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Forest practices

2 Addressed In Current Work Plan

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Current work plan (Issue 6, Objective 4) regarding specified resource site protection rules is examining existing protection requirements. Significant wetlands are included as specified resource sites, and their protection will be addressed as this work plan progresses.

90	significant wetland protections in Forest Practices Act	Jennifer Weikel
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Staff Comment See Issue ID 88 staff analysis.

140	Improve Coordination in developing areas	Derrick Tokos
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Staff Comment The work group appointed by the Board to review issue scan input has identified delivery of ODF services in developed and developing areas as important for Board consideration, part of a larger concern about forestland ownership change and sustainability of Oregon's forest land base.

In the Outreach to Urban Populations workplan, one of the products of Objective 1 is "Develop a strategy for integrating urban forestry services and other Department programs targeting the Portland metro area." That product would begin to address the commenter's concern over the transition from forest to urban land use in specific areas.

ODF Activities

ODF is currently involved with local governments to some degree, as follows:

1. The department's Urban and Community Forests Program works closely with local governments, but the program's resources are strained. Stewardship foresters with the department's Private Forests Program work with landowners in urbanizing areas as well, but this is at the expense of preventive work and inspections on forested tracts in the more rural areas. As part of Objective 1 in Workplan 4, the department is seeking ways to gain more field positions for work in urban areas.

2. ODF is a signatory to a multi-agency memorandum of understanding in which ODF agrees to require approval from the appropriate agencies of a land use change activities before waiving forest regulations. Other signatories include the Oregon Departments of Agriculture, State Lands, Fish and Wildlife, Parks and Recreation, Land Conservation and Development, and Environmental Quality. In addition, before ODF will waive the reforestation requirements on a parcel after a harvest, the landowner must provide ODF written documentation that the local government allows that change.

3. Under ORS 527.722, any local government may develop its own local forest practice ordinance to apply within the local urban growth boundary. When this is done as prescribed in the statute, the local regulation takes the place of the Forest Practices Act within the local jurisdiction inside the urban growth boundary. This process allows the local government to address items of local interest, such as esthetics or increased tree retention in harvest units, which for the most part are not addressed under the Forest Practices Act. ODF works closely with local governments planning to adopt local forest practice ordinances. To date, at least 21 local governments (cities, for the most part) in Oregon have taken advantage of this option.

Improved Coordination Needed

ODF agrees that improved coordination of state and local regulations, including local permitting requirements, would help avoid problematic situations. The department has observed situations where landowners attempt to build roads and harvest trees under the Forest Practices Act standards before development in an attempt to avoid the local permitting standards in development permits. Improved coordination would require the willing participation of ODF, other state agencies, and local governments.



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160	Stream Restoration	Brett Brownscombe
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*Staff
Comment*

Ensure FMP and FPA support coho recovery, especially addressing known limiting factors:

The Coast Coho Conservation Plan calls for roughly doubling the amount of fresh water habitat presumed to be needed to reach conservation plan goals. Steps that have been taken since the adoption of the conservation plan include:

- o Successful collaboration between the Board of Forestry, ODF and EPA to streamline process for forest landowners to place large wood in streams for fish habitat.
- o Engage forest and agricultural landowners who live in coho intrinsic habitat areas to implement appropriate projects.
- o New ODF Riparian Specialists positions will work directly with landowners and department field staff support project implementation.
- o Forest landowners are updating their set of Oregon Plan services. Oregon Trout's assistance in the development and implementation of these projects is welcome.
- o Board of Forestry evaluation of the Forest Practices Act is continuing with regard to incentives that will lead to increased availability and placed large wood. Oregon Trout's input is appreciated to ensure new rules or voluntary measures are successful. An adaptive management process is in place for evaluation of the FPA. Oregon Trout's participation in rule evaluations now and in the future is necessary to ensure new rules or voluntary measures will successfully achieve the intended outcomes.

Comments Specific To State Forests

- As part of the adoption of the Northwest and Southwest Oregon Forest Management Plans (FMPs), the Board of Forestry committed to evaluating watershed conditions using watershed analysis, with a focus on identifying and evaluating limiting factors. ODF has been implementing watershed analysis at a pace consistent with available funding (4 completed, 1 in progress).

Effectiveness of Forest Management Plan (FMP) Strategies to Address Limiting Factors

- State forests is a partner in monitoring and research projects that are attempting to understand the effectiveness of FMP riparian and aquatic strategies in meeting goals to protect or improve aquatic habitat. Specific projects include: the Trask River Watershed Study and RipStream (a collaborative project between private and state forests).

167	Review and Revise Regulatory Approach	Mike Gaudern
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*Staff
Comment*

The BOF and the Private Forests Program are trying to move away from a one-size-fits-all approach to regulation, using the dynamic ecosystem approach. We also provide the option of alternate practices, which allow all landowners to develop an alternate approach that achieves better results for the landowner. While there appears to be support for a more site-specific approach, there is also a demand to keep regulations simple and easily understood. These countervailing concepts raise challenges in moving forward on solutions.

172	notification to owners of dwellings at landslide risk	Nancy Nichols
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*Staff
Comment*

See issue no. 18

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3 General Comments Not Related To Specific Work Plan

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43	Sustainable, precautionary approach	Nyles Jahansel
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Staff Comment The Vision of the 2003 Forestry Program for Oregon begins with the principle of healthy forests providing a sustainable flow of environmental, economic, and social benefits.

The general precautionary approach requested advocates regulation or prohibition unless proven safe or that regulation is unnecessary. In the context of the Forest Practices Act, the Board is required to act only upon documented evidence that degradation of resources is likely under existing regulations. There is a perceived gap between proving a specific level of activity is safe and proving it is unsafe.

The FPFO value statement 9. applies: Continuous learning. We are committed to continuous learning. The results of forest management policies and programs should be evaluated and appropriately adjusted based upon ongoing monitoring, assessment, and research.

46	sustainable, precautionary approach	Maxine Centala
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Staff Comment The 2003 Forestry Program for Oregon (FPFO) begins with a vision statement advocating "healthy forests providing a sustainable flow of environmental, economic, and social outputs and benefits." The challenge is in arriving at a common perception of what is "truly sustainable".

The reduction of carbon emissions is a factor of utilization, reduction of fuels at risk in wildfires, and smoke management during controlled burning. The FPFO supports efforts in all aspects of reducing carbon emissions within the context of natural disturbance and active management.

The precautionary principle advocates regulation or prohibition unless an activity is proven safe to some specified degree of certainty. Within the context of the Forest Practices Act the Board is prohibited from adopting standards unless there is monitoring or research documenting that degradation of resources is likely under existing regulation. There is a perceived gap between what can be proven safe and what can be proven unsafe.

Air quality, water quality, and pesticide use standards are currently established by either the federal Environmental Protection Agency, or the state Department of Environmental Quality. Those standards can be considered as using the precautionary principle, by setting levels of exposure that are considered safe. The standards applied through the Department's Smoke Management Plan and Forest Practices Act are established to meet or exceed those safe exposure standards. For example the use of pesticides on forest land under the Forest Practices Act may be more but never less restricted than EPA allows.

62	sustainable, precautionary approach	Robert Purdy
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Staff Comment The Vision of the 2003 Forestry Program for Oregon begins with the principle of healthy forests providing a sustainable flow of environmental, economic, and social benefits.

