

Agenda Item No.:	4
Topic:	<i>Vision for Oregon's Forests</i>
Date of Presentation:	June 6, 2024
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SUMMARY

The *Vision for Oregon's Forests* is a joint planning effort between the Board of Forestry and Department of Forestry. The *Vision* establishes the strategic direction that will guide the policy and operational decisions for the Board of Forestry and department in the coming years and serves as the foundation for continued planning work. It also informs several other key department and board strategies and plans, including:

- Biennial Agency Request Budget
- Affirmative action; diversity, equity & inclusion; and employee engagement action plans
- Oregon's Forest Action Plan
- Agency communications and information technology strategies
- Succession management plan

Further work is needed to develop the objectives and metrics that will guide the Department's operational planning processes. Additionally, the Board and Department have not yet had the opportunity to discuss and consider input provided via the May 2024 public comment period on the draft *Vision for Oregon's Forests*. However, the Department must submit a strategic plan to the Department of Administrative Services in June 2024 in order to meet one of the expectations set forth by Governor Kotek for Executive Branch agencies.

RECOMMENDATION

The Department recommends the Board support:

1. Submission of Attachment 1 as the Department's strategic plan to meet Governor Kotek's expectation for state agencies to submit current strategic plans to the Department of Administrative Services in June 2024, and
2. Continuation of subcommittee work to further develop the *Vision for Oregon's Forests*, to include metrics and objectives, with input from Board and Department committees (Committee for Family Forestlands, regional forest practices committees, State Forests Advisory Committee, Forest Trust Lands Advisory Committee and the Smoke Management Advisory Committee), key stakeholders and partner agencies.

NEXT STEPS

With Board approval, Attachment 1 will be formatted and submitted to the Department of Administrative Services before the end of June 2024 and the Board Administrator will schedule and coordinate further meetings of the subcommittee.

ATTACHMENTS

- (1) 2024-2029 Oregon Department of Forestry Strategic Plan
- (2) Current draft of the *Vision for Oregon's Forests*
- (3) Public comment received on draft Vision for Oregon's Forests through May 24, 2024

Oregon Department of Forestry: 2025-2030 Strategic Plan

Introduction

Forests are an integral part of the social economic and environmental fabric of our state, and as such, their vulnerability is ours as well. Clean air and water, sustainable forest products, biodiversity, public health and safety, and many more critical benefits Oregonians rely upon require a foundation of resilient forest ecosystems. But there is a lot of work to do to help our forests get there.

Oregon's forest ecosystems are vulnerable. Forest health overall is in decline. This is due in large part to climate-driven stressors—such as insects, diseases, drought and wildfire—and historic forest management decisions. Recognizing the importance and urgency of this work, the Oregon Board of Forestry and Oregon Department of Forestry collaboratively developed this bold, forward looking strategic *Vision for Oregon's Forests* that will best serve Oregon's forests and people into the future.

About this plan

This plan draws from the *Vision for Oregon's Forests*, a joint planning effort between the board and department. The *Vision* establishes the strategic direction that will guide the policy and operational decisions for the board and department in the coming years and serves as the foundation for continued planning work. It also informs several other key department and board strategies and plans, including:

- Biennial Agency Request Budget
- [Affirmative action; diversity, equity & inclusion](#); and employee engagement action plans
- Oregon's [Forest Action Plan](#)
- Agency communications and information technology strategies
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Throughout the remainder of 2024 and into 2025, the board and department will continue to build upon the foundation provided by the *Vision for Oregon's Forests*, including development of objectives and performance/progress measures. Once that work is complete, department leadership will begin their work of ensuring alignment between strategy and operations. Engagement with department and board advisory committees, Tribes, key state and federal agencies, stakeholders, other partners, and local communities to identify actions will be a core component of continuing planning efforts.

Regular reviews of/updates to this plan and reports on progress will be necessary to keep up with the department's constantly changing operational environment.

Target review/update and reporting timeframes:

- **Priorities & Goals:** Every 5 years
- **Objectives:** Biennially
- **Strategies & Tactics:** As needed, but at least annually
- **ODF executive leadership progress checks:** Quarterly
- **Board progress report:** Annually

About Us

Oregon Board of Forestry (est. 1907)

For more than a century, the Board of Forestry and Department of Forestry have been caring for Oregon's forests. The board was established in 1911, along with the positions of state forester and deputy state forester. Together, they were charged with preventing forest fires and coordinating the response when fires did start. This was the start of Oregon's complete and coordinated fire protection system that is still a crucial part of our suppression success today.

Less than a decade after being founded, the Board of Forestry adopted a forest policy for the state that identified the need for increased forest protection, a forest nursery, insect control, and formation of state forests. This policy was the starting point for the broad portfolio of work the board and department are responsible for today.

The Oregon Board of Forestry is a seven-member citizen board appointed by the Governor and confirmed by the state Senate. The board's primary responsibilities are to:

- Supervise all matters of forest policy within Oregon.
- Appoint the State Forester, who also serves as the director of ODF.
- Adopt rules regulating forest practices.
- Provide general supervision of the State Forester's duties in managing ODF.

The board is charged with representing the public interest. No more than three members may receive any significant portion of their income from the forest products industry. At least one member must reside in each of the state's three major forest regions: northern, southern, and eastern. The term of office is four years, and no member may serve more than two consecutive full terms. The State Forester serves as secretary to the board.

Oregon Department of Forestry (est. 1911)

The Department of Forestry's work is truly a team effort. The policy and direction established at the headquarters level guides the work happening in the

field statewide. The department's headquarters are in Salem, but much of the on-the-ground work is done by the leadership and staff of ODF's 12 districts with 24 units from Astoria to Wallowa and all the way down to Lakeview and Medford. The dedicated public servants in these offices are the people responsible for fighting fires, assisting landowners and managing our state forestlands every day for their fellow Oregonians. ODF also partners with three forest protective associations as part of the fire protection program.

ODF's Fire Protection Division is the state's largest fire department and protects 16 million acres of private, state, and some federal lands. ODF has been protecting Oregon's forests for 110 years. The department emphasizes preventing human-caused fires, reducing wildfire risks through improved forest health and resiliency, and keeping those fires that do start as small as possible. This approach minimizes resource loss, fire danger and smoke impact to communities, and suppression costs. ODF leads Oregon's complete and coordinated fire protection system. This system relies on partnerships with local, state, tribal, and federal government; the structural fire service; landowners; forest operators; contractors and more.

ODF's Forest Resources Division is responsible for several key areas of operation that contribute to sustainable, healthy forests. The most prominent work they do involves the

administration of the Forest Practices Act, which is a cornerstone of natural resource protection in Oregon that encourages sound management of forestlands.

Division staff also:

- Monitor and help preserve forest health across the state,
- Provide technical assistance to landowners, and
- Support local urban and community forestry efforts.

The division also houses the Federal Forest Restoration Program that, along with the Good Neighbor Authority, enables ODF to assist its federal partners in forest restoration and resiliency work on federally managed forestlands. Since the federal government is responsible for so much of Oregon's forests, the condition of these lands has a dramatic effect on the health of the state's total forestland.

ODF's State Forests Division manages more than 760,000 acres of working forests—also known as Board of Forestry lands—to provide social, economic and environmental benefits for Oregonians, which is not an easy task. The way the division's work is funded adds to the complexity. State forestland management is funded by a portion of the revenues received from timber sales on these lands. The majority of the revenue goes to the counties in which the timber sales are located and helps fund essential local services. ODF retains 36.25% of the

revenues, which has to support all aspects of state forestland management. Essentially, all recreation and environmental work on state forestlands is paid for by timber sales. The ability to build trails, maintain campgrounds, and improve wildlife habitats are all

dependent upon timber being harvested off those same lands.

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Vision: Complex and resilient forest ecosystems that endure and adapt.

Mission: To protect and promote resilient forests that benefit all Oregonians.

Values

Ecosystem benefits

Healthy, functioning ecosystems provide reciprocal benefits to people and the forest, including jobs, food, clean air and water, recreation, habitat, regional biodiversity, carbon storage, and so much more.

Ecosystems support

People’s actions are critically important to the continued resilience and adaptive capacity of forest ecosystems, including habitat protection, wildfire management, seedling selection, cultural and natural resources stewardship, restoration activities, and water and soil protection.

Forestry infrastructure

The forest products sector—including its workforce and infrastructure—plays a vital role in supporting healthy ecosystems and resilient forests and communities.

Climate-smart forestry

Addressing the management needs related to climate change requires a holistic approach that considers adaptation, mitigation and the social dimension of forestry, which includes community and economic aspects.

Relationships

Strong, respectful relationships are the backbone of our work. Those relationships

are built and maintained through transparent, honest, effective communication.

Workforce

At ODF, our workforce is our greatest asset. We provide them with a safe, diverse and inclusive workplace that encourages continuous learning and improvement.

Safety

The safety of ODF’s workforce and the public is always a top priority.

Public service

Through efficient and effective stewardship of natural and public resources, we strive for excellence in our service to the public.

Sound decision making

ODF empowers its workforce to make decisions in the best interest of Oregonians based on science, best practices and lessons learned.

Accountability

We are transparent about our actions and take ownership of the outcomes. We do what we say we’re going to do.

Priority: Promoting Resilient Forests

Goal

To reduce the vulnerability of Oregon's forests from a myriad of catastrophic climate driven disturbances, ODF will direct its policy management and educational actions to enable and promote all forestland managers to make intentional decisions that increase adaptive capacity of forest ecosystems.

The Board of Forestry believes that all forest owners and stewards have a social responsibility to improve the resilience and adaptive capacity of their lands. The Department of Forestry has the tools to incentivize and support this work.

Context

Changes related to climate, social values and economics are resulting in changes to ecosystem functions and ecosystem services provided to our society. Society recognizes the importance of reciprocal relationships between humans and forests; relationships in which humans support forests so that forests can support humans and other species.

Communities in rural, suburban, and urban environments can support forest management if communities can see their values considered and represented in the outcomes of that management, including clean water and air, fish and wildlife habitat, timber for jobs and housing, and recreational opportunities. Complex, functional forest ecosystems in each of Oregon forest types hold the greatest opportunities for providing these values over space and time.

Objectives

Development in late 2025-early 2025.

Strategies

- Promote ecological forestry principles that further forest complexity components using a variety of silvicultural approaches and landscape designs.
- Engage in the development of safe harbor agreements, habitat conservation plans, and other regulatory compliance mechanisms in collaboration with landowners and state and federal agencies.
- Engage with the Governor's Office and Legislature on potential incentives to encourage implementation of stewardship agreements on private lands.

- Promote the Forest Legacy Program and other efforts to protect private forestlands. And the multitude of public benefits they provide, from fragmentation and conversion.
- Engage with partners on place-based plans that seek to balance ecological, economic and social trade-offs to support the resilience, recovery and regeneration of diverse forests in the aftermath of severe disturbance events.
- Manage ODF's state forestlands to produce a blend of social, economic and environmental benefits to Oregonians, and demonstrate leadership in forest management.
- Increase partnerships and co-stewardship work with tribes, including incorporation of tribal ecological knowledge into ODF forest management activities.
- Increase cross-jurisdictional alignment on management of public forestlands that meets the needs and expectations of Oregonians.

Performance/Progress Measures

Development in late 2025-early 2025.

Priority: Supporting Resilient Communities

Goal

Policy and management decisions foster healthy relationships between humans and forests, so that forests support resilient human communities through social, economic, and ecological change.

Context

Forests have both direct and indirect effects on quality of life, economic opportunities for communities, and ecological conditions in rural, suburban, and urban areas across the state. Resilience varies regionally and between communities of place and culture. Forests provide a range of benefits to Oregonians and contribute to community resilience. Place-based and scientifically informed management approaches support forests to contribute a full range of benefits to enhance community resilience by meeting their needs.

Objectives

Development in late 2025-early 2025.

Strategies

- Promote access to forests for recreation, culture, education, and appreciation, in ways that are welcoming and inclusive for a wide range of diverse communities. Ensure access respects cultural resource protections, private ownership and natural resources.
- Promote forest and forestry related educational programs, technologies, pilot projects, forest management jobs, infrastructure and other tools to invest in the sustained economic viability and vitality of communities.
- Ensure management of forests contributes to clean water and air.
- Create a culture of shared learning and engagement about forestry with communities that includes culturally specific and appropriate approaches and content.
- Employ shared stewardship to support collaborative management across ownerships, promoting diverse strategies that maintain environmental and economic values.

- Take a place-based approach to supporting resilient communities that recognizes unique characteristics of that place.
- Engage with communities on place-based plans to support community recovery from severe disturbance events.

Performance/Progress Measures

Development in late 2025-early 2025.

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Priority: Addressing the Wildfire Crisis

Goal

Prevent, suppress and mitigate wildfire to protect communities and expedite forest resilience activities that promote the adaptive capacity of Oregon's forests.

Context

Wildfire has been a force that has helped shape Oregon's forests for millennia. Naturally occurring and prescribed fire, as well as suppression of fire, have played important roles in creating the forests we have today. Across Oregon, fire in forests has always existed in a variety of regimes, from frequent, low intensity fire to stand-replacing events, and mixed severity fires that present a spectrum of disturbance patterns.

Over the past decade, wildfires in Oregon have been trending toward larger, more complex, and more challenging and costly due to climate change and current forest conditions. With more people living in or near forests, there are far more lives, property and infrastructure threatened every year. Beyond immediate physical safety concerns, wildfire and smoke have broader impacts on public health, community wellbeing, local economies and our state's natural resources, including water and air quality.

This plan seeks a balanced approach that recognizes the role of fire suppression in protecting life and property, the role of active management to mitigate risk and control forest fuels, the ecological role of fire on the landscape, and the importance of place-based solutions.

Objectives

Development in late 2025-early 2025.

Strategies

- Development of a stable, equitable, and sustainable funding structure that adequately funds the resources needed to address Oregon's wildfire crisis and recognizes the broad impacts of catastrophic wildfire on public health and safety, community wellbeing, economies and natural resources across Oregon.
- Lead state-level efforts to expand the use of prescribed fire and fully integrate this tool into forest restoration and resiliency and community fire adaption efforts. Learn from tribes and incorporate tribal ecological knowledge into prescribed fire policy and practice.

- Continuously improve upon Oregon’s complete and coordinated wildfire protection system to meet the needs of the changing operational environment.
- Increase community education and engagement on wildfire topics, such as wildfire science, Oregon’s fire environment, the importance of mitigation, and actions they can take to protect themselves and their communities (prevention, mitigation, preparedness, etc.).
- Prioritize and promote fuels management and forest resiliency work in areas with human life and infrastructure, especially in the wildland-urban interface.
- Advance the implementation of the [20-year Landscape Resiliency Strategy](#) and all-lands shared stewardship across Oregon.
- Promote fire and smoke-adapted communities in the wildland-urban interface and beyond to mitigate the impacts of climate-induced increases in wildfire severity.
- Promote management activities that provide for safe operations before, during and after wildland fire events.
- Align with the [National Cohesive Wildland Fire Management Strategy](#):
 - Restore and maintain landscapes.
 - Support fire adapted communities.
 - Respond to fire.
- Improve cross-jurisdictional alignment and coordination on preparedness, prevention, mitigation and suppression to provide consistent, quality service to Oregonians.

Performance/Progress Measures

Development in late 2025-early 2025.

Priority: Providing Climate Leadership

Goal

The Board and Department will build capacity for climate-smart leadership.

Context

The Board adopted its [Climate Change and Carbon Plan](#) in November 2023, which centered climate-smart forest management to guide activities contributing to adaptation and mitigation, as well as social dimensions of the effects of climate change. Climate-smart forestry is a holistic approach for addressing the management needs related to the existential pressures exerted from climate change.

Objectives

Development in late 2025-early 2025.

Strategies

- Implement the adopted *Climate Change and Carbon Plan*.
- Lead efforts for a just and equitable transition to climate-informed silviculture and climate-smart forestry that optimizes climate mitigation and adaptation, while maintaining a sustainable flow of wood products to ensure long-term resource benefits and viability of the forest products industry and flow of long-lived forest products.
- State forests management: Lead by example and demonstrate climate-smart forest management on state forests to achieve adaptation, mitigation, and the achievement of forest resource goals.
- Accelerate the pace, scale, and quality of climate appropriate forest restoration to increase the resilience to increased wildfire, drought, and biotic disturbance severity and incidence. Support implementation of the recommendations of the Governor's Council on Wildfire Response.
- Increase the extent and resilience of urban and community forests to maximize the climate mitigation and health benefits of urban forest canopy.
- Facilitate the reforestation of areas burned by wildfire and encourage afforestation of low-productivity lands that are understocked or not in forest use.
- Support a strong, but flexible, land use planning system as a cornerstone of maintaining Oregon's forests on private lands.

- Create and maintain a research and monitoring program to track the status and trends of ecological, economic, and social indicators and the effects of climate change and to track progress related to this plan.

Performance/Progress Measures

Development in late 2025-early 2025.

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Priority: Striving for Organizational Excellence

Goal

Strengthen trust and confidence in ODF's ability to effectively accomplish its mission and provide excellent service to Oregonians.

Context

Oregon state agencies have an obligation to the Oregonians they serve to continually improve business processes to promote organizational efficiency and effectiveness in their delivery of services. Achieving this requires alignment: internally at all levels; with the direction provided by the Board of Forestry, Executive Branch and Legislature; with our partners; and with the public we serve. Organizational excellence requires a well-trained, highly competent and diverse staff of professionals and a culture that values and encourages individual and team learning and continuous improvement.

Objectives

Development in late 2025-early 2025.

Strategies

- Engage with legislators and Executive Branch leadership to promote awareness and understanding of the agency's challenges, opportunities and complexities.
- Build an agency governance structure that ensures consistent, optimized and efficient implementation of all agency functions.
- Create and maintain strategic and operational plans that support accomplishment of the goals in this document.
- Foster a culture of continuous improvement and innovation to increase efficiency and effectiveness.
- Engage and collaborate regularly with the nine federally recognized Tribes in Oregon.
- Collaborate and coordinate with partners to identify and pursue opportunities and leverage efficiencies to accomplish individual and shared goals and objectives.
- Increase transparency into key areas of interest including agency performance, enforcement activities, and financial condition.
- Expand ODF's education, information, outreach and engagement efforts to increase awareness and understanding of all that the agency does and the variety of ways in which it impacts Oregonians.

- Continue to build a diverse workforce where employees understand and value their role in the agency's mission.
- Encourage a culture of learning by providing development opportunities and supporting professional growth.
- Incorporate diversity, equity and inclusion into all aspects of ODF's business and operations.

Performance/Progress Measures

Development in late 2025-early 2025

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Draft Content: *Vision for Oregon's Forests*

Note for readers: This is the current draft language articulating the Board of Forestry and Department of Forestry's vision for the future of Oregon's forests. Key components are still under development. Throughout the remainder of 2024 and into 2025, the board and department will continue to build upon the foundation provided by the Vision for Oregon's Forests, including development of objectives and performance/progress measures. Once that work is complete, department leadership will begin their work of ensuring alignment between strategy and operations. Engagement with department and board advisory committees, Tribes, key state and federal agencies, stakeholders, other partners, and local communities to identify actions will be a core component of continuing planning efforts.

