



November 14, 2025

Via Project Website

Kelly Lawrence
Forest Supervisor
Olympic National Forest
1835 Black Lake Blvd SE
Olympia, WA 98591

RE: Canyon Forest Restoration Project #62260 Draft Environmental Assessment Comments

Dear Ms. Lawrence:

The American Forest Resource Council (AFRC) submits the following comments for the Draft Environmental Assessment (EA) for the proposed Canyon Forest Restoration Project.

AFRC represents the forest products industry throughout Oregon, Washington, Idaho, Montana, California, and Nevada. AFRC's members include over 50 forest product businesses and forest landowners. AFRC's mission is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and the protection of all forest lands. Many of our members operate in communities adjacent to the Olympic National Forest (ONF), and the management of these lands ultimately dictates not only the viability of their businesses but also the economic health of the communities themselves. The forest products sector in Washington State continues to provide around 40,000 direct and about 100,000 indirect jobs. Many of these are found in rural communities, such as those in Clallam, Jefferson, Mason, and Grays Harbor Counties, and the surrounding areas. In addition to the wages paid, the taxes and other monetary transactions generated by these businesses and family-wage jobs contribute to the infrastructure and well-being of the local communities. AFRC submits these comments on behalf of its members.

Washington and surrounding states continue to face a shortage of raw materials to meet manufacturing demand for wood products. Several mills have closed in the past few years. Vegetation management projects, both current and future, on the ONF can help contribute to the wood supply that many mills depend on to continue operating and employing their workforce. The economic activity generated by these treatments contributes to the broader community's well-being.

Sustainable commercial timber harvest on the Olympic National Forest and neighboring National Forests is critical to our members' near and long-term success. Our members and their contractors and employees rely on the timber output from the ONF and surrounding lands, including other National Forests. The economic activity generated by this work also supports local economies and government services, including those provided by AFRC members in Clallam and Mason Counties. Commercial timber harvesting is critical for the vitality of many rural communities in Washington State.

Additionally, much of the non-commercial and non-timber work proposed in the project will benefit from both economically viable and productive commercial timber projects and healthy and vibrant local economies. Too often, we see 'Purpose and Need' statements where the economic contribution of timber harvest appears to be more of an afterthought or byproduct of the proposed work. We also appreciate the emphasis on road infrastructure needs outlined in the Purpose and Need section. Investing in the road infrastructure through maintenance and upgrades supports many aspects of this project, as well as the current and future access needs of the stakeholders who visit the ONF.

Because commercial timber management on National Forest lands provides a substantial economic benefit, we are happy to see the Forest include this benefit in the 'Purpose and Need' statement. However, we always encourage the Forest to raise the priority of and use clearer, affirmative, and stronger language regarding economic contributions in future projects' Purpose and Need statement.

Proposed Action

AFRC generally supports the Proposed Action for this project and believes it will provide the best opportunity for the Forest to meet its intended goals. The sections below cover specific concerns and/or recommendations.

General Comments on the Proposed Action

We are pleased to see the Forest using prescriptions in its Adaptive Management Area (AMA) within the project area, to treat structurally simple stands over 80 years old. Given the large number of acres across the ONF that are over 80 years old but still in simple structures, conducting and monitoring the results of these treatments is critical to inform future policy and management of the Olympic National Forest.

Plantation Thinning Treatments

Given the presence of the Taylor Spotted Butterfly in part of the project area, we would like to understand in more detail how sufficient habitat can be created and maintained for this species, which requires openings and early-seral habitats or traditionally used balsds.

Riparian Reserve Management

AFRC is pleased to see the Forest propose some treatments within the Riparian Reserves. Many streams in the project area were not buffered during the previous harvest operation. Wide "no-cut" buffers can limit the ability to treat the area that would provide the most significant benefit for accelerating desired future conditions for the Riparian Reserves.

However, we are concerned with the application of 50-foot-wide "no-cut" buffers on Class 4 streams. As well as the limitation of thinning within the "no-cut" buffers to non-fish streams only. While we understand the need to exclude ground disturbance near these streams and therefore

not allow ground-based equipment to operate within this proximity to the stream, as we noted above, some form of treatment near these streams is critical to accelerate the development of desired future conditions. We encourage the Forest to explore opportunities to implement both commercial and non-commercial treatments within 20 to 50 feet of these streams, where structurally simple stand conditions exist.

Harvest Operations

AFRC is pleased to see tethered logging systems included as a timber harvesting method. Providing operators with flexibility in harvesting systems, especially given the current challenge of finding qualified cable systems loggers, is critical to this project's success.

While these systems can provide flexibility and access to areas difficult to reach with other methods, we encourage the Forest to ensure that operating seasons support both tethered/ground-based and skyline/high-lead logging.

The industry is experiencing a shortage of loggers to conduct much of this type of harvesting work. Very limited operating seasons can create challenges to maintaining this critical infrastructure.

Quarry Development

We are pleased to see the Forest include the potential for using rock from existing pits on the Forest. 'On-Forest' rock pits and the products that can be made from them (pit run, crushed aggregate, etc.) can help reduce future costs for maintenance and timber-harvest projects. Costs associated with hauling rock long distances have escalated in recent years, often representing a significant cost in timber sale implementation for our members. The rock source for required and optional roadwork usually influences the economic viability of timber sales. The long distances to commercial rock sources can make timber sales economically unviable.

Additional Project Design Criteria Comments

We understand the need to conduct much of this work during the dry season, from June 1st to October 31st. However, we remain concerned about some of the relatively narrow Limited Operating Periods (LOPs) identified in the Project Design Criteria. While we understand most of these are related to ESA obligations, the narrow windows they create for operating can significantly challenge the economic viability of the projects being offered. Cable thinning operations are most affected by these LOPs. AFRC strongly encourages efforts to minimize them so that operations can occur year-round and maximize available days, especially during the winter season.

Thank you for the opportunity to comment on this project. We look forward to participating in the further development of this proposal. If you have any questions regarding the above comments or additional information, please contact me at 360-352-3910 or mcomisky@amforest.org.

Sincerely,



Matt Comisky
Washington State Manager
American Forest Resource Council