The general precautionary approach requested advocates regulation or prohibition unless proven safe or that regulation is unnecessary. In the context of the Forest Practices Act, the Board is required to act only upon documented evidence that degradation of resources is likely under existing regulations. There is a perceived gap between proving a specific level of activity is safe and proving it is unsafe.

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The FPFO value statement 9. applies: Continuous learning. We are committed to continuous learning. The results of forest management policies and programs should be evaluated and appropriately adjusted based upon ongoing monitoring, assessment, and research.

75 sustainable forestry Zac Zuppas

Staff
Comment

This comment is a general value statement about clearcuts and other aspects of forestry.

The board supports sustainable forest management through its mission to "lead Oregon in implementing policies and programs that promote environmentally, economically, and socially sustainable management of Oregon's 28 million acres of public and private forests." Sustainable forest management is defined as meaning that forest resources across the landscape are used, developed, and protected at a rate and in a manner that enables people to meet their current environmental, economic, and social needs, and also provides that future generations can meet their own needs. (This is based on ORS 184.421).

Regarding old growth forests, the Board's strategic document, the Forestry Program for Oregon (FPFO), outlines four broad categories of forests and the roles they play in sustainable forest management. The Reserve category includes parks, reserves, wilderness, and special areas for natural cultural values. These will be the types of forests where most old growth is to be found and where it contributes to sustainable forest management.

123 Urban Stream Protection Pat Russell

Staff
Comment

ODF does not administer the forest practices act within the urban growth boundary of the City of Portland. Pursuant to 527.722, the City of Portland has adopted land use regulations to achieve protection of soil, water, air, and fish and wildlife resources.

This submission does point out the institutional barriers to coordinated resource policies. In this case, a fish barrier prevents access to riparian habitats. Tree cutting ordinances are the purview of the City of Portland, and riparian habitat restoration is coordinated by Metro.

ODF does not have a regulatory role, however negative attention may be drawn to forest practices because notifications must be obtained to sell the logs. Neighbors see the notification and ask ODF to prevent the tree harvest.

The Urban Forestry Outreach workplan seeks to address aspects of this submission.

This submission is related to Issue ID 125.

125 Urban Harvest & Riparian Habitat Pat Russell2

Staff
Comment

ODF does not administer the forest practices act within the urban growth boundary of the City of Portland. Pursuant to 527.722, the City of Portland has adopted land use regulations to achieve protection of soil, water, air, and fish and wildlife resources.

This submission does point the institutional barriers to coordinated resource policies. In this case, a fish barrier prevents access to riparian habitats. Tree cutting ordinances are the purview of the City of Portland, and riparian habitat restoration is coordinated by Metro.

Odf does not have a regulatory role, however we get the "black eye" because notifications must be obtained to sell the logs. Neighbors see the notification and ask ODF to prevent the tree harvest.

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3 General Comments Not Related To Specific Work Plan

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The Urban Forestry Outreach workplan addresses the root of this submission, but has not yet reached this neighborhood.

The work group appointed by the Board to review issue scan input has identified delivery of services in developed and developing areas as a key issue for Board consideration, part of a larger concern about sustaining Oregon's forest land base.

This submission is related to Issue ID 123.

144	Eliminate Posting of Prohibitive Bond	Samantha Chirillo
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Staff Comment HB 3396 (1987) provided an opportunity for persons adversely affected by operations requiring a written plan under ORS 527.670(3) to request a hearing under ORS 527.700(3). In addition, those persons may request a stay of operation (ORS 527.700(8)) but, if granted, must "give an undertaking [bond] which may be in the amount of the damages potentially resulting from the stay, but in any event shall not be less than \$15,000."

The intent was to deter frivolous actions and to provide compensation to forest landowners and operators if the adversely affected party did not prevail in the appeal.

4b Issue for staff to address

Issue No.	Topic	Submitter
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39	water temperature for salmonids	Bob Rees
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Staff Comment The State Forests Program complies with the state Forest Practices Act, a mechanism for meeting state water quality standards, and employs additional measures to meet our broader management objectives. Fish Habitat is linked to riparian areas that provide important functions such as recruitment of large wood to streams forming pools and retaining spawning gravels. These areas also provide shade to maintain cool temperatures and are important sources of nutrients. The State Forests Program's additional measures, as described in the forest management plan, call for the establishment of wide Riparian Management Areas (RMAs) along all fish streams and most non-fish streams to protect these functions. Management within RMAs along fish streams only occurs to promote mature forest conditions (a condition considered likely to provide temperature needs for spawning and rearing of sensitive salmonids) in a timelier manner. The Program performs watershed analyses to determine limiting factors for fish habitat and describe actions that can be taken to improve fish habitat.

Current monitoring includes:

- The Trask River Watershed Study to evaluate the effects of forest management on water quality, fish habitat, and aquatic biota (including fish) at the site and watershed scales.
- The RipStream project that is evaluating whether the State Forests Management Strategies prevent increases in stream temperature on small and medium fish bearing streams. The study is also evaluating the riparian structure in RMAs, large wood recruitment, and shade.
- Collaborating on a study with Tillamook Estuary Project to monitor status and trends in stream channels (relative bed stability) throughout the five rivers that drain into Tillamook Bay.

87	notification system improvements	Tally Patton
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4b Issue for staff to address

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Staff Comment This request addresses an ongoing concern with the dissemination of information required and contained on notifications of operation. The issue is focused on copies provided through "subscription" to one party which are subsequently passed to another organization and posted on the internet. The Forest Practices Act (ORS 527.670 (6)) allows the State Forester to determine what "other information [is] considered by the State Forester to be necessary for the administration of the rules promulgated by the board pursuant to 527.710." The Board has not involved itself in matters of detail required on the notification forms, although they may choose to do so.

The department has reviewed the concerns expressed by Ms. Patton, and is sympathetic to those concerns. The Department sought the advice of general counsel and was advised to retain the requirement for a specific named individual to print and sign their name on the notification form as currently required. It is up to the company to decide who will sign on behalf of the company. The required information is not privileged and may not be redacted.

We are unaware of the details regarding the "accidental" listings of unlisted phone numbers, but beyond emphasis and advice, it is difficult to see what the Board could do to prevent something already acknowledged as "accidental".

89	noxious weed control	Tally Patton
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Staff Comment Analysis
This issue is related to the Draft Invasive Species Work Plan, but staff has not made enough progress on the plan to include specific elements. The work group appointed by the Board to review the issue sscan input identified invasive species as a key topic for Board attention.

There is currently some uncertainty over when treatments of invasive plants should be considered forest operations subject to the Forest Practices Act and when the activity would not meet that condition.

Staff Response

Staff has been aware of this issue for several years, but has not had the resources to complete a review. Private Forests staff is currently developing a program issue paper as a tool to review the issue of when invasive plant treatments should be considered operations subject to the Forest Practices Act. However, other priorities are delaying completion of the paper.

143	Transition from current practices to raising hemp	Samantha Chirillo
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Staff Comment State Policies
The State of Oregon is committed to encouraging growing and harvesting of forest trees on private forestlands. ORS 527.630 (part of the Forest Practices Act) describes state policy as being to "...encourage economically efficient forest practices that ensure the continuous growing and harvesting of forest tree species and the maintenance of forestland for such purposes as the leading use on privately owned land, consistent with sound management of soil, air, water, fish and wildlife resources..."

