



2020 FIRE SEASON

Board of Forestry

June 03, 2020

Doug Grafe, Chief of Fire Protection

Ron Graham, Deputy Chief of Fire Protection

AGENDA ITEM B
Attachment 1
Page 1 of 8

ShangriLa Lane Fire
4/21/2020, ODF-SWO District

2021 Fiscal Fire Protection Budgets



The Base Level:

The “Local Fire Department”



Statewide Severity:

Additional Resources above the base funded by General Fund and OFLPF

Large Fire Cost:

Blend: General Fund, Oregon Forestland Protection Fund, Insurance Policy, FEMA

Funding Partnership



- Century-year-old system
- Complete and Coordinated Fire Protection System
 - State Office, Area, Districts, Cooperators, and Landowners
- Complex blend of private and public dollars
 - Private Landowners 50% / General Fund 50%
 - Public Landowners 100%

Budget Development

“Base Level”



- District's develop fiscal budget
- Review and guided by Associations / Boards
- Approved by the Board of Forestry
- Establishes the Level of Protection and associated costs (per-acre assessment)
- Legislative policy determines ratio (ORS 477.230)

The Base Level of Fire Protection



- 16.2 Million Acres (half of Oregon's Forestland)
- 12 Fire Protection Districts
- Initial and Extended Attack Capacity
 - Engines
 - District Contract Helicopters
 - IA Dozers
 - Frontline Seasonal Firefighters

Spring 2020 Association Meetings



- Meetings were held remotely/virtually using Zoom to comply with the Governors Executive Order and social distancing guidelines.
- All Associations recommended approval of fiscal budgets

Governor's Budget Reduction Plan



- Chief Financial Office requested ODF to prepare a plan for an 8.5% reduction to our biennial General Fund allotment.
- The \$3,272,101 GF cut equates to a total reduction to protection of \$8,060,734.
- No decisions on any budgetary adjustments have been made.
- Could require development of new Fire Protection Fiscal Budgets for BOF approval.



Recommendation

The Department recommends the Board approve all Fiscal Year 2021 District and Association Protection Budgets as presented in Agenda Item 2, Attachment 1.

Board of Forestry Comments

June 3, 2020

Ken Cummings

Chair – Emergency Fire Cost Committee

RE: Budget Proposal

We [EFCC] are in total support of the budgets presented before you for the following reasons;

Current budgets allow for an Adequate Level of Protection across ODF jurisdictions and additionally hold the following five areas in check:

A] Health, Environment, & Economy - Current budget proposal will minimize the impacts of large fires that will have dire impacts on these three areas. We are particularly concerned with the potential impact of smoke intrusions into populated areas given the serious respiratory issues associated with Covid-19.

B] General Fund - Current budget proposal will allow for maximum focus on initial attack to keep fires small. With high potential of less available help from outside Oregon [in form of multi-agency teams] there is a much higher probability for large fire costs and severe impact on an already beleaguered General Fund.

C] Firefighter Safety / Effectiveness - Current budget proposal will provide for staffing levels to at least meet the current need and forecast. Governor's Wildfire Council identified many opportunities for improvement, to meet future need and to shore up ODF resources over time so people are not worn out and experience safety and effectiveness problems.

D] Public / Private Partnership with Private Landowners – Private landowners match General Fund contributions to these budgets dollar for dollar providing great leverage. In addition, landowners (primarily forest protective association members) contribute significant fire prevention, protection, and suppression resources at their own expense to add significant risk mitigation and suppression capacity to ODF efforts without any prevention, protection, or standby cost to ODF.

E] Access to Insurance Markets] - Current budget proposal underwrites the commitment we have made to our partners at Lloyds of London and maintain positive standing - regardless of the outcome of this fire season.

More detail commentary –

Large Fire Impacts - Over the last 10-years there has been an uptick in large fire costs which have huge impacts on the General Fund [GF] once large fire costs go above the shared [General Fund \$10MM and Oregon Forest Land Protection Fund \$10MM] responsibility of \$20MM. A study commissioned by the Emergency Fire Cost Committee [EFCC] in 2017 found the Bureau of Land Management[BLM] contributed only 3% of funding toward the Oregon Forestland Protection Fund [OFLPF] but fires on BLM land consumed 68% of the OFLPF financial expenditures in the ten year period from 2006-2015 (this does not include the huge impact these fires had on the GF). As a result, the BLM accepted financial responsibility for funding large fire costs on their lands starting with the 2018 fire season. The downside is that this has created a greater collections documentation and invoicing burden on ODF which exacerbates the recovery of FEMA and other agency claims, which can take years. In fact, ODF is still awaiting receivables related to fires in 2015. Fire suppression costs will increase this fire season regardless of the number of large fires due to all the requirements for keeping workers safe during the pandemic. This includes extra vehicle expenses for transporting crews, potentially lower productivity due to social distancing and use of personal protective equipment, including use of face masks, etc.

