



November 14, 2025

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 Supervisor Lawrence:

On behalf of the Olympic Forest Collaborative, please accept these comments on the Draft Environmental Assessment for the Canyon Forest Restoration Project.

The Olympic Forest Collaborative (Collaborative), launched on May 8, 2015, brings together stakeholders from the environmental community, timber industry, and representatives from federal and local government around shared goals of increasing timber harvest from the Olympic National Forest while benefitting the environmental quality of our forests and watersheds. The Collaborative works together and with federal officials to address issues that stand in the way of achieving the above-stated goals. Ultimately, the purpose is to simultaneously enhance the forest ecosystem, provide for increased, sustainable timber harvests on the Olympic National Forest, and provide economic benefits to timber communities on the Peninsula.

**Purpose and Need for the Project**

The purpose of the Canyon Project is consistent with the stated goals of the Collaborative, the Northwest Forest Plan, and other applicable laws and regulations governing vegetation management and restoration thinning activities on the Olympic National Forest (ONF), as in (EA Pg. 3):

"The purpose and need for the project is to increase forest structural and wildlife habitat diversity and accelerate the development of late-successional forest characteristics, while contributing to the economic viability of local communities."

The Northwest Forest Plan includes a goal of providing a sustainable level of forest products for local and regional economies and jobs. Both industry and conservation representatives on the Collaborative recognize the proposed restoration thinning in previously harvested stands to be an important opportunity to benefit the overall forest, wildlife, and local economies.

The proposed commercial thinning treatments are consistent with the types of thinning prescriptions that the Collaborative supports and has been conducting. Overall, we have observed that these

treatments result in an increase of the diversity, habitat value, and resilience of these stands and landscape over time. There is a large body of research demonstrating the benefits of thinning in dense plantations (e.g. Anderson and Ronnenberg 2013<sup>j</sup>).

#### **Stewardship Contracting Opportunity**

The Collaborative was established in part to support timber sales under Stewardship Contracting authority which allows associated timber receipts to be allocated to local activities rather than go to the Treasury Department in Washington D.C. This powerful tool, if developed with a Collaborative, allows the Forest Service to trade 'goods' (commercial timber) in return for services (e.g. watershed restoration, road improvements, restoration and maintenance of wildlife and aquatic habitats - either directly during the project, subsequently via the use of retained receipts, or both).

The Collaborative is extremely interested in partnering with the ONF to utilize Stewardship Authority as part of the Canyon Project to increase the amount of priority restoration work by providing additional and complementary funding through retained receipts. The Collaborative has previously worked with the ONF on Stewardship projects on other timber sales - Donkey Creek, WWB, GFF, H to Z, Big Stew, Queets Corner, Humptulips, Orchard Loner, Boomerang and Tiger Tail. We encourage the ONF to employ Stewardship Contracting to the extent possible to implement the Canyon Project.

#### **Potential Stewardship Aquatic Restoration Projects**

In anticipation of the opportunity for Stewardship Contracting as part of implementing the Canyon Project, we recommend that the Environmental Assessment (EA) identify and analyze high priority aquatic restoration projects in the Project area. We anticipate that Stewardship sales coming out of this project will generate retained receipts that will stay on the ONF and be applied to unfunded priority aquatic restoration projects. These potential Stewardship Restoration projects need to be identified and analyzed through NEPA analysis before they can be included and implemented in Stewardship contracts.

The ONF should continue to work with local restoration entities and its own specialists to identify and analyze potential priority aquatic restoration projects as part of the EA. We appreciate that the EA identifies two Aquatic Organism Passage (AOP) priority projects for consideration.

#### **Monitoring and Evaluation**

The Collaborative is interested in understanding what types of monitoring and evaluation the ONF apply to these restoration projects. Monitoring is critically important, especially in Adaptive Management Areas (AMA) where the ONF is planning novel or different thinning approaches (i.e., in stands over 80 years old).

Due to insufficient funding and staff levels, it is our understanding that the Forest conducts limited monitoring at a regional level for late successional forests, habitats for certain species, and watershed condition; but does not have a stand-level treatment monitoring program.

The Collaborative finds quantitative treatment monitoring to best verify that project implementation on Collaborative Stewardship sales is consistent with planned treatments, and to understand project outcomes, identify required adaptations for future work, and communicate project results to a broader audience. To that end, the Collaborative has secured funding to implement an effectiveness monitoring protocol to evaluate and highlight the meaningful ecological changes effected by restoration thinning treatments, and to allow for direct comparisons among Collaborative and other projects on the Olympic National Forest.

The overarching goal of the Collaborative's monitoring is to quantify the outcomes of forest management actions, track how well forest conditions are approaching the desired forest conditions, and to inform best management practices in future ONF timber harvest projects. A secondary goal of OFC's monitoring work is to supply the ONF with data characterizing the changes to forest stands brought about by thinning treatments. We intend that pre- and post-treatment data collected by the Collaborative and made available to the public will provide insights into the ecological impacts and benefits of forest thinning and build trust between the Forest and interested members of the public.