Board of Forestry Policies

In its 2003 Forestry Program for Oregon, the Oregon Board of Forestry states "We believe different land ownerships play different roles in achieving the full suite of environmental, economic, and social needs met by the forested landscape" (p. 13, Value Statement 7). Action C.2 on page 15 of the same document notes that "The board recognizes different owners have different objectives for land ownership with different emphases on conservation, commodity production, multiple use, and residential values."

Analysis of pesticide uses is included in other portions of this issue scan report.

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4b Issue for staff to address

Issue No.	Topic	Submitter
150	Animal Damage Control Alternatives	Ivan Maluski
<i>Staff Comment</i>	<p>The Private Forest program does not have a policy on removal of nuisance bears. The Private Forest program does collect bear damage information during its annual aerial forest health survey, which is provided to the US Forest Service, landowners, researchers, and the general public upon request. Special aerial surveys for bear damage were conducted in southwest Oregon in the spring and fall of 2006 in support of a special bear damage assessment project being conducted by the Oregon Department of Fish and Wildlife.</p> <p>A general policy on control of nuisance animals, including bears, would be the purview of the Oregon Department of Fish and Wildlife.</p>	

Pesticides

1c New Topic: Staff Work-Board Action

Issue No.	Topic	Submitter
40	Review literature on toxicity of forestry chemicals	Bradley Knotts
<i>Staff Comment</i>	<p>ODF has received many comments stating that significant research into potential negative effects of forest pesticide use has taken place since the board and department last reviewed such effects in 1995 through 1997. Requests for increased priorities on forest pesticide research and monitoring are elements of multiple submissions to the issue scan.</p> <p>ODF agrees that there may be a large body of new research, but the department is not aware of any comprehensive reviews of new research literature related to negative forest pesticide effects on humans or other nontarget organisms. Such a review would allow the board and department to determine how to respond to requests for increased or changed forest pesticide regulations.</p> <p>ODF recommends the following staff work: Contract with a qualified party to conduct a literature review of research related to potential nontarget effects of forest pesticides used in Oregon. ODF would explore whether the review should be related to top-priority monitoring/research question #75 in the ODF Forest Practices Monitoring Program Strategic Plan, which asks what levels of contamination are injurious to aquatic biota, and moderate-priority monitoring/research question #79, which asks if water quality is protected from pesticide formulation inert ingredients and additives.</p> <p>Staff work on this can include promotion of this idea with the legislature and other agencies with shared interests. Options for moving forward with the idea, including funding, would come before the Board before going through the next legislature.</p>	



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Issue No.	Topic	Submitter
64	keep monitoring as low/medium priority	Rick Williams
<i>Staff Comment</i>	See Issue #28	

4a Outside Board Purview

Issue No.	Topic	Submitter
37	ban use within 300 feet of streams	Andrew Orahoske

Staff Comment Court-Ordered Buffer Zones
 The commenter apparently refers the 2004 injunctive order issued by the judge in Washington Toxics Coalition vs. U.S. Environmental Protection Agency (EPA) (the litigation began in 2002). The original order was that EPA would be required to consult with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service on the effects of a list of specific chemicals on threatened or endangered salmon species. The 2004 injunctive order specified that until EPA completed the consultations, the agency would be required to prohibit of the listed chemicals within the following distances of salmon supporting streams:

- Twenty yards for ground-based applications
- One hundred yards for aerial applications

The order allows exceptions under some circumstances. Court-ordered EPA review since 2004 has removed many of the chemicals on the original list. Of the chemicals used in forestry in Oregon, only triclopyr ester remains on the list of chemicals for which the buffers are required for terrestrial applications.

For the following reasons, ODF concludes that it is not appropriate for the Board of Forestry to use the injunctive order as a directive or guide for protective measures:

1. The order is not binding on the Board of Forestry.
2. The order is merely a conservative interim preventive measure to be instituted until the required federal consultations take place; it does not specify what protection levels must result from the consultations.



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4b Issue for staff to address

Issue No.	Topic	Submitter
28	Schools, water, monitoring	Joel Robe

Staff Comment

The following response addresses a range of pesticide-related concerns raised during the Board of Forestry's 2007 issue scan. After reviewing the issue scan material, the work group appointed by the Board to review issue scan comments, and Department staff, recommend that the Board call for an independent literature review, conducted in collaboration with other agencies, on non-target effects of forest pesticides.

The response could also include staff review of pesticide monitoring, research priorities, and the need to refine current pesticides monitoring questions, in the context of overall priorities within the Department's Private Forests Program.

The following issues were raised by various participants in the issue scan:

-- Lack of Commitment to Review the Forest Practices Act (special emphasis on pesticides)

Through Oregon Administrative Rules, the Department is committed to regularly reviewing the implementation and effectiveness of the Oregon Forest Practices Act. The web link at http://egov.oregon.gov/ODF/PRIVATE_FORESTS/fpreports.shtml#Monitoring_Technical_Reports provides a list of 19 Technical Reports completed in support of these requirements. Ongoing projects include the Riparian Function and Stream Temperature Project (a seven-year study of forestry-related effects on temperature and stream/streamside functions), the Leave Tree and Downed Wood Compliance Project (near completion), and the Long-term Stream Temperature Monitoring Project. The Department's Monitoring Unit continues to fulfill its responsibilities within the limits of available resources.

-- Pesticides Should be a Higher Monitoring Priority

The 2002 Forest Practices Monitoring Program Strategic Plan identified 89 monitoring questions. These questions were drawn from the previous monitoring strategy, the Oregon Plan for Salmon and Watersheds Work Plan, the Forest Practices Advisory Committee final report, and citizen and stakeholder group input in 1994 and 2000.

Because of the sheer number of questions, prioritization was required. Five questions pertain specifically to forest chemicals, ranging from top to low priority. Based on the Department's aerial chemical application monitoring study (ODF Technical Report #7, 2000, http://egov.oregon.gov/ODF/PRIVATE_FORESTS/docs/fp/ChemAppFinal.pdf), current regulations adequately protect fish-use streams from drift contamination that would harm humans, fish, or aquatic invertebrates. Drift contamination of surface waters is therefore a low monitoring priority, but assessment of the level of contamination that is injurious to aquatic life has been ranked as a top priority.

The remaining moderate priority questions focus on potential impacts to human health and aquatic life, particularly relating to storm runoff events and to small non fish-bearing streams. Although cost was not considered during priority-setting, these particular monitoring questions have remained unaddressed due to lack of resources.

The Department's Monitoring Unit has and continues to address top- and high-priority questions identified in the Monitoring Strategy. As current projects are completed, new ones will be undertaken.

-- Recommendations from the 2000 Chemicals Report have not been implemented

The current Monitoring Strategy specifically mentions all but two of the items identified in the 2000 chemicals study. Recommendations within any of ODF's monitoring Technical Reports must be considered in the context of overall monitoring priorities. Additional items, however, could

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questions in the Monitoring Strategy.

-- Not Taking Advantage of Pesticide Monitoring Partnership Opportunities

There are many opportunities to implement projects in conjunction with other agencies, non-governmental organizations, and businesses, and there are many grant funding sources. The Monitoring Unit has done cooperative and grant-funded projects in the past as it seeks to address questions in the Monitoring Strategy.

