



VIA online submission: Comment Analysis and Response Application (CARA)

March 23, 2026

Objection Reviewing Officer, Region 6 Regional Forester
Pacific Northwest Region, USDA Forest Service
Attn: 1570/1950 Objections
1220 SW 3rd Avenue
Portland, OR 97204

RE: Mount Baker-Snoqualmie National Forest Forestwide Thinning Project Objection

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files this objection to the proposed draft decision for the Forest-Wide Thinning Project on the Mount Baker-Snoqualmie National Forest.

Objector:

American Forest Resource Council
700 NE Multnomah, Suite 320
Portland, Oregon 97232
(503) 222-9505

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, California, and Nevada. AFRC represents 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. The Forest-Wide Thinning project will, if properly implemented, benefit AFRC's members and help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

Objector's Designated Representative

Matt Comisky, Washington Manager
924 Capitol Way South; Suite 102
Olympia, WA 98501
360-352-3910
mcomisky@amforest.org

The content of this objection below is based upon the prior specific written comments submitted by AFRC in response to the Draft EA, which are hereby incorporated by reference.

1. The use of variable density thinning using “skips and gaps” on Matrix Land Allocations

AFRC submitted written comments in response to the Draft EA and identified our concerns with the use of variable-density thinning on Matrix lands. This included concerns about the Forest Service's future ability to meet commercial timber production goals. Given the limited number of Matrix acres available on the MBS, management prescriptions to create late seral conditions on these acres will ultimately risk the economic viability of future projects.

Resolution Requested:

AFRC requests that the Deciding Official clarify that there is no intent expressly made or implied that the treatments on Matrix lands are for the development of Late Successional characteristics that would limit or eliminate the future sustainable production of saw timber. We further request that any variable-density thinning be focused on other land allocations and only thinning prescriptions designed to enhance the growth and economic value of Matrix lands be implemented on Matrix land allocations. Traditional commercial thinning prescriptions for spacing and vigor are the preferred treatments. Pockets of extreme root-rot infestations may be an opportunity to create openings, but must be reforested with root-rot-resistant species. Also, any Matrix stands that are at or nearing CMAI should be considered for a regeneration harvest.

2. Riparian Reserve Management

AFRC submitted written comments in response to the Draft EA and identified our support for the proposed treatments within the Riparian Reserves. However, we are disappointed to still see wide no-cut buffers applied to all streams. Class 3 and 4 streams are of greatest concern, as they are most likely to have extremely dense, simple stand structures due to past harvest activities. Additionally, the wide no-cut buffers along Class 3 and 4 streams will slow the attainment of desired future conditions along these stream courses and reduce the likelihood of near-term wood recruitment.

Resolution Requested:

AFRC requests that the Deciding Official, at a minimum, direct the Forest to ensure that no-cut buffers do not expand in width unless there are slope stability or other similar concerns. We would prefer to see a minimum 25-foot no-harvest buffer on Class 3 and 4 streams, and a 40-foot no-harvest buffer on Class 2 streams.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, AFRC respectfully requests that the resolution meeting be held with all objectors present. AFRC believes that having all objectors together at one time,

though perhaps making for a longer meeting, will, in the long run, be a more expeditious way to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, AFRC requests to participate to the maximum extent practicable and specifically requests the ability to comment on points made by other objectors during the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Matt Comisky, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, flowing style.

Travis Joseph
President