This proposed budget will:

- Provide for highest level of initial attack and will minimize fires growing larger than 10 acres and burning past the first burning period to incur large fire costs [roughly \$1MM per day]
- Minimize long periods of smoke in the air to exacerbate an already frustrated public around increased health concerns
- Minimize loss to timberland assets, protecting significant investments for current and future generations, as well as fish and wildlife habitat and water quality.
- Reduce potential loss to critical municipal drinking water supplies (2017 Eagle Creek Fire could have easily burned Bull Run Watershed)
- Minimize contribution to climate change concerns (smoke created by Eagle Creek Fire in 4 weeks was equal to everyone in Portland Oregon not driving their car for a year)
- Save potential loss of community infrastructure and lives like Paradise, California in 2018 (2018 Klondike Fire threatening towns of Selma, Obrien, Cave Junction, Grants Pass)
- Maintain staff to process billing and minimize wait times for reimbursement from federal partners / FEMA in the case of large fires, which results in 10's of millions of dollars sitting on hold with no interest being paid on [state of Oregon] loans covering these costs accumulating interest

- Increase pressure on ODF cash flow / funding as these costs come out of the daily ODF operating budgets (already strained) and ultimately come back to the E-Board / General Fund to get reimbursed so ODF does not run out of money

Federal Team Response – Approximately half of Oregon’s 96,000 square miles is covered in timber or about 30 million acres. ODF protects about half of that and the USFS the other half. A review of the 10-year historical Oregon fire history shows that fire starts are also about equal on ODF protected land and USFS protected land but about 90% of the acres burned (and therefore smoke produced) occurs on US Forest Service lands. Many of these USFS fires get very large [over 100 acres]. In fact, in southern Oregon in 2017 and 2018 10’s of thousands of acres of private lands were burned due to large Forest Service fires that came off of public lands and moved onto private lands before ODF could get involved and stop them (Chetco Bar, Hendrix, Miles, Klondike, Snow Shoe Fires). When the Forest Service local resources are overwhelmed, they are dependent on multi-agency teams to come and support their efforts. Oregon has benefited greatly in very tough years by having these resources available both on ODF fires and USFS fires.

For the first time we are entering a time of potentially “competing catastrophes”. In the face of COVID-19, there will be a more limited and less timely response from this resource nationally and internationally, as everyone in the world is responding to concerns about how to deploy teams, travel to and from fires, and all-around safety of firefighters. Because of the pandemic, there are indications that large numbers of firefighters connected to these teams will not respond when asked to participate. This alone might create a huge gap in the potential work force available to fight fires when they become large. Additionally, competing catastrophes beyond Covid19 - see NOAA predictions of Hurricane season expectations (insert below) will limit extended multi agency response effectiveness.

Roll Call: Coronavirus wallops disaster agencies as storms, fires approach

State and federal emergency managers, already stretched thin by an unprecedented pandemic response effort, now face a potentially devastating hurricane and wildfire season. Tropical Storm Arthur formed this week in the Atlantic, well before the official June 1 start of hurricane season. Colorado State University researchers are already predicting a season of “above average” intensity, in advance of the National Oceanic and Atmospheric Administration’s official forecast Thursday. Several Western states are already battling wildfires. The California Department of Forestry and Fire Protection sees “above normal” potential for large fires across Southern California this spring, with climate change driving an earlier start and later end to the season each year.

A quick review of recent history, when federal agencies have been unable stop the spread of large fires despite mustering tremendous forces , should compel us to be as intentional as possible in budgeting to provide adequate levels of protection and resources to stop fires when they are small.

The threat to the General Fund could easily be two or three times the average fire season costs, which have doubled in Oregon from an average of \$20MM to over \$40MM in recent years. The most rigorous approach to mitigating this \$100 million risk is to make sure that ODF has the budget and resources to aggressively suppress fires and take full advantage of the contributions of landowners and other agencies in Oregon's Complete and Coordinated System.

Wildfire Council Recommendations - The overall findings presented from the Governor's Wildfire Council in 2019 conclusively outlined many of the problems identified above. Additionally, there were specific recommendations in the Suppression section of the report which identified over \$40MM [per biennium] in needed funds that should be applied over time to shore up positions and resources needed to get ODF back to a level of sufficiency to be able to staff three Incident Command Teams, run the day-to-day business of the department when it comes to fire and generally get caught up to meet the current and future challenge. Over the last ten years the department has been operating with personnel on overtime and retirees that equates to acting like they have 55 more staff than exists. As this situation continues leadership is faced with tough decisions that either limit response time and effectiveness or take unprecedented risks of deploying people who are over worked, overtired and could result in large safety issues.

Additionally, effective and efficient wildfire response requires the agency to have high-caliber, experienced personnel and excellent teamwork. It is very clear ODF has that, as witnessed over the last several months, with many top leadership positions across all Incident Management Teams being asked to deploy for various assignments to help with the unfolding pandemic. Not only are ODF fire team members trained for longer term catastrophe engagement they are highly respected for their tenacity and patience during chaos. These proposed budgets ensure longevity of that fundamental expertise and minimizes jeopardizing effective response this season.

