



Council of Forest Trust Land Counties

1212 Court St. NE | Salem, Oregon 97301

November 16, 202

Chair Kelly, members of the Board of Forestry, State Forester Mukumoto, Staff: I am John Sweet, Coos County Commissioner and Vice-chair of the Forest Trust Land Advisory Committee (FTLAC).

When I think about the HCP, FMP, PFA, and the different plans over the years for forest management, I think about the effects these plans made in Salem and beyond have had on the community in Coos County. The State and Federal lands could provide stability for the economy in the county providing a sustainable flow of timber when harvest slows on private lands, thus supporting the manufacturing base in the community. Instead, the BOF seems intent on lowering the harvest from the lands.

I talk about revenue often with the BOF but actually, I am talking about the multiple benefits that counties and other local taxing districts provide in essential governmental services in the form of education, public safety, parks and recreation, public health, mental health, voting, roads, ports, airports, hospitals, libraries, extension services, the list goes on and on. The State Forester is directed to manage the lands for Greatest Permanent Value and the Board must review the State Foresters' Forest Management Plan to do so. How do you as board members assign Greatest Permanent Value to education, public health, voting?

The proposed forest management plan has so many goals. Goals for recreation, soil, invertebrates, and many more. I have not heard from the BOF about goals for supporting public education, public health, and our communities. The BOF instead, seems to me, to be concerned only about ensuring enough lands are taken away from the counties. I would like to see the BOF rethink how value is assessed and to focus on real impacts in our communities. To me communities are the greatest permanent value.

Respectfully,

John Sweet
Vice Chair, Forest Trust Land Advisory Committee



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Chair Kelly, members of the Board of Forestry, State Forester Mukumoto, Staff: I am David Yamamoto, Tillamook County Commissioner and Chair of the Forest Trust Land Advisory Committee (FTLAC).

I am here today representing FTLAC in order to fulfill our statutory responsibility to advise the BOF and the State Forester on matters which affect management of the State Forest Lands (ORS 526.156).

Board members, on behalf FTLAC, I want to thank you. At the last BOF meeting you asked ODF staff a number of questions about the HCP, Draft EIS Alternatives, and long-term funding for the department. FTLAC appreciates this inquiry. We believe these are the kinds of questions the BOF must ask as part of your statutory requirements under ORS 562.016(1) which directs you “to supervise all matters of forest policy and management under the jurisdiction of the state.” FTLAC, in its statutory advisory role to the BOF, has long held that the BOF must understand the full consequences of the decisions before it.

We do, however, think you should go farther in your questions and should continue to consider HCP alternatives other than the current proposal. In ODF’s rationale for the HCP design and development, we do not see reference to Greatest Permanent Value or ODF’s assessment for determining the appropriate scale of conservation needed to meet legal requirements. It could well be that the proposed HCP limits the ability of ODF to provide Greatest Permanent Value and so other options must be considered.

Looking ahead, we believe you have an opportunity now to ask similar questions of ODF regarding the Forest Management Plan. ODF’s public timeline for the FMP shows nine months before Draft FMP modeling results are out. However, after the model results are released, you will have only four months to review the results and request modifications prior to being asked to approve the FMP. Asking questions now would give ODF time to develop modeling inputs and outputs that could answer your questions.

I believe questions about Greatest Permanent Value are most important. The Greatest Permanent Value rule requires the State Forester to secure Greatest Permanent Value by developing and implementing a forest management plan (OAR 629-035-2202(1) and (4)). ODF has indicated the modeling for the draft FMP will include only one set of goals with a narrow range of modeling scenarios. I believe that indicates the State Forester is confident this current set of goals provides Greatest Permanent Value. I also note the wording of the goals themselves changed little during the public engagement period for the FMP, indicating that the State Forester was confident that ODF’s initial goals closely achieved Greatest Permanent Value prior to input from FTLAC and the public. I think the first question for ODF is how did the department determine that the proposed FMP provides Greatest Permanent Value.

Beyond that, key questions include:

1. How does each goal contribute to Greatest Permanent Value?
2. How will each proposed FMP goal impact distribution of revenue to the counties?
3. How are local community services accounted for when calculating Greatest Permanent Value
4. What flexibility does the proposed FMP include to ensure Greatest Permanent Value is provided?

I want to note here that the current FMP is built around structure-based management, but ODF has chosen not to continue with that management style, indicating structure-based management has failed to provide Greatest Permanent Value. The proposed plan must provide flexibility to provide Greatest Permanent Value so that ODF is not locked into a failing management plan as it is now.

I urge you to think about these questions on your tour tomorrow. Looking over the schedule, I see you have stops dedicated to Greatest Permanent Value ties with recreation and transportation planning. I am disappointed the tour does not have stops to consider Greatest Permanent Value ties with essential community services and jobs supported by State Forest Lands. As you participate in the tour, consider that revenue from State Forests Lands support the county road network you drive on out to the tour stops, it supports schools where families of tour participants and guests learn, and it supports health care systems these families utilize. Board members, these benefits are all part of Greatest Permanent Value.

Respectfully,

David Yamamoto
Chair, Forest Trust Land Advisory Committee