Introduction

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Oregon's forest ecosystems are vulnerable. Forest health overall is in decline. This is due in large part to climate-driven stressors—such as insects, diseases, drought and wildfire—and historic forest management decisions. Recognizing the importance and urgency of this work, the Oregon Board of Forestry and Oregon Department of Forestry collaboratively developed this bold, forward looking strategic *Vision for Oregon's Forests* that will best serve Oregon's forests and people into the future.

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protection system. This system relies on partnerships with local, state, tribal, and federal government; the structural fire service; landowners; forest operators; contractors and more.

ODF's Forest Resources Division is responsible for several key areas of operation that contribute to sustainable, healthy forests. The most prominent work they do involves the administration of the Forest Practices Act, which is a cornerstone of natural resource protection in Oregon that encourages sound management of forestlands.

Division staff also:

- Monitor and help preserve forest health across the state,
- Provide technical assistance to landowners, and
- Support local urban and community forestry efforts.

The division also houses the Federal Forest Restoration Program that, along with the Good Neighbor Authority, enables ODF to assist its federal partners in forest restoration and resiliency work on federally managed forestlands. Since the federal government is responsible for so much of Oregon's forests, the condition of these lands has a dramatic effect on the health of the state's total forestland.

ODF's State Forests Division manages more than 760,000 acres of working forests—also known as Board of Forestry lands—to provide social,

economic and environmental benefits for Oregonians, which is not an easy task. The way the division's work is funded adds to the complexity. State forestland management is funded by a portion of the revenues received from timber sales on these lands. The majority of the revenue goes to the counties in which the timber sales are located and helps fund essential local services. ODF retains 36.25% of the

revenues, which has to support all aspects of state forestland management. Essentially, all recreation and environmental work on state forestlands is paid for by timber sales. The ability to build trails, maintain campgrounds, and improve wildlife habitats are all dependent upon timber being harvested off those same lands.

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Context and Commitments

The board and department recognize that:

Bold, science-based actions are needed to address the composition and structure of the forests in Oregon.

- Policies will be responsive and adaptable to global and local climate change while mitigating threats to ecosystems, human health and safety, and economies.
- Policies will strive for a reciprocal relationship between forests and human cultures representing multiple identities. There is a responsibility to take care of forests so that forests can take care of us.
- Policies will support development of local and regional economies. Diversification and innovation in all aspects of forest management should promote the adaptive capacity of forests.

Oregon's rural, urban and suburban populations have varying social perceptions and expectations about forests and how forests should be managed to benefit humans and other species.

- The vision and goals put forth in this document are applicable statewide. The policies to enact these goals will be applied in a place-based manner at the regional and local level.
- Policies will seek to reflect and integrate the needs of all communities and identities including those which have been, and continue to be, marginalized.
- The board and department will provide clear and accurate information about forests in Oregon and accessible opportunities for all Oregonians to provide meaningful input on policies and decisions.

The state has unique and specific [government-to-government relationships](#) with the nine federally recognized Tribes in Oregon.

- Policies will honor government-to-government relationships with Sovereign Nations and meet obligations to protect tribal cultural resources.
- Policies will encourage collaboration with Tribes by pairing western science with indigenous knowledge.

Workforce supply continues to be a challenge, and there is a reduction in the ability of managed forests to cover associated costs in this dynamic state of climate and social change.

- Policies will recognize the changing educational requirements for a trained and skilled workforce that will support the work needed in Oregon.

- Policies will promote educational and employment opportunities that include communities and identities that have been and continue to be excluded from the profession.

The *Vision for Oregon's Forests* is forward looking and aspirational, which means that not all strategies can be immediately implemented with the authorities and resources currently available to the board and department.

- The board and department will work together to identify opportunities and solutions to challenges.
- There is a shared commitment to working within state government budgeting and policy processes to promote and fulfill the needs to implement this vision.

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Vision: Complex and resilient forest ecosystems that endure and adapt.

Mission: To protect and promote resilient forests that benefit all Oregonians.

Values

Ecosystem benefits

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Ecosystems support

People’s actions are critically important to the continued resilience and adaptive capacity of forest ecosystems, including habitat protection, wildfire management, seedling selection, cultural and natural resources stewardship, restoration activities, and water and soil protection.

Forestry infrastructure

The forest products sector—including its workforce and infrastructure—plays a vital role in supporting healthy ecosystems and resilient forests and communities.

Climate-smart forestry

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The safety of ODF’s workforce and the public is always a top priority.

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Priority: Promoting Resilient Forests

Goal

To reduce the vulnerability of Oregon's forests from a myriad of catastrophic climate driven disturbances, ODF will direct its policy management and educational actions to enable and promote all forestland managers to make intentional decisions that increase adaptive capacity of forest ecosystems.

The Board of Forestry believes that all forest owners and stewards have a social responsibility to improve the resilience and adaptive capacity of their lands. The Department of Forestry has the tools to incentivize and support this work.

Context

Changes related to climate, social values and economics are resulting in changes to ecosystem functions and ecosystem services provided to our society. Society recognizes the importance of reciprocal relationships between humans and forests; relationships in which humans support forests so that forests can support humans and other species.

The range of components that describe forest complexity, structure and function in each ecoregion in Oregon will be defined at multiple spatial scales (individual forest stand-to landscape-level) and temporal scales (stand initiation to old-growth). Beyond the legal requirements of the Endangered Species Act, the Clean Water Act and the Clean Air Act, and state forest practices act rules, complex, functional forests representing a wide range of seral stages from early successional to old-growth contribute to maintaining populations of native species over space and time in each Oregon forest type. Forest complexity can be enhanced at all stages of stand development using management based on best available science and continuous learning.

Communities in rural, suburban, and urban environments can support forest management if communities can see their values considered and represented in the outcomes of that management, including clean water and air, fish and wildlife habitat, timber for jobs and housing, and recreational opportunities. Complex, functional forest ecosystems in each of Oregon forest types hold the greatest opportunities for providing these values over space and time.

Objectives

Development in late 2025-early 2025.

Strategies

- Promote ecological forestry principles that further forest complexity components using a variety of silvicultural approaches and landscape designs. See the “Ecological Forestry” callout box to learn more.
- Engage in the development of safe harbor agreements, habitat conservation plans, and other regulatory compliance mechanisms in collaboration with landowners and state and federal agencies.
- Engage with the Governor’s Office and Legislature on potential incentives to encourage implementation of stewardship agreements on private lands.
- Promote the Forest Legacy Program and other efforts to protect private forestlands. And the multitude of public benefits they provide, from fragmentation and conversion.
- Engage with partners on place-based plans that seek to balance ecological, economic and social trade-offs to support the resilience, recovery and regeneration of diverse forests in the aftermath of severe disturbance events.
- Manage ODF’s state forestlands to produce a blend of social, economic and environmental benefits to Oregonians, and demonstrate leadership in forest management.
- Increase partnerships and co-stewardship work with tribes, including incorporation of tribal ecological knowledge into ODF forest management activities.
- Increase cross-jurisdictional alignment on management of public forestlands that meets the needs and expectations of Oregonians.

Performance/Progress Measures

Development in late 2025-early 2025.

CALLOUT BOX FOR ECOSYSTEM SERVICES

Forest ecosystem services are the benefits provided by healthy, functioning ecosystems to humans; these services are categorized into the following four groups (Millennium Ecosystem Assessment 2005).

1. **Provisioning services.** Provisioning services are raw resources provided by forest ecosystems including but not limited to:

sustainable and predictable supply of timber and special forest products; food, energy and mineral sources; and clean air and water.

2. **Regulating services.** A regulating service is the benefit provided by a forest ecosystem’s impact on natural processes such as carbon storage, water storage and purification, erosion and flood control and decomposition.

3. **Cultural services.** Cultural services are nonmaterial benefits provided by forest ecosystems such as sustenance; spiritual, recreational, aesthetic, and scientific benefits; and values as numerous and diverse as the people and cultures that use them.
4. **Supporting services.** Supporting services are necessary for the maintenance and support of all other ecosystem services. Forest ecosystems support the *function* of many systems including *nutrient cycling*, soil formation, pollination and seed dispersal, habitat for fish and wildlife and regional *biodiversity*.

Services to ecosystems are the actions taken by humans that support the continued resilience and adaptive capacity of ecosystems.

1. **Protecting Services.** Wildfire management activities, fish and wildlife habitat protection, integrated pest management, riparian and water protection, soil protection, sustainable harvest.
2. **Enhancing services.** Density management, seedling selection, nutrient cycling.
3. **Restoring services.** Post-wildfire restoration activities, fish and wildlife habitat restoration and enhancement, promoting carbon storage.
4. **Supporting services.** Cultural and natural resources stewardship practices, culturally significant vegetative species strategy, native seed sources, recreation management, educational and interpretive opportunities.

CALLOUT BOX FOR SHARED STEWARDSHIP

Urgent land management challenges like extreme wildfires, severe drought, and invasive species do not recognize property lines. Shared stewardship is a collaborative approach to land management that emphasizes partnerships across state, federal, private, and tribal landownerships. Shared stewardship approaches seek to identify joint priorities, explore opportunities, and develop cross-boundary strategies that make an impact on a landscape scale to create more resilient landscapes over time.

In 2019, Oregon’s Governor and state and federal officials signed a Memorandum of Understanding (MOU) to document the commitment to work

collaboratively to create a shared stewardship approach for implementing land management activities in Oregon. This MOU and the passage of Oregon Senate Bill 762 (2021) led to the development of the 20-year Landscape Resiliency Strategy.

This strategy—developed in collaboration with public and private sector partners—prioritizes restoration actions and geographies for wildfire risk reduction to direct federal, state, and private investments. More information on the strategy the plan for implementing Shared Stewardship in Oregon can be found on the [ODF website](#).

CALLOUT BOX FOR ECOLOGICAL FORESTRY

The following is adapted from information provided by Franklin, Jerry F., K. Norman Johnson, and Debora L. Johnson. 2018. Ecological forest management. Waveland Press.

Ecological forestry differs from production forestry by focusing on the following characteristics of the managed forest:

Maintains an array of ecosystem functions, structures and biota over time and over a range of spatial scales from within stands to landscapes rather than maintaining a limited set of functions, structure and biota driven by economic goals.

Emphasizes ecosystem diversity and resilience to reduce risks from major ecosystem disturbances

rather than focusing on fast-growing species with short rotations to minimize economic risks.

Tends toward increasing the number of management options needed to achieve an array of social values rather than narrowly prescribed management approaches.

Values complexity and heterogeneity at multiple spatial and temporal scales rather than simplicity and uniformity.

Accommodates climate change and changes to social goals by adjustments to the ecological model rather than to economic models.

More information:

Franklin, J.F., Johnson, K.N. and Johnson, D.L., 2018. Ecological forest management. Waveland Press.

Palik, B.J., D'Amato, A.W., Franklin, J.F. and Johnson, K.N., 2020. Ecological silviculture: Foundations and applications. Waveland Press.

D'Amato, A.W. and Palik, B.J., 2021. Building on the last "new" thing: exploring the compatibility of ecological and adaptation silviculture. Canadian Journal of Forest Research, 51(2), pp.172-180.

DRAFT

Priority: Supporting Resilient Communities

Goal

Policy and management decisions foster healthy relationships between humans and forests, so that forests support resilient human communities through social, economic, and ecological change.

Context

Forests have both direct and indirect effects on quality of life, economic opportunities for communities, and ecological conditions in rural, suburban, and urban areas across the state. Resilience varies regionally and between communities of place and culture. Forests provide a range of benefits to Oregonians and contribute to community resilience. Place-based and scientifically informed management approaches support forests to contribute a full range of benefits to enhance community resilience by meeting their needs.

Objectives

Development in late 2025-early 2025.

Strategies

- Promote access to forests for recreation, culture, education, and appreciation, in ways that are welcoming and inclusive for a wide range of diverse communities. Ensure access respects cultural resource protections, private ownership and natural resources.
- Promote forest and forestry related educational programs, technologies, pilot projects, forest management jobs, infrastructure and other tools to invest in the sustained economic viability and vitality of communities.
- Ensure management of forests contributes to clean water and air.
- Create a culture of shared learning and engagement about forestry with communities that includes culturally specific and appropriate approaches and content.
- Employ shared stewardship to support collaborative management across ownerships, promoting diverse strategies that maintain environmental and economic values.

- Take a place-based approach to supporting resilient communities that recognizes unique characteristics of that place.
- Engage with communities on place-based plans to support community recovery from severe disturbance events.

Performance/Progress Measures

Development in late 2025-early 2025.

CALLOUT BOX FOR PLACE BASED

Oregon is home to diverse and varied landscapes, ecosystems, and peoples. Developing natural resource management strategies that maintain environmental, human, and economic health requires consideration of local differences in both human and natural communities. Taking a place-based approach means finding solutions that are uniquely tailored to the geography and relevant human communities for a given locale, while still meeting broader regional, national, or global needs.

Place refers to both the natural-environmental context (a valley, mountain range, region,

ecosystem, etc.) and the human context (human cultural history, economics, laws, etc.). Place-based strategies include goals and outcomes that reflect a balance of needs between the environmental and human components of a place. Understanding and achieving this balance can be challenging, but the Board and department are committed to open and equitable processes that attempt to bridge this often-challenging divide.

Link analysis of resilience in spatial planning:
<https://doi.org/10.1007/s12061-022-09449-z>

Priority: Addressing the Wildfire Crisis

Goal

Prevent, suppress and mitigate wildfire to protect communities and expedite forest resilience activities that promote the adaptive capacity of Oregon's forests.

Context

Wildfire has been a force that has helped shape Oregon's forests for millennia. Naturally occurring and prescribed fire, as well as suppression of fire, have played important roles in creating the forests we have today. Across Oregon, fire in forests has always existed in a variety of regimes, from frequent, low intensity fire to stand-replacing events, and mixed severity fires that present a spectrum of disturbance patterns.

Over the past decade, wildfires in Oregon have been trending toward larger, more complex, and more challenging and costly due to climate change and current forest conditions. With more people living in or near forests, there are far more lives, property and infrastructure threatened every year. Beyond immediate physical safety concerns, wildfire and smoke have broader impacts on public health, community wellbeing, local economies and our state's natural resources, including water and air quality.

This plan seeks a balanced approach that recognizes the role of fire suppression in protecting life and property, the role of active management to mitigate risk and control forest fuels, the ecological role of fire on the landscape, and the importance of place-based solutions.

Objectives

Development in late 2025-early 2025.

Strategies

- Development of a stable, equitable, and sustainable funding structure that adequately funds the resources needed to address Oregon's wildfire crisis and recognizes the broad impacts of catastrophic wildfire on public health and safety, community wellbeing, economies and natural resources across Oregon.
- Lead state-level efforts to expand the use of prescribed fire and fully integrate this tool into forest restoration and resiliency and community fire adaption efforts. Learn from tribes and incorporate tribal ecological knowledge into prescribed fire policy and practice.

- Continuously improve upon Oregon’s complete and coordinated wildfire protection system to meet the needs of the changing operational environment.
- Increase community education and engagement on wildfire topics, such as wildfire science, Oregon’s fire environment, the importance of mitigation, and actions they can take to protect themselves and their communities (prevention, mitigation, preparedness, etc.).
- Prioritize and promote fuels management and forest resiliency work in areas with human life and infrastructure, especially in the wildland-urban interface.
- Advance the implementation of the [20-year Landscape Resiliency Strategy](#) and all-lands shared stewardship across Oregon.
- Promote fire and smoke-adapted communities in the wildland-urban interface and beyond to mitigate the impacts of climate-induced increases in wildfire severity.
- Promote management activities that provide for safe operations before, during and after wildland fire events.
- Align with the [National Cohesive Wildland Fire Management Strategy](#):
 - Restore and maintain landscapes.
 - Support fire adapted communities.
 - Respond to fire.
- Improve cross-jurisdictional alignment and coordination on preparedness, prevention, mitigation and suppression to provide consistent, quality service to Oregonians.

Performance/Progress Measures

Development in late 2025-early 2025.

Priority: Providing Climate Leadership

Goal

The Board and Department will build capacity for climate-smart leadership.

Context

The Board adopted its [Climate Change and Carbon Plan](#) in November 2023, which centered climate-smart forest management to guide activities contributing to adaptation and mitigation, as well as social dimensions of the effects of climate change. Climate-smart forestry is a holistic approach for addressing the management needs related to the existential pressures exerted from climate change.

Objectives

Development in late 2025-early 2025.

Strategies

- Implement the adopted *Climate Change and Carbon Plan*.
- Lead efforts for a just and equitable transition to climate-informed silviculture and climate-smart forestry that optimizes climate mitigation and adaptation, while maintaining a sustainable flow of wood products to ensure long-term resource benefits and viability of the forest products industry and flow of long-lived forest products.
- State forests management: Lead by example and demonstrate climate-smart forest management on state forests to achieve adaptation, mitigation, and the achievement of forest resource goals.
- Accelerate the pace, scale, and quality of climate appropriate forest restoration to increase the resilience to increased wildfire, drought, and biotic disturbance severity and incidence. Support implementation of the recommendations of the Governor's Council on Wildfire Response.
- Increase the extent and resilience of urban and community forests to maximize the climate mitigation and health benefits of urban forest canopy.
- Facilitate the reforestation of areas burned by wildfire and encourage afforestation of low-productivity lands that are understocked or not in forest use.
- Support a strong, but flexible, land use planning system as a cornerstone of maintaining Oregon's forests on private lands.

- Create and maintain a research and monitoring program to track the status and trends of ecological, economic, and social indicators and the effects of climate change and to track progress related to this plan.

Performance/Progress Measures

Development in late 2025-early 2025.

CALLOUT BOX FOR CLIMATE-SMART FORESTRY

Climate-smart forestry is a holistic approach for addressing the management needs related to the existential pressures exerted from climate change. Recent impacts go beyond the biotic aspects of the forest and include social dimensions including economics and state financial obligations. Abiotic and biotic forces are driving a divergence of existing ecosystems and the future environment.

The Oregon Department of Forestry and the Oregon Board of Forestry have accepted a definition of climate-smart forestry that includes three legs: adaptation, mitigation, and the social dimension (including communities and economic aspects), and following this will help the board and department align with each other and with the State's federal counterparts which have been directed to center climate-smart agriculture and forestry in their own work and processes. Adaptation policy can help forests adapt towards more resilient landscapes through human intervention. Examples include changing forest structure, management approaches, and incentivizing efforts to incorporate climate change into management

decisions. Adaptation tools can help forest landowners and managers assess their vulnerability to climate change. Mitigation policy and activities contribute to reducing temperatures through the removal of carbon dioxide from the atmosphere. Natural climate solutions like forests, agricultural lands, and blue carbon offer options to increase this mitigation through biologic sequestration. Policy approaches and levers that can be utilized include incentivizing practices to increase stored carbon in the forests, reducing emissions from forest activities (e.g., limiting slash burning and increasing alternative slash use), among others. Social license considers the impacts of adaptation and mitigation action on people, personal and community health, and community and rural economies. Utilizing climate smart forestry to create healthy, resilient forests that also provide ecosystem and economic benefits can help lift disadvantaged, underserved, natural resource dependent, and those living with intergenerational poverty.

Priority: Striving for Organizational Excellence

Goal

Strengthen trust and confidence in ODF's ability to effectively accomplish its mission and provide excellent service to Oregonians.

Context

Oregon state agencies have an obligation to the Oregonians they serve to continually improve business processes to promote organizational efficiency and effectiveness in their delivery of services. Achieving this requires alignment: internally at all levels; with the direction provided by the Board of Forestry, Executive Branch and Legislature; with our partners; and with the public we serve. Organizational excellence requires a well-trained, highly competent and diverse staff of professionals and a culture that values and encourages individual and team learning and continuous improvement.