Overall, by any calculation, this is the absolute worst time to do anything other than fully fund a budget that maintains capacity and resources to allow for highest degree of success possible. To be clear, it will save substantial General Fund dollars and reduce negative impacts to Oregon's economy and environment, but most importantly, the health of its citizens.

Insurance Policy - The Lloyds of London Insurance Policy for the State of Oregon (\$25 MM policy that is engaged if the state spends over \$50MM in large fire costs) is in place for this season. Long term relationships with underwriters, a stellar record at ODF of being effective at keeping fires small, and the many elements of Oregon’s unique Complete and Coordinated System all contribute to maintaining this policy. This is clearly a national model for effective public/private partnership.

The cornerstone of the risk mitigation plan in Oregon is a fully funded base level budget which meets an “Adequate Level of Protection” across all districts in Oregon. ODF professionals and landowners sit down every year to painstakingly, deliberate and ensure that this criterion is met across the landscape they manage at every district and association. If initial attack were compromised and more large fires occurred due to that fact, it would severely jeopardize Oregon’s integrity in the insurance markets. A practical review, of a partial or full claim on the insurance policy, that revealed Oregon leadership knowingly did not fund the base level of fire budgets, reducing initial attack capability, could be disastrous. In fact, that outcome could be the end of a forty-year relationship that has successfully maintained a one-of-a-kind policy in the world.

Thank you for the opportunity to comment.

Respectfully submitted,

Kenneth Cummings
Chair - Emergency Fire Cost Committee

**CLACKAMAS-MARION
FOREST PROTECTIVE ASSOCIATION**

22965 N Fork Rd. SE, Lyons OR 97358 503-859-2151

Organized to Promote Cooperative Forest Protection
"A Partnership with the Oregon Department of Forestry"
Founded 1912, Incorporated December 21, 1936

President:

Russ Minten

Frank Timber Resources, Inc

Vice President:

Dale Bleakney

Freres Timber, Inc.

Secretary/Treasurer:

Andrew Dobmeier

Clackamas County Forestry Dept

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T&R Tree Farm

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Portland General Electric

Jerry Workman

Weyerhaeuser Company

Advisory Directors:

**Bureau of Land
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**Clackamas Farm Forestry
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**Clackamas County Fire
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**Marion County Fire
Defense Board**

Keep Oregon Green

**Oregon Dept. Fish &
Wildlife**

ODF - NW Oregon Area

**Oregon Forest &
Industries Council**

USFS - Mt. Hood NF

USFS - Willamette NF

-Peter Daugherty, State Forester, ODF

-Oregon State Board of Forestry

2600 State Street

Salem, Oregon 97310

May 21, 2020

Dear Peter and members of the Oregon State Board of Forestry,

On behalf of the Clackamas-Marion Forest Protective Association, I would like to express my appreciation for the support that you have given us throughout the past year and the efforts and hard work the Oregon Department of Forestry employees have put into making the 2019 fire season another successful year.

All of the success at fighting extremely dry fire seasons in four out of the last five years could not have been accomplished without ODF providing an adequate level of protection for ODF protected lands. That is why we are so concerned with Governor Brown's proposed across the board budget cuts.

If the amount of PSFF (Public Share Fire Fund) goes down, then by statute, the private landowner's share must go down, and government acres can only pay per acre of what PSFF and private landowners are paying. This nearly equals a \$3 cut in protection for every \$1 cut in PSFF. The proposed \$3,272,101 cut in the fire program then equates to a total reduction to fire protection of \$8,060,734. This reduction in protection will result in substantial reduction in fire personnel and equipment which will result in more fires escaping, which will lead to increases in smoke, which will have negative impacts to the health and economy of the State.

Fewer HR personnel will cause delays in hiring. Fewer finance staff will cause delays in billing, processing, and collecting receivables, further impacting agency cash flows. Fewer investigative personnel could cost the State millions of dollars in lost cost recovery. All of these reductions greatly reduces the adequate level of protection, which is developed collaboratively with rate payers and the State as required by statute.

Fighting wildfire in this era of Covid-19 will be more complex and expensive. Every Federal agency is increasing its investment in suppression and pre-suppression resources ahead of the 2020 fire season. Private landowners and contractors are gearing up, investing, and preparing for fire season 2020 at historic levels. Why would the State of Oregon choose to dis-invest at a time when all other parties are realizing a need for increased efforts?

Long range forecasts are predicting similar fire season conditions as seen in 2012 and 2013, where annual firefighting costs reached in excess of \$100 million. Crippling ODF at a time like this could cause exponential increases in fire costs and cause irreparable damage to the State's highly regarded fire program.

