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Comments: COMMENTS ON FOREST PLAN REVISION

*Recruitment of acoustic spruce: There's been a great deal of emphasis on keeping Viking Lumber solvent to maintain an acoustic spruce pipeline to Steinway, missile nose cones, helicopter blades, etc. but no mention that the clearcuts needed for Viking's solvency will no longer produce such tone wood for centuries if ever. Does the Forest Plan consider suppressing tree regeneration in previous tone wood stands to mimic the slow growth that tone wood requires? Thinning second growth to increase wood volume for framing lumber is counterproductive for regeneration of tone wood. Europeans are allegedly selective harvesting their tone wood to maintain not only a non-declining inventory of their acoustic quality trees but also the mycorrhizal foundation in the soil under those trees.

One might add that using LIDAR or satellite imagery to identify volume class 7 as a proxy for tone wood would not replace on the ground identification of acoustic quality trees to establish existing inventories to even know if these high value trees are being harvested sustainably.

*Carbon sequestration and retention of soil fertility in logging plans: From the D. Pascual, et al paper, "Higher carbon storage in primary than secondary boreal forests in Sweden" (Science 391, 1256 19 March 2026) states "...primary forests store ~72% more C than managed secondary forests in vegetation, deadwood, soils, and harvested wood products combined (land C storage). Among the compartments, soils constitute both the largest C store and the largest difference between primary and managed secondary forests." With an administration that apparently supports and acts upon a POTUS's opinion that climate change is a hoax, incorporating BASI (Best Available Scientific Information) in forest planning has apparently been neutered.

From Oregon Wild (March 4, 2025) (oregonwild.org)

"The Trump administration has issued a sweeping executive order that prioritizes industrial logging over the health of America's forests. Titled 'Immediate Expansion of American Timber Production' this directive seeks 'to fully exploit' our public forest lands for timber production. Paired with a second order that falsely frames increased timber production as a matter of national and economic security, the timber production order is, in reality, an unprecedented assault on science-based decision-making, environmental protections, wildlife, and the communities that depend on these forests for clean drinking water. By systematically dismantling safeguards and fast-tracking logging projects while at the same time eliminating resource specialists and other civil servants from agencies, Trump is taking steps towards his goal of gutting hard-won protections and handing our public lands over to industry.

*Removing Environmental Protections to Expand Logging

This executive order directs federal agencies to identify pathways to aggressively weaken key environmental protections, including those established by the National Environmental Policy Act (NEPA) and the Endangered Species Act (ESA). These laws exist to ensure public involvement and science-based decision-making and to prevent reckless exploitation of public lands, but under this directive, agencies must now take the following actions:

*Within 30 days: Issue new guidelines to accelerate logging under various contracting authorities and propose legislative changes to further expand logging operations.

*Within 60 days: Develop a strategy to rush through endangered species reviews for logging projects, slashing oversight that protects at-risk wildlife.

*Within 90 days: Propose aggressive new logging targets for federal lands for the next four years, measured in millions of board feet of timber.

*Within 120 days: Finalize a broad review of whitebark pine forests under the Endangered Species Act, setting the stage to undermine protections for this imperiled species.

*Within 180 days: Consider adopting blanket exemptions that would allow logging projects to bypass environmental review entirely under the National Environmental Policy Act.

*Within 280 days: Review and reinstate past exemptions for thinning and salvage logging, further cutting back environmental oversight.

Gutting Environmental Safeguards

In attempting to bypass statutes passed by Congress, this executive order attacks existing environmental protections head-on. It instructs federal agencies to eliminate any policy—whether a regulation, legal settlement, or guideline—that creates an undefined "undue burden" on timber production. This vague and dangerous language provides a blank check for industry to push for the elimination of any rule standing in the way of profit-driven deforestation.

Of particular concern is the expansion of Categorical Exclusions demanded in this order. These loopholes allow federal agencies to bypass environmental review and other public processes. Some have no size limit, meaning agencies would have the discretion to log vast landscapes while declaring the project has no impact. Oregon Wild and our allies are currently challenging such exemptions in court.

Oregon Wild and our allies have also won a string of victories against reckless Bureau of Land Management logging projects that target old-growth forests, degrade drinking water and endangered salmon habitat, and increase fire risks to nearby communities. This executive order appears designed to push logging projects like those found illegal by the courts through new loopholes.

An Anti-Law Order

The executive order seeks to set the stage to expand logging through legally dubious—if not outright illegal—means. Executive orders cannot override federal statutes, but this directive is focused on identifying ways to circumvent the Endangered Species Act and NEPA to expedite logging...." (and more) oregonwild.org

Carbon credits:

Carbon crediting appears to have become an option for retaining existing carbon sequestered on primary, unlogged forest stands.

1) If carbon credits are incorporated into USFS managed merchantable forests, some accommodation should be made to set aside an appropriate portion of those funds to be dedicated to PILT and SRS moneys that would have been realized had the timber been harvested.

2) Historical local harvest volumes, e.g. free use permitted timber should be baked into the "Business as Usual" model so they don't count as "leakage".

3) I question a carbon credit program designed to keep carbon out of the atmosphere through retention of standing live trees, said credits that can be used to fund the creation of a massive carbon debt by logging living trees elsewhere.

Agreement for shared stewardship between USDA and Alaska's DNR DFFP: Since USDA is required to use BASI (Best Available Scientific Information) in managing federal lands but Alaska's DFFP and FRPA are not it appears this agreement for shared stewardship is little more than a means to sidestep hindrances to logging like the Roadless Rule, non-riparian beach fringe and non-declining inventories of acoustic spruce, non-declining nutritional value of deer browse, etc.

I'm concerned with land exchanges that result in relaxed standards and guidelines including carbon sequestration, logging debris and slash left in clearcuts as well as helicopter-logged parcels, utilization of merchantable logs.

I was interested in goals under FW-OGF-G mentioning red and yellow cedar cultural quality trees and specialty forest products such as instrument sound boards. See my above comments on need to establish baseline inventory on specialty woods to know what can be sustainably harvested.

I'm interested in just what changes are to be considered for free-use timber.

Is timing of all timber harvests to be adjusted to be done during time of year that coincides with lower ambrosia beetle and other pest colonization of recently downed trees?

Create very low action alternatives that consider carbon credits, dead-and-down-only harvests, selective harvests that approximate annual per acre growth rates that, e.g. apply especially to high community value areas like Cleveland Peninsula and Gravina Island.

Finally, I'd suggest commercial harvest of dead and down timber that reach state tidelands be required to be processed locally primarily for local residents.

Clearcutting of merchantable old growth should be limited to salvage of dead, dying or diseased timber.

Sincerely

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