Objectives

Development in late 2025-early 2025.

Strategies

- Engage with legislators and Executive Branch leadership to promote awareness and understanding of the agency's challenges, opportunities and complexities.
- Build an agency governance structure that ensures consistent, optimized and efficient implementation of all agency functions.
- Create and maintain strategic and operational plans that support accomplishment of the goals in this document.
- Foster a culture of continuous improvement and innovation to increase efficiency and effectiveness.
- Engage and collaborate regularly with the nine federally recognized Tribes in Oregon.
- Collaborate and coordinate with partners to identify and pursue opportunities and leverage efficiencies to accomplish individual and shared goals and objectives.
- Increase transparency into key areas of interest including agency performance, enforcement activities, and financial condition.
- Expand ODF's education, information, outreach and engagement efforts to increase awareness and understanding of all that the agency does and the variety of ways in which it impacts Oregonians.

- Continue to build a diverse workforce where employees understand and value their role in the agency’s mission.
- Encourage a culture of learning by providing development opportunities and supporting professional growth.
- Incorporate diversity, equity and inclusion into all aspects of ODF’s business and operations.

Performance/Progress Measures

Development in late 2025-early 2025.

CALLOUT BOX FOR DIVERSITY, EQUITY & INCLUSION

The Oregon Department of Forestry and the Oregon Board of Forestry are committed to a vision for Oregon’s forests that benefits all Oregonians across all identities, backgrounds, and experiences. The board and department are committed to integrating diversity, equity, and inclusion, as defined below, across the agency’s operations and spheres of influence. Collectively, we aspire to create a culture of inclusivity for our employees and the communities we serve.

Definitions extracted from [C](#).

Diversity: Honoring and including people of different backgrounds, identities, and experiences collectively and as individuals. It emphasizes the need for sharing power and increasing representation of communities that are systemically underrepresented and under-resourced. These differences are strengths that maximize the state’s competitive advantage

through innovation, effectiveness, and adaptability.

Equity: Equity acknowledges that not all people, or all communities, are starting from the same place due to historic and current systems of oppression. Equity is the effort to provide different levels of support based on an individual’s or group’s needs in order to achieve fairness in outcomes. Equity actionably empowers communities most impacted by systemic oppression and requires the redistribution of resources, power, and opportunity to those communities.

Inclusion: A state of belonging when persons of different backgrounds, experiences, and identities are valued, integrated, and welcomed equitably as decision-makers, collaborators, and colleagues. Ultimately, inclusion is the environment that organizations create to allow these differences to thrive.

CALLOUT BOX FOR TRIBAL RELATIONS

There are nine federally recognized Indian Tribes in Oregon. These Tribes existed prior to the foundation of the United States of America and retain a unique legal status and provide a

historic context to Oregon's natural resources. The board and department are committed to communicating, engaging, and partnering with the Tribes at a government-to-government

level. This means acknowledging Tribal governments as sovereign nations that have rights of self-determination. The nine federally recognized Tribes of Oregon have lived, worked, and played in Oregon since time immemorial, and partnering in natural resource stewardship is imperative given the challenges we face together, and the millennia of knowledge Tribes bring to ecosystem management in the Pacific Northwest. The [department's intent](#) is to promote and strengthen inter-government relations, resolve potential concerns, and enhance the exchange of information, ideas, and resources for the greater good of all Oregonians.

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Appendix C: Reference materials & resources

National Cohesive Wildfire Management Strategy:

<https://www.forestsandrangelands.gov/documents/strategy/natl-cohesive-wildland-fire-mgmt-strategy-addendum-update-2023.pdf>

Pacific Northwest Quantitative Wildfire Risk Assessment: <https://pnw-quantitative-wildfire-risk-assessment-osugisci.hub.arcgis.com/>

Oregon Forest Action Plan: <https://www.oregon.gov/odf/Documents/aboutodf/OregonActionPlan.pdf>

ODF Diversity, Equity and Inclusion Action Plan 2023-25:

<https://www.oregon.gov/odf/aboutodf/Documents/2023-2025-diversity-equity-and-inclusion-action-plan.pdf>

ODF's Information Technology Strategic Plan:

ODF/Tribal Relations: <https://www.oregon.gov/odf/aboutodf/Pages/tribalrelations.aspx>

Shared Stewardship MOU: <https://www.oregon.gov/odf/fire/documents/shared-stewardship-mou-agreement.pdf>

2021-2023 Landscape Resiliency Program Report:

<https://www.oregon.gov/odf/aboutodf/documents/2023-odf-sb762-landscape-resiliency-program-report.pdf>

Peer reviewed: Climate-Smart Forestry: Promise and risks for forests, society, and climate.

<https://doi.org/10.1371/journal.pclm.0000212>

Peer reviewed: Meta-Overview and Bibliometric Analysis of Resilience in Spatial Planning – the Relevance of Place-Based Approaches. <https://doi.org/10.1007/s12061-022-09449-z>

May 24, 2024

Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

Submitted Electronically at: <https://www.oregon.gov/odf/board/pages/commentsvision.aspx>

RE: Vision for Oregon's Forests

Dear Members of the Oregon Board of Forestry,

The Oregon Forest Industries Council is submitting the following comments in regard to the latest draft of the Vision for Oregon's Forests (the "Vision") that was discussed during the Board of Forestry (the "Board") retreat in April and that has subsequently undergone additional changes to reflect the content of the Board's discussions at that meeting. Although this document is not operable on its own, given that it is meant to serve as a strategic plan for the Board and for the Department of Forestry (the "Department") that will inform the Department's operational priorities for years to come, we believe that the way in which the Vision frames forest policy issues is of paramount importance. That said, we have four primary concerns with this most recent draft, and hope that the Board will take our feedback into consideration as you move toward adoption of a final document in June.

1.) The Vision Gives Short Shrift to the Importance of Active Forest Management and the Forest Products Sector in Promoting Resilient Communities

Given that this document is meant to paint a holistic picture of the values, functions, and uses of Oregon's forests, and of the challenges facing those forests, it makes sense that the three major categories of forest values (economic, ecological, social/recreational) are addressed across the priorities outlined in it. And indeed, the shared values outlined on p. 3 identify all three of these categories either directly or implicitly. We appreciate that these values are not set over and against one another, but that their interrelation is recognized and clearly articulated.¹ This is even reflected in certain priorities within the Vision, as well. For example, the context section for the "Resilient Forests" priority recognizes the fact that resilient forests are forests that can provide the full panoply of services that Oregonians value.

However, in many sections of the document, the importance of active forest management and of the economic services provided by forests are conspicuously minimized, if not altogether absent. For example, the strategies outlined under the "Resilient Forests" priority do not include any strategies aimed at either maintaining or increasing harvesting and wood products manufacturing capacity and infrastructure in the state, even though such capacity is necessary for the state to actively manage both private and public lands and to fully leverage tools such as the Good Neighbor Authority program to restore unhealthy forests that are otherwise beyond the state's jurisdiction to a more resilient state. Likewise, under the "Resilient Communities" priority, aside from the strategy aimed at "promot[ing] forest and forestry related educational programs, technologies, pilot projects, forest management jobs, infrastructure and other tools," no recognition is given to the fact that the economic and social fabric of rural, forest-adjacent communities is inextricably tied to a healthy and robust timber industry. Yes, forests provide services for rural communities that extend beyond jobs and economic activity, but that activity is

¹ For example, the "Forestry infrastructure" value is framed in such a way that it is clear that a robust forest products sector plays a vital role in supporting healthy ecosystems and resilient communities.

of vital importance if these communities are to maintain, much less grow and thrive. There is a way of talking about the full range of values and functions of forests that is helpful for establishing necessary context for policy discussions and resource prioritization, and there is a way of doing so that is meant to implicitly minimize the importance of certain values and functions. Here, we would submit that the document does the latter with regard to the importance of an economically viable forest products sector to healthy, resilient communities across the state.

2.) The Document Misconstrues the Perils Facing the State’s Forested Landscapes

Reading through the document, one can’t help but get the impression that those who drafted it have a prevailingly negative outlook on the health and vitality of the state’s forested landscapes. The document begins with a sweeping statement that “Oregon’s forest ecosystems are vulnerable” and that “[f]orest health *overall* is in decline.” Forests across the state are repeatedly characterized as “vulnerable,” lacking in resilience, and in need of protection.

One can certainly debate whether this prevailing narrative matches reality, or whether it is presented in unnecessarily dour terms, but the document goes one step further and implies that the imperiled state of our forests is owing to two primary causes: (1) climate change and (2) a lack of forest complexity. The first of these stated causes is in step with the general alarmism that goes hand-in-hand with most mentions of climate change nowadays, but is also largely unverifiable. That climate change is occurring cannot be denied. That a slow and steady increase in global temperatures will *necessarily* imperil the forest ecosystem in the Pacific Northwest is a conclusion that at this time is lacking in solid scientific evidence and is therefore premature.

Worse, however, is the second implied reason articulated in the document for the alleged vulnerability of Oregon’s forests. The type of complexity that the document calls for (and that will supposedly decrease the vulnerability of the forest) is clearly meant to implicate actively managed (and therefore largely private) forests.² We strenuously disagree that private forests and actively managed public forests are the problem.

We are not shy about talking about the need to restore forest health across the state – particularly to address a growing danger of large, stand-replacing wildfire.³ But it is our firm belief, backed up by multiple studies and plentiful data, that the forests that are in need of restoration are our public forests (particularly federal) that have been left largely *unmanaged* for nearly forty years, *not* privately managed forests.⁴ Over the past ten years, 93 percent of the forest acres burned each year have been on public

² For example, the “Resilient Forests” goal is stated as promoting “forestland managers to make intentional decisions that increase adaptive capacity of forest ecosystems” and the context section then calls out enhancing forest complexity as the primary tool for decreasing vulnerability. The strategies under this goal further single out “ecological forestry principles” such as variable stand densities, increased rotations, and increased retention of large legacy structures as the way to accomplish this goal. Other strategies likely prioritize complexity as a focus under the state’s forestry regulations.

³ See, e.g., Prichard et al. *Adapting western North American forests to climate change and wildfires: 10 common questions*. J. of Ecological Applications, 31(8), 2021; National Interagency Fire Center, “Total Wildland Fires and Acres,” www.nifc.gov/fire-information/statistics/wildfires; Governor’s Council on Wildfire Response, November 2019: Report and Recommendations, p. 5, available at: <https://www.oregon.gov/osp/Docs/GovWildfireCouncilRpt-FinalRecs.pdf>.

⁴ See, e.g., Starrs et al., “The impact of land ownership, firefighting, and reserve status on fire probability in California,” *Environmental Research Letters* 13 (2018), available at <https://iopscience.iop.org/article/10.1088/1748-9326/aaaad1> (finding that the difference in fire probability

lands, even though just over half of the state’s forests fall under federal jurisdiction, and the rate of the year-over-year increase in acres burned on federal forestland has outpaced that on state-protected lands (including both state and private).⁵

And it simply won’t do to waive one’s hand and pass this all off as an unavoidable consequence of climate change. If the increase in fire activity that we have experienced were primarily the result of the changing climate, one would expect all forests to be impacted to a roughly similar degree. But this is simply not the case.⁶ It is, instead, a function of management decisions (i.e. decisions *not* to manage) that have resulted in the buildup of surface, ladder, and canopy fuels on our federal forestland and on how to manage fire once it is on the landscape.

It is perfectly acceptable to aspire to continuously improve our understanding of how best to manage our forests, both public and private, but in its present form, this document seems to imply that Oregon’s forests are in an acutely vulnerable state, and that this is primarily a function of current management practices on privately-owned forestland. We hope to see this changed in the final form of the document that the Board approves in June.

3.) Little to No Discussion of Ongoing PFA Work

One stunning omission from the document was the complete lack of any reference to the recent Private Forest Accord (“PFA”) between private forestland owners and environmental organizations. Interpreted generously, this omission could be owing to the belief that the PFA is now water under the bridge and does not require a special call out in a strategic planning document framed with an eye to the future. Alternatively, it could be an intentional attempt to avoid what the Board understands to be a sensitive topic that, celebrated as it was by both the timber industry and environmental groups, still has detractors across the spectrum of stakeholders. Whatever the reason is, we believe that it is a gross error not to include as a goal – or at least as a strategy targeted intended to address the goals already outlined – the successful implementation of the PFA as well as ongoing support of the adaptive management process outlined in the revised forest practice regulations.

It is our hope and (we believe reasonable) expectation that the Department and the Board will lend full support to promoting and defending a program that now constitutes one of, if not the most advanced, suite of forest practice regulations in any jurisdiction. Yes, much of the necessary heavy lifting has already been done to get us on the path to a durable final product – including a monumental compromise agreement between historical forest policy combatants, a successful legislative effort to enshrine the agreement in state statute, an efficient rulemaking process to update Forest Practices Act regulations, and the standing up of a new adaptive management committee and independent research and science team –

on federal versus non-federal lands is increasing over time); “Wildfires,” *Congressional Budget Office*, June 2022, p. 3. Available at, www.cbo.gov/publication/57970.

⁵ Data Source: National Interagency Fire Center. “Historical year-end fire statistics by state.” Available at, <https://www.nifc.gov/fire-information/statistics>. The 2020 and 2021 fire seasons did see a dramatic increase in private acres burned (though still significantly less than what was burned on federal forestland), but it remains to be seen if those years (2020, in particular) will prove in the long run to be anomalous in that regard.

⁶ In fact, one study showed that climate variables such as average maximum temperature during summer months, average annual precipitation, and annual topsoil moisture content had a relatively minor effect on increased fire probability. Starrs, C.F. et al. 2018. The impact of land ownership, firefighting, and reserve status on fire probability in California. *Environmental Research Letters* 13(3):034025. <https://doi.org/10.1088/1748-9326/aaaad1>.



but the task is not yet complete, and even if/when a private forest habitat conservation plan has been approved by the federal services, the program will require continued care and promotion if it is to have lasting value. We implore the Board to include this as a priority in the Vision document.

4.) A Lack of Data Informing the Document's Policy Aims

Finally, we have serious concerns with the lack of data and general scientific rigor employed in the framing of this document and its stated goals and strategies. We have borne witness to nearly every meeting of the Board and the subcommittee where the Vision was discussed, and to our knowledge, the Board was never presented with research or data to support the claims made in this document and to inform its policy aims. The closest that the Board came to consultation with outside sources appears to have been the public opinion surveys conducted by Oregon Kitchen Table ("OKT"). This is incredibly troubling.

Setting a strategic plan for forest policy in Oregon that is primarily informed by public sentiment – much of which may be based on faulty assumptions and incomplete information – could very well lead the Board and the Department to prioritize ineffective or even ultimately harmful goals and strategies. This danger is especially true in this case when, as we have noted before and as the Board itself acknowledged at a public meeting when the survey was first presented, the survey that was conducted appears not to have followed standard practice in instrument design, leading to outcomes that are unreliable at the outset. We implore the Board to delay adoption of a final Vision until it has time to review more reliable data regarding the health and use of our state's forests and the general sentiment of those who live, work, and play in them.

Conclusion

Much in the latest draft of the Vision is to be applauded. In particular, we believe that the Board and Department staff have shepherded the section of the document on "Addressing the Wildfire Crisis" to an excellent place that both recognizes the magnitude of the challenge and that appropriately nuances how the Department (and the State, writ large) must act to address it. Other sections, however, lack this nuance. In particular, the "Resilient Forests" and "Resilient Communities" sections unhelpfully downplay the importance of actively managed forests on the economic and social fabric of local communities, and misconstrue the issues facing Oregon's forests as primarily issues of management of private forests rather than as a function of decades of neglecting federal forests within the four corners of the state. Finally, the omission of anything regarding the ongoing work under the PFA is a regrettable omission. It is our hope that these issues will be addressed and that the product considered by the Board in June will more accurately reflect these points.

Sincerely,

A handwritten signature in black ink, appearing to read "Tyler Ernst".

Tyler Ernst
General Counsel and Director of Regulatory Affairs
Oregon Forest Industries Council

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Thursday, May 09, 2024 11:25:21 AM
Attachments: [formsubmission.csv](#)

Name	Betsy Ayres
Email (Optional)	
Comments	Everything the state can do to restore ecological balance to our forests is critical for a healthy future for all Oregonians.

Submission ID: 0b52d890-e827-4443-ac7b-9e72af435e4d

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Thursday, May 16, 2024 2:51:24 PM
Attachments: [formsubmission.csv](#)

Name	BRENT FRIDRICH
Email (Optional)	bfridrich@walterenelson.com
Comments	As the forest service moves forward with forest management plans it is extremely important to ensure that future plans keep recreational opportunities multi-use. This includes motorized recreation. Motorcycle trail riding supersedes mountain bike trail use by dozens of years. Many trails that were originally for motorized recreation are now off limits. Thousands of people come to Central Oregon every year to enjoy motorized recreation and it should be one of the priorities as these plans are developed. Best Regards, Brent Fridrich

Submission ID: ce791051-2707-402b-88a1-1ef66a5574b8

Record ID:

Committee for Family Forestlands

Comments on *Vision for Oregon Forests*



Comments compiled from CFF Meeting of 5.20.24, for CFF submission as public comment on the Board of Forestry's Vision/Strategic Plan

To the Board of Forestry,

The Committee for Family Forestlands (“CFF”) thanks the Board for the opportunity to comment on its strategic plan, the *Vision for Oregon Forests*. The following comments are based on the CFF’s meeting of May 20, 2023, and the CFF has voted to submit them as comments of the CFF. ¹

1. Role of Small Forestland Owners should be included in the *Vision* overall. The CFF notes the critical role that small forestland owners play as owners of a substantial portion of Oregon forests, including a high percentage of forest in the Wildland Urban Interface and of forest with high riparian and watershed value. Small family forestland owners should be specifically referenced in the *Vision* throughout, and especially in the “Our Shared Values” and “Resilient Communities” sections, for their importance as to:
 - Avoided conversion: the *Vision* should note the importance of policies that avoid the conversion of forestland to other uses, and the importance of providing incentives to small family forestland owners that alleviate financial pressures leading to conversion.
 - Avoiding wildfire: this is a top concern of small forestland owners, and one in which they can lead in prevention efforts.
 - SFO role in communities: the *Vision* should recognize the benefits that small forestland owners bring to their communities (economic, ecosystem, open lands); in addition, small forestland owners, and the CFF, could assist the Board in its outreach about issues such as fire and forest practices.
 - Specific places to add SFOs: in additional to references overall, the *Vision* should reference small forestland owners on p. 6 (engagement with Governor and legislature--add landowners), and on p. 21 (partnerships of ODF—include small forestland owners).
2. Including Small Forestland Owners in “place-based” decision making. The *Vision* refers to place-based decision making. The CFF emphasizes that place-based decision making needs to include true input on decisions made, rather than general information gathering, and inclusion in implementation. Also, the

¹ CFF voting members:

Wendy Gerlach, Chair (Citizen at Large)
Dave Bugni (Northwest Oregon Family Forestland Owner)
Gary Jensen (Southern Oregon Family Forestland Owner)
Maurizio Valerio (Eastern Oregon Family Forestland Owner)
Kate McMichael (Landowner At Large)
Kaola Swanson, Vice-Chair (Conservation Community Representative)
Eric Kranzush (Industry Representative)

CFF ex-officio members:

Amanda Sullivan-Astor for Associated Oregon Loggers (AOL)
Rick Zenn for Oregon Small Woodlands Association (OSWA)
Glenn Ahrens for Oregon State University (OSU) College of Forestry, OSU Extension Forestry and Natural Resources Program
Julie Woodward for Oregon Forest Resources Institute (OFRI)

May 24th, 2024

Vision should recognize the relative burdens (and potential benefits) that forestry and forest policy has on rural communities. References to “urban, suburban, and rural” communities in the document doesn’t reflect the outsized role of, and impact to, rural communities of forest policy.

