincus, “Economic Impact and Job Creation from Forest and Watershed Restoration: A Preliminary Assessment” (Ecosystem Workforce Program Briefing Paper #14; winter 2009; Institute for Sustainable Development, Eugene, OR).

² Cassandra Moseley and Max Nielson-Pincus, “Economic Impact and Job Creation from Forest and Watershed Restoration: A Preliminary Assessment” (Ecosystem Workforce Program Briefing Paper #14; winter 2009; Institute for Sustainable Development, Eugene, OR).

sustaining life”. Why then is the economic need lacking from this proposal? To have one component without the other is a poor misinterpretation of what the agency is supposed to holistically stand for. Without a robust wood products industry, the restoration needs simply cannot be met, period.

We request the Forest add a socioeconomic need statement to the Midnight Restoration Final EA to send a signal of the Forest’s understanding and adherence to this guidance, and of its recognition of the agency’s need to support to critical wood products infrastructure. We commend the District’s use of condition based management as an effort to streamline management. We also appreciate and support amending one Forest-wide S&G to allow snow plowing on one of the two routes, and using “winter by default” where the purchaser can provide an implementation plan that achieves the same level of soil protection during other seasons, as opposed to hard and fast winter only logging restrictions. Winter only logging limits the competitive bidder pool to eastern Washington mills (those that do not have to use closed in winter Highway 20 haul route), and thereby hinders the District’s chances of a successful timber sale purchase.

As previously stated during Scoping, 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 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. The economics analysis should also include a discussion around issues around the non-existent chip market and realize that due to continued chip market struggles, the proposed action should not require non-saw removal.

Additionally, as reported and recognized by the Forest Service Notice of Intent to amend the NWFP, the development and implementation of the NWFP has had significant socioeconomic, cultural, workforce, and financial impacts on communities and publics. The NWFP has largely not achieved its timber production goals, which were the NWFP’s primary criteria for supporting economies and community wellbeing (e.g. livelihoods and subsistence practices). Impacts include not only timber-related employment, but also community and industry infrastructure, and community connection to management and conservation practices and activities.

The intent of the NWFP amendment is to be forward-looking and promote adaptability of communities, the forest workforce, and the Forest Service to future changes with a focus on timber and non-timber products and other economic opportunities.

While part of the initial decline in federal forest harvest levels was to promote habitat protection for sensitive or endangered species, you, our Forest Service partners, also face litigation, dwindling revenues, and increased wildfire costs. These social challenges have made it difficult for the Region and the District to accomplish active management, including critical fuels reduction and restoration thinning. Restoration projects are important for a variety of reasons, the most pressing of which is preventing catastrophic wildfire and subsequent loss of habitat, community, or life. Methow Valley residents are threatened by frequent and increasingly severe wildfire events and drought. Choking wildfire smoke blankets the area through much of the summer. On densely packed Forest Service-managed land, there is also need to maintain and improve critical wildlife habitat, restore hydrologic function and soil productivity, and maintain access roads needed for not only recreation and administration, but wildfire suppression and evacuation. Yet, timber thinning activities associated with many of the Region's proposed projects take place on minimal acreage and are still expected to fund all non-harvest related work.

Years are spent debating on Collaborative projects, including the Midnight Project, as if trying to ensure each and every aspect of a forest restoration project is perfect on paper. However, these too-far-into-the-weeds debates are not always realistic and it compromises the District's ability to do good and meaningful work in a timely manner. Hampton Lumber knows, as well as the Forest, that this work won't happen in time to prevent the next catastrophic wildfire event.

Our Forest Service partners, managing 145.2 million acres of forestland in the U.S., recognize the risk; with 4.1 million acres of Forest Service land burned in 2021 alone. In January 2022, the agency released a strategy for confronting the wildfire crisis. 63 million Forest Service-managed acres are at high risk of catastrophic wildfire, a third of which the agency hopes to treat by 2032. At the current pace of treatment, it will take many decades (far beyond the above stated goal) to achieve the fuels reduction the region needs today and we do not have the luxury of such a timeline.

Additionally, poorly designed harvest treatments (that also leave too much wood behind) can lead to significant delays. Like other public landowners, the Forest Service puts up timber sales and solicits bids for the work. Unfortunately, these requests too often go unanswered as contractors are reluctant to take on the economic burden (with road costs sometimes 3 times that of the timber value). The Forest Service then has to go back to the drawing board to try to fix the sale to make it economically feasible. It can take another 2-3 years before a sale is reoffered, putting project areas at risk of complete loss from fire before a sale ever gets underway. The question that lingers unanswered is how many times can timber purchasers be expected to take a loss to get these fuels out of the forest before they throw in the towel? Once a logging company or mill goes under, they do not come back.

For all of these reasons, the Proposed Action and Need for Proposal should support the long-term sustainability of communities located near National Forest System lands and those that are culturally and economically connected to forest resources.

We find it unfortunate that the District has been pushed to include increasingly complex silvicultural prescriptions that do not align with National guidance to streamline timber sale preparation and reduce administrative costs of restoration treatments through the use of “designation by description” (DxD) and other techniques used by other federal agencies³. Additionally, the Draft Vegetation Resource Specialist Report states that “in MA 25, the goal is to intensively manage the timber and range resources using both even-aged and uneven-aged silvicultural practices to achieve a high present net value and a high level of timber and range outputs while protecting the basic productivity of the land and providing for the production of wildlife, recreation opportunities, and other resources...Stands with a high level of dwarf mistletoe or root disease would receive the highest priority for silvicultural treatment”.

