



May 14, 2025

c/o Forest Supervisor
Gifford Pinchot National Forest
987 McClellan Rd
Vancouver, WA 98661

RE: Forest Wide Thinning and PCL Draft EA

As a fourth-generation, family-owned company deeply rooted in a number of rural communities of Washington and Oregon, we believe this project offers a valuable opportunity to work with the Forest Service to achieve a more effective restoration strategy forest wide. While the initial reduction in federal forest harvest levels under the Northwest Forest Plan (NWFP) aimed to protect sensitive and endangered species, our Forest Service partners now grapple with a complex interplay of challenges including litigation, declining revenues, escalating wildfire management costs and reduced staffing capacity. These factors have significantly hindered the implementation of active forest management to protect habitat, specifically critical fuels reduction and restoration thinning. We are concerned about the ability of our Forest Service partners to maximize the acres treated under this EA, considering both funding and staffing limitations. Effective implementation requires field personnel, and we understand that numerous positions have been left vacant due to recent reductions in force and delayed resignation programs. The administration's recent emphasis on increasing timber production, coupled with the high level of vacancies within the agency, raises concerns for Hampton Lumber regarding the feasibility of fully implementing these proposed actions. These factors underscore the critical need for enhanced industry and agency partnerships to ensure the continuity of essential forest health treatments outlined in this EA.

Consistent, predictable, sustained yield from active forest management is not merely a business objective for us; it is vital to the long-term health of the National Forests we depend upon, and to the well-being of the rural communities we call home. Our ability to support our facilities and surrounding communities is dependent on the availability of raw material from private and public forestlands. Specifically, our Cowlitz Division sawmills in Morton and Randle depend on reliable raw material outputs from the Cowlitz Valley Ranger District (CVRD). The family-wage employment we provide, along with the indirect employment created by the presence of our manufacturing facilities, benefits schools, businesses, and the overall economic wellbeing of local communities and the region.

Purpose and Need

It is evident that the promised timber yields from projects on Forests managed under the existing NWFP have not been realized. Having had first-hand experience with the closure of Region 6

milling infrastructure due to the NWFP shortcomings, we have deep concerns about unpredictable or diminished timber volume and the impact that will have on our communities and our business. With less than 15 percent of the NWFP's footprint is classified as “suitable for timber production” under the Matrix land use allocation, it is imperative that the matrix lands are managed in a manner to meet the need to provide sustainable flow of forest products long term.