3. Economic and funding vision. While recognizing that the *Vision* is a strategic plan, the CFF notes that it is short on economic and funding considerations as to the Department’s funding of the plan as well as to community impact. The CFF recommends that those considerations be referenced in the *Vision*, and that economic and funding viability be a significant part of the Board’s further development of the strategies in the *Vision* document. The *Vision*’s section “Addressing the Wildfire Crisis” notes the importance of developing a viable wildfire funding structure; again, strategies on this topic should be specific and include economic impacts.
4. Infrastructure and workforce. The CFF notes the *Vision*’s references to infrastructure and workforce. These are both critical to the viability of small forestland owners, and the CFF encourages the Board to build strong strategies to address these issues.
5. Private Forest Accord. The Private Forest Accord includes programs, such as the Small Forestland Owner Office and several incentive programs, that are important to small forestland owners. The *Vision* should recognize the PFA and its programs as part of the overall strategic plan. The CFF notes that incentive programs (rather than rule-based compliance) are critical to small forestland owners and the resilient and sustainable management of forestland.
6. Resilient forests and climate-smart forestry. As mentioned above, small forestland owners have a vital role to play in developing resilient forests in critical areas (especially WUI and riparian areas). In addition to resilience, the *Vision* should note the importance of adaptation of forest practices to suit changed conditions, and the importance of workforce and education in facilitating adaptation. In climate-smart-forestry, the CFF noted that there may be tradeoffs between carbon sequestration (especially in forests dense in biomass) and fire resilience.
7. Revising *Vision* Introduction. The CFF feels that the first paragraph of the *Vision*’s introduction is overly negative and backward looking in tone, and that it could be deleted.

The CFF thanks the Board for its work on the *Vision for Oregon’s Forests*, and for its consideration of these comments.

Respectfully submitted,

The Members of the Committee for Family Forestlands

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Wednesday, May 08, 2024 10:11:23 AM
Attachments: [forms submission.csv](#)

You don't often get email from oregon-gov-web-services@egov.com. [Learn why this is important](#)

Name	Christopher Pershing Warren
Email (Optional)	hwmechanicalinc@gmail.com
Comments	We have heard the RHETORICAL reference to "SUSTAINED YIELDS" from the Timber Industry for 100 years or so while we have watched Trees disappearing from our rural slopes at prodigious rates that VISUALLY are overpowering and seem to be growing together as logging proceeds, mostly at the direction of WALL STREET! Science has DETERMINED that Old Growth Trees sequester MORE CARBON THAN PRESENT PLANTATIONS, producing Genetically tweaked productions of monocultures that are more susceptible to fire and insect depredation than OLD GROWTH! So, if "sustained Yield is NOT A LIE, WHERE'S THE NEW OLD GROWTH THAT WILL HELP SAVE OUR PLANETS ATMOSPHERE instead of ENRICHING WALL STREET?

Submission ID: b7b84072-0de3-4478-815c-a0c2c1e7dd73

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Wednesday, May 22, 2024 10:54:38 AM
Attachments: [forms submission.csv](#)

Name	Clark Seely
Email (Optional)	cseely2@cfl.rr.com
Comments	<p>Since the Oregon Board of Forestry adopted its set of governance policies in March of 2024 (the Board Policies Manual, or BPM), it seems appropriate and important to include a reference to that set of governance policies that speak to the strategic thinking and planning efforts of the board and the department (through the State Forester). These policies set the requirement for the development of a collaborative strategic plan and the primary elements of such a plan. This specific requirement of the board and the department is found nowhere else in higher-level 'policies' such as statutes or rules. While there is general direction about planning at an agency level in Oregon statutes, the requirement for the board and department is now found in the BPM. This is codified in the BPM in Part 2, as follows: Part 2: Strategic Essentials 2.1 Strategic Thinking. The board expects itself to think strategically at all times. The board and the State Forester are expected to develop a collaborative strategic plan, update it as necessary, link major activities in the plan to the relevant sections of this BPM, and ensure that the plan is available to the board and the public on an ongoing basis. 2.2 Strategic Planning. The board's mission, vision, values, owner and beneficiary relationships, goals and primary strategies, and monitoring standards are all contained within the strategic plan. Further support and policy requirements for the board and the department are found in Part 3: Board Structure and Processes, specifically policy 3.1 Governing Style, and policy 3.2 Board Job Description. Within the current draft of the Vision for Oregon's Forests, I would recommend that a simple two to four-sentence reference to the BPM and its requirements be inserted at the beginning of the 'Context and Commitments' section on page 1. Language from BPM policy 2.1 could be used verbatim if desired, and some language from 3.1 or 3.2 could be utilized as well. In addition, on the flow diagram on page 18, I would recommend that the Board Policies Manual be either added to the upper right box that currently holds 'Legislature & statute' or added as a separate box below this current 'Legislature and statute' box with both types of arrows pointing to the 'BoF & ET' box. Finally, on page 19, 'Appendix C: Reference materials & resources', I would recommend that the Board Policy Manual be added as a reference with an active web link to the public webpage housing the BPM itself. Apart from the board governance efforts vis-a-vis the BPM outlined above, one additional comment might be useful. On pages one and two of the draft, the word 'policies' is used multiple times under various sections of text. It is not clear what policies are being referenced. Are these policies the same as the 'strategies' found later in the vision document, and if so, then the word 'strategies' would be more</p>

appropriate. Or are these policies yet to be developed by the board and/or the department over time going forward, and if so, that should be explained in the vision document? Finally, as has been mentioned in the press release, the board and the department will be developing performance metrics to help monitor the progress and accomplishment of the vision. I would simply state that this is incredibly important for the successful implementation of the plan over time, and is a key feature of all meaningful planning efforts. From a governance standpoint, a plan without monitoring is simply wishful thinking, and fundamentally, serves no value, either internally to the organization or externally to constituents or beneficiaries. As football legend Vince Lombardi was once purported to say, "If you're not keeping score, it's only practice." Thank you for the opportunity to review and comment. Please feel free to contact me if you want any clarification of my comments or wish to discuss the further development of the draft, including performance monitoring. My best regards, Clark Seely President Seely Management Consulting, Inc. 503-999-3475 cseely2@cfl.rr.com

Submission ID: 8758fc54-a15b-4554-8373-5ed777fe2a33

Record ID:

To: Oregon Board of Forestry and Department of Forestry
From: Scott Killops
Subject: Public Comment on the *Vision for Oregon's Forests*
Date: May 13, 2024

Thank you for the opportunity to provide public comment on the Board of Forestry's (BOF) and Department of Forestry's (ODF) shared strategic plan, the [Vision for Oregon's Forests \(Vision\)](#).

On page 12 of the Vision there is a typo. It says that ODF's [Climate Change and Carbon Plan \(CCCP\)](#) was adopted by the Board in November 2023. The CCCP was in fact adopted by the Board in November 2021. This typo wouldn't be remarkable, except that it has existed in drafts of the Vision for over six months without BOF or ODF noticing. This seems emblematic of the attention BOF and ODF are paying to climate change in general.

It has been two and a half years since the Board approved the CCCP. Since then, no timeline for execution or progress updates have been posted to ODF's [Climate Change](#) web page and no progress reports have been presented at [BOF meetings](#). There is a [Climate Change and Forest Carbon Work Plan 2022-2024](#) on the [About the Board of Forestry](#) web page, but it appears that execution of this work plan is not being tracked either.

The stated purpose in the CCCP is, "Make forestry in Oregon a leader in climate change mitigation and adaptation. The Oregon Department of Forestry will be a leader in promoting climate-smart forest policies and actions that achieve our vision by operationalizing goals, implementing actions, and measuring progress to achieving climate goals." The Vision has the more modest Climate Leadership goal, "The Board and Department will build capacity for climate-smart leadership." If BOF and ODF don't have the capacity to actually execute the CCCP, then building that capacity is a necessary first step. But I liked it better when BOF and ODF aimed higher.

The first Climate Leadership Strategy in the Vision is, "Implement the adopted *Climate Change and Carbon Plan*." I agree with this strategy. But it doesn't amount to a strategic plan without resources, a timeline, and a commitment to monitoring execution.

Globally, the last ten months have been the [hottest months on record](#). In March, the atmospheric concentration of CO2 reached 426ppm, [a record-breaking increase in CO2 levels over a 12-month period](#). Climate scientists now [expect global temperatures to rise to at least 2.5C \(4.5F\) above preindustrial levels](#) this century. Time is of the essence in addressing the global climate crisis. I urge BOF and ODF to apply more urgency to execution and monitoring of the CCCP.

Thanks again for the opportunity to provide public comment on the Vision and for all the hard work that BOF and ODF perform on behalf of all Oregonians. Additional comments on the Vision appear below.

Respectfully,
Scott Killops
350PDX Forest Defense Team Member

Additional Comments on the [Vision for Oregon's Forests \(Vision\)](#)

These somewhat lengthy comments on the Vision notwithstanding, I want to say that I have great respect and appreciation for BOF and ODF. I see BOF and ODF as professional, dedicated, hard-working, and doing a great job managing a complex and challenging set of circumstances. These comments are intended as constructive input, not criticism. They come from a shared love of Oregon's forests and a shared concern for all of Oregon's people and communities. Following the [FPFO Subcommittee](#) and assembling these comments has been a useful exercise for me. It has deepened my knowledge of ODF's many plans and programs and highlighted areas where I need further study. Thank you for your open process and for the opportunity to comment on the Vision.

Document Suggestions

- Add a title page
- Make the date in the document file name and in the document footer agree. Currently "20240430" and "May 7, 2024" respectively.
- Add a document revision number and revision history table
- Add a glossary for acronyms
- Add a glossary for specialized terminology

Purpose

This section does not state that the Vision is intended to serve as a strategic plan. As it stands, I think this document works as a vision, but it does not yet work as a strategic plan. Most of the goals and strategies included in the Vision are not measurable or time-bound. Under "Context and Commitments" the Vision states, "The Vision for Oregon's Forests is forward looking and aspirational, which means that not all strategies can be immediately implemented with the authorities and resources currently available to the board and department." However, the Vision does not distinguish which strategies are resourced and which are not. Without this clarity, the Vision does not represent a plan that can be tracked. For reference, see the description of S.M.A.R.T. goals and objectives (Specific, Measurable, Achievable, Relevant, Time-Bound) found in the [Agency Strategic Plan Outline](#) on the Department of Administrative Services [Strategic Planning Resources](#) web page.

The scope of the Vision with respect to [forestland ownership types \(federal, state, private, tribal\)](#) is unclear. The text eventually implies that the Vision addresses all forestland ownerships, but the Vision doesn't actually say so (and never mentions the U.S. Forest Service or the Private Forest Accord). A scope including all forestland ownerships is also implied by the fact that the only forest management plan included in the Vision references is the [Oregon Forest Action Plan \(FAP\)](#). But that's only if you know that the FAP is intended to address all ownerships, and the FAP is not actually described in the Vision or on the ODF web site. The Vision would be easier to understand if the scope were made explicit up front.

P1 – "Forest health overall is in decline." – Recommend adding to the references the ODF [Forest health](#) web page and/or [ODF/USFS Forest Health Highlights in Oregon – 2022](#).

Context and Commitments

P1 – “Policies will support development of local and regional economies.” – This is an important goal, but it is unclear how the policies in the Vision will do this. The Resilient Communities section includes the Strategy, “Promote forest and forestry related educational programs, technologies, pilot projects, forest management jobs, infrastructure and other tools to invest in the sustained economic viability and vitality of communities.” This is pretty ambitious, pretty vague, and the forest and forestry education piece overlaps the mission of [OFRI](#). It sounds like the rest of this Strategy would require the creation of a new program at ODF to carry it out, but it’s not clear that ODF has the resources to do so. The impact of the [Western Oregon State Forests HCP](#) on harvest volume, revenue, jobs, and infrastructure has been a major source of concern expressed by the [Council of Forest Trust Land Counties](#) and timber industry representatives at [BOF](#), [FTLAC](#), and [SFAC](#) meetings for at least a year and a half. I don’t think a Strategy this vague will allay their concerns. I think BOF and ODF should articulate a much more specific strategy to study the economic challenges presented by the ecological crises we are facing (especially climate change and biodiversity loss) and propose actions to address them. This may require an interagency approach similar to the [Governor’s Wildfire Programs Advisory Council](#) or new legislation. Economic transitions to adopt ecological forestry, develop mass timber or biochar, or implement other recommendations may require at least a temporary infusion of additional resources beyond state forest timber revenue. But the intention of this Vision, stated in the Purpose section, is to be bold.

P2 – “Oregon’s rural, urban and suburban populations have varying social perceptions and expectations about forests and how forests should be managed to benefit humans and other species.” – Recommend adding a reference to [Community Engagement – A Vision for Oregon Forests Oregon’s Kitchen Table, April 2024](#).

P2 – “Workforce supply continues to be a challenge, and there is a reduction in the ability of managed forests to cover associated costs in this dynamic state of climate and social change.” – Is there a reference report for this statement?

P2 – “The Vision for Oregon’s Forests is forward looking and aspirational, which means that not all strategies can be immediately implemented with the authorities and resources currently available to the board and department.” - This statement is what makes this document a “vision” and not a “strategic plan”. A “plan” implies the availability of resources to achieve objectives or a reasonable expectation of obtaining them. It also implies target timeframes. The Vision does not distinguish which Strategies are resourced and which are not. At a minimum, this distinction needs to be added to turn the Vision into a strategic plan.

Shared Vision, Shared Mission, Shared Values

P3 – I assume ODF realizes that the vision, mission, and values contained in this document differ from those on the ODF web page [About us](#) and intends to bring them into alignment with the completion of this document.

Priority: Resilient Forests

P5 – Context – It seems odd to me that the Context subsection includes no discussion of [Oregon’s 20-Year Landscape Resiliency Strategy](#) or ODF’s [Landscape Resiliency Program](#).

P5 – “Promote ecological forestry principles that further forest complexity components” – Suggest adding a reference for ecological forestry like [Ecological Forest Management](#) and/or [Ecological Silviculture – Foundations and Applications](#).

P6 – “Promote the Forest Legacy Program” – Suggest adding a link for the [Forest Legacy Program](#).

Priority: Resilient Communities

P8 – Context and Strategies– The Context and Strategy descriptions in this section seem too vague to drive subsequent action planning. It’s also unclear where subsequent action plans for this section will land, i.e. in which ODF programs or plans. I recommend articulating that.

P8 – “Promote forest and forestry related educational programs, technologies, pilot projects, forest management jobs, infrastructure and other tools to invest in the sustained economic viability and vitality of communities.” – As commented above under “Context and Commitments”, it’s not clear how ODF intends to do this. The “forest and forestry education” piece seems to be the [mission of the Oregon Forest Resources Institute](#) which I suggest adding to the references.

P9 – “Link analysis of resilience in spatial planning: <https://link.springer.com/article/10.1007/s12061-022-09449-z>” - I understand and accept the argument for a place-based approach to natural resource management strategies. But the linked paper does nothing to enhance or clarify the argument. It’s highly abstract. I recommend removing this reference. (For comparison, I found the [paper included in the references for climate-smart forestry](#) to be very informative and useful.)

Priority: Addressing the Wildfire Crisis

P10 – Goal – “Prevent, suppress and mitigate wildfire to protect communities” – It’s not clear that protecting communities is achievable without an equal emphasis on promoting fire-adapted communities. (If that is what is meant by “mitigate wildfire” in the Goal, it didn’t come across clearly to me.) One of the Strategies is, “Promote fire and smoke-adapted communities in the wildland-urban interface and beyond to mitigate the impacts of climate-induced increases in wildfire severity.” It feels like this Strategy needs more emphasis in the Goal and/or Context for this Priority. I also suggest adding to the references the ODF [Wildfire hazard](#) web page and the [Firewise USA](#) web page.

Priority: Climate Leadership

P12 – Strategies – I suggest adding a Strategy to continue ODF’s work on [Forest carbon accounting](#). This work is foundational to understanding whether we are making progress in utilizing forests for carbon sequestration and storage. From outside appearances, this work seems to have stopped with the completion of the [Climate Change and Carbon Plan](#) in 2021.

P12 – Strategies – I suggest adding a Strategy to work with the [Oregon Climate Action Commission \(OCAC\)](#) on implementation of [HB 3409](#) Sections 53-67, State Policy for Natural Climate Solutions. See the discussion in [Natural and Working Lands INR Report Discussion](#). In particular, work with OCAC to administer the Forestry Natural Climate Solutions Fund portion of the [Natural Working Lands Fund](#).

Priority: Organizational Excellence

From the outside, it appears that ODF lacks an execution team for the CCCP. I believe that to be successful, execution of the CCCP should be assigned to a dedicated program manager leading a cross-functional team who are actively working to implement the plan and who report progress and results to the BOF on a quarterly or biannual basis.

Appendix A: Monitoring, evaluating & adapting

Without accompanying text, this diagram fails to acknowledge that ODF already has lots of action plans and existing or draft progress measures. Most of these just need to be completed, revised, updated, or reported and monitored. It would be useful to articulate here gaps where new action plan development is required.

The [Oregon Forest Action Plan](#) included in the references defines a set of performance measures, though it's unclear how and where these measures are reported.

For Oregon State Forests, I recommend adding references for the [Draft Adaptive Management Plan](#) and [Draft Performance Measures for the Board of Forestry](#).

For the [Climate Change and Carbon Plan](#) we are overdue for a progress report to the Board.

Appendix B: Connection to other strategies & plans

This diagram may confuse readers. First, without an acronym glossary they may not know what "ET" is. (I assume ET means the ODF Executive Team.) Second, without an explanation they may wonder what the [Forest Action Plan \(FAP\)](#) is. Third, this diagram does not include any of the plans used to manage Oregon State Forests and is different from similar diagrams in those plans that don't include the FAP. For example, see Figure 4-1 in the [Draft FMP](#).

When the FAP first appeared in the Vision references with the [October 2023 draft](#) I had been following ODF State Forest planning closely and was familiar with the FPFO, HCP, FMP, AMP, CCCP, IPs, and AOPs, but had never heard of the FAP. It's not mentioned in the Draft FMP and as far as I know is not mentioned on the ODF web site (although if you know it exists, you can find it with a search of the ODF web site). I emailed ODF to ask what the FAP was and received this helpful response:

"With the 2008 Farm Bill, Congress tasked the states and territories with assessing the condition of trees and forests within their boundaries, regardless of ownership, and developing strategies to: conserve

working forest landscapes, protect forests from harm, and enhance public benefits from trees and forests.

The resulting state Forest Action Plans, completed in 2010, updated in 2015, and comprehensively revised in 2020 by all 59 states and territories offer roadmaps for investing federal, state, local, and private resources where they can be most effective in achieving national conservation goals.

For Oregon’s Action Plan, Best Management Practices, State Fact Sheet and Alignment of Action Plan Priorities to National Priorities: <https://www.stateforesters.org/districts/oregon/>.”