We had requested the District use other project’s implementation (such as that of the original Twisp EA) to recognize how the more complex and prescriptive the EA is, the more difficult it is to implement in line with the intent of treatment. In Scoping, we requested that the District simplify prescriptions, making it more likely to meet the intended treatment outcome overall. We urge you to consider this where possible within the Midnight project area, for instance, the District could consider using DxD within the matrix allocation of the project, rather than overly complex designation by prescription across the entirety of the planning area. The matrix land allocation should be treated differently than the rest of the planning area, not lumped with prescriptions intended for late successional reserves (LSRs) for the management of a singular species. We challenge the proposed action’s common to all thinning prescription being applied across the matrix allocation. In particular, the opening size of ½ to 1 acre, with potential increases of up to 2 acres is misguided within the NWFP-defined matrix lands which are intended to be where most timber harvest and silvicultural activities will occur, with moderate levels of legacy old-growth features amongst creating intended early-seral, or young forest habitat.

Additionally, matrix lands within the treatment area should include large gaps (as allowed under the NWFP and the Okanogan Forest Plan) of regeneration harvest, whereas smaller gaps should be applied across the LSRs. The Draft EA fails to assess regeneration harvest (even-aged management) and to disclose the extent that regeneration could meet the desired critical economic need described above, nor to maximize Net Public Benefit over the long term as a desired future condition purported in the Land and Resource Management Plan for Okanogan National Forest (LRMP).

While we support Need #2 to Protect and Maintain Wildlife Habitat and Complex Forest in Strategic Places, we ask that the current condition described and associated affects analysis not

³ USDA USFS. 2012. Increasing the Pace of Restoration and Job Creation on Our National Forests. February 2012.

only focus on the threats to complex forest structure from fire, climate change, and historic logging practices on northern spotted owl habitat, but to also clearly recognize the threat to this old-growth indicator species by presence of barred owl. The U.S. Fish and Wildlife Service has developed a proposed 2023 Barred Owl Management Strategy to address the threat of the non-native, invasive barred owl to the native northern spotted owls, an action they deem necessary to support the survival of the threatened northern spotted owl from barred owl competition⁴. Even with this broad understanding, the Forest and District largely remain silent on this current condition competition within NEPA analyses. It is critical that the public and decision makers outline the full spectrum of effects that has led to the imperiled NSO, and to highlight that even with all the restoration that will be done in the project area, the effects on NSO habitat from barred owl competition will remain.

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 reduce and break fuels to create safety for community and wildland firefighters should be applied where necessary to avoid future tragedy.

In the Draft Climate Change, Greenhouse Gases, and Carbon Sequestration Resource Specialist Report, only impacts from thinning and fire are discussed; the full carbon cycle should be discussed, including carbon stored in wood products, as manufactured wood products are a key mechanism to capture and store carbon. While set aside mature forests can store carbon for long periods of time, actively managed timber stands sequester CO₂ out of the atmosphere and into much needed building products. With population growth, demand for building materials is increasing and wood products offer significant carbon benefits when compared to other materials. In 2022, an estimated 2.1M metric tons of CO₂ was stored in our Hampton lumber product, an amount roughly equivalent to the emissions 456,000 passenger vehicles produce in a year⁵.

The project design features are unclear as to what no commercial harvest buffer is being used for the different stream types. While the NWFP Riparian Reserve definitions are listed, it is important to note that those outer reserves were not designated as no cut buffers, and may be overly restrictive if applied as such. In fact, in a recent science synthesis of riparian harvest buffers from commercial regeneration harvest developed by Resilient Forestry⁶, the vast majority of studies show that buffers of 50 to 100' are successful at moderating adverse effects of upslope harvests on stream conditions, and very few even evaluate buffers larger than this. Most buffer studies examine effects of clear cuts on streams. Therefore, smaller buffers may suffice when

⁴ <https://www.fws.gov/media/draft-barred-owl-management-strategy>

⁵ Hampton Lumber and Family Forests Sustainability Report. 2022. <https://www.hamptonlumber.com/sustainability/>

⁶ Provided as an attachment

less intense harvest methods, such as thinning, is used. High level points include: stream temperatures generally return to baseline levels quickly following harvest and within a relatively short distance after flowing into shaded areas from a harvested area; most dead wood contributed to streams comes from forests closer than 100' from the stream; and riparian areas are ecosystems in and of themselves, and large no-touch buffers could limit our ability to restore natural qualities of these ecosystems in previous conifer plantations. We encourage you to review this body of literature and take its findings into account when establishing no commercial harvest buffers (using the best available science as your metric) in the final EA.

We are unclear as to why the proposal considers an unnecessary amendment to thin in LSR stands older than 80 years old (NWFP C-12) which is not required in eastern Washington. Please clarify why the Forest is seeking an amendment to treat stands in the LSR areas over 80 years of age, especially considering the project is in the Dry East Side High Risk Forest Type, treatments in stands over 80 years should be a given.

Thank you for your consideration,

A handwritten signature in blue ink, appearing to read 'Anjole Ngari', written in a cursive style.

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