Grant applications and cooperative efforts require significant time and effort from staff, including the time dedicated to seeking support from participating landowners. The Department has maintained a very low rate of denial of access to private lands through this relationship-building. Monitoring staff are currently fully engaged in ongoing monitoring efforts. Finally, the Department is engaged in policy discussions with the state Departments of Agriculture, Human Services, Environmental Quality, and other key stakeholders in response to a request from the Governor's Office regarding pesticides and how this topic should be addressed in a cohesive manner.

-- Staff Are Not Abreast of Current Pesticides Research

A comprehensive review of forest chemicals research has not been conducted, but is identified as a top-priority question in the Monitoring Strategy. Monitoring staff must devote the majority of their attention to the key research questions they are currently addressing. Current projects focus on stream temperature, the role of large woody debris as a natural component of streams, riparian (stream and streamside) vegetation functions, wildlife leave trees (trees left during harvest for wildlife use) and downed wood.

In addition, staff strive to keep abreast of current research on a broad range of topics through the literature search services available from the State Library, by sharing information among staff, by receiving information from other agencies and contacts, and by attending conferences. Staff have received research on pesticide impacts, and outside of a comprehensive literature review with expert input, the research did not indicate the need for an urgent change in monitoring priorities.

-- Toxicity & Regulation (Wildlife, fish, humans)

Forest pesticide use is subject to several layers of regulation. First, all pesticide products must be registered with the U.S. Environmental Protection Agency (EPA) and must have EPA-approved labels. Testing of effects on fish and wildlife is required in the registration process. Product label requirements are designed to protect humans and the environment, and are binding on all pesticide applicators. EPA periodically reviews product registrations based on new monitoring and research data.

Next, Oregon's pesticide control law, administered by the Oregon Department of Agriculture, prohibits faulty, careless or negligent pesticide applications, including those that cause pesticide movement into streams or across property boundaries and damage wildlife, human health or property. Forest pesticide applications are also subject to the Forest Practices Act Chemical Rules (Oregon Administrative Rules 629-620), which provide additional surface water protection.

The Board of Forestry adopted the most recent version of the Chemical Rules in 1997 through a collaborative process, including a review of technical data on toxicity and expected exposure.

Finally, all pesticide use in Oregon is subject to spill cleanup and container disposal regulations administered by the Oregon Department of Environmental Quality.

-- Chemical "Trespass" / Aerial Drift Contamination

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Suspected cases of contamination may be reported to Department of Forestry district offices (list at <http://www.oregon.gov/ODF/offices.shtml>) and to the state Pesticide Analytical Response Center (PARC). District Forestry personnel would assess whether or not forest applications complied with Forest Practice rules.

PARC can consult appropriate government agencies, health care providers or other sources as necessary, can provide confidential investigations of health effects, and can give advice on clean-up and exposure prevention. More information on PARC is available at <http://www.oregon.gov/ODA/PEST/parc.shtml>

-- Removing Important Forestry Tool (Chemicals) is Not Responsible

Oregon Forest Practices Act rules encourage voluntary use of integrated pest management, of which pesticide use is one possible tool (Oregon Administrative Rule 629-620-0000 (2)). Roles of pesticides in forestry include reducing vegetation that competes with seedlings (the Forest Practices Act requires successful post-harvest reforestation) and controlling invasive species. Changing this rule to remove the option of forest chemical use is not currently being considered.

-- Board of Forestry Needs Latest Information on Safe Use of Forest Chemicals

The Board is updated on key issues as outlined in Board work plans, during various staff updates, by specific request from the Board, through the periodic issue scan, by advisory committees, and when interested groups or individuals submit comments to the Board or appear before it directly.

Pesticides will be raised as a topic with the Board in the context of the issue scan, which includes feedback indicating both concerns about and, conversely, support for their continued use. The Board will also be presented with staff recommendations on given issues. In the case of pesticides, staff have recommended a literature review in order to more fully assess and respond to concerns.

Until further monitoring or peer-reviewed science indicates otherwise, compliance with state and federal requirements is considered sufficient to protect human and environmental health. The Department's most recent aerial chemical application monitoring study (ODF Technical Report #7, 2000), indicated that implementation of current Forest Practices Act rules adequately protect fish-use streams from drift contamination that would harm humans, fish, or aquatic invertebrates.

Drift is only one possible contamination route. Other pathways, such as storm runoff, warrant investigation and were identified as a need within the 2002 Forest Practices Monitoring Program Strategic Plan (as well the need for an updated literature review).

The issue scan is not the only route by which pesticides has been raised as an issue for the Department. Bills focused on limiting the use of pesticides, including near schools, have been introduced in the Legislature, and the Governor's Office recently directed key agencies to work together to develop a cohesive strategy to assess and deal with the issue of pesticides in Oregon. This will entail continual data collection on the benefits and risks associated with their use.

-- Lack of Public Input Opportunity

All people may provide public comment to the Board of Forestry or the Oregon Department of Forestry at Board meetings, through the Board's issue scan, in rulemaking processes, or in other informal processes. State law establishes regional forest practices committees, two-thirds of whose members must be forest landowners, while the remainder may be from the general public. The committees provide advisory recommendations to the Board on proposed forest practices rules.

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-- Wider Pesticides Buffers Are Needed

The Department operates on an adaptive management model. Under this model, when monitoring or other applicable research indicates the need for rule changes to protect resources, rule changes are pursued. Any rule changes, however, must also meet the objectives of the Forest Practices Act, including the need for effective and efficient rules.

Any research showing the effectiveness of 60-foot ground application or 300-foot aerial application buffers relative to other buffer widths would be an item sought out during the research review discussed above.

-- State/Federal Collaboration

A collaborative, landscape-level chemicals monitoring project is the Department's preferred approach. Key stakeholders could include the Oregon Departments of Agriculture, Environmental Quality and Fish & Wildlife, EPA, health agencies and non-governmental interest groups. The Department is having discussions with other key governmental agencies on chemicals as a statewide issue, as requested by the Governor's office. The outcomes of these discussions will help frame the needs and priorities for chemicals monitoring on a statewide basis.

-- Duplication of Monitoring Efforts

Prior to engaging in monitoring efforts, Monitoring Unit staff review applicable research and consult with experts in research and university organizations. We also work cooperatively with these groups to find opportunities where graduate students or other staff can collect and analyze our monitoring data. This is done to avoid duplication of effort and maximize efficiency. Often, existing or ongoing research is occurring on federal lands or in other states, or is otherwise difficult to interpret in terms of the effectiveness of the Oregon Forest Practices Act. The Monitoring Unit seeks to design and conduct monitoring efforts tailored specifically to test the Oregon Forest Practices Act where existing research is not adequate.

-- Applicable Work Plans

Pesticide regulation is within the general scope of the Board's Forest Regulation work plan, but is not specifically addressed in the plan.

Pesticide monitoring issues on private lands are included generally in objective 4 of the Forest Regulation work plan. The plan discusses monitoring of the Water Protection Rules as described in Oregon Administrative Rule 629-635-0110 (3), but the specific rule (OAR 629-620-0700) relating to effectiveness monitoring of the Chemical Rules is not mentioned.

