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First name: Anjolene
Last name: Price
Organization: Hampton Lumber
Title: Collaborative Forestry Manager
Comments: Please find our comments attached.

[Text from attached document]

August 13, 2020

Meg Trebon

North Zone Environmental Coordinator
24 West Chewuch Road
Winthrop, WA 98862

Dear Ms. Trebon,

On behalf of Hampton Lumber, thank you for the opportunity to comment on the proposed Okanogan Forest Plan Amendments. As you are likely aware, Hampton Lumber is a fourth-[shy]generation, family-owned business with deep ties to the communities in which we operate. We are a committed, efficient, and community-oriented company with a long-term vision for the future. We directly employ 500 people in our Darrington, Morton, and Randle sawmills, along with our reload and remanufacturing facilities in Arlington and Napavine. We serve on the board of the North Central Washington Forest Health Collaborative, Pinchot Partners, and Darrington Collaborative, and participate in the Tapash Sustainable Forest Collaborative.

The continued success of our Darrington sawmill in the North Cascades is directly linked to raw material outputs from the Mount Baker Snoqualmie and Okanogan-Wenatchee national forests. The family-wage employment we provide along with the indirect employment provided by the presence of our manufacturing facilities (e.g. three indirect jobs for every one created by our mill) benefits schools, businesses, and the overall economic wellbeing of the local communities. Our ability to support these communities and source raw materials for our manufacturing facilities is highly dependent on the continued success proposals such as this.

We agree with and support the proposal's stated need to amend two Standards and Guidelines (S&Gs) that prohibit scheduled and unscheduled timber harvest, firewood collection and treatment of natural fuels in identified old growth stands. We agree that current science demonstrates that thinning by mechanical means and treating natural fuels with prescribed fire can help maintain old-growth stands and the habitat they provide by reducing the potential for stand-replacing fires.

We believe that the S&Gs must be amended to: I) maintain and restore Forest Plan Old Growth (FPOG) on the Methow Valley and Tonasket Ranger Districts; 2) allow treatments that increase resilience ofFPOG to disturbance and maintain these features on the landscape; and 3) include non-scheduled timber harvest, hand and machine piling, pile burning, and underbuming to enhance resilience to disturbance without degrading FPOG designation.

However, we do not agree with the "Mixed-conifer old growth" definition from Forest Plan EIS,

p. Glossary-33: A stand of trees, 30 acres or larger, that has the presence of large pine trees with 15 or more trees per acre greater than 18" DBH..." considering we experience seeing young trees often grow beyond 18" DBH depending on site conditions.

In addition, we support the need to amend all deer cover-related S&Gs to allow for consistent management. Adequate levels of quality forage in the spring, summer, and late fall are more critical for deer to survive winter than the Forest Plan's prescribed levels of thermal cover. We agree that this supports that forage quantity and quality are greater in landscapes with less canopy closure than is called for in current S&Gs. We support the need for treatments in deer cover types according to the historic range of variability (HRV) for vegetation as determined on a project-specific basis at the landscape level, including thinning and prescribed fire treatments to maintain or move vegetation toward historic patterns, composition, and arrangement of vegetation across both districts. However, we would prioritize thinning to give a more defined area and opportunity to generate revenue which can support future treatments, especially in the face of shrinking budgets and limited Forest capacity. In instances where possible, we suggest thinning prior to burning.

We agree with the list of 2012 Planning Rule Substantive Provisions The 36 CFR 219 planning rule substantive provisions related to these amendments.

Sincerely,

Anjolene Price Hampton Lumber

Collaborative Forestry Manager