It would be useful to provide this information to ODF’s wider audience.

Appendix C: Reference materials & resources

This section seems ad hoc and incomplete. I think BOF and ODF are missing an opportunity here to educate the public and to provide enough guidance for people to meaningfully participate in a subsequent dialogue with BOF and ODF. Below I suggest a more complete set of references organized around the flow of the Vision document. These suggestions are based on my experience of trying to come up to speed on ODF planning over the last year and a half. That process is ongoing, so not all of these suggestions may make sense, but I think you’ll get my drift. A newcomer or a casual participant needs to know that resources exist before they can reference them and they need assistance directing their attention to the most relevant resources.

Appendix D: Who we are

I suggest adding the ODF web pages [About the Board of Forestry](#) and [About us](#) to the references.

Example of a revised “Appendix C: Reference materials & resources” organized around the flow of the Vision document and including additional resources

General References

ODF web page - Oregon Department of Forestry home page

<https://www.oregon.gov/odf/Pages/index.aspx>

ODF web page - About Oregon’s forests

<https://www.oregon.gov/odf/forestbenefits/pages/aboutforests.aspx>

Oregon Forest Resources Institute

<https://oregonforests.org/>

Purpose

ODF web page – Tribal government relations

<https://www.oregon.gov/odf/aboutodf/Pages/tribalrelations.aspx>

Context and Commitments

Community Engagement – A Vision for Oregon Forests, Oregon’s Kitchen Table, April 2024

<https://www.oregon.gov/odf/board/bof/20240424-bof-item-03.pdf>

Shared Vision, Shared Mission, Shared Values

ODF web page – About ODF – Articulates ODF’s Mission, Vision, and Core Values

<https://www.oregon.gov/odf/aboutodf/Pages/default.aspx>

Priority: Resilient Forests

ODF web page – Forest health

<https://www.oregon.gov/odf/forestbenefits/pages/foresthealth.aspx>

ODF/USFS Forest Health Highlights in Oregon - 2022

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1131761.pdf

ODF web page - Oregon’s 20-Year Landscape Resiliency Strategy

<https://www.oregon.gov/odf/pages/20-year-strategy.aspx>

Oregon’s Landscape Resiliency Strategy - Progress Report: June 30, 2023

<https://www.oregon.gov/odf/aboutodf/documents/olrs-progress-report.pdf>

ODF web page – Landscape Resiliency Program

<https://www.oregon.gov/odf/pages/landscape-resiliency-program.aspx>

ODF Landscape Resiliency Program Final Report

<https://www.oregon.gov/odf/aboutodf/documents/2023-odf-sb762-landscape-resiliency-program-report.pdf>

Ecological Forest Management, Jerry F. Franklin, K. Norman Johnson, Debora L. Johnson, Waveland Press, Inc., 2018

<https://www.waveland.com/browse.php?t=730>

Ecological Silviculture – Foundations and Applications, Brian J. Palik, Anthony W. D’Amato, Jerry F. Franklin, K. Norman Johnson, Waveland Press, Inc., 2021

<https://www.waveland.com/browse.php?t=747&r=s|ecological%20silviculture>

Priority: Resilient Communities

Oregon Forest Resources Institute – Oregon Forest Facts 2023-24 Edition

<https://oregonforests.org/publication-library/oregon-forest-facts-2023-24-edition>

Oregon Forest Resources Institute - County Economic Fact Sheets 2023

<https://oregonforests.org/publication-library/county-economic-fact-sheets-2023>

State of Oregon Employment Department - Oregon's Forestry and Logging Industry: From Planting to Harvest

<https://www.qualityinfo.org/-/oregon-s-forestry-and-logging-industry-from-planting-to-harvest-1>

State of Oregon Employment Department - Oregon's Wood Product Manufacturing Industry Is Still Important, Especially in Rural Areas

<https://www.qualityinfo.org/-/oregon-s-wood-product-manufacturing-industry-is-still-important-especially-in-rural-areas-1>

ODF web page – Urban forests

<https://www.oregon.gov/odf/forestbenefits/pages/urbanforests.aspx>

ODF web page - Burning & smoke management

<https://www.oregon.gov/odf/fire/Pages/burn.aspx>

Oregon Watershed Enhancement Board

<https://www.oregon.gov/oweb/Pages/index.aspx>

Priority: Addressing the Wildfire Crisis

National Cohesive Wildfire Management Strategy:

<https://www.forestsandrangelands.gov/documents/strategy/natl-cohesive-wildland-fire-mgmt-strategy-addendum-update-2023.pdf>

Pacific Northwest Quantitative Wildfire Risk Assessment:

<https://pnw-quantitative-wildfire-risk-assessment-osugisci.hub.arcgis.com/>

Oregon Governor's Wildfire Programs Advisory Council

<https://www.oregon.gov/gov/policies/Pages/wildfire-programs-council.aspx>

ODF web page – Fire

<https://www.oregon.gov/odf/fire/pages/default.aspx>

ODF web page – Wildfire hazard

<https://www.oregon.gov/odf/fire/Pages/wildfire-hazard.aspx>

Firewise USA

<https://www.nfpa.org/Education-and-Research/Wildfire/Firewise-USA>

Fire Adapted Communities Learning Network

<https://fireadaptednetwork.org/>

Oregon Health Authority – Wildfires and Smoke

<https://www.oregon.gov/oha/ph/preparedness/prepare/pages/prepareforwildfire.aspx>

Priority: Climate Leadership

ODF web page – Climate change

<https://www.oregon.gov/odf/forestbenefits/pages/climate-change.aspx>

ODF web page – Forest carbon accounting

<https://www.oregon.gov/odf/forestbenefits/Pages/forestcarbonstudy.aspx>

ODF Climate Change and Carbon Plan

<https://www.oregon.gov/odf/forestbenefits/Documents/odf-climate-change-and-carbon-plan-draft.pdf>

BOF Climate Change and Forest Carbon Work Plan 2022-2024

<https://www.oregon.gov/odf/board/bof/bofwp-climate-change-2022-2024.pdf>

Oregon Climate Action Commission – Natural and Working Lands 2023 Report

<https://www.keeporegoncool.org/natural-working-lands>

Oregon Climate Action Commission – Natural Working Lands Fund Proposal

<https://static1.squarespace.com/static/59c554e0f09ca40655ea6eb0/t/6594aea62498db70a925d691/1704242854973/2024-NWL-Joint-Proposal.pdf>

Oregon Climate Action Commission – Institute for Natural Resources Final Report

https://www.ogwcnaturalandworkinglands.org/files/ugd/0e48c2_5019dc1a8a744109a513d45bc448339d.pdf

Oregon Climate Action Commission – Natural and Working Lands INR Report Discussion

<https://static1.squarespace.com/static/59c554e0f09ca40655ea6eb0/t/65579fb3f97a3c2304e93e75/170241333665/INR+N%26WL+Report+Overview%26+Recommendations+-+FINAL.pdf>

Peer reviewed: Climate-Smart Forestry: Promise and risks for forests, society, and climate.

<https://doi.org/10.1371/journal.pclm.0000212>

Priority: Organizational Excellence

ODF Diversity, Equity and Inclusion Action Plan 2023-25

<https://www.oregon.gov/odf/aboutodf/Documents/2023-2025-diversity-equity-and-inclusion-action-plan.pdf>

Appendix A: Monitoring, evaluating & adapting

Adaptive Management Plan for State Forests Management (Draft)

<https://www.oregon.gov/odf/board/documents/fmp-hcp/adaptive-management-plan-draft.pdf>

Performance Measures for the Board of Forestry (Draft)

<https://www.oregon.gov/odf/board/documents/fmp-hcp/performance-measures-draft.pdf>

Appendix B: Connection to other strategies & plans

National Association of State Foresters – Oregon Forest Action Plan

<https://www.stateforesters.org/districts/oregon/>

ODF web page - Western Oregon State Forests Habitat Conservation Plan (HCP)

<https://www.oregon.gov/odf/aboutodf/pages/hcp-initiative.aspx>

ODF web page - Western Oregon State Forests Management Plan (FMP)

<https://www.oregon.gov/odf/aboutodf/Pages/stateforestsfmt.aspx>

ODF web page - Oregon State Forests Implementation Plans (IPs) and Annual Operations Plans (AOPs)

<https://www.oregon.gov/odf/working/pages/stateforests.aspx>

ODF web page - Forest Practices Act

<https://www.oregon.gov/odf/working/pages/fpa.aspx>

ODF web page - Private Forest Accord

<https://www.oregon.gov/odf/pages/private-forest-accord.aspx>

ODF web page - Budget

<https://www.oregon.gov/odf/aboutodf/Pages/budget.aspx>

Appendix D: Who we are

ODF web page – About the Board of Forestry

<https://www.oregon.gov/odf/board/Pages/aboutbof.aspx>

ODF web page – About us

<https://www.oregon.gov/odf/aboutodf/Pages/default.aspx>

Additional References

Forestry Program for Oregon - A Strategy for Sustaining Oregon's Public and Private Forests – 2011 Edition

https://www.oregon.gov/odf/board/bof/fpfo_2011.pdf

Oregon Revised Statutes, Vol. 14, Title 44, Chap. 526 – Forestry Administration

https://oregon.public.law/statutes/ors_chapter_526

Oregon Revised Statutes, Vol. 14, Title 44, Chap. 530 – State Forests; Community Forests

https://oregon.public.law/statutes/ors_chapter_530

Oregon Administrative Rules, Chap. 629, Div. 35 – Management of State Forest Lands

https://oregon.public.law/rules/oar_chapter_629_division_35

To: Board of Forestry
From: Bob Van Dyk (bvdoregon@gmail.com)
Date: April 23, 2024
Re: [FPFO Document and the BOF retreat](#)

I'm writing about the FPFO document that serves as the center of the upcoming BOF retreat.

It is clear from the [FPFO subcommittee site](#) that a lot of work has gone into this document. While there is much to like in the vision, I also have some concerns about the document and the path ahead. To be clear, I have not reviewed all the meetings and work on the FPFO subcommittee website, so most of my comments are based on the document in the BOF packet for the April 24 meeting. (It definitely would have been helpful to me as a newcomer to this work to have some kind of staff report that provided some explanation – i.e. where did this document come from, is it required by law, what purpose is it intended to serve, etc.?)

Overall, I really like the concern about forest health and forest ecosystems that are at the center of the document. Oregon is so rich in forest resources, and they are at risk. An overall vision that tries to ensure our forests are resilient and able to keep providing benefits seems the right focus to me. As the document notes, the effects of climate change and legacy of historic management create serious challenges for Oregon and the board.

Below are comments on some of the sections, as well as some final comments on your next steps.

Purpose (p.1)

I wanted a bit more clarity here about purpose. Is this the purpose of the vision? Or is this the purpose of the board in developing the vision? Or is this the purpose that is proposed for the FPFO? A more simple sentence starting “The purpose of X is....” would help me.

I have also heard that this work is in part a response to the governor’s request for a strategic plan. If that is the origin of the document, it would be helpful to include something on the governor’s request/directions, including any specific guidelines or standards to which the plan should conform. In any case, Appendix A seems to indicate that this document is meant to be translated into specific actions over the next five years, so my comments below are based on that assumption.

Context and Commitments (p. 1-2)

These seem like two different things – the context of the vision and then any commitments the board may make. I would not lump them together.

Regarding the context section, if the next five years are the focus, I suggest the following:

- note climate change, and the effects on forests, including undesirable trends in forest health and wildfire
- note recent legislation, including SB 762 and SB 1501/1502.
- note recent board decisions/actions, including the Climate Change and Carbon Plan, DEI plan, as well as the decision to operate under an ITP on most BOF lands
- note rapidly evolving technology that allows collection of details on forest characteristics via remote sensing

In addition, I think the context section should add some detail and emphasis on the appropriate role and place of the board in forest policy. The vision does address the role of the board when it says “not all strategies can be immediately implemented with the authorities and resources currently available to the board and department.” My concern is that if the vision is too aspirational it will lead to inappropriate and unhelpful expectations about board and department performance.

The fact is that the board does not lead in forest policy making, except on the state forests, which as you know are appx. 3% of the forested landbase. While ORS 526 contains a broad mandate for the board to “supervise all matters of forest policy and management under the jurisdiction of the state,” when viewed in context of the broader forest policy making statutes and rules, the board’s role is forest and foremost administrative. (ORS 526 is titled Forest Administration, after all.) On private lands, for example, the board’s authority is extremely cramped. The 714 requirements coupled with Measure 49 provide only a very narrow pathway for new regulations on private forests. The board’s authority over federal lands is even more modest. The board does not appropriate funds. None of these constraints is likely to change soon.

Lastly, under context I think it is worth mentioning that some of the board’s authority and much of the board’s work occurs through partners – partnership with the EQC on CWA implementation, partnership with many different partners in the fire management system, partnership with ODFW on many resource matters, etc.

Shared Vision, Mission, Values (p.3)

All look good, though I might add something about both humility and partnerships, especially partnerships with other state agencies.

Priority: Resilient Forests (p.4)

This is an excellent framing/priority for considering Oregon’s forests, though what it will mean in practice to “enable and promote...decisions that increase adaptive capacity of forest ecosystems” is hard to operationalize.

The strategies for forest resilience (p.5) are good, from affirming safe harbor/HCP work to seeking new incentives for forest owners to provide more complex forests and more carbon storage.

However, from my view a perplexing omission in this section is the work pursuant to SB 1501 and 1502, which were based on the Private Forest Accord.

As you know, the accord prescribed a massive revision of many aspects of private forest management, including appx. 1 million acres of private forest moved to a conservation focus, These bills included reshaping 714, adding many new conservation-oriented positions to ODF, establishing a rigorous program to survey roads and requirement to improve them, a new program for SFOs, a new science-driven adaptive management program, rules for beaver, a mitigation fund, etc. What is more, the legislation reflected an unprecedented (for Oregon) coming together of a very wide range of forest stakeholders who have a history of acrimonious argument before the board and elsewhere. Crucially, many of the new measures in the PFA will terminate if ODF does not get a take permit by the end of 2027.

The state and stakeholders have asked a great deal of ODF: Hiring and integrating many new employees, administering new programs, and implementing new rules are always challenging, but especially when there is so much new.

For me, then, ensuring the successful attainment of the PFA ITP would be at the very top of the board's agenda for the next five years, yet the document makes no mention of it, which I find unsettling.

Another area where the BOF/ODF might benefit on forest resilience is by working more closely with ODFW on the Conservation Strategy, which includes a variety of [forested habitats by ecoregion](#), including both [specialized and local habitats](#), as well as [habitat data gaps](#). The Conservation Strategy might provide helpful data on trends desired forest types.

Priority: Resilient Communities (p. 8)

I like this section, but I am not sure it is correctly labeled. Most of the strategies seem to focus on things like promoting access, engaging communities, promoting forest management, etc. Similar to some of the other sections, though, I am not sure some of the high level strategies are conducive to productive conversations. Things like contributing to economic viability and clean water aren't really strategies, they are outcomes that the board can prioritize (or not) and in some cases the board may have very limited ability to realistically provide them.

Priority: Living with Fire (p.10)

This section seemed especially strong to me. I like the framing of “living with fire.” In the context section I think I would add something about the unusual fire conditions that we have inherited, due to past management and climate change, as well as the challenge of managing fires that in many cases occur in forests where people live full time.

Planning Schedule/Next Steps

I would be highly resistant to spending too much more time on this document. I think the committee can take the win by clarifying the purpose a bit and affirming the big priority areas. From there I think the board would be better served by developing a plan that focuses on specific tasks it is in charge of administering, such as the following:

- The massive change to forest laws that came in SB 1501-1502
- Getting the take permit for the BOF lands and focusing on the State Forest funding model
- Working with the legislature and partners as directed to address the many fire-related needs

I would not suggest the board spend much time developing sophisticated progress measures for these tasks. Rather, I think focusing on whether the State Forester and Department are moving effectively toward very specific goals set by the legislature or the board is the way to go.

If there is great interest in developing performance measures, I suggest the board start by revisiting the usefulness of the [KPMs](#) it reports to the legislature, or the state forest performance measures which remain in effect (never rescinded so far as I know) and which will inform a new FMP, I believe.

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Wednesday, May 08, 2024 10:08:17 AM
Attachments: [forms submission.csv](#)

You don't often get email from oregon-gov-web-services@egov.com. [Learn why this is important](#)

Name	Corina Morin
Email (Optional)	cmmorin1970@icloud.com
Comments	I do not agree with hire more diverse people. You also stated it would be people who are not usually involved in this type of lifestyle. Why would you want them to work for us if it's not their passion. It is important that our forest is ran by people who live and understand, not reaching out to others to make our decisions. I also feel like if you want to help our forest allow cutting of trees. We are losing so much to fire damage. If you would like to make changes to our forest, please make changes that will affect us in the positive not affect our government officials who are just encouraging us to hire Minority groups that do not have passion for nature the way we are that live in this community do

Submission ID: 6c5e01e1-ba84-4f65-9ba6-4bde2c7d6443

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Tuesday, May 14, 2024 4:14:21 PM
Attachments: [formsubmission.csv](#)

Name	Craig Zarling
Email (Optional)	craig.zarling@comcast.net
Comments	I write to advocate to maintain lands identified for preservation as such, and not converting them to clear cuts. I feel the use of state forests to generate financial profits needs to be shifted toward habitat preservation. As an Oregonian, preservation of our forests is a high priority for me.

Submission ID: 0990e54b-0208-422e-8382-b8f12a6b851b

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Thursday, May 09, 2024 11:58:58 AM
Attachments: [formsubmission.csv](#)

Name	Cristy Rein
Email (Optional)	RZPublish@aol.com
Comments	The Board of Forestry MUST implement active management of all of our forests in order to not lose them to fire. The attitude of "preserving forests" is ridiculous as all data and history shows us the forests lost to wildfire are mostly forests that are not being managed and maintained. This negligence has to end. Do what right for all Oregonians and stop succumbing to special interest groups.

Submission ID: a192b103-d442-415f-ba54-aef6202601ba

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Thursday, May 16, 2024 6:13:45 PM
Attachments: [formsubmission.csv](#)

Name	Cynthia Dreps
Email (Optional)	Cadreps@yahoo.com
Comments	Please make the webpage used to apply for state of oregon jobs work correctly. Th webpage my workday Oregon does not show the list of currently open jobs. Please ask the information technology people to get the service provided by my workday to allow people from around the state and country to access the information and apply for the job openings in Oregon.

