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First name: Mike

Last name: Davis

Organization: Hampton tree farms

Title: Division Forester

Comments: December 5, 2016

Kelly Lawrence

Naches District Ranger

Okanogan-Wenatchee National Forest

10237 Highway 12

Naches, WA 98937

Dear Kelly:

On behalf of Hampton Tree Farms, thank you for the opportunity to comment on the Little Crow Restoration Project.

As you are likely aware, Hampton Tree Farms 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 are a committed, efficient, small community oriented company with a long term vision for the future. We directly employ 500 people at our manufacturing facilities (sawmills) in Darrington, Morton, and Randle along with our reload and remanufacturing facilities in Arlington and Napavine. 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. A decline or absence of the raw material outputs from the national forest timber sale system would jeopardize our ability to continue to operate and it would severely strain the wellbeing and social fabric of the small rural communities in which we operate.

The Little Crow Restoration project area includes approximately 56,871 acres of National Forest System lands located in the southern portion of the Little Naches watershed and includes the Crow Creek and Lower Little Naches River sub watersheds. Hampton Tree Farms supports both the Purpose and Need for this project, with the overall purpose to increase forest resiliency, restore aquatic resources, and maintain public access within the larger context of the Little Naches watershed. The needs for the project include:

- *Accelerate the development of a sustainable vegetative structure, composition, and pattern, which will allow for natural processes to function.

- *Improve hydrologic function and water quality by reducing storm water drainage connectivity from roads and trails to the stream channel network.

- *Restore stream habitat conditions to contribute towards long term recovery goals of listed fish species.

- *Provide for an economically and environmentally sustainable transportation system that maintains public access for recreational opportunities, special uses, and other traditional and non-traditional forest use in the context of vegetative and watershed health.

Hampton would like to extend our thanks to the Naches Ranger District for being proactive in the outreach to the local community and interest groups in developing the Modified Proposed Action which Hampton strongly supports. Having been personally involved since the inception of the Little Crow Project it has been encouraging to see this project come to fruition at the guidance and leadership provided by the Naches Ranger District and

staff. With respect to the final implementation Hampton would like to offer the following comments and recommendations:

*Strengthen and intensify the economics section of the project analysis by sending a strong signal of the importance of the local manufacturing facilities along with the loggers that will be supporting and performing the treatments on the ground. It is important to note the significance of each manufacturing sawmill job supporting 2 additional service related or support positions.

*Increase the commercial treatment in the project area to fireproof and increase forest stand resiliency.

*Maximize the vegetation treatments within huckleberry project areas to reduce canopy closure and enhance Huckleberry treatment areas. This similar technique has been employed on many wet side treatment areas with excellent results.

*We encourage and support the efforts to decommission approximately 24 miles of roads. We request that the District examine the entire forest road system recognizing the millions of dollars of initial investment that went into these systems. We recommend that the District examine the value of these systems for future management activities along with their ability to provide the district with some protection for fire suppression. Other forms of road closure treatment options are available and we support the utilization of gates, non-drivable water bars and additional road closure techniques that would render more of these systems inactive as opposed to deactivated.

*In areas designated to enhance old and large tree development, we encourage the district to increase the commercial treatable acres from 6,500 acres to 10,081 acres. For the Northern Spotted Owl treatment areas, we recommend maximizing the treatments to the potential of 6,317 acres from the proposed 2,990 acres.

*Hampton strongly believes that this project will improve forest health and reduce the threat of catastrophic wildfire while improving hydrologic functions and water quality, restore stream habitat conditions and aquatic organism passage, and provide for an economically and environmentally sustainable transportation system.

Thank you for the opportunity to provide comments on the Little Crow Restoration Project. I look forward to following the implementation of this project as it moves forward.

Sincerely,
HAMPTON TREE FARMS, INC.

Mike Davis
Division Forester
Cowlitz Division