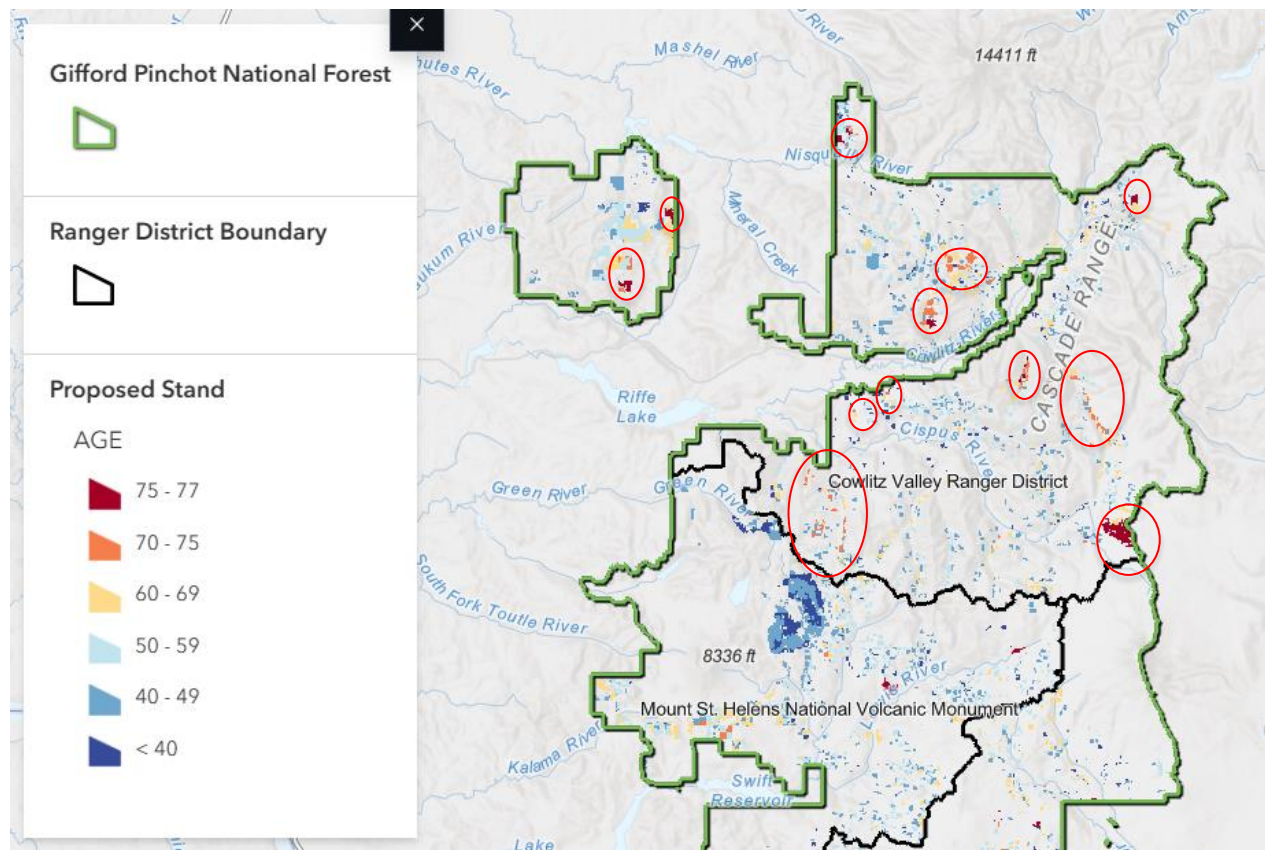
This is especially important to comply with the Executive Order on the Immediate Expansion of American Timber Production which prioritizes boosting domestic timber supply, improving forest health through active management, and removing barriers that impede effective forest management and timber production. It emphasizes the need for streamlined federal processes, *increased timber production* from federal lands, and wildfire risk mitigation. The final EA should similarly aim to remove barriers to project implementation, increase active forest management and enhance timber supply, while also prioritizing wildfire risk reduction. By incorporating these principles, the GPNF plantation thinning project can effectively contribute to the broader objectives outlined in the Executive Order, ensuring both sustainable forest management and a robust domestic timber industry.

We appreciate the noted differentiation between management objectives for late successional reserves (to develop stands with old-growth forest characteristics) and matrix (to produce commercial timber while retaining old-growth components and creating early seral habitat) under the NWFP. We are encouraged to see the inclusion of a need to develop multiple seral stages on the landscape to provide habitat for both late-successional and early-seral dependent species, as allowable under the NWFP. Similarly, we appreciate the need to reduce canopy cover to reduce the likelihood of crown-to-crown fire transmission and the likelihood of high severity fire effects that could negatively affect forest health and resilience.

Considering the most significant threat to NWFP area forests of all seral stages (including mature and old growth) is catastrophic wildfire, insects, and disease, we support strategic, targeted, accelerated active forest management to protect resources, such as NSO habitat. We also support the need to reduce the risk of wildfire on adjacent communities and valued assets, while providing 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.

We appreciate the inclusion of a need around providing a sustainable flow of forest products and the Forest's commitment to the economic benefits of the forest products to the local communities. However, it is important to recognize that this EA only analyzes potential treatment of 12 percent (approximately 157,000 acres) of the 1,320,000 million-acre Forest over the life of project. With the max treatment of 3,600 acres per year, it would take over 40 years to treat the entirety of the 157,000-acre analysis area.