Submission ID: 3b828668-c9a3-4df3-8dc0-e2e1ef2e6ef8

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Monday, May 20, 2024 9:14:05 PM
Attachments: [formsubmission.csv](#)

Name	DIANA LARSON
Email (Optional)	planetsky@charter.net
Comments	<p>LOOKING AT THE GPS SCREEN ON THE MONITOR IN MY CAR, IT IS BLATANTLY OBVIOUS THE CHECKERBOARD PATTERN IN DOUGLAS COUNTY. ALL OF THE SQUARES THAT ARE/WERE AVAILABLE TO LOG, HAVE BEEN LOGGED. 90% OF THE JOBS THAT WERE ONCE THERE HAVE BEEN REPLACED WITH AUTOMATION. THE COAST RANGE DOES NOT HAVE THE CHECKERBOARD. IT JUST HAS MASSIVE CLEARCUTS. MASSIVE DESTRUCTION AND DEVESTATION. NO JOBS. RESILIENT FORESTS WERE THE OLD GROWTH FORESTS. THE SECOND GROWTH AND REPROD PLANTATION FORESTS ARE A DISASTER. PLANTATION FORESTS THAT BURN AT SUCH HIGH INTENSITY, EVERYTHING INCLUDING THE DIRT, IS DESTROYED, MUST BE STOPPED. IT IN NO WAY MIMICS A NATURAL FOREST LET ALONE A NATURAL FOREST FIRE. THERE SHOULD BE A MORATORIUM ON ANY LOGGING OF PUBLIC LANDS WHILE THEY FIGURE OUT HOW TO BETTER MIMIC A NATURAL FOREST ON THIER PRIVATE LANDS, RATHER THAN THE MONO SPECIES DISASTER FORESTS THEY ARE BEING ALLOWED TO CONTINUE TO CREATE. THINNING AND BRUSH REMOVAL IN THE PLANTAION AND SECOND GROWTH FORESTS SHOULD BE ENCOURAGED. ENACT BETTER LAWS FOR REPLANTING ON CLEARCUT AREAS. PLANTATION TREES REQUIRE A LOT OF WATER FOR THE FIRST 30 TO 40 YEARS OF GROWTH CONTRIBUTING TO DROUGHT. THE MISMANAGEMENT OF PRIVATELY OWNED FORESTS IS A HUGE PROBLEM AND CONTRIBUTOR TO CLIMATE CHANGE. RESULTING IN UNNATURALLY INTENSE FOREST FIRES RESULTING IN MASSIVE, ENDLESS, SMOLDERING, SMOKE. THE FELLER BUNCHER THAT STRIPS ENTIRE FORESTS IN A DAY TAKING THE PLACE OF COUNTLESS JOBS. SOMETHING THAT IS NEVER MENTIONED WHEN IT COMES TO LOGGING IS THE NUMBER OF NESTING BIRDS AND OTHER ANIMALS. LOGGING GOES ON ALL YEAR LONG WITH ABSOLUTELY NO THOUGHT OR CONSIDERATION TO THE TREMENDOUS NEGATIVE EFFECT IT CAUSES TO THE ENVIROMENT. THERE ARE ALTERNATIVES. WE NEED TO BE LOOKING AT 3D HOMES, OTHER TYPES OF MATERIALS THAT WILL NOT BURN. LEAVE THE OLD GROWTH AND DO EVERYTHING WE CAN TO PROTECT AND PROPAGATE MORE!</p>

Submission ID: c5ae2ba1-6f74-442d-b8b8-8b3ba408c838

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Thursday, May 23, 2024 7:48:57 AM
Attachments: [formsubmission.csv](#)

Name	Drew Simrin
Email (Optional)	marioman3@gmail.com
Comments	My vision for the future of Oregon's forests are a forest full of old growth trees sequestering carbon, cooling drinking water that the salmon use, and providing clean oxygen for all to breathe.

Submission ID: b2376cc5-95b8-4e04-b8f2-7704bb092938

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Wednesday, May 08, 2024 12:20:43 PM
Attachments: [forms submission.csv](#)

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Name	Harry Freiberg
Email (Optional)	hap@alumni.stanford.edu
Comments	To borrow from Mark Twain: Guard & Protect our National and State Parks/Forests, shore lines, rivers, lakes, and wild lands. They are not being made anymore.

Submission ID: 05af8792-fa17-4232-b0af-3e74fb6fa7f2

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Saturday, May 11, 2024 1:48:13 PM
Attachments: [formsubmission.csv](#)

Name	Heather Harris
Email (Optional)	
Comments	Please stop the timber sale of Clatsop Forest and neighboring Legacy Forests near Astoria! These forests and ecosystems are beautiful and flourishing and support so much wildlife!! This is not what we want for our wild forests to be cut down!! Please preserve and protect these trees, wildlife and other ecosystems. They are worth preserving!!

Submission ID: 18f07693-52d7-43cf-aa0d-13c003e2b778

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Thursday, May 09, 2024 9:04:23 AM
Attachments: [forms submission.csv](#)

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Name	Jerry Carlson
Email (Optional)	jkcarlbel@gmail.com
Comments	<p>Lots of words - all paid for by the taxpayers of Oregon. (I tend to be a bit wordy too.) I perused it quickly - my assessment is that it is very thorough. The only portion I find rather silly is the "Climate Change" portion. I question anyone's intellect (and scientific background), if they truly believe that man controls our planet's climate. Absurd! Arrogant! ... and just plain stupid! Those who believe this nonsense never made it to Piaget's "Conservation of Volume" maturity stage. Most likely, such a person lives in an urban area and has never climbed a mountain, or visited Hell's Canyon, or jumped out of a perfectly good airplane. Other than that absurdity, it is quite thorough.</p>

Submission ID: 611bf4b1-93d4-43c3-9acf-5aa852fc508d

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Tuesday, May 14, 2024 3:16:07 PM
Attachments: [formsubmission.csv](#)

Name	John Flannigan
Email (Optional)	john.j.flannigan@odf.oregon.gov
Comments	<p>The Board should work with other agencies to ensure the policies and rules for forest protection apply to all landowners i.e. Stream buffers. Water flows through many kinds of landowners, agricultural, residential, commercial, etc. and water quality can be harmed in any of these areas, but most landowners aren't required to buffer streams. Fish don't know what the zoning of land is. They swim through and nest in all these different lands. If stream buffers are needed to protect water, fish, and the environment, everyone should abide by the required buffer rules, not just forest landowners. Singling out one type of landowner is not just unfair, but it also fails to protect a large percentage of the resource. If these protections are truly important, they should apply to everyone.</p>

Submission ID: 7bddedef-1b90-433a-bc0a-233d33658cf2

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODF](#)
Date: Wednesday, May 15, 2024 2:52:09 PM
Attachments: [formsubmission.csv](#)

Name	John Parulis
Email (Optional)	johnp@brightpathvideo.com
Comments	<p>Dear ODF. I think the metrics for determining forest "usage" needs to be updated with current science, particularly in soil science. Soil is the planet's second largest active pool of carbon after the oceans, but its ability to continue to retain the huge amounts of carbon it stores has been weakened in recent decades, largely due to unsustainable land-management practices and changes in land use. The Woodwell Climate Research Center is a preeminent authority on climate change science. In a recent study, they found that soil carbon fails to recover in cleared forests. https://www.woodwellclimate.org/study-soil-carbon-fails-to-recover-in-cleared-forests/ Please value this information when you consider yielding to powerful investment guided decision making from the timber industry to continue clear cutting Oregon's forests and spraying them with soil killing, health hazard herbicides, all for short term gain. Thanks</p>

Submission ID: 64d2ad99-964a-4a35-ad52-a5af661484bd

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODF](#)
Date: Thursday, May 23, 2024 11:34:11 AM
Attachments: [formsubmission.csv](#)

Name	judith dickerson
Email (Optional)	claydickerson44@gmail.com
Comments	Much survey space was taken with repeated desires for more forest education. If you are interested in connectioning ASAP with an under-served community, why not start small - how about School for the Deaf. I even know possible materials and maybe instructors. On another thread, the forestry board may learn about available but stored in-house resources with a look at my late-husband's book, Fire at my Feet (author Clay Dickerson). It is a memior of his four decades as an ODF forest manager. Several of his fellow workers told me they felt his description of his job (over those years) was the best they'd ever seen. J.Dickerson/retired educator

Submission ID: 7ff086d2-17f3-4df2-a685-bd561aa81f82

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Wednesday, May 15, 2024 5:25:46 PM
Attachments: [formsubmission.csv](#)

Name	Julia Snyder
Email (Optional)	snydesiii@live.com
Comments	<p>This is concerning the proposed Davis Ridge clearcut and Slough Hill (alt) clearcut in the 2025 draft Annual Operation Plan. I live within 4 blocks of the proposed Davis Ridge cut. And I walk past the proposed clear cutting 2-3 times weekly. The proposed cut on the south side of that street walk is on a steep slope. On the other side of the street is a downhill slope that ends in a stream of water. That uphill slope, if clearcut, and given the degree of rain here, would most probably cause landslides onto the road. The stream of water on the other side of the road is a conduit for salmon runs. If pesticides are used, it will end up in that stream, killing off those salmon. Please consider these serious problems before supporting this project. thank you</p>

Submission ID: 43b69791-29e6-4b8b-8b4c-10b6fb2cfb72

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODF](#)
Date: Friday, May 10, 2024 2:51:26 PM
Attachments: [formsubmission.csv](#)

Name	Katy Davis
Email (Optional)	katyannndavis@gmail.com
Comments	Hello, I'm writing to you as an Oregon resident who opposes the ODF's plan to Clear Cut and Aerial Spray the Legacy Forest at Mothball Hill, East of Astoria in the John Day Estuary watershed. This forest contains an invaluable habitat and recreation space for the citizens of Oregon and a clear cut and spray could have devastating geological and ecological impact on wildlife and the community. Thank you for your time, Katy Davis

Submission ID: 77fca239-4cc0-403f-a506-b8cee891262c

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Wednesday, May 22, 2024 3:00:00 PM
Attachments: [forms submission.csv](#)

Name	Linda Jensen
Email (Optional)	lindasinesjensen@gmail.com
Comments	My comment is to clean up these forests and start managing them!! Old fir trees rot! That brings in the bugs. Which causes more fuel!! We always had healthy forests before the environmentalists got all involved! Bring back the real stewards of the lands! We had to stop all the logging because of a bird (farce). And now the same people are behind putting windmills in the ocean! It seems they don't mind wiping out birds after all!! Manage our forests!!

Submission ID: 3160e828-3183-46bd-b556-5b05cba9f653

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Friday, May 10, 2024 2:00:54 PM
Attachments: [formsubmission.csv](#)

Name	Matthew Lehman
Email (Optional)	mlehman418@gmail.com
Comments	Private land owners are killing the forest products manufacturing business in Oregon by exporting too many logs to Asia. Many counties are having a hard time raising enough funds to keep services at the level they are now, let alone make any improvements, and further reducing the amount of timber harvested will only make things worse. We need to increase the amount of excise or removal taxes on private land owners to offset the losses, and those funds need to stay in the counties where the wood is harvested. No more free rides for Weyerhaeuser and the like. Time to pony up.

Submission ID: a4bdcd26-32f7-49be-8384-526124f8aee6

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Saturday, May 18, 2024 3:35:40 PM
Attachments: [formsubmission.csv](#)

Name	Michael Hill
Email (Optional)	mehill100@gmail.com
Comments	Purpose should include - in the second paragraph after "health and safety, "recreational opportunities"

Submission ID: 1b896875-b964-4524-a954-672b67b1d1a4

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Friday, May 24, 2024 2:47:44 PM
Attachments: [formsubmission.csv](#)

Name	Mike Bechdolt
Email (Optional)	mikebechdolt@gmail.com
Comments	<p>To: Oregon Department of Forestry From: Mike Bechdolt / Consulting Forester / Klamath Falls, Oregon Subject: Please consider the following comments on Oregon’s 20 Year Vision: • Context and Commitments: Page 1-2 (It would be helpful to mention wildfire as it has had the greatest impact to our Forests per the latest Northwest Forest Plan Monitoring report and recent Old Growth Inventory assessment. While Wildfire is mentioned in the Purpose section, the vision needs to address the impact of recent wildfire on our forests and communities as part of the Context for this Vision. It is the urgency element that makes this vision and strategy more of a directive than a plan on a shelf. • Page 6: “Increase cross-jurisdictional alignment on management of public forestlands that meets the needs and expectations of Oregonians.”... Possible change: “Increase cross-boundary treatment opportunities of public and private forestlands... Another way to express: “Build stewardship across boundaries for alignment of objectives, efficiencies in activities, and broader-scale impact.” • Page 8: “.”Promote forest and forestry related educational programs, technologies, pilot projects, forest management jobs, infrastructure and other tools to invest in the sustained economic viability and vitality of communities.” Consider adding the words here...sustainable wood products & markets, carbon markets and ecosystem services? The bullet mentions promoting forest management jobs and infrastructure which obviously infers a sustainable supply of wood products including (timber, biomass, special forest products...boughs, mushrooms, cones, etc....). • Page 10&11: “Addressing the Wildfire Crisis”..... While the strategic bullets mention “fuels management”, “forest resiliency work” and increase use of “prescribed fire”. Should the word “thinning” be used as well? Science has demonstrated again and again that a combination of thinning, including commercial thinning, and prescribed fire has been the most beneficial treatment to reduce wildfires. It seems that the document is steering away on purpose from using the term “harvesting/harvest/thinning” to avoid controversy. • Page 13: “CALLOUT BOX FOR CLIMATE-SMART FORESTRY”... Make sure that the callout box includes development of an incentive program for industrial and nonindustrial forest landowners to practice silviculture methods that promote climate smart forestry to including incentivizing practices to increase stored carbon in the forests. Thank You Mike Bechdolt Bechdolt Consulting Forestry 541-892-2564 mikebechdolt@gmail.com</p>

Submission ID: dbcab66a-3412-4fd4-97e9-14f0387f7d12

Record ID:

May 14, 2024

Oregon Board of Forestry
c/o Oregon Department of Forestry Public Affairs
2600 State Street
Salem, Oregon 97310

Members of the Oregon Board of Forestry:

Thank-you and thank-you to the Department of Forestry staff for your work to date developing the draft *Vision for Oregon's Forests* (VFOF) and for this opportunity to offer comments as you finalize this document.

I have previously submitted comments during the development of the VFOF. I would like to offer some additional general observations for your consideration as well as some specific suggestions for improving the VFOF and its implementation.

1. When approved in 2011, it was intended that the *Forestry Program for Oregon* be reviewed and revised in 2019. The timeline slipped a bit but I am pleased to see this action is now finally underway. I appreciate the efforts of both State Forester Mukumoto and past State Forester Daughterty to champion this work.
2. While significant public outreach has been conducted, I have not seen strong participation of other state and federal agencies and key stakeholder groups in developing the VFOF. In both 2003 and 2011, the 2011 Board was deliberate in bringing these partners to the table and involving them in shaping those editions of its strategic plan. The hope was that other forestry institutions, other state agencies, landowner groups, environmental groups could all see their values and interests respected in the final product and see their roles in achieving desired outcomes.

The Board in 2011 also established an *Oregon Roundtable on Sustainable Forests*. An open invitation was provided to all interested stakeholders to participate in the Roundtable. Most significantly, the Board entered into a formal "Declaration of Cooperation" with key public agencies (Oregon Department of Forestry, OSU College of Forestry, USDA Forest Service Region 6 and Pacific Northwest Research Station, Bureau of Land Management, and Oregon Department of Environmental Quality) in support of the Roundtable and the *Forestry Program for Oregon*. I encourage you to review the powerful language in the Declaration. But a word of caution—while the 2011 *Forestry Program for Oregon*, enjoyed passionate individual champions within each of these organizations at the time, the lack of long-term institutional support (including within the Department of Forestry) crippled its full implementation. Obtaining and maintaining that support will be crucial for the VFOF to

be more than another internal bureaucratic exercise. If not before, then after final approval of the VFOF, I encourage you to seek similar formal commitments of cooperation from all partners who will play critical roles in meeting its goals and objectives.

3. Oregon's forests are diverse and are also owned by very diverse landowners with a wide spectrum of values and management objectives. For simplification, the 2011 *Forestry Program for Oregon* grouped these management objectives into four broad categories emphasizing different values – production emphasis, nature emphasis, multiple-use emphasis, and residential value emphasis. All four will play a role producing diverse forests and a wide range of benefits. If in the right proportions and in the right locations, they can also serve to meet the goals of the VFOF. A challenge in implementing the VFOF will be respecting and working within the range of landowner management objectives. This is particularly important when policies affect private landowners who must continue to have an economic justification for owning and managing forestland versus converting forests to other, potentially more lucrative, uses.
4. In the 2000s, quite a bit of work was done to develop a comprehensive State of Oregon forest cluster economic development strategy. The Oregon Department of Forestry, Oregon Business Development Department, Oregon Forest Resources Institute, Oregon Department of Energy, and the Wood Innovation Center at Oregon State University coordinated with private-sector partners to develop this strategy. I would encourage you to strengthen the VFOF text regarding the importance of an promoting an updated and unified State of Oregon forest cluster economic development strategy.
5. I recommend greater attention be placed on invasive species management which, along with climate change forest conversion to development, may be the greatest long-term threats to Oregon's forest resources.
6. There are general references to "biodiversity" and "habitat" in the draft VFOF but very little specifically discussing fish and wildlife—two subjects very important to many Oregonians. The 2011 *Forestry Program for Oregon* included a specific goal to "conserve diverse native plant and animal populations and improve their habitats in Oregon's forests" combined with an indicator tracking whether the number of at risk (extinction, extirpation, endangered, threatened, or potentially endangered or threatened) forest plant and animal species was increasing or decreasing. I recommend similar text in the VFOF.
7. In a similar vein, I recommend more specific attention be given to the continued protection of the physical and biological quality of soil and water resources in Oregon forests. The current text only makes passing references to these important resources.
8. The readers of VFOF will have different interpretation of some of the terminology used. Therefore, I recommend a glossary of terms in an appendix that includes agreed-to definitions of terms such as "active management," "adaptive capacity," biodiversity," "ecosystem," "forests," "forest health," "maintain," "protect/protection" (particularly in the context of disturbance-driven ecosystems), "resilient," and "sustainable/sustainability" (slippery terms if undefined but central concepts in the 2003 and 2011 editions of the *Forestry Program for Oregon*)

9. I recommend that you review the recent work of the citizens of Bend in developing a strategic vision for this rapidly changing city ([Vision Action Plan • Envision Bend](#)). Note that for each “project” or goal identified in the plan both “quick win” and “gamechanger” desired outcomes have been identified. Something similar in the VFOF would make it immediately more useful to Oregonians.
10. Page 1: The commitment statement, “Policies will strive for a reciprocal relationship between forests and human cultures representing multiple identities” is so vague it borders on meaningless. Maybe just stick with “There is a responsibility to take care of forests so that forests can continue taking care of all of us.”
11. Page 3: Revise the shared mission statement to read: “To restore, maintain, and promote resilient forest ecosystems that benefit all Oregonians.” The public needs to understand that in disturbance-based forest ecosystems the focus is on the ecosystem and not on an unrealistic expectation of maintaining current forest stand conditions.
12. Page 5: The paragraph on achieving desired forest complexity fails to acknowledge how this outcome will be achieved on an administratively-fragmented forest landscape and, in particular, what is expected of private forest landowners (from real estate investment trusts to family forest landowners) who manage their forestlands for many different objectives. To gain greater private landowner support, a stronger emphasis is needed that on private ownerships non-regulatory tools will be used to achieve desired public policy goals beyond the existing baseline environmental protections of the Forest Practices Act.
13. Page 9: Revise the text to read; “Place refers to both the natural-environmental context (a valley, mountain range, region, ecosystem, etc.) and the human context (human cultural history, economics, laws, ownership, management objectives, etc.).”
14. Page 10: Under “Addressing the Wildfire Crisis,” consider rewording the goal to read: “Manage wildfire risk through prevention, suppression, and mitigation strategies that protect communities and expedite forest restoration activities that promote the resiliency of Oregon’s forests.”
15. Finally, I believe the draft VFOF lacks specifics on how its successful implementation will be measured and reported. I am pleased that the email I received soliciting comments stated that, “[T]he board and department will continue to build upon the foundation provided by the *Vision for Oregon’s Forests* through developing associated progress measures. ODF will also build out its process for development of action plans to achieve the goals identified in the *Vision for Oregon’s Forests*.” But without these details in place, it is difficult to judge the value of the lofty, aspirational VFOF text.

