

Oregon Roundtable on Sustainable Forests

Preliminary Evaluation of Indicator of Sustainable Forest Management



A.c.: Compliance with forestry regulations

Current desired trend/target: High levels of compliance with Oregon Forest Practices Act requirements for reforestation and other activities on private lands. Clear public policy expectations for private forest landowners' contributions to the protection and maintenance of public forest resource values. High levels of compliance with management plan standards and guidelines on Oregon federal forestlands.

The current data report for this indicator can be accessed at:

<http://www.oregon.gov/ODF/indicators/indicatorAc.shtml>

Evaluation Summary:¹

Key Roundtable findings

- The protocol regarding Forest Practices Act administration is clear for non-federal lands but the federal lands analysis needs improvement. It is only partial data and geographically-biased. The omission of federal forestlands outside the Northwest Forest Plan area needs to be corrected.
- The indicator report needs to be clearer on the time frames for reported compliance information.
- There is increasingly dated information and there are concerns about the availability of future data. Consider information quality for this indicator to be inadequate on federal lands.
- Further discussions are needed with the BLM and Forest Service on a meaningful metric for compliance on federal forest lands that can be reported consistently and on a statewide basis.
- Support for continued compliance monitoring is encouraged but ODF is going to be hard pressed under near-term project budgets to undertake any monitoring to see whether forest management projects meet forest practice rules.

¹ This is a summary of the Oregon Roundtable on Sustainable Forests discussion and conclusions regarding the staff report on an Oregon Indicator of Sustainable Forests Management. The summary is organized around nine questions identified by the Roundtable as being central to evaluations of all 19 indicators. It reflects the input from Roundtable participants who attended the September 30, 2010 meeting where the indicator was discussed and from an electronic survey of those participants following the meeting. The summary is based on interpretation of the Roundtable discussions by the seven-person Roundtable Leadership Group, with the assistance of Oregon Department of Forestry staff.

Conclusions may not have been reached by the Roundtable for every evaluation question. The summary should not be considered as expressing a consensus of the meeting participants or the Roundtable in general. However, this information will be immediately useful to the technical staff working to implement and improve future indicator data collection and reporting and to the Board of Forestry and other Oregonians desiring to use the indicator as one tool in assessing Oregon's progress towards sustainable forest management.

It is anticipated that the Roundtable will proceed with discussions on all the indicators and will then discuss the body of indicators as a whole – looking for common themes and synthesizing conclusions about the indicators project. Therefore, Roundtable conclusions for this indicator may be revisited and revised at a later date.

Additional Roundtable comments organized by indicator evaluation questions

1. Is the purpose and intent for the indicator clear?

- The clarity of the indicators purpose and intent is adequate.
- The purpose and intent is less clear on federal lands than non-federal lands.
- It was expected that the indicator would measure the whole state based one set of requirements.
- Not all forestry regulations were considered in the analysis.
- The intent is clear on to what extent do forest management projects comply with regulations designed to assure sustained yield forestry. But the metrics for federal forests seem to track conformance with zoning rules instead of project results.
- The federal metrics presented pertain only to federal forests within the area of the Northwest Forest Plan, leaving out eastern Oregon.
- The indicator purpose for federal lands needs to be clarified. Do we want to track agency compliance with plans or completed on-the-ground project compliance?

2. Is the protocol for indicator data collection clear and technically sound?

- The protocol regarding Forest Practices Act administration is clear for non-federal lands but the federal lands analysis needs improvement. It is only partial data and geographically-biased. The omission of federal forestlands outside the Northwest Forest Plan area needs to be corrected.
- The omission of reporting on meeting federal timber harvest objectives needs to be addressed.
- A readily available data set is difficult for federal lands. Federal monitoring does not go down to actual active operation performance, but does look at post-operation outcomes like soil compaction.
- The differences in federal and non-federal monitoring may be confusing to the public—compliance with the Forest Practices Act versus compliance with federal land management plan standards and guidelines.
- The public does want to know if federal management plans are being carried out.
- The protocol for collection is clear, but the prospect of continuing to collect information in the future seems dim. Also, many data sources do not look as if they will continue to generate information in the future.
- Budgetary inability to collect relevant data makes trend progression impossible to identify, and may eventually jeopardize compliance.
- The indicator report needs to be clearer on the time frames for reported compliance information.

3. Are indicator data being reported at the appropriate spatial and temporal scales?

- The indicator data are not being reported at the appropriate spatial and temporal scales.
- Non-federal data is a one-time snapshot with no trend data.
- Federal data has an appropriate, but becoming dated, temporal dimension and a limited spatial side.
- Federal forests in the east part of Oregon were not covered. Also, the data are growing old, and the agencies that generate the data may not continue producing new information.