Here is a link to the Collaborative's Monitoring Protocol: <https://olympicforestcollaborative.org/wp-content/uploads/2025/02/OFC-Monitoring-Plan-Protocol-June-2023-Update.pdf>

#### Thinning Stands Over 80 Years Old in Adaptive Management Areas (AMA)

The Collaborative understands and agrees with the statement in the EA that recognizes that thinning stands in AMA is not limited by age as it is in Late Successional Reserves (LSR):

"Removing trees over 80 is an allowed and expected activity in the Northwest Forest Plan for Adaptive Management land allocations. Authors of the Northwest Forest Plan used tree age of 80 years or older as a threshold for forest managers to consider...They recognized that stands follow individual development pathways of succession depending on many factors and age or time alone is only a partial predictor of structure." (Draft EA Pg. 12)

We also understand that over the past three decades, thinning in stands over 80 years old, especially if naturally regenerated rather than plantation stands, has been the subject of much discussion and disagreement; and has not been a utilized activity on the Forest. Given its unique makeup of conservation and timber interests, the Collaborative worked with Resilient Forestry to explore and develop a Decision Tree Framework to apply when evaluating the potential for thinning to promote or achieve ecological management objectives in stands above 80 years old. The Decision Tree was based on a comprehensive scientific literature review and walks users through a decision matrix of ecological values (e.g. habitat provision, carbon storage, fire resilience, and others) and their relation to current and ideal structural conditions for a forest stand.

This framework was presented to ONF staff during the scoping period for this EA in 2022 with the intention that it would provide a scientifically-based tool to guide and inform development of thinning prescriptions in the AMA stands over 80 years old as part of this Project. The tool is designed to specifically explore the Collaborative's highest-priority ecological values. Should this Framework be

**Commented [ML1]:** The monitoring the collaborative does (effectiveness monitoring) is focused mainly on look at and learning from the forest system's response to the treatment with regard to ecosystem functional values. This is in contrast to compliance monitoring, which is often conducted by the sale administrator during the harvest, and which is focused on ensuring that the harvest matches the Rx. Not sure how important this distinction is to make, but since the forest is doing this compliance monitoring during the sale so it could be useful to focus on the functional aspects of the collaborative's monitoring program.

**Commented [MC2R1]:** I think it would be good to discuss both types of monitoring and encourage the FS to conduct both. Each type has its place in ensuring the goals of the project and the collaborative are met.

**Commented [ML3]:** The framework was originally developed to provide the collaborative with a tool to facilitate discussions and arrive at consensus for support of proposed thinning treatments in stands over 80 yo on in moist douglas-fir forest on the ONF. The tool is designed to specifically explore the collaboratives highest-priority ecological values. Should this framework be adopted by the ONF, it would need to be modified to include a set of values relevant to the ONF and it's stakeholders.

adopted by the ONF, it would need to be modified to include a set of values relevant to the ONF and its stakeholders.

The members of the Collaborative have agreed to use this Decision Framework on Collaborative projects in AMA Stands Over 80, and to work to adapt and/or modify the Framework over time, as we evaluate results and conditions on the ground. The desired outcome of the Framework is to employ a transparent and credible science-based decision tool to identify stands that can benefit from treatments to accelerate the goals of achieving desired future conditions that support late seral species such as the Northern Spotted Owl and the Marbled Murrelet<sup>i</sup> among other ecological values identified in the Decision Framework.

This Decision Framework would be a useful and prudent tool to identify priority treatment areas in AMA Stands Over 80 as part of the implementation of this project. The AMA Over 80 Decision Framework can be accessed here: <https://olympicforestcollaborative.org/decision-framework/>

In closing, the goals of this project align with that of the Olympic Forest Collaborative. The project would apply restoration thinning to accelerate late successional and old-growth characteristics consistent with Late Successional Reserve management under the Northwest Forest Plan. Effectiveness monitoring and adaptive management will be included in post-sales prescriptions. In addition, local economic benefits and the opportunity for needed aquatic restoration associated with existing road impacts would be realized under the use of Stewardship Contracting authority. With respect to the sensitivity about thinning in stands over 80 years of age, we encourage the ONF to review and utilize the Decision Framework developed by the Collaborative for this purpose in the development and implementation of this important Project.

Thank you for the opportunity to comment and collaborate.

Sincerely,

Jon Owen  
Conservation Co-Chair  
Olympic Forest Collaborative

Matt Comisky  
Industry Co-Chair  
Olympic Forest Collaborative

**Commented [ML4]:** Among other ecological values identified in the DST

**Commented [ML5]:** I'm not %100 this is the correct approach here. The decision framework provides tools that facilitate discussion, but it doesn't give the user the yes/no answer perse. I don't think the collaborative necessarily wants that process to happen without collaborative engagement.

**Commented [MC6R5]:** Perhaps we change it to "in the development and implementation of this project."

<sup>i</sup> <https://research.fs.usda.gov/treesearch/44695>