In 2011, the Board the Board of Forestry endorsed 19 Oregon indicators of sustainable forest management recommended by a diverse advisory committee of Oregonians. The indicators, in total, were intended to answer the question, “What would you need to know to determine if Oregon’s forest and being sustainably managed?” They were also intended to measure success in meeting the *Forestry Program for Oregon* goals and objectives. The indicators represented a way to share common interests, and to promote agreement about forest issues. The indicators were intended to address all Oregon public and private

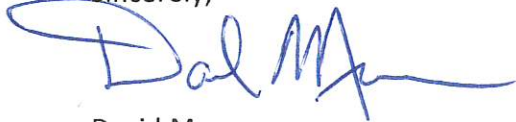
forestlands. They belonged not just to the Board but to all Oregonians, regardless of their values and perspectives.

Looking forward, a new set of well-designed VFOF indicators/progress measures can:

- Tell stories--Convey critical and complex information more simply to build public confidence and facilitate better communication and cooperation among all parties interested in forest resources;
- Inform greater social understanding of forests and the forces that influence them;
- Provide a framework around which natural resource inventory, assessment, planning, and management can be better coordinated;
- Better prioritize and allocate finite monitoring and research funding to those efforts that will inform the indicators.
- Provide citizens interested in forests with a tool to encourage society to better address and communicate what it needs from forests; and
- Help to repair a fragmented administrative landscape by providing a common language for measurement and discussion.

Thank-you for considering these comments and best wishes for successful implementation of the *Vision for Oregon's Forests*.

Sincerely,



David Morman

Bend, Oregon

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODF](#)
Date: Sunday, May 19, 2024 2:03:10 AM
Attachments: [forms submission.csv](#)

Name	Nancy Cook
Email (Optional)	nacook2022@gmail.com
Comments	<p>Dear Board of Forestry, Although some of the direct management impacts of this Draft feel unclear, I'm impressed by the progressive vision of this Vision for Oregon Forests. Managing our public lands to address Oregonian's clearly expressed values around habitat conservation and climate resilience is so important. Indeed, I would propose citing the recent Oregon Values and Beliefs Center polls in the introduction to this document. For example, Oregonians have clearly stated their broad majority support for "Very Important" forest benefits to include habitat conservation (73%), clean, cool water for fish (71%), and carbon storage (50%) https://oregonvbc.org/state-forest-management. Additional comments from this 2022 report resonate with this Vision: "BALANCING environmental benefits—especially clean water—with the economic benefits of forestry continues to resonate with Oregonians. Oregonians are united in their concern about future access to clean water. Nine in ten express concern that access to clean water is not guaranteed for future generations." Related to clean water is the key role our state forests play in sustaining struggling salmon and other fish stocks. Research clearly demonstrates that salmon survival in Western Oregon is directly related to stream temps, and stream temps are directly related to forestry practices, especially ample stream buffer zones, through out the watershed. Part of climate resilience is regional food security; fish are forest products, too. And initiatives like the Habitat Conservation Plan are central to Oregon's resilience as our warming climate impacts salmon streams. Profit-mongering and by a politically powerful lobby which promotes aggressive harvest of carbon sequestering forests is unacceptable at this pivotal point in climate history. Research also proves that single aged stands are exceptionally vulnerable to wildfires. So yes, yes: I support this intention of this vision and hope the Board will work diligently to assure to make this a truly meaningful guiding role to support the climate resilient forests required for future generations. Thank you for your service. Nancy Cook Astoria, Oregon nacook2022@gmail.com</p>

Submission ID: b58f2fbd-0398-4a06-acdf-7eca79d01d57

Record ID:

Southern Oregon Climate Action Now

SOCAN

Confronting Climate Change

<https://socan.eco>

Alan R.P. Journet Ph.D.

Cofacilitator

Southern Oregon Climate Action Now

alan@socan.eco

541-500-2331

May 21st 2024

Oregon Board of Forestry

Oregon Department of Forestry

Reference: Vision for Oregon's Forests

Chair Kelly and members of the Oregon Board of Forestry:

I write as cofacilitator of Southern Oregon Climate Action Now, an organization of some 2,000 Southern Oregonians who are concerned about the climate crisis and encourage state action to address it. As rural and coastal Southern Oregonians, we live on the frontlines of the warming, reducing snowpack, heatwaves, drought and the increasing wildfire risk that these trends conspire to produce. Because of this, we pay close attention to what is happening in state agencies that pertains to climate and wildfire.

We are particularly interested in the incredibly important role that Oregon's forests can play in terms of contributing to the state's natural climate solutions by sequestering carbon. It is within this context that the Vision for Oregon's Forests was reviewed.

I was delighted to see the statement (P. 1): "Forests are an integral part of the social economic and environmental fabric of our state..." included in the purpose. It would have been better, however, if this had been followed by recognition of 'stabilizing our climate' as one of the listed benefits since doing so would indicate that the authors acknowledge this as a priority. Indeed, this should probably be the first item listed since without a stable climate, "Clean air and water, sustainable forest products, biodiversity, public health and safety' will all be severely compromised. Given that reality, stabilizing climate should be the highest priority.

It is also encouraging to see (P. 1) that "Policies will be responsive and adaptable to global and local climate change while mitigating threats to ecosystems, human health and safety, and economies." However, this should be stated as occurring within the recognition that 'climate smart' management will be employed (see below for further comment on this concern).

On face value, it is encouraging to identify (P.3) a shared vision of “Complex and resilient forest ecosystems that endure and adapt.” Regrettably, however, the climate envelope studies and projections of Rehfeldt and Crookston, as depicted on the [Plant Species and Climate Profile Predictions](#) website suggest the consequences of continuing our business-as-usual behavior of accelerating fossil fuel use and greenhouse gas emissions. These projections indicate that unless we globally divert the current climate trend, this will likely reduce the range of many ecologically and commercially important Oregon forest species and eliminate some from the state. Without elevating the role of our forests in combating climate change, our ability to maintain complex and resilient forest ecosystems seems like a challenge.

In terms of the strategies proposed (P.6) I was delighted to see “...extended rotations and increased retention of large legacy structures (live green trees, snags, and downed wood) during harvest activities.” This delight applies also, and critically, to “Encourage the development of complex, functional forests that sequester and store carbon.”

In terms of the “Priority: Addressing the Wildfire Crisis” (P. 10), it is somewhat disappointing to see the Goal as: “Prevent, suppress and mitigate wildfire to protect communities and expedite forest restoration activities that promote the adaptive capacity of Oregon’s forests.” As the subsequent narrative implicitly acknowledges, we live in a Mediterranean climate where the millennia of winter wet / summer dry seasonal cycles have generated forest communities that are fire prone, fire adapted and fire dependent. Instead of repeating the 20th Century refrain indicated in this goal of trying to prevent, suppress and mitigate wildfires, I would prefer to see a goal that focuses on ‘managing’ fire in our forests and promoting a regime that includes fire. The evidence suggests that the decades of fire suppression combined with climate transitions resulting from the Pacific Decadal Oscillation and global warming have contributed to the problem of increasing fire risk. I suggest that it would behoove ODF to acknowledge more explicitly the consequences of our Mediterranean climate and the need for managing fire to serve both forest and human community health rather than focusing on fire prevention and suppression. The subsequent list of strategies that include ‘prescribed fire’ suggests that ODF understands the need for fire in our forests though there seems to be little recognition that we should manage wildfire rather than merely and consistently prevent and suppress fire.

It is gratifying to see that Climate Smart forestry is incorporated into the planning (P. 12). However, it is a little disturbing that the basic literature on climate smart natural resource management is not included. Instead, ODF seems to have adopted its own definition of what comprises ‘climate smart’ management. Since there is a tendency for natural resource managers to claim that since they manage natural resources and they accept climate science,

what they are doing must be climate smart. It would generate greater confidence if the literature listed below were referenced.

In this vein, I note that one of the basic tenets of climate smart management is recognition that future climate will be unlike past climates. Thus, seeking restoration to some prior species composition is not rational.

While I see reference to the need for public education, I would like to recommend that this be accorded greater emphasis. One of the greatest problems we have in discussing climate change and wildfire with the public is that there exists tremendous ignorance about the importance of fire in our forests and why our forests are fire adapted and fire dependent. This is compounded by a similar level of ignorance regarding climate change and how that is currently affecting fire risk and how ongoing climate change will only exacerbate the fire risk problem. The roll out of wildfire risk maps a year or so ago is a perfect example of how that level of public ignorance can lead to anger and rejection of rational proposals and arguments.

Respectfully Submitted



Alan Journet

7113 Griffin Lane
Jacksonville
OR 97530-9342

Suggested Examples of Climate Smart Literature:

[Glick, P., B.A. Stein, and K.R. Hall. 2021. Toward a Shared Understanding of Climate-Smart Restoration on America's National Forests: A Science Review and Synthesis.](#) Washington, DC: National Wildlife Federation. A 2021 update of the seminal Stein et al 2014 discussion

Schuurman, G. W., C. Hawkins Hoffman, D. N. Cole, D. J. Lawrence, J. M. Morton, D. R. Magness, A. E. Cravens, S. Covington, R. O'Malley, and N. A. Fisichelli. 2020. Resist-accept-direct (RAD)—a framework for the 21st-century natural resource manager. Natural Resource Report NPS/NRSS/CCRP/NRR—2020/ 2213. National Park Service, Fort Collins, Colorado.

Stein, B.A., P. Glick, N. Edelson, and A. Staudt (eds.) (2014). Climate-Smart Conservation: Putting Adaptation Principles into Practice. National Wildlife Federation, Washington, D.C. One of the seminal papers that kick-started climate smart thinking.

Swanston, Christopher W.; Janowiak, Maria K.; Brandt, Leslie A.; Butler, Patricia R.; Handler, Stephen D.; Shannon, P. Danielle; Derby Lewis, Abigail; Hall, Kimberly; Fahey, Robert T.; Scott, Lydia; Kerber, Angela; Miesbauer, Jason W.; Darling, Lindsay; Parker, Linda; St. Pierre, Matt.
2016. Forest Adaptation Resources: climate change tools and approaches for land managers, 2nd ed. Gen. Tech. Rep. NRS-GTR-87-2. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 161 p.



**Comments on Draft *Vision for Oregon's Forests*
May 24, 2024**

We applaud the Board of Forestry for its collaborative work with the ODF leadership team and for incorporating valuable insights from the *Oregon Kitchen Table* project. We appreciate the Board of Forestry for hosting the many thoughtful work sessions and subcommittee meetings necessary to draft the proposed *Vision for Oregon's Forests*. We also want to gratefully acknowledge ODF seeking input on May 20 from the appointed Committee for Family Forestlands (CFF). We support the comments the CFF offered.

Review: We are disappointed, however, with the incomplete and still marked-up document that was made available for public comment. There are clearly strong statements and calls to action about climate, wildfire, insects, disease, as well as the need for broader public education and engagement. From the opening, despite many declarations in the document, the *Vision for Oregon's Forests* is not inspirational, bold, inclusive, or empowering.

3.7 Million Acres. Many significant factors which obviously impact the future of public and private forestlands in Oregon go largely unmentioned. For example, the document does not recognize the significant role played by the state's 3.7 million acres of private family forest properties. Despite ODF's decades of successful work with family forest owners and the state's recent investments in the new Small Forestland Owners Office, there is only passing reference to Small Forestland Owners (SFOs) in the document. SFOs should at least be defined and included in an appendix.

SFO Contributions: The social, economic, and environmental contributions from the very diverse SFOs in Oregon are huge. Sadly, the document's use of "forestry infrastructure" and "forest products sector" understates and undervalues the present and future contributions made by SFOs all over the state. In the years ahead, the loss or conversion of family forest properties is a very real threat. As the state grows and changes, this loss can have cascading negative impacts on adjacent forests, fish and wildlife, and communities. What is ODF's long term vision for SFOs?

Place-Based: We are attracted to the concept of place-based plans cited in the draft. However, the term is broad and lacks any sense of scale: National? State? Region? County? Watershed? Individual properties? All of the above? Place-based planning is literally how many SFO presently operate. We would have expected to see more how important guiding principle will be applied.

New Rules: The impact on the Oregon's private forestlands, including family forests, dictated by recent legislation and the state's new Forest Practice Rules probably does not receive the attention it deserves in the *Vision for Oregon's Forests*. Addressing the positive impacts on fish and wildlife habitat over time is not included in the draft. Oregon's family forest owners are major contributors to this living legacy and anticipate being part of this Oregon success story for generations to come.

Leadership: The Board of Forestry and ODF must grow trust and broaden public support. The many beneficiaries of Oregon's remarkable forest resources, other public and private landowners, Oregon taxpayers, and local and state leaders deserve to know much more about the ODF's leadership role intends to play in the future. References to accountability and transparency in draft are well below the aspirational level seen throughout the rest of the document. Similarly, the financial model and

sustainability of ODF's operations is inadequately addressed in the document. This is a significant omission or oversight for a new strategic plan or vision. Prudent and responsible use of public and private resources is required for success. We would expect to see more in the document how ODF intends to address these mission-critical components.

Thank you for the opportunity to comment on this important document and participate in the process. We look forward to working with ODF to improve and fortify the *Vision for Oregon's Forests*.

Thank you again for including members of the Committee for Family Forestlands in the discussion this week.

Rick Zenn, Executive Director
Oregon Small Woodlands Association
187 High Street NE, Suite 208
Salem, OR 97301

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Sunday, May 12, 2024 10:56:43 PM
Attachments: [formsubmission.csv](#)

Name	Philip Ratcliff
Email (Optional)	skazz999w@hotmail.com
Comments	Most of us in Oregon get our drinking water from forests. That's amazing, but it also leaves us vulnerable to drought, climate change, and forest practices on land that doesn't belong to us or where we don't have a say in management. In a better world, forests would be managed to protect drinking water for all of us.

Submission ID: 9bf2954b-bcfb-4db0-b7b1-c06c70ac6e87

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Thursday, May 16, 2024 11:38:40 AM
Attachments: [forms submission.csv](#)

Name	Rob Freres
Email (Optional)	rob@frereswood.com
Comments	Does public comment really mean anything to the Department? You've implemented the HCP prior to its approval by the federal agencies. You've passed a 70 year plan to not manage 57% of the properties you are entrusted with on a 4-3 vote. You've disenfranchised all of rural Oregon where these lands are situated. Your actions say, "we don't care, we don't have to"...Thanks for the let it burn policy you've just implemented. You have the federal NW Forest Plan that has resulted in half of Oregon's forests lost to fire and you've endorsed more of the same.

Submission ID: e994a60a-2fe1-4ac8-860f-9aa67364ad16

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Wednesday, May 22, 2024 5:47:55 AM
Attachments: [formsubmission.csv](#)

Name	Scott Killops
Email (Optional)	scott.killops@gmail.com
Comments	The goal statement for the Climate Leadership priority is not measurable or time-bound and lacks the ambition of ODF's Climate Change and Carbon Plan (CCCP). Here's an example of how the goal statement might be rewritten to be more measurable and time-bound and to align its ambition with the CCCP: "The Board and Department will demonstrate leadership in climate-smart forest management by implementing the Climate Change and Carbon Plan by the end of 2025".

Submission ID: 7092492d-a39f-49f8-be55-d313b2f7b8c1

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODE](#)
Date: Thursday, May 09, 2024 9:30:02 AM
Attachments: [formsubmission.csv](#)

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Name	Steven
Email (Optional)	Elenger
Comments	Stop selling the land off. BLM is not for sale. Our taxes maintain it which means we partially own it. It's not for sale to any one. Not logging company's. Not Chinese energy company's. It's our land and it's not for sale. Lots of parts around here are now closed to hiking and hunting because loggers bought it up. I live here for the nature. Now I am moving out of this shithole liberal state.

Submission ID: fbf65c16-98bf-4630-906b-8aef8e914653

Record ID:

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODF](#)
Date: Friday, May 17, 2024 11:37:39 AM
Attachments: [formsubmission.csv](#)

Name	Teresa DeLorenzo
Email (Optional)	tde@teleport.com
Comments	Regarding proposed clear cuts in east Clatsop County -- David Ridge and Slough Hill planned clearcuts. I have the following concerns about these two clearcuts and believe that they do not meet the standards in the Forest Practices Act. -- The slopes are steep and are active slide areas -- several large slides within the last five years. -- The clearcuts are adjacent to a number of established house and potentially threaten them with slides, erosion, and flooding from run-off. -- There are 80+ year old trees on the sites with no provision for their protection. -- The planned cuts are near verified salmon streams and the plans do not address stream protection. Clearcuts may compromise water quality and temperature. Please review these planned clearcuts with an eye to removing them from sale. Thank you. Teresa DeLorenzo 971 563 7943

Submission ID: 6f4bacde-b5d2-4b0d-b8bb-619a741b13a0

Record ID:

May 24, 2024

Oregon Department of Forestry
Oregon Board of Forestry

Comments on the Vision for Oregon's Forests

Submitted by: Kyle Smith, Director of Government Relations and Pete Caligiuri, Forest Strategy Director

State Forester Mukumoto, Chair Kelly, and Members of the Board:

Thank you for the opportunity to provide comments on the draft *Vision for Oregon's Forests*. As landowners, forest stewards, scientists, and fire managers, The Nature Conservancy (TNC) works closely with the Oregon Department of Forestry (ODF) on a range of issues related to the health and resilience of Oregon's forests. Living in communities around the state, we manage lands and waters in varied ecosystems and partner with ranchers, farmers, fishers, timber, and environmental interests on some of the most challenging conservation issues facing people and nature.

Our work has long focused on ecological restoration and beneficial fire use in Oregon's seasonally dry forests to increase forest resilience, reduce wildfire risk to communities, and sustain the many benefits these forests provide now and into the future. We plan, implement, and monitor large-scale, ecological forest restoration and prescribed fire projects on our own lands and in partnership with local, state, federal, and tribal partners on thousands of acres each year. We also support climate-smart forestry in the highly productive forestlands across western Oregon and the Coast Range, which have the potential to play a globally significant role in sequestering and storing carbon to mitigate climate change while providing habitat conservation benefits.

TNC commends ODF's efforts to tackle such an aspirational and large-scale strategy for all of Oregon's diverse forest types and the people and communities that depend on them. We support ODF's intention to craft a new vision and mission to guide the agency, including a holistic suite of strategies that we hope the agency will organize around to shift and accelerate forest management to better address current conditions in and threats to Oregon's forests. In particular we want to highlight, emphasize, and expand on the following important themes:

- Recognizing the diversity of Oregon's forests, people, and communities, and the need to integrate and reflect the uniqueness of these social-ecological systems in forest policy and management actions;
- Grounding the Vision document in forest and community resilience, and the critical importance of science-based management to restore and sustain healthy, functioning ecosystems from which the broadest suite of benefits (i.e., ecosystem services, including carbon sequestration and storage) to nature and people will flow;
- The need for stable, adequate, and equitable funding, invested holistically in wildfire mitigation strategies that address both landscape resilience and fire-adapted communities;

- The importance of safe *and effective* wildfire management, to protect the safety and wellbeing of people, communities, and firefighters, and use the state’s limited wildfire funds responsibly in the face of increasingly severe wildfire;
- Affirming commitment to implement the Climate Change and Carbon Plan and recognizing the significant carbon sequestration and storage potential of Oregon’s wet and coastal forests;
- Identifying and investing in forest management infrastructure that is oriented to forest resilience and climate goals, including a workforce with the training and skills to respond to contemporary forest management challenges and a forest products sector that is scaled and tooled to support management for forest resilience and climate mitigation;
- Promoting collaboration and shared stewardship across all ownerships, and investing ODF time and resources in that collaboration, and;
- Recognizing the importance of and responsibility to Oregon’s Tribes, their sovereignty and self-determination, and their access to and stewardship of the land.