4. Has the Department appropriately assessed the quality of the indicator information?

Original indicator report conclusion

Information = Partial



Conclusion following Roundtable evaluation

Information = Inadequate



- Federal data limitations may be more significant than described. We may need to rate as “inadequate.”
- There is increasingly dated information and there are concerns about the availability of future data. Consider information quality for this indicator to be inadequate on federal lands.

5. Has the Department appropriately assessed the conditions measured by the indicator?

Original indicator report conclusion

Condition = Good



Conclusion following Roundtable evaluation

Condition = Good



- The condition interpretation is appropriate given what was measured, which is outdated and limited information.
- The report properly concludes that compliance has been high with state forest practice rules and federal "zoning" rules. However, given future prospects for generating these data, we may not be able to draw conclusions in the future.

6. Has the Department appropriately assessed the current trend measured by the indicator, when compared to the Desired Trend Statement?

Original indicator report conclusion

Trend = No change, uncertain



Conclusion following Roundtable evaluation

Trend = Uncertain



- There is a lack of data and a lack of resources to assess trends on non-federal lands.
- ODF has properly assessed the current situation. A "trend" requires two data points-- or snapshots—and that second data point is lacking.
- No current empirical data is available except with respect to forest practice notifications.
- The fourth bullet on page 1 of the report should be clarified and made more specific, e.g. What is likely to happen in the next two or three years and why?

7. Can a case be made that other technical information should be considered as a supplement or an alternative to the information already provided for the indicator?

- Look at additional information for federal lands.
- Look at third-party forest certification audit results as a compliance metric for private lands.
- Bring in data from federal forests east of the Northwest Forest Plan area. Refine the federal metric so that it measures project outcomes rather than conformance with land use plan zoning standards.
- A concern was expressed that federal agencies are not meeting planning targets and that sufficient projects were not being implemented. A related concern was also expressed that federal contracting processes were not resulting in enough contract awards to local contractors or residents.

8. Do you believe there is an adequate level of institutional commitment and resources allocated for continued full implementation and reporting of this indicator into the future?

- With budget cuts to the ODF Private Forests Program there is concern about a lack of capacity to continue compliance monitoring.
- No. ODF is going to be hard pressed under near-term project budgets to undertake any monitoring to see whether forest management projects meet forest practice rules.
- Federal agencies are moving away from producing the kind of overarching reports that ODF combed for data. The next reporting period will present a real data challenge.
- If there is no ability to monitor forest regulations so how can any conclusions be drawn about compliance?

9. What improvements would you like to see in future reporting for the indicator?

- Reconcile encumbrance data for this indicator with private lands management allocations under Indicator E.b.
- On the indicator website, allow the public to drill down to more detailed information on compliance and non-compliance areas.
- Recommend covering the whole forest landscape using equivalent metrics across state, private, and federal forests.
- If on-the-ground evidence indicates the forest practice rules are inadequate or inadequately administered to address important resource issues like high landslide risk sites or spotted owl habitat, then monitoring data concluding there are high levels of compliance are misleading.
- Renewed forest practice rule compliance monitoring is strongly recommended, similar to the work that produced the 2002 report.
- Further discussions are needed with the BLM and Forest Service on a meaningful metric for compliance on federal forest lands that can be reported consistently and on a statewide basis.
- The indicator report would benefit from an expanded discussion on the scale and impacts of Private Forests Program budget reductions.
- In addition to on-the-ground, operational compliance monitoring, consider also tracking agency compliance with required administrative processes.

Oregon indicators of sustainable forest management ratings explanations

Indicator Condition:



Good

Desired trend or target is being achieved



Mixed or Fair

Conflicting factors are affecting the status in both positive and negative ways



Poor

Desired trend or target is not being achieved

Indicator Trend:



Improving

Current status is an improvement compared to previous data



Mixed, Uncertain, or No Change

There are either conflicting (mixed) trends, trend direction is uncertain, or there is no significant change compared to previous data



Deteriorating

Current status is a deterioration compared to previous data

Quality of Indicator Information:



Adequate

Data coverage, frequency, currency, sources, and reliability are sufficient to draw conclusions with high confidence



Partial

Data coverage, frequency, currency, sources, and reliability are of mixed quality which affects the ability to draw conclusions



Inadequate

Data coverage, frequency, currency, sources, and reliability are of insufficient quality to draw conclusions