Sincerely,

Russ Minten

President

Clackamas-Marion Forest Protection Association

AGENDA ITEM B

Attachment 3

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Coos Forest Protective Association

DIRECTORS

JIM CARR
WILL CHANDLER
PAT FADDEN
JEFF MILLER
MARK OLSON
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May 27, 2020

The Oregon Board of Forestry:

Tom Imeson - Chair	Nils Christopherson
Cindy Deacon Williams	Mike Rose
Joe Justice	Jim Kelly
Brenda McComb	Peter Daugherty – State Forester

2600 State Street
Salem Oregon, 97310

Mr. Imeson,

The Coos Forest Protective Association (CFPA) fire managers and the Board of Directors have continually monitored fire prevention and protection since 1910. In the 1970's, CFPA and the Oregon Department of Forestry (ODF) completed two official protection studies that showed that CFPA was operating at near optimum levels. In the 1980's CFPA and Douglas Forest Protective Association jointly review operations and efficiently and again, in the 1990's, CFPA and ODF completed an Initial Attack Analysis (IAA). The IAA centered on initial attack resources, unit mission cost, productivity and Most Efficient Level (MEL) of operation. The IAA showed CFPA operating at approximately 95% MEL.

Beginning in 2003, CFPA's Protection Level Committee finalized and implemented the district Protection Level Study utilizing the previous studies and updated statistics. This Protection Level Study follows a 5-year revision schedule and is reviewed annually during the budget process to support and ensure an adequate level of protection. Prior to 2009, CFPA's Key Performance Measure (KPM) was 94% of all fires suppressed at 10 acres or less. Reviewed statistics showed that CFPA consistently met this standard. In 2009, legislation was passed, per a request by Oregon Department of Forestry, to increase the Statewide KPM to 97%. Analysis of district statistics reflect the district's capability to achieve this standard.

The CFPA Board of Directors, through the use of working-committees, provides the protection budget oversight. This oversight ensures that the duty of the owner, as described in statute, to protect forestland, and provide an adequate level of protection against the start or spread of fire has been met.

The Governors proposed cuts based on an Oregon revenue shortfall, if enacted, will put the district below an adequate level of protection. Forest Protection Districts across the state are at risk of experiencing another bad fire season as drought conditions continue to persist. Coronavirus Covid-19 mitigations and social distancing requirements will have serious impacts on daily operations, driving up the cost of suppression and limiting ability to keep fires small. The proposed cut by the Governor will compound an already difficult situation putting forest resources in jeopardy, firefighters at risk of inadequate support, and the people of Oregon inundated with smoke from large fires.

The Board of Directors of the Coos Forest Protective Association supports the approved adequate level of protection presented to the Board of Forestry and holds firm to the Protection Budget voted on and passed at our 2020 Annual Membership and Board of Directors meeting held on Friday April 10, 2020. The CFPA Board does not support any proposed budget cuts.

Sincerely,

A handwritten signature in black ink, appearing to read "Will Chandler". The signature is fluid and cursive, with a large initial "W" and "C".

Will Chandler

President, CFPA Board of Directors

Douglas Forest Protective Association

BOARD OF DIRECTORS

Mark Wall – Roseburg Forest Products
Rick Barnes – Nickel Mountain LLC
Dan Dawson – Dawson Ranch
Mike Rundell – Weyerhaeuser Co.
Brennan Garrelts – Lone Rock Timber Co.
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Steve Weber – Seneca Jones Timber Co.
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Ken Canon – Aurora Resources
Quinton Quisenberry – Quisenberry Ranch
Tim Vredenburg – Cow Creek Band of Umpqua Indians



HEADQUARTERS

1758 NE Airport Road
Roseburg OR 97470
Phone: (541) 672-6507
Fax: (541) 440-3424
www.dfpa.net

May 28, 2020

Peter Daugherty
State Forester
Oregon Department of Forestry
2600 State St.
Salem, OR

Dear Mr. Daugherty,

As you are well aware, the Governor has directed the Oregon Department of Forestry (ODF) to develop reduction plans to meet Oregon's revenue shortfall that directly affect the Douglas Forest Protective Association (DFPA) and the lands we protect. The Board of Directors of the DFPA would like to acknowledge and recognize that as part of the Executive Branch, the Oregon Department of Forestry must be respectful and responsive to the Governor's request to reduce spending and must make reductions accordingly. Likewise, the DFPA Board of Directors would like to remind you and the Board of Forestry any reduction below the approved funding level leaves us in a compromised position to meet our statutory requirements in ORS 477.005 and 477.210, our contractual obligations with ODF, and Department Directive 1-0-1-101.

The FY21 budget for the Douglas District was developed and approved by the membership on April 7, 2020 to meet these obligations. This budget reflects a standard of protection the Board of Forestry has historically approved for our district and fulfills our statutory and contractual requirements. The proposed budget reduction of 8.5% over the biennium leaves a 17% shortfall this coming year in capital for critical wildland fire protection and suppression for our landowners and the communities we serve. We believe it is our responsibility to make strong objection to any level of reduction below the approved budget by our members, as it reflects what we recognize to be the appropriate level of protection for our lands. We believe a reduction in the fire preparedness budget has a huge risk of having an increase in large fire suppression costs that will be much greater than the funds saved on fire preparedness. In addition to the increased costs, catastrophic large fires create a decrease in quality of life for Oregonians due to the large volumes of smoke as well as a tremendous loss in high quality forest ecosystems and forest resource values.