With those themes in mind, we respectfully provide the following overarching comments as well as comments on specific priority areas.

Emphasis on the implementation of existing plans and policies. There are several strategies that include *implementation of previously adopted plans*, including the 20-Year Landscape Resiliency Strategy, the Climate Change and Carbon Plan, or others. Several of the strategies under each goal are relatively passive, reading more like ‘desired outcomes’ instead of specific actions or steps ODF will need to take for implementation. It is important to ask, what does ODF need in terms of resources, funding, and staff to implement these already adopted plans, and are the plans on track? If not on track, what is needed to adjust and adapt implementation? If on track, how do ODF and partners build upon the great work that was done to craft these policies and plans to increase the quality, pace, and scale of the work? In short, identifying challenges and opportunities to implementation and ODF’s previous commitments to partners would be helpful in upcoming legislative advocacy.

Coordinate with state, federal, tribal, and private landowners and partners. TNC is encouraged to see ODF elevate the need to work collaboratively with different partners. This is particularly important as ODF’s work spans the state and should include community-based input and solutions. We have questions on how this Vision document interacts with other strategic documents both within ODF as well as external partners. To be effective, there needs to be a clear connection describing how this document with actually drive policies and programs to support on-the-ground projects across the state. Addressing this overarching question in the document would help external audiences understand the importance of the Vision as the agency and Board’s strategic plan, and know where and how to support its implementation through other policies and programs.

Priority: Resilient forests. TNC welcomes the renewed emphasis throughout the Vision document on resilient forests with the aim of reorienting management to promote healthy, functioning forest ecosystems rather than maximizing any one value or subset of values. Inherent to managing towards this goal is an emphasis on restoring the natural processes, such as fire and natural regeneration, that are a fundamental building block for ecological function, as well as a central strategy to helping many of Oregon’s forests adapt to climate change. This is an area where ODF should invest and leverage its stewardship forestry and fire personnel and resources, building internal and external knowledge, skill, and experience to support climate-adaptive forestry and the expanded use of prescribed fire.

Priority: Resilient communities. TNC is encouraged to see increased emphasis on the reciprocal relationship between forests and society in restoring, protecting, and sustaining healthy ecosystems and communities. Science supports the principle that managing for ecological function and ecosystem integrity does not inherently maximize any individual value, but does sustain the broadest suite of benefits to both nature and people. This is a particularly important principle in an era when rapidly changing climate will make us all increasingly dependent on resilient forest ecosystems and the many ecosystem services they provide.

It is also particularly important that ODF and society writ large think about the distribution of positive and negative impacts (i.e., benefits and burdens) of both the current forest and fire management system, as well as the impacts of the new system this Vision describes, in order to realize equitable outcomes in both. We know that these benefits and burdens are not spread equitably across communities in Oregon, and we recommend ODF utilize tools and data, such as the Social Vulnerability Index and Community Adaptive Capacity, to understand and better integrate equity and inclusivity in decision making, landscape prioritization, resource allocation, and investment in forest and fire management across the state.

Priority: Addressing the wildfire crisis. TNC supports the need for proactive investments in wildfire mitigation strategies—both landscape resilience and fire-adapted communities—as an essential part of any long-term solution to wildfire management. It takes urgent, proactive steps to support healthy, resilient ecosystems and livable communities for generations to come. Sustaining our forest ecosystems and reducing wildfire risks to people and property requires a stable, adequate, and equitable funding structure that is more flexible than the current biennial budget structure.

It is also important to recognize that fire is a critical part of the solution in addressing the trend of increasingly severe wildfire. Many of Oregon’s ecosystems are dependent on fire, and have evolved with a variety of different eco-cultural fire regimes resulting from both lightning-caused and indigenous use of fire. To this end, we are encouraged to see a renewed focus within the Vision on state-led efforts to invest in and expand the use of prescribed fire in forest management and to increase community education on the use of prescribed fire, smoke management, and public health. Although this is an ODF-specific document, it is important to note that there are other state agencies engaged in this complex, cross-sector work, such as the Department of Environmental Quality (DEQ), the Oregon Health Authority (OHA), and the Department of the State Fire Marshal (DSFM)—all critical agencies that need to have adequate and stable funding to do this work.

Placing a priority on the wildfire crisis also presents an opportunity for ODF to invest in and support Oregon’s Tribes in their own vision and goals to build and expand their own prescribed fire and cultural fire use programs and capacity. We strongly encourage ODF to dedicate time and resources to tribal partnerships in service of tribally-led fire programs.

Collaborating effectively across local, state, federal, and Tribal partners in the implementation of the 20-Year Landscape Resiliency Strategy will be critical to reducing wildfire risk, restoring resilient landscapes, and sustaining the broadest suite of ecological, social, and cultural values. TNC strongly encourages ODF to invest in the capacity and resources necessary to build on this strategy and ensure its adoption and integration as a principal “roadmap” to guide execution of this Vision. This investment is particularly important to ensure coordination and alignment at the local level, where statewide strategies can be seen as either a coalescing force and a much-needed accelerator, or as a confusing hinderance to locally-led landscape planning and prioritization.

Priority: Climate Leadership. TNC is excited to see that Climate Leadership is an ODF priority. In conjunction with the reduction of fossil fuel-based emissions, natural climate solutions, including climate-smart forest management, are a critical part of our approach to climate mitigation and adaptation.

Climate-smart forestry as defined in ODF's Climate Change and Carbon Plan includes a broad spectrum of silvicultural practices with varying degrees of carbon sequestration potential. Improved forest management as a natural climate solution (NCS) practice should emphasize activities with high sequestration potential such as extended rotations and variable retention timber harvest. It is also critical to apply sufficient ecological sideboards to maintain resilience, improve ecological function, and avoid unintended consequences, such as reforestation or afforestation that is ecologically inappropriate in a given ecosystem or biophysical environment.

As one of the four agencies that received Natural Working Lands Fund (HB 3409) investment, ODF is a key agency in helping the state meet its greenhouse gas emissions reduction goals. We look forward to working alongside ODF to support fund distribution and program implementation to increase use of NCS forest management practices to sequester and store carbon in Oregon's wet and coastal forests.

In conclusion, thank you again for the opportunity to provide comments on the draft *Vision for Oregon's Forests*. We are appreciative of ODF leadership, the Board of Forestry, and the committee's work on this strategic document and for the continued outreach and engagement the agency has conducted throughout the process. We encourage and support ODF in taking this step and stand ready to assist where possible in making this Vision as strong and bold as possible to guide implementation of the identified priorities for the benefit of nature and people. Thank you for your consideration.

Sincerely,

Kyle Smith
Director of Government Relations
The Nature Conservancy – Oregon

Pete Caligiuri
Forest Strategy Director
The Nature Conservancy – Oregon

From: oregon-gov-web-services@egov.com
To: [KRAWCZYK Joy P * ODF](#)
Date: Tuesday, May 14, 2024 10:38:13 AM
Attachments: [forms submission.csv](#)

Name	Vickie Schroeder
Email (Optional)	vschroeder763@gmail.com
Comments	<p>I married a timber feller. He has been cutting since 1976. His father was a feller and our son is also a tree feller/logger. Back in the late 70's and early 80's there was production, everyone including the government was making money. Replanting of trees was being done and the forest were being managed and thriving. Fires in Oregon were very few and if there were fires the loggers put them out, "no Special fire fighters to fight fires that have been left to grow out of control and then move in and take care of it mentality like it is now." I think the management plan back then was diversified enough that all entities were benefiting from logging. Of course there are always some kinks, bad people and such. The ENVIRONMENTAL EXTREMIST are part of a huge problem. Don't log, they are cutting down all of forests. The lies have to stop. Restrictions on logging have slowed it to a trickle and fores have destroyed marketable timber that could have funded the school, benefited people with jobs oh and they would be paying taxes on those earning. Instead you have been leaning towards all the extremists demands and now infringing on small woodland owners. We have worked hard for what we have and planned and managed our timberland's that would benefit us in later years when it is mature and ready to be harvest. ODF has successfully shut down mills that would cut larger timber. We are harvesting future old growth trees. The fires that we had Labor Day 2020, destroyed during Oregon's unprecedented 2020 wildfire season. Oregon's 2020 Labor Day Megafires. Acres burned. Archie Creek. 131,542. Beachie Creek. 193,573. A lot of this was old growth timber up the Clackamas river that has been destroyed now the Environmentalism want more set aside, don't log the burnt timber . FOR What? to fuel the next fire that goes thru to make it so nothing would grow because the ground will be so depleted it will not support growing plants. If you look back thru time EVERYTHING that the EXTREMIST demand turns out badly. Management of our timbers lands like a crop ids responsible. Quit putting so many restrictions on the timber industry and small woodland owners. Manage to prevent wildfires like Beachie Creek and other out of control fires that destroy the timber lands, people's homes and people. Environment for endangered species, was destroyed in those fires and now we are supposed to set aside more for them? How much more is going to be taken out of the governments pockets as well as the tax payers for firefighting when you won't work on prevention to begin with. My grandchildren may become timber fallers and loggers one day if you don't shut the forest down to nothing by the time they are old enough. Be responsible and manage it like we did back in the days of prosperity for</p>

everyone. Make some changes but dumbing down the harvest will not benefit anyone but the people who go to put fires out and that is truly sad and a waste of resources.

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May 24, 2024

Submitted via: <https://www.oregon.gov/odf/board/pages/commentsvision.aspx>

Oregon Department of Forestry
2600 State Street
Salem, OR 97310

RE: Comments on the draft Vision for Oregon's Forests

Dear Chair Kelly and Board of Forestry Members:

Thank you for the opportunity to comment on the draft "Vision for Oregon's Forests." This has been a multiyear process with several iterations of the draft plan and while this version still needs refining, the plan has improved over time. We appreciate the time and resources the Board of Forestry (Board) and the Oregon Department of Forestry (ODF) have spent on developing the plan.

Process Concerns

While a lot of work has gone into the process, we don't believe it has been as inclusive as it should have been. Starting with this public comment period, ODF only allowed 16 days for people to submit comments. This is too short considering the significance of this document. Most ODF comment periods are much longer. Also, the public comment period ends less than two weeks before the Board is scheduled to vote on the plan. How can staff review, organize, and consider public comments thoughtfully with such a short turnaround? Furthermore, the subcommittee met and changed the draft plan during the middle of the comment period. It appears those edits are unavailable online, so people aren't commenting on the most recent draft of the plan. This is all very concerning, to say the least.

Leading up to now, there have been very few opportunities for the public to comment on the plan. The subcommittee did not allow for public participation and almost all of the full Board meetings that covered this topic were during Board retreats, where there is no opportunity for testimony. The only real chance to comment was during the surveys and meetings led by Oregon's Kitchen Table. Yet, those options never discussed the specific document, just high-level concepts and questions about Oregon's forests. Stakeholders were only approached very early in the process before the draft plan came together and were never reached out to again. Even ODF committees like the Forest Trust Land Advisory Committee, the State Forest Advisory Committee, or the Committee for Family Forestlands were not engaged during this process. It's disappointing that a public agency drafting a plan that applies to all forestlands in Oregon would not be developed in a more transparent and inclusive process.

General Comments

A lot of thought and wordsmithing has gone into this document, but sadly, it grossly omits the forest products sector and natural resource-dependent communities. Sustainable forest management practiced by most landowners is not acknowledged or appreciated in this plan. Instead, the document suggests all of Oregon's forests are in dire straits when most private forestland is third-party certified under the Sustainable Forestry Initiative, American Tree Farm System, or Forest Stewardship Council.

Additionally, those who work in the forest sector or live in rural communities that rely on forests are largely ignored in this draft. Instead, ODF and the Board should have used this plan to validate the unique and acute relationship they have with forests and the forest sector. Those communities often feel forgotten and it's a missed opportunity to address their circumstances and concerns in this document. To highlight these concerns, I would note that the word "climate" appears 33 times in the plan while the words "timber" and "wood products" appear three times and once, respectively.

Another omission in this plan is the Private Forest Accord (PFA). This historic and massive agreement between the forest products sector and the environmental community should at least be acknowledged and appreciated in this document. It will be ODF and the Board's responsibility to see the agreement through. The Board should be encouraging collaboration like the PFA in a plan like this, instead of ignoring it.

The document also makes a lot of specific claims that are not supported with citations. For example, the first two sentences on the first page under "Purpose" claim that Oregon's forests are vulnerable and in decline, but fail to include references to support this (which most private forest managers would disagree with). The document frequently references "science" but fails to refer to any scientific studies to support claims made throughout the document, mainly in the "Context" sections.

It also seems like Appendix D, which explains who ODF and the Board, are should be at the beginning of the document.

Specific Comments – Organized by Section

The introductory section

- Under "Purpose", the first two paragraphs should be swapped and edited. To make broad-sweeping claims and controversial statements at the outset of this plan sets an unfortunate tone. We should be promoting and celebrating the accomplishment of the forest products sector while addressing the challenges our state faces – like our housing crisis.
- We appreciate the inclusion of "forestry infrastructure" under the list of "shared values."

Priority: Resilient Forests

- The first sentence under "Context" needs to include citations to support this claim.
- The sentence in the second paragraph under "Context" that starts with "Beyond the legal requirements of..." is a jumbled run-on sentence.
- The first bullet under "Strategies" should be removed or edited. Specific forest management prescriptions should be place-based and decided among local land managers.
- The fourth strategy about carbon fails to mention that all forests already store and sequester carbon at all stand levels.
- Delete the strategy about Oregon Administrative Rules. Applying more rules to landowners is more likely to disincentivize them.

- Delete the last strategy about State Forest funding. This is not the place for this discussion.

Priority: Resilient Communities

- Overall, this priority says nothing about natural resource-dependent communities. This is a glaring oversight that perpetuates concerns that most rural Oregon communities and their challenges are not taken seriously.
- ODF and the Board should have used this section to recognize the economic benefits and social fabric that the forest product sector provides to these communities.

Priority: Addressing the Wildfire Crisis

- This section has gone through many versions and we support how it is currently written.

Priority: Climate Leadership

- Delete the first strategy. The Climate Change and Carbon Plan exists outside of this plan and its implementation should be left out of this conversation.
- Delete the third strategy. Specifics about State Forests will be addressed through other plans and processes and do not need to be referenced here.

Priority: Organizational Excellence

- This section (as with most of this plan) mostly ignores the reliance ODF and the state have on the private sector to perform work on all forest landownerships. This is another missed opportunity to appreciate and promote the forest contractor and forestry infrastructure workforce, as well as wildland firefighters.

According to Appendix A, ODF plans to have a robust process to consider the recommendations in this plan. This process must include stakeholders and forestry experts early and often. There needs to be more opportunities for the public to weigh in on the process and materials directly.

Thank you again for the opportunity to provide these comments on the draft Vision for Oregon's Forests. We hope this feedback is seriously considered as you finalize this draft and into the future.

Sincerely,



Laura Wilkeson
Oregon Director of Government Affairs
Hampton Lumber



TO: Chair Kelly, members of the Board of Forestry
FROM: Michael Lang, Senior Policy Manager, Wild Salmon Center
CC: State Forester Cal Mukumoto, ODF Staff
DATE: May 24, 2024

Thank you for the opportunity to comment on the Vision for Oregon's Forests. Wild Salmon Center is a nonprofit organization based in Oregon that works with local partners to protect and restore healthy forests and abundant clean water to support the strongest remaining runs of wild Pacific salmon. We use science to drive policy, lead planning processes, and support implementation of durable conservation protections.

The Oregon Department of Forestry refers to the "Vision for Oregon's Forests" as a strategy plan, however the document lacks key components of a strategic plan. For example, there is a lack of actual outcomes and measures that would result from the implementation of the strategic plan.

Without performance outcomes or indicators, there is no accountability to the plan or an ability to evaluate its implementation. As drafted, it appears that the document is more of a vision statement and not a strategic plan. WSC understands that performance measures for the new state forest forest management plan are under development. We recommend including references to these performance measures in the strategic plan.

Recommendations:

- Develop specific, measurable, attainable, responsible and time-bound (SMART) goals evaluated on an annual basis.
- Determine performance measures to track performance and measure whether goals are being achieved.
- Monitor annual progress toward achieving goals.

Private Forest Accord:

The Private Forest Accord (PFA) represents the single biggest change in Oregon Forest Practices in decades, covering 10 million acres of private forest land. Obligations under the SB 1501 and 1502 include the completion of a habitat conservation plan (HCP) by 2027, implementation of an incidental take permit (ITP) and adopting tethered logging rules. The PFA also established the Adaptive Management Program, consisting of both the Adaptive Management Program Committee (AMPC) and the Independent Research

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and Science Team (IRST). This new program and process to evaluate the effectiveness of the rule changes to achieve biological goals and objectives will be a critical component of the Board and Department's work into the future.

In the entire document there is no mention of the implementation of the PFA. This should be elevated to a high level priority with specific measurable goals/outcomes and annual progress reports.

Recommendations:

- Elevate the PFA requirements in SB 1501 and 1502 to a high level priority.
- Develop specific measurable goals/outcomes and regular progress reports.
- Continue collaboration with other key state and federal agencies.

State Forests

The draft Strategic Plan does not mention the state forest HCP or Forest Management Plan (FMP), yet these are critically important steps in updating state forest management and ESA compliance. In March, 2024, The Board directed the ODF staff to work with federal agencies to complete the HCP for Western Oregon State Forests. In 2025, the FEIS and Biological Opinion are expected to be completed and Incidental Take Permits issued. A new state forest management plan is expected to be finalized and adopted in 2025 along with new performance measures.

On a parallel track, the State Forest revenue model is in need of modernization and funding diversification, particularly with the implementation of the HCP and an anticipated reduction in harvest and revenue under the HCP.

Recommendations:

- Prioritize completion of the state forest HCP and the adoption of a new FMP.
- Include the development of performance measures for the state forest FMP in the strategic plan.
- Work with the Governor, legislators, counties and interest groups to revise and diversify the state forest revenue model.

Climate Change and Carbon Plan

WSC is pleased to see that the Board is considering a "Climate Leadership" priority in its draft strategic plan and we support strategies that implement the Climate Change and Carbon Plan and its goal to establish Oregon as a national leader in climate smart forestry. We are also encouraged that the ODF is considering a carbon storage performance measure for state forests. We recommend the addition of strategies that are consistent with the SMART model, including the development of key indicators and a monitoring and evaluation system to ensure the ODF is on track to attain its climate and carbon goals.

Recommendations:

- Develop a baseline carbon inventory for state forests and for proposed habitat conservation areas and riparian conservation areas.
- Set targets for increased carbon sequestration and storage and a road map to achieve those targets.

Thank you for considering these comments and recommendations.

Sincerely,

Michael Lang
Senior Policy Manager
Wild Salmon Center