30	Water Pollution by Chemical Application	Barbee Bird
<i>Staff Comment</i>	See Issue #28	

31	on state forests	Peg Reagan
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4b Issue for staff to address

Issue No.	Topic	Submitter
<i>Staff Comment</i>	State Forests is addressing several high priority monitoring issues at this time. Although herbicide application is not among them, we understand the importance of this issue and historically have collaborated with the Private Forests Monitoring Program on questions regarding effectiveness of BMPs in preventing contamination of waters of the state.	
	See also issue #28.	
32	Water, health, long-term effects	Susanna DeFazio
<i>Staff Comment</i>	See Issue #28	
33	discontinue all use, aerial application	Jerome Kimmel
<i>Staff Comment</i>	See Issue #28	
34	Opposition to use, aerial spraying	Melinda McComb
<i>Staff Comment</i>	See Issue #28	
35	negative effects, use as last resort	James Moore
<i>Staff Comment</i>	See Issue #28	
38	use on state lands	Karl Johnson
<i>Staff Comment</i>	See Issue #28	
41	drift, monitoring, health effects	Nyles Jahansel
<i>Staff Comment</i>	See Issue #28	
44	drift, monitoring, health effects	Maxine Centala
<i>Staff Comment</i>	See Issue #28	
47	higher priority to monitoring	Dean Nebergall
<i>Staff Comment</i>	See Issue #28	
52	higher priority for monitoring	David Eisler

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4b Issue for staff to address

Issue No.	Topic	Submitter
<i>Staff Comment</i>	See Issue #28	
53	increase monitoring, decrease use	Donald Gudehus
<i>Staff Comment</i>	See Issue #28	
54	protect public from effects	Jocelyn Luciano
<i>Staff Comment</i>	See Issue #28	
55	higher monitoring priority, health issues	Nancy Hopps
<i>Staff Comment</i>	See Issue #28	
56	input to issue scan encouraged	Lisa Arkin
<i>Staff Comment</i>	See Issue #28	
57	monitoring, buffer zones	Howard Sampley
<i>Staff Comment</i>	See Issue #28	
58	notification of ground applications	Jim Carr
<i>Staff Comment</i>	<p>Analysis</p> <p>Currently, operators must notify ODF before applying pesticides on forestland by ground or by air. Operators must submit written plans for operations near specific resources, e.g., fish use streams. ODF foresters use the notification and written plan information to review resource protection requirements and to help evaluate compliance. Other parties may purchase annual "subscriptions" from ODF to receive notification and written plan information for designated locations. Some subscribers depend on the information, including that related to ground-based chemical applications, to know when and where operations will occur.</p>	

Removing the notification and written plan requirements for ground-based forest pesticide applications would substantially reduce the administrative workload for operators and landowners, and potentially for ODF foresters and support staff. However, ODF would lose an opportunity to consult with operators on specific ground-based pesticide application operations, potentially leading to compliance problems. In addition, subscribers would lose a reliable method of determining when and where ground-based forest pesticide applications were to occur.

Staff Response

Private Forests Program staff would address this issue by contacting the Washington Department of Natural Resources to find out the rationale for and experience with the exclusion in Washington forest practices regulations. Staff would then evaluate whether further consideration of the issue was appropriate. Private Forests Program staff would need to consider the priority of this task in the context of overall program priorities.

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4b Issue for staff to address

Issue No.	Topic	Submitter
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See also issue #28.

59	increase monitoring	David Webb
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Staff Comment See Issue #28

60	monitoring and drift	Robert Purdy
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Staff Comment See Issue #28

63	Monitoring should be highest priority	Honey Vizer
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Staff Comment See Issue #28

66	objective analysis of safety, utility	Michael Newton
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Staff Comment See Issue #28

67	Monitor, update science, be responsive	Richard Gross
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Staff Comment See Issue #28

70	stream health, public involvement, compare with thinning	Mary Moffat
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Staff Comment Compare Clearcutting and Spraying to Thinning
Erosion: The Forest Practices Act contains best management practices that limit erosion regardless of the type of harvesting employed. Thinning is appropriate in many instances, but can require more entries than clearcuts, and may result in more skid trails and haul roads, which may contribute sediment to streams if not managed properly.

Endangered Species: Forest Practices Act addresses protection of endangered species regardless of harvest type, but the Act does not directly administer the Federal Endangered Species Act.

Fire Spread: The State of Oregon addresses fire issues through Fire prevention regulations and a complete and coordinated fire suppression system.

Invasive Species: There may be the potential for the disturbance from clearcutting to facilitate invasion of undesirable plants. There are many other factors to be considered. The work group appointed by the Board of Forestry to consider the issue scan input identified this as a key issue for Board consideration.

Forest Worker Health: Many methods of vegetation control may pose worker safety risks that need to be considered. This issue is addressed in Worker Protection Standards administered by the U.S. Environmental Protection Agency and the Oregon Occupational and Health Division (OSHA).

See also issue #28.

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4b Issue for staff to address

<i>Issue No.</i>	<i>Topic</i>	<i>Submitter</i>
76	increase monitoring priority	Carla Hervert
<i>Staff Comment</i>	See Issue #28	
77	drift, monitoring, collaboration	Lisa Arkin2
<i>Staff Comment</i>	See Issue #28	
78	conduct biomonitoring with DEQ	Lisa Arkin2
<i>Staff Comment</i>	See Issue #28	
79	aerial application and air quality	Lisa Arkin2
<i>Staff Comment</i>	See Issue #28	
81	increase monitoring priority	Laura Stockford
<i>Staff Comment</i>	See Issue #28	
82	allow use to enhance forest management	Rob Freres
<i>Staff Comment</i>	See Issue #28	
86	improve monitoring of aerial spraying	Michelle Saxton
<i>Staff Comment</i>	See Issue #28	
91	increase monitoring	Harold Codman
<i>Staff Comment</i>	See Issue #28	
93	increase monitoring	Maya Hyes
<i>Staff Comment</i>	See Issue #28	
97	consider alternatives, broader input	Janine Offutt
<i>Staff Comment</i>	See Issue #28	

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4b Issue for staff to address

<i>Issue No.</i>	<i>Topic</i>	<i>Submitter</i>
98	Necessary Tool	Marc Halley
<i>Staff Comment</i>	See Issue #28	
122	Increase monitoring, change policies	Robin Winfree
<i>Staff Comment</i>	See Issue #28	
124	increase monitoring priority	Dianne Ensign
<i>Staff Comment</i>	See Issue #28	
126	increase monitoring, research	Paul Engelmeyer
<i>Staff Comment</i>	See Issue #28	
127	consider alternatives	Ayala Talpai
<i>Staff Comment</i>	See Issue #28	
130	increase monitoring, update research	Sarah Sheffield
<i>Staff Comment</i>	See Issue #28	
132	Support Research & Funding	Sue Kupillas
<i>Staff Comment</i>	See Issue #28	
149	Use best available science, improve regulation	Ivan Maluski
<i>Staff Comment</i>	See Issue #28	



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1b New Topic: Incorporate Input Into Existing Work Plan

Issue No.	Topic	Submitter
69	improve decision-making framwork	Barbara Lee
<i>Staff Comment</i>	The issue will provide the Board an opportunity to discuss the existing legal and decision-making framework, and identify possible improvements that would support their policy-level decision-making. Such improvements would consider the recently adopted performance measures and whether adjustments legal and decision-making framework may be warranted to ensure their effectiveness.	
	The staff plans to bring this issue to the Board for further consideration during 2008.	