Further, it is crucial the Board of Forestry and all of the involved parties understand any General Fund cuts in the fire protection budgets equates to a much larger reduction for the district budget and significantly affects the level of protection we can provide. While typical budget reductions are dollar for dollar, every \$1 cut in General Funds to the fire program equates to about a \$3 reduction on the Douglas District. There

are two primary reasons for this: first, the legally mandated 50% General Fund split with private landowners; and second, a cut in General Funds reduces the public land assessments which does not have the 50% offset by Public Share Fire Funding. In our district, public ownership accounts for nearly 35% of the timberlands we protect and any reduction of General Funds has a compounding effect on our operating capital. Any mandatory cuts in General Funds for the fire protection budgets, and the resulting reductions, will directly increase the exposure for large catastrophic wildfires that are both costly to landowners and to the State of Oregon.

In conclusion, DFPA is very fiscally conscious in funding our fire protection program while meeting our statutory obligations to the State and our members. We work hard to develop budgets that are not only fiscally responsible but appropriate to avoid excessive large fire costs and loss of our valuable forest resources. We appreciate the opportunity to lend comment and are also grateful for the opportunity to coordinate with ODF staff on this matter. We trust that you will convey our concerns to the Board of Forestry and the Governor's Office.

Respectfully,



Rick Barnes
President, Douglas Forest Protective Assn.

cc/ec:

DFPA Board
OFIC Protection Committee
Representative Gary Leif
Representative Cedric Hayden
Senator Dallas Heard
Senator Floyd Prozanski



EASTERN LANE FOREST PROTECTIVE ASSOCIATION

3150 MAIN STREET
SPRINGFIELD, OR 97478

(Incorporated)

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Vice President:

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ODF Unit Forester:

Michael Curran

NW Oregon Interagency

Fire Management:

Ed Hiatt

Or. Forest & Ind. Council:

Kyle Williams

Keep Oregon Green Assn:

Kristin Babbs

Army Corp. of Engineers:

Wendy Jones

May 22, 2020

The Oregon Board of Forestry:

Tom Imeson – Chair

Cindy Deacon Williams

Joe Justice

Brenda McComb

Nils Christopherson

Mike Rose

Jim Kelly

Peter Daugherty - State Forester

2600 State Street

Salem, Oregon 97310

Greetings from the Eastern Lane Forest Protective Association (ELFPA), where cooperative forest protection began in the State of Oregon. For the first 71 years of our history private landowners in Eastern Lane County managed protection of forestlands from fire, human caused and natural threats to benefit growing forest resources and the development of Lane County. Since 1975 ELFPA has been engaged in an active agreement with the Oregon State Forester and State Board of Forestry to manage the daily task of forest protection work on behalf of landowners. That relationship has been fruitful through productive and difficult times.

The Board of Directors of ELFPA works diligently each year to collaborate with the State Forester's representative in the South Cascade District toward appropriate and efficient forest protection operations and budgets.

Collaboration is focused towards the singular goal of providing the best emergency services response at the lowest possible cost. This is undoubtedly the highest level of public and private collaboration for use of public funds that exists in the State of Oregon. This is the high quality and responsible partnership that we are engaged in with you.

Uncertain financial times has the Governor and Legislature seeking cost saving opportunities across all functions of state government. Keep in mind, a cut of 8.5% or more from forest protection budgets impacts district operations by double that amount due to the 50/50 public-private cost share for protection operations. This level of cost reduction **WILL** reduce the number of firefighters and the equipment they depend on in the South Cascade District. The district will lay off ten or more firefighters OR not sig a call when needed helicopter contract.

AGENDA ITEM B

Attachment 6

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At the same time drought conditions have private landowners investing in additional protection measures including equipment, forest gates, road maintenance, and development of water resources. Considering 70% of fires in Oregon were started by people last year, the State of Oregon cannot pull back from much needed fire funding.

The Oregon values we all hold dear, like clean water, healthy forests, wildlife habitat and clean air will be in jeopardy if current wildfire season predictions hold true. Protection of private and public forest resources and small communities in Eastern Lane County will be at risk of experiencing another bad fire season should front line firefighters and their equipment be reduced. We already expect the Coronavirus Covid-19 will have serious impacts on daily efforts to keep fires small and stop large fires if they occur. A damaging fire season would make our collective uncertainty and public health challenges even more daunting.

The Board of Directors of ELFPA holds firm to the original operations budget forwarded by the South Cascade District Forester as being the appropriate and adequate level of forest protection required for fiscal year 2020. ELFPA does not approve of any reductions to the original budget passed by a vote of the Membership and Board of Directors of ELFPA at our 2020 Annual Membership and Board of Directors meetings held on Wednesday April 15, 2020.

Please continue to hold the protection of forest resources from threats like wildfire in the highest regard for an adequate level of funding as we enter a new biennium. Local and climatic weather conditions do not care about the financial troubles of the public sector in Oregon. Most Oregonians remember the summer of 2017 being filled with smoky skies and cancelled outdoor activities. As we enter each stage of reopening the economy in Oregon, we need to have certainty that public health measures will be bolstered by properly funded emergency services operations. The people of Oregon and our forest resources deserve protection. Let us make that happen together.