Additionally, considering the upcoming timber sales from the Little White planning area in the South Zone, and the anticipated delay in the Skate Creek planning efforts, Hampton Lumber supports the prioritization of the oldest treatment areas (70–80-year-old stands circled in red below) on the CVRD. We believe focusing treatment acres in the Cowlitz would help meet the need of sustainable flow of forest products for timber-dependent east Lewis County communities and distribute these activities across the Forest more evenly in the coming years.



Affected Environment and No Action

We believe it is crucial that the Final EA's description of the affected environment and the no-action alternative acknowledge barred owl competition as a present and continuing threat. This factor, alongside fire, climate change, and historic logging practices initially listed by the FS, represents a key pressure on the ecosystem.

Desired Conditions

We urge you to include a clearly stated desired condition for matrix and Adaptive Management Area (AMA) that maintains the ability for those lands to provide a long-term sustainable and predictable supply of timber products. As an example of a desired condition for matrix and AMA, we propose the following: Stands are managed based on the principles of even-aged sustainable timber production, guided by ecological forestry principles through a combination of regeneration harvest and intermediate thinning, to support economic stability of rural communities.

While we concur with having healthy, vigorous stands that have a diverse native species composition and structure as a primary desired condition, during scoping we urged the GPNF to ensure treatment prescriptions are varied to suit the overall goal of the specific land allocation where specific treatments occur, and not applied broadly in a one-size-fits-all approach. We agree that for stands within the Late-Successional Reserve (LSR) and managed LSR land use

allocations, the focus should be on increasing the stand development trajectory to become complex, multilayered stands as quickly as possible. However, within the matrix and AMA, consistent, predictable, sustained yield from active forest management should be the primary focus.

We also concur with management activities within the Riparian Reserves to maintain and improve their conditions by reducing tree density.

Proposed Action

We appreciate the inclusion of treatment stands under 80 years old at the time of timber sale or stewardship contract award. However, considering the limited annual treatment capacity, we are concerned that many LSR stands will exceed this age before they can be managed. To ensure these stands within LSRs are treated before they age out, the Forest should clearly state that all stands *under 80 years old in LSRs when the Decision Notice is signed* are covered by this analysis and are available for treatment. At a minimum, the Final EA should include an additional alternative that would allow for this adjustment once the NWFP is amended.

While we support the proposed 300 acres of regeneration harvest to promote early seral species and address insect and disease outbreaks within plantation stands, **we do not support the use of variable-density thinning on Matrix lands. The proposed action on the 89,047 acres of Matrix in the planning area should:**

- **Explicitly identify timber production as the primary focus on stands identified as Matrix under a clearly outlined sustained yield principle; and**
- **Significantly increase harvest intensity across available Matrix acres, including a management paradigm shift from thinning to regeneration harvest.**

Promised timber yields under the NWFP have not been realized. We are concerned that prioritizing the development of late-successional forest conditions through thinning on Matrix lands will jeopardize the continuous supply of wood products from these stands. It is important that we manage all stands on Matrix lands to ensure successful regeneration and timber production long term.

We support tethered logging as a method that can mitigate negative soil impacts associated with mechanized harvesting, as well as provide operator flexibility.

We support the proactive development of Potential Control Lines (PCLs). However, we are concerned about the potential cost and limited effectiveness of non-commercial thinning focused only on fuels less than 8 inches DBH. Furthermore, dedicated funding for ongoing PCL maintenance and a demonstrated capacity for reliable prescribed fire outcomes are crucial for the sustained success of fuel reduction efforts.

Thank you for providing the opportunity to comment on this proposal. We believe that careful consideration of the concerns outlined, particularly regarding thinning efficacy and long-term timber production, will enhance the project's outcomes. We look forward to a productive partnership in the implementation of these treatments.

Sincerely,

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