2 Addressed In Current Work Plan

Issue No.	Topic	Submitter
1	return on asset value	John Griffith
<i>Staff Comment</i>	This comment has applicability to objective one of the State Forests Work Plan, which refers to Board evaluation of the performance of the forest management plans through the use of performance measures. The Board is using performance measures and targets to help it evaluate and improve state forests management.	
12	Increase Timber Harvesting	Sam Brentano
<i>Staff Comment</i>	This comment has some applicability to the State Forests Work Plan.	
	The current Northwest and Southwest Oregon Forest Management Plan, adopted by the Board in 2001, "secures the greatest permanent value to the state." Greatest permanent value means "healthy, productive, and sustainable forest ecosystems that over time and across the landscape provide a full range of social, economic, and environmental benefits." These benefits include, but are not limited to, six that are identified in Administrative Rule, including "sustainable and predictable forest products that generate revenues for the state, counties, and local taxing districts." The Department proposes operations annually that meet targets established by the State Forester consistent with implementation plan ranges. Implementation plans describe management actions to achieve the goals of the forest management plan, which will secure "the greatest permanent value to the state."	
	The Board's current work plan (objective one) is considering the NW and SW Forest Management Plans and whether adjustments are needed. The Board is examining improvements to the management plan's economic performance in terms of all three of the greatest permanent value benefits: social; economic; and environmental. The recent adoption of performance measures and targets will assist with periodic review of the forest management plans regarding their performance in securing "greatest permanent value to the state" as embodied in the "full range of social, economic, and environmental benefits."	
15	increase timber harvests	Tom Partin
<i>Staff Comment</i>	This comment has some applicability to the State Forests Work Plan but also is a general value statement.	
	As required by Oregon Administrative Rules, ODF uses active management on Board of Forestry lands. Under the Board's current State Forests work plan (objective one) the Board is considering the Northwest and Southwest Forest Management Plans and whether adjustments are needed. The Board is examining improvements to the management plan's economic performance in the context of all three of the greatest permanent value benefits: social; economic; and environmental. The Board's recent adoption of	

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2 Addressed In Current Work Plan

Issue No.	Topic	Submitter
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performance measures and targets will assist with periodic reviews regarding whether these plans continue to "secure the greatest permanent value to the state" as embodied in the "full range of social, economic, and environmental benefits." The Board's examination of the FMP includes 'different looks' regarding how these lands are managed, which may include a 'look' that reflects less reliance on structure-based management.

Also as part of this work plan (objective two), the Board is considering the most appropriate Federal Endangered Species Act compliance tool - take avoidance or seeking a habitat conservation plan - for continuing to "secure the greatest permanent value to the state." The Elliott State Forest planning process is developing a revised forest management plan and associated federal draft habitat conservation plan. This planning process is considering the latest science related to federal T&E species and all other natural resources areas. The Board continues discussion on the applicability of a federal habitat conservation plan for the Northwest and Southwest state forestlands.

27 Increase harvest and economic benefits Bill Kluting

Staff Comment This comment has some applicability to the State Forests Work Plan but is also a fairly general value statement.

The Board's current State Forests work plan (objective one) is considering the Northwest and Southwest Forest Management Plans and whether adjustments are needed. The board is examining improvements to the management plan's economic performance in the context of all three of the greatest permanent value benefits: social; economic; and environmental. The board's recent adoption of performance measures and targets will assist with periodic reviews of the forest management plans regarding whether these plans continue to "secure the greatest permanent value to the state" as embodied in the "full range of social, economic, and environmental benefits".

50 increase harvest, define benefits of structure-based management Chris Jarmer

Staff Comment This comment has some applicability to the State Forests Work Plan, objective 1, but it is a fairly general value statement, being characterized by the writer as a "commentary".

The Board is continuing to examine improvements to the management plan's economic performance in the context of all three of the greatest permanent value benefits: social; economic; and environmental. The board is examining improvements to the management plan's economic performance in the context of all three of the greatest permanent value benefits: social; economic; and environmental. The recent adoption of performance measures and targets will assist with periodic reviews of the forest management plans regarding whether these plans continue to "secure the greatest permanent value to the state" as embodied in the "full range of social, economic, and environmental benefits".

Several analyses were requested by the Board of Forestry in 2006 that address the tradeoffs of harvest volume and complex structure development on the North Coast state forests. In the fall/winter of 2006 ODF staff answered Board questions regarding maximum sustainable harvest under unrestricted and FPA land base assumptions, the tradeoffs of SBM silvicultural treatments, the cost of complex structure targets, and additional FMP-HCP runs at 30% and 70% complex structure targets.

Currently ODF staff is developing management options to improve the performance of the FMP relative to achieving Greatest Permanent Value, using three principles provided to the Department by the Board at the June 6, 2007 meeting as a basis for the work. Those principles are:

1. Improvement should seek to maintain or improve outcomes across economic, environmental, and social measures.
2. Improvements to the SBM concept should consider the utility of active and passive management, as



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well as the means to provide greater assurances around the achievement of complex structure in a timely manner.

3. Improvements should explore ways to enhance financial performance.

65	intensive forest management	Rick Williams
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Staff Comment This comment has some applicability to the State Forests Work Plan but it is also a general statement of values.

As required by rule, ODF actively manages Board of Forestry lands. Also under rule, all state forestland is designated as either silviculturally capable or not (OAR 629-035-040), and also classified according to the types of management that will be applied, the appropriate range of management activities, and the forest resources addressed (OAR 629-035-055). Land management classification describes the management emphasis as determined by forest management plans. The Board of Forestry adopts a forest management plan as administrative rule, which establishes that they have determined the plan "secures the greatest permanent value to the state."

Greatest permanent value means "healthy, productive, and sustainable forest ecosystems that over time and across the landscape provide a full range of social, economic, and environmental benefits." These benefits include, but are not limited to, six that are identified in Oregon Administrative Rule, including "sustainable and predictable forest products that generate revenues for the state, counties, and local taxing districts."

The board's recent adoption of performance measures and targets will assist with periodic reviews of the forest management plans regarding whether these plans continue to secure greatest permanent value.

A link to the forest management plans can be found on the ODF web site under "State Forests."

68	conserve biodiversity	Noah Greenwald
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Staff Comment The issue may be defined as a more explicit consideration of conservation of biological diversity on state forest lands. Specifically, the proposal appears to ask for specific actions related to conservation of biological diversity, including identification of key habitats, identification of focal management species, and development of a system of reserves.

Currently, state forest management plans (FMP) do address and consider biological diversity. For example, in the Northwest Oregon FMP, one of the guiding principles is, "The plan will consider the overall biological diversity of state forest lands, including the variety of life and accompanying ecological process" (p. 3-7). Concepts for managing biodiversity are described on pages 4-22 through 4-25 of the plan.

In addition, under the current State Forest Management work plan, one of the objectives is to adapt the FMP through development and application of performance measures. Performance Measure #6 is, "Quantity of habitat by forest management plan stand structure type, habitat components, and the use of those areas by native fish and wildlife." This performance measure includes the following decadal measures that are components of biological diversity: "Composition and structure of forest vegetation" and "Use of stand structure types and habitat components by wildlife." Currently, the State Forests Program is developing a monitoring project to examine stand structure and wildlife use with a focal species approach. The information from this project will be used to adapt the plan as needed. Although biodiversity is considered on state forest lands, the Northwest Oregon FMP does not describe measurable objectives that specifically address this value.

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As the Board continues its examination of the Northwest and Southwest FMPs under the State Forests

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Work Plan (objectives one and two), conversations on managing for species of concern will continue. Under this Board work plan, ODF staff is developing management options to improve the performance of the FMP relative to achieving Greatest Permanent Value, using three principles provided to the Department by the Board at the June 6, 2007 meeting as a basis for the work. Those principles are:

- 1.Improvement should seek to maintain or improve outcomes across economic, environmental, and social measures.
- 2.Improvements to structure-based management should consider active and passive management, as well as the means to provide greater assurances around the achievement of complex structure in a timely manner.
- 3.Improvements should explore ways to enhance financial performance.

84 Discontinue Structure Based Management Rob Freres

Staff Comment As required by OAR, the ODF uses an active management approach on Board of Forestry lands. The Board's current work plan (objective one) is considering the Northwest and Southwest Forest Management Plans and whether adjustments are needed. The board is examining improvements to the management plans' economic performance in the context of all three of the greatest permanent value benefits: social; economic; and environmental.

The board's recent adoption of performance measures and targets will assist with periodic reviews of the forest management plans regarding whether these plans continue to "secure the greatest permanent value to the state" as embodied in the "full range of social, economic, and environmental benefits." The Board's examination of the FMP includes 'different looks' regarding how these lands are managed, include a look that reflects less reliance on structure-based management.

85 Discontinue NSO protection Rob Freres

Staff Comment The Board's current work plan (objective two), is considering the most appropriate Federal Endangered Species Act compliance tool - take avoidance or seeking a habitat conservation plan - for continuing to "secure the greatest permanent value to the state."

The Elliott State Forest planning process is developing a revised forest management plan and associated federal draft habitat conservation plan. This planning process is considering the latest science related to federal T&E species and all other natural resources areas. The board continues discussion on the applicability of a federal habitat conservation plan for the Northwest and Southwest state forestlands.

99 Restore Active Mgt & Timber Harvest Gary Groth

Staff Comment Regarding federal forestlands, this issue is being addressed by Objective 2 of the Forest Vitality Work Plan. Mr. Groth may want to become engaged in the Federal Forests Advisory Committee process.

Specific to state forestlands, the 'greatest permanent value' rule (OAR 629-035-0020) states that the State Forester shall "actively manage" the Board of Forestry Lands "in a sound environmental manner." The Board-approved management plans for the Northwest and Southwest Oregon areas are currently being examined by the Board under their current State Forests work plan (objective one) to determine whether improvements to the management plan's economic performance in the context of all three of the greatest permanent value benefits: social; economic; and environmental may be warranted. The Board has recently adopted performance measures and targets to help in guiding the management of the forests to achieve greatest permanent value.

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2 Addressed In Current Work Plan

<i>Issue No.</i>	<i>Topic</i>	<i>Submitter</i>
114	Habitat Conservation Plan	Jake Gibbs
<i>Staff Comment</i>	The Board's current work plan (objective two), is considering the most appropriate Federal Endangered Species Act compliance tool - take avoidance or seeking a habitat conservation plan - for continuing to "secure the greatest permanent value to the state." The Elliott State Forest planning process is developing a revised forest management plan and associated federal draft habitat conservation plan. This planning process is considering the latest science related to federal T&E species and all other natural resources areas. The board continues discussion on the applicability of a federal habitat conservation plan for the Northwest and Southwest state forestlands.	
129	Maximize Timber Harvest	Wayne Giesy
<i>Staff Comment</i>	This comment has some applicability to the State Forests Work Plan but it is a fairly general value statement. The current Northwest and Southwest Oregon Forest Management Plan, through its adoption by the Board of Forestry in 2001, "secures the greatest permanent value to the state." Greatest permanent value means "healthy, productive, and sustainable forest ecosystems that over time and across the landscape provide a full range of social, economic, and environmental benefits." These benefits include, but are not limited to, six that are identified in Oregon Administrative Rule, including "sustainable and predictable forest products that generate revenues for the state, counties, and local taxing districts." Under this plan, the Department proposes operations annually that meet targets established in the implementation plans. Implementation plans describe management actions that will occur to achieve the goals of the forest management plan, which will secure "the greatest permanent value to the state." The board's current work plan (objective one) is considering the Northwest and Southwest Forest Management Plans and whether adjustments are needed. The board is examining improvements to the management plan's economic performance in the context of all three of the greatest permanent value benefits: social; economic; and environmental. The board's recent adoption of performance measures and targets will assist with periodic reviews of the forest management plans regarding whether these plans continue to "secure the greatest permanent value to the state" as embodied in the "full range of social, economic, and environmental benefits."	
147	Carbon Sequestration revenue from state lands	Ivan Maluski
<i>Staff Comment</i>	This issue is addressed in the Forest Vitality work plan. State Forests Program staff is coordinating with the Forest Resources Planning Program on this issue, and whether carbon sequestration and credit trading is possible for inclusion in our revenue portfolio. All potential revenue-generating options are explored relative to their relationship to the "greatest permanent value" rule.	



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3 General Comments Not Related To Specific Work Plan

Issue No.	Topic	Submitter
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6	Lack of Disease Resistant Stock	Tom Bender
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Staff Comment ODF uses an adaptive management approach. As new information is learned through science, management experiments, monitoring or other methods, management direction is adjusted as supported by the information. This would hold true for our understanding of plant genetics.

We continue to collaborate on research efforts through involvement in genetics cooperatives and other partnerships. Decisions made at any given time are based on the best available science and the judgment of forestry professionals. This would be true for reforestation decisions made following the devastating fires of the early- and mid-20th century in Northwest Oregon; in hindsight, our current scientific understanding of forest stand dynamics and tree genetics would have led to different decisions. The Program continues its cooperative efforts to develop and deploy improved seed and to move the forest toward mixed-species stands appropriate for the specific geographic/ecological area.

9	include people, honor agreements	Charles Hurliman
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Staff Comment This comment has applicability to the State Forests Work Plan but it also is a fairly general value statement.

The Board's recent adoption of performance measures and targets (work plan objective one) includes several metrics intended to measure direct and indirect contributions to trust counties that result from forest management activities. These measures are intended to assist the Board with periodic reviews of the forest management plans regarding whether these plans continue to "secure the greatest permanent value to the state" as embodied in the "full range of social, economic, and environmental benefits."

4b Issue for staff to address

Issue No.	Topic	Submitter
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5	Present Value Accounting	Tom Bender
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Staff Comment The State Forests Program is continuing to coordinate work associated with the newly adopted performance measures and targets, under State Forests Work Plan objective one. This work includes determining methodologies to assess the economic performance of the Board of Forestry lands.

25	biodiversity on state lands	Lona Pierce
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Staff Comment On the Tillamook and Clatsop State Forests, a diverse mix of tree species is replanted to ensure biodiversity, a foundational concept of the Northwest Forest Management Plan, and a component of Oregon Administrative Rules for Board of Forestry lands.

This forest management plan also uses an adaptive management approach. As new information is learned through science, management experiments, monitoring or other methods, management direction is adjusted where such change is supported by the information. This would hold true for our understanding of plant genetics and of the limitations of past planting practices, when knowledge of the importance of site-appropriate species was limited. We continue to collaborate on research efforts through involvement in genetics cooperative and other partnerships, to move the forest toward mixed-species stands appropriate for the specific geographic/ecological area.

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4b Issue for staff to address

<i>Issue No.</i>	<i>Topic</i>	<i>Submitter</i>
145	Fund Non-Motorized Recreation Opportunities	Ivan Maluski
<i>Staff Comment</i>	<p>Funding for the implementation of recreation actions comes from a variety of sources, however, the majority of the recreation management actions are funded through the revenue derived from these lands per Oregon Revised Statute (530.110).</p> <p>The State Forests Program recently conducted a second party assessment of the recreation program to assess how well we are doing in implementing our current recreation plans. This assessment, along with an earlier program evaluation of the recreation program, identified areas of improvement for the recreation program, such as facility monitoring and maintenance plans, better outreach materials, etc. Funding, specifically the diversification of funding sources, was also identified by the assessments as a strategically important component of a comprehensive recreation program. The Program is currently conducting staff work in response to this second party assessment. This may include discussions at a variety of levels (Board, Counties, stakeholders, etc.) that might help better define the department's role as a recreation provider, and help determine inclusion in the Board's work plan.</p>	
148	Revisit FSC Certification for State Forests	Ivan Maluski
<i>Staff Comment</i>	<p>The management of State forestlands is rooted in statutory authorities and administrative rule, including the 'greatest permanent value rule.' Greatest Permanent Value means "healthy, productive, and sustainable forest ecosystems that over time and across the landscape provide a full range of social, economic, and environmental benefits."</p> <p>The management plans describe how the lands will be managed and are also adopted by the Board as administrative rule. Any decision to seek certification would be anchored in these statutory authorities and whether such certification is a good business decision. A certification pre-assessment conducted on one Board of Forestry forest in 2005/2006 led the department to reaffirm that the statutory authorities and rules associated with managing these lands establish standards that in many cases "meet or exceed" those required for FSC certification. The department's commitment to periodically conduct third party assessments of the forest management plans will assure we are meeting those statutory authorities and the greatest permanent value rule.</p>	



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Urban Forestry

1b New Topic: Incorporate Input Into Existing Work Plan

Issue No.	Topic	Submitter
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95	maintain funding	Bill Narver
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*Staff
Comment*

This comment relates to the lack of funding for maintaining public trees at the local level. Oregon has no pool of funds that cities can use to maintain street and park trees in a safe and healthy condition. Many cities use road taxes to maintain trees in the public rights-of-way, but these funds usually aren't dedicated and must compete with other road improvement and maintenance needs.

In two previous legislative sessions, a proposal was submitted that would have taken 25 cents of every state license plate fee and dedicated it to a fund to be used by cities to plant and maintain trees in the public right of way, but neither bill advanced beyond the committee stage.

The Board might consider this issue of dedicated funding in its future legislative initiatives and as part of its evolving Urban Outreach work plan. The work group appointed by the Board to review issue scan input identified this as an area for future Board consideration.

156	Lack of Funding for Tree Maintenance of Community Trees	Mark Snyder
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*Staff
Comment*

This comment relates to the lack of funding for maintaining public trees at the local level. Oregon has no pool of funds that cities can use to maintain street and park trees in a safe and healthy condition. Many cities use road taxes to maintain trees in the public rights-of-way, but these funds usually aren't dedicated and must compete with other road improvement and maintenance needs.

In two previous legislative sessions, a proposal was submitted that would have taken 25 cents of every state license plate fee and dedicated it to a fund to be used by cities to plant and maintain trees in the public right of way, but neither bill advanced beyond the committee stage.

The Board might consider this issue of dedicated funding in its future legislative initiatives and as part of its evolving Urban Outreach work plan.

158	secure funding	Mark Snyder
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*Staff
Comment*

This comment relates to the lack of funding for maintaining public trees at the local level. Oregon has no pool of funds that cities can use to maintain street and park trees in a safe and healthy condition. Many cities use road taxes to maintain trees in the public rights-of-way, but these funds usually aren't dedicated and must compete with other road improvement and maintenance needs.

In two previous legislative sessions, a proposal was submitted that would have taken 25 cents of every state license plate fee and dedicated it to a fund to be used by cities to plant and maintain trees in the public right of way, but neither bill advanced beyond the committee stage.

The Board might consider this issue of dedicated funding in its future legislative initiatives and as part of its evolving Urban Outreach work plan.



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2 Addressed In Current Work Plan

Issue No.	Topic	Submitter
157	Reaffirm urban outreach efforts	Mark Snyder2
<i>Staff Comment</i>	This comment reaffirms the current Outreach to Urban Populations workplan, and encourages restoration funding for ODF's urban forestry program.	

Urban outreach

1c New Topic: Staff Work-Board Action

Issue No.	Topic	Submitter
116	link with ecosystem services	Jake Gibbs
<i>Staff Comment</i>	This comment expresses the writer's opinion about the workplan, and seeks to link the Outreach to Urban Populations workplan with the concept of ecosystem services. Staff would agree that this concept fits within the workplan framework.	
	The work group appointed by the Board to review issue scan input has identified valuing ecosystem services as a part of a larger issue, involving the future sustainability of Oregon's forest land base, as a key item for Board consideration.	

2 Addressed In Current Work Plan

Issue No.	Topic	Submitter
138	residents unfamiliar with forest practices	Derrick Tokos
<i>Staff Comment</i>	Mr. Tokos' comment supports the existing workplan concepts. He requests additional outreach by ODF staff in urban/wildland interface areas. ODF staff is currently investigating options for addressing issues like this one as part of its Community Forestry Initiative. Time and resource constraints will limit the scope of this work during the current biennium as a result of the related budget proposal not being approved by the last Legislature. Board may want to consider revising the scope of this work plan to focus more on interface issues such as this one.	



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Urban outreach

4b Issue for staff to address

<i>Issue No.</i>	<i>Topic</i>	<i>Submitter</i>
48	delete work plan	Chris Jarmer

*Staff
Comment*

The work group appointed by the Board to review issue scan input identified questions such as those raised by Mr. Jarmer as key for Board consideration, including the ongoing potential for collaboration with other organizations.

This comment seems to reflect a disagreement about the scope of the Board's and the Department's mission. Mr. Jarmer suggests that the BOF and ODF drop this workplan from consideration, and that we should focus our limited resources on working with those landowners continuing to practice traditional, long-term forestry. While it is true that the Department has limited resources, taking a view of forestry and forest management as Mr. Jarmer proposes could be considered as precluding any Departmental efforts in urban forestry, the urban/wildland interface, and forest education that actually furthers the implementation of its missions on rural lands.

This comment relates to whom the Board and Department sees as its stakeholders. There is no other agency in the state that has more expertise to advocate for sound forestry principles than ODF, and engaging urban populations keeps the Department involved with the majority of Oregonians.