Sincerely,



Ted Reiss
President

CC: ELFPA Board of Directors and Advisors
Chris Cline – ODF South Cascade District Forester
Dave Lorenz – ODF Southern Oregon Area Director

East Oregon Forest Protection Association

1604 27th Street

La Grande, OR 97850

May 27th, 2020

Oregon Department of Forestry

State Board of Forestry

State Forester, Peter Daugherty

2600 State Street

Salem, Oregon 97310

Oregon Board of Forestry members and State Forester Daugherty,

The East Oregon Forest Protective Association (EOFPA) and ODF has a long history of a collaborative working relationship. This relationship has helped develop the best wildfire protection and fire fighting programs in the State of Oregon. The EOFPA is concerned with budget cuts that have been proposed, by the Governor and the legislature, for ODF wildfire fighting and prevention programs at our district level and across the state of Oregon.

EOFPA has worked with the local ODF districts to provide budgets that define an "Adequate Level" of protection. These levels of protection are desired by the members and landowners with in the EOFPA. We believe that the proposed budget cuts will require staff reductions and critical resource reductions that will result in ODF not being able to provide an "Adequate Level" of protection.

With the unprecedented restrictions of COVID-19 and the threat of a long dry summer, ODF is looking at the potential of a very difficult fire season. Reducing funding to fight fire would not be in the best interest of ODF, the landowners and all residents in the State of Oregon. With the unique funding for ODF protection, a reduction in general fund money is doubled because the landowners are matching 50% of the costs. This simply does not make sense to arbitrarily reduce landowner costs who have asked for and expect protection of their lands. Every Federal agency is increasing its investment in suppression and pre-suppression resources ahead of the 2020 fire season. Private landowners and contractors are gearing up, investing, and preparing for fire season 2020 at historic levels. Why would the State of Oregon choose to dis-invest at a time when all other parties are realizing a need for increased efforts?

The members of the EOFPA urge you to approve the EOFPA budget in its entirety. We also urge you to continue to make the Governor and the legislature aware of the unique funding mechanism for the protection program and understand the importance of providing an “Adequate Level” of protection for all Oregonians.

Sincerely,

Jered Schwabauer

President, EOFPA

Klamath Forest Protective Association

PRINCIPAL PLACE OF BUSINESS

KLAMATH FALLS, OREGON

ORGANIZED TO PROMOTE COOPERATIVE FOREST PROTECTION

Peter Daugherty, State Forester, ODF
Oregon Board of Forestry
2600 State Street
Salem, Oregon 97310

State Forester Daugherty and Members of the Board,

On behalf of the Klamath Forest Protective Association (KFPA), I am writing to express concern over the budget reduction exercise and the shortage of resources that we will have to fight fire should that exercise become a reality.

The Klamath-Lake District protects nearly 1.6 million acres of private and public lands in South-Central Oregon. Our District has a history of large fire occurrences, has several high-risk wildland-urban interface zones as well as high value private timberlands. Each year we are tasked as a Committee to establish the budget at a level that is commensurate with the adequate level of protection for this highly fire prone landscape.

While it is understood that any general fund reduction directed by the Governor will affect all agencies, the fact remains that landowner contributions are directly tied to those general funds thus having a significantly greater impact than it does to other agencies. The reduction exercise amounts to approximately \$580,000 for the Klamath-Lake District. KFPA is highly concerned that a reduction of this magnitude will compromise the adequate level of protection and thus reduce Oregon Department of Forestry's ability to keep fires small. As landowners, this results in greater exposure and risk to losing our natural resources to catastrophic fire. KFPA has identified what level of protection is appropriate and has stepped up to pay for that landowner share. It is important that the general fund contribute its share to the system.

KFPA understands and appreciates the financial situation that we all face due to the COVID-19 pandemic. It is important that we not allow this hopefully short term situation to compromise the fire protection system that strives to keep our forests healthy in the long term.

Thank you for leadership and continued diligence as we face these historic challenges. Your efforts and support are recognized by the landowner community and we look forward to partnering with you as we find solutions to these issues.

If you have any questions or you feel we can help in any way, please don't hesitate to contact us.

Respectfully,


Brandon Wood
KFPA President
541-891-3079

AGENDA ITEM B
Attachment 8
Page 1 of 1





4690 Highway 20
Sweet Home, Oregon 97386
541-367-6108

votredPresident:

Scott Melcher
Melcher Family, LLC

Vice President:

Marty Suing
Marty & Tamaria Suing

Treasurer/Secretary:

Caleb Brown
Frank timber Resources, Inc

Directors:

Eric Kranzush
Giustina Land & Timber Co.

Christy Tye
SNO-Peak Nobles

Jeremy Norby
Giustina Resources, LLC

Jim Neef
Weyerhaeuser Company

Meghan Thorton
Campbell Global
Franklin Clarkson Timber

Brian Carroll
Linn County Parks

Randy Hereford
Starker Forests, Inc

Milt Moran
Cascade Timber Consulting, Inc.
South Santiam Tree Farm

Advisory Directors:

ODF Area Director (SOA):
Dave Lorenz

Bureau of Land Mgt:
Eric Johnson (Eugene)
Dan Eddy (Salem)

US Forest Service:
Edward Hiatt

Amy Corp of Engineers:
Wendy Jones

Oregon Forest
Industries Council:
Kyle Williams

Keep Oregon Green Association:
Kristin Babbs

ODF:
District Forester:
Chris Cline

May 29, 2020

The Oregon Board of Forestry:

Tom Imeson – Chair
Cindy Deacon Williams
Joe Justice
Brenda McComb

Nils Christopherson
Mike Rose
Jim Kelly
Peter Daugherty – State Forester

2600 State Street
Salem, Oregon 97310

Greetings from the Linn Forest Protective Association, above all I hope this letter finds everyone well and healthy. I feel it is important to recognize the work that the landowners of this state, in cooperation with the Board of Forestry, put forth to protect the forests of Oregon from the threat of wildfire. The LFPA has now shouldered this task in Linn County for **One Hundred and Nine years**. Justice is not done by just saying the relationship between the landowners and the State is unique, the complete and coordinated system that this relationship has become is unmatched.

The LFPA and ELFPA have worked diligently with representatives of the state for the South Cascade District to develop a budget that all parties agree is an adequate level of protection for our district. The LFPA voted on and approved this budget on April 16, 2020 at our annual meeting.

The 8.5% cut to the general fund the Governor and Legislature are requesting has double the impact due to the 50/50 cost share between Public and Private. This type of cut will be devastating to the level of protection in our District and all Districts across the State. In the South Cascade District this level of cuts will result in 10 or more firefighters and not going into contract for a helicopter when needed. State wide, the magnitude of the list only grows.

Every year the forest resources of this state are threatened by wildfire. The question is not if it will happen, but when and where it will happen, and when it does it destroys one of the most valuable resources to all the citizens of Oregon. This forests resource provides clean air, clean water, wildlife habitat, forest recreation, the forest economy and home to many who choose to live in or near the forest lands of this beautiful state.

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This last fire season 70% of fires in Oregon were human caused and occurred near populated areas, resulting in evacuations, loss of structures, homes, and livelihoods. Above all, these fires have resulted in the loss of **Life**.

The LFPA goes on the record in support of an adequate level of protection represented by the **current** budget as presented by the South Cascade District. Further more we support the budgets, **as presented**, of all other Forest Protection Districts across the State of Oregon and the Oregon Department of Forestry.

Sincerely,



Scott Melcher
President

CC: LFPA Board of Directors and Advisors
Chris Cline – ODF South Cascade District Forester
Dave Lorenz – ODF Southern Oregon Area Director

N.W. OREGON FOREST PROTECTIVE ASSOCIATION

Mr. Peter Daugherty
State Forester
Oregon Department of Forestry
2600 State Street
Salem, OR 97310

May 18, 2020

Dear Mr. Daugherty,

As we approach the summer months, forest landowners and workers are completing their required yearly training and preparing their firefighting equipment in preparation for fire season.

The gloom of the economy and subsequent declining State revenues have invoked the suggestion of large, across the board budget cuts. Arbitrary budget cuts of this magnitude imposed so close to the onset of fire season are not in the best interest of taxpayers or landowners. Rash decisions could have devastating impacts on this year's firefighting season and likely affect firefighting budgets and funding for many years into the future and put our forests at risk.

Each year the Forest Protection Associations meet with Forest Protection District personnel to establish a budget that all landowners agree will provide an "Adequate Level of Protection" for both private and public forestlands. Private forestland owners acknowledge their obligation to manage their lands in an environmentally and economically sustainable fashion while additionally protecting their property and neighboring forests from wildfire. In addition to the levied per acre assessment, private forest land owners contribute additional protection measures through substantial "In Kind Contributions". The Association members strongly believe the initial attack capabilities of ODF Protection crews must be maintained at the "Most Efficient Level" which is based on a fully funded budget. Although expedient; across the board budget cuts will undermine the wildfire suppression efforts that private forest landowners and Oregonians expect and rely on.

It is also very important that the Governor and the legislature continue to be made aware of the unique funding mechanism used in the Protection Program to create the Complete and Coordinated System. We are concerned that entering a fire season with the mind set of "we'll provide the best forest protection we can" undermines the agreement between the State and forest landowners and sets a precedent to break the agreement in future years.

Thank you for your continued leadership and guidance as this fire season and budget dilemma gets defined and sorted out. The challenges faced each year in Salem are many and each one threatens to seriously affect the nature in which we manage and protect our forests for their highest and best use. A fully funded Fire Protection budget is the foundation of our forest management principles. Your dedication and support is noticed by the landowners in the Association and is very much appreciated.

Sincerely;

Rodney L. Jacobs
President, NWOFFPA

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May 19, 2020

Oregon Board of Forestry
2600 State Street
Salem, OR 97310

Dear Oregon Board of Forestry Members,

The members of the Rogue Forest Protective Association (RFPA) are writing to you in regards to the proposed budget cuts to fire prevention and protection in our local operating area and across the State of Oregon. We recently approved the local ODF budget at our Spring Association Meeting because we determined that it would provide the "Adequate Level of Protection" that ODF is required by statute. We believe the budget cuts, as proposed, to staffing and critical resources will result in ODF not being able to provide the required "Adequate Level of Protection".

Southwest Oregon handles approximately 30% of ODF fires every year, so initial attack is absolutely critical. The budget cuts would have a major impact on the following:

Large Fires - Over the last 10 years, we have seen an uptick in large fire costs which have huge impacts on the General Fund once we go above the shared responsibility of \$20MM. In fact we are still collecting money from fires that go back to 2015. A high likelihood of immediate implications of cost reductions could be:

- Fewer fire fighters and aircraft will result in more acres growing beyond the target 10 acres or less and becoming large costly fires
- Reducing the Fire Investigation staff will hinder the ability to collect cost recovery monies from responsible parties
- More smoke in the air will exacerbate an already frustrated public around increased health concerns and economic loss to businesses
- More loss to important timberland assets such as watersheds, fish and wildlife
- Potential loss of community lives and infrastructure like California (Klondike Fire c 2018 threatening towns of Selma, Obrien, Cave Junction, Grants Pass)
- Less people to process billing and longer wait times in reimbursement from federal partners / FEMA in the case of large fires , which results in 10's of millions of dollars sitting on hold with no interest being paid but loans to cover these costs are accumulating interest
- More pressure on ODF cash flow / funding as these costs come out of the daily ODF operating budgets (already strained) and General Fund.

Federal Team Response/ COVID-19 - With over 50% of the timbered landscape in Oregon being owned by the Federal Government, ODF is not involved in many of the overall fire starts that occur. The 10 year historical average of acres burned (and therefore smoke produced) is that approximately 90% occurs on US Forest Service lands. Many of these fires get very large. In fact in southern Oregon in 2018, 10's of thousands of acres of private lands were burned due to large Forest Service Fires that came off the public land side and onto private and ODF protected lands before ODF could get involved and stop them. When the Forest Service local resources are overwhelmed, they are dependent on multi-agency teams to come and support their efforts. In the face of COVID19, there will be a more limited and less timely response from this resource nationally and internationally as everyone in the world is responding to concerns of how to deploy teams, travel to and from fires, and all around safety

of firefighters. There are indications that large numbers of firefighters connected to these teams will not respond when asked to participate. This alone will create a huge gap in the potential work force available to fight fires when they become large.

This one fact alone should be enough based on recent past history (when the agencies were able to muster tremendous forces and still not stop the spread of large fires) should be enough to ask the question “*why are we not expanding our investment in initial attack or base level of funding of the fire department*” across ODF Associations in Oregon.

The threat to the GF could be two or three times the average fires season costs which has doubled from an average of \$20MM to over \$40MM in recent years. The punitive approach to reducing ODF budgets across Oregon will be of miniscule value squandered, if we have another \$100 + MM large fire cost year like 2013.

Wildfire Council Recommendations - The overall findings presented from the Governor’s Wildfire council in 2019 conclusively identified many of the problems identified above. Additionally, there were specific recommendations in the Suppression section of the report which identified over \$20MM in costs that should be applied over time to shore up positions and resources needed to get ODF back to a level of sufficiency. Over the last ten years the department has been operating with personnel on overtime that equates to acting like they have 55 more staff than they actually do. As this situation continues, leadership is faced with tough decisions that either limit response time and effectiveness or take unprecedented risks of deploying people who are over worked, overtired and could result in large safety issues.

Overall, by any calculation this is the absolute worst time to respond by cutting back and reducing resources when we should be following these recommendations and adding to them.

Insurance Policy - The Lloyds of London Insurance Policy for the State of Oregon (\$25 MM policy that is engaged if the state spends over \$50MM in large fire costs) is at risk. The cornerstone of the risk mitigation plan in Oregon is as fully funded base level budget which meets an “Adequate Level of Protection”. ODF professionals and landowners painfully sit down every year to deliberate and insure that this criteria is met across the landscape they manage at every association. If reductions to the current budget proposals are instituted and initial attack compromised then we will have more large fires. A practical review of a partial or full claim on the Fund that reveals Oregon leadership knowingly reduced initial attack capability will put relationships in London with underwriters in serious jeopardy. In fact, that outcome could be the end of a forty year relationship that has successfully generated a one of a kind policy in the world.

Given all the above consequences, along with the severe fire danger season forecast, we believe that reducing the ODF budget is not viable in this current environment.

Sincerely,

Greg Johnson
President- Rogue Forest Protective Association

Western Lane Forest Protective Association

Mr. Peter Daugherty
State Forester
Oregon Department of Forestry
2600 State Street
Salem, OR 97310

June 2, 2020

Dear Mr. Daugherty,