



Submitted via the ONF Website Project Comment Form

June 29, 2026

Regional Forester, Objection Reviewing Officer,
Pacific Northwest Regional Office, USDA Forest Service, Attn: 1570 Objections,
1220 SW 3rd Ave, Portland, OR 97204

RE: OBJECTION Canyon Project

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files this objection to the proposed draft decision for the Canyon Project.

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, and California. 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 protection of all forest lands. The Canyon 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 in great demand.

Objector's Designated Representative

Matt Comisky, Washington Manager
921 Capitol Way S, Suite 102
Olympia, WA 98501
360-325-3910
mcomisky@amforest.org

Reasons for the Objection

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

Objection Point #1

In our comments, we raised the question regarding treatments to benefit Taylor's Checkerspot Butterfly (TCB), as seen below:

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 balds.

While we could have been more explicit in our request about further details regarding treatments for this habitat type, the Final EA does not address the concern about how more habitat will be created under this proposal, or how, in LSR land allocations, the natural process of tree growth towards late seral conditions can be interrupted, through the removal of trees, to maintain openings. Many of these openings appear to be larger than allowed in LSR treatments.

Resolution Requested

AFRC requests that the Forest better describe how the proposed "Opening Maintenance" treatments within LSR Land Allocations meet the requirements and intent of growing and restoring late seral conditions. And should the Forest move ahead with this proposal, please provide a more detailed description of the methods to be used to maintain the TCB habitat and the monitoring efforts to ensure the successful management of this species.

Objection Point #2

In our comments, as seen below, we raised concerns about the lack of management in buffers associated with non-fish-bearing streams, as seen below:

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.

While the Final EA indicates that some treatments involving tree cutting may be proposed within the 50-foot and 60-foot no-cut buffers associated with non-fish-bearing streams, the ability to remove those trees for use as wood products appears to be excluded. These would fall under the “non-commercial” treatments mentioned in our comments. However, the use of “commercial” treatments, as raised in our comments, does not appear to be a tool the Forest has chosen to implement to accelerate the attainment of Late Seral Conditions in the stream corridors.

Resolution Requested

AFRC requests in the “no cut buffers” associated with non-fish-bearing streams that the Forest permit the removal of cut trees, in excess of those needed for down wood/in-stream large woody debris, to be considered for removal where conditions will allow the operation to occur with minimal impact. This work will further support the project's stated goal of “Contribution to local economies from sale of wood products to achieve the items stated above,.....”

Objection Point #3

In our comments, as seen below, we raised concerns about the limited operating season, June 1 to October 31, and the impacts that additional limitations due to ESA timing restrictions will have on the implementation of this project.

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.

It is appreciated that the limitation on hauling on weekends was removed from the Final EA. We still have concerns that the limited operating season will have unnecessary negative impacts on the project's viability and implementation.

Resolution Requested

AFRC requests that the Forest adjust the operating season to year-round, subject to the limitations required by ESA obligations. This can be accomplished through performance measures on soil disturbance, road surface conditions (rutting, mud, etc.), and weather conditions (heavy rain, freeze/thaw events, etc.), rather than confining most of the work to the peak of the fire season.

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 to be able 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 stylized with a large, sweeping initial "T" and a cursive "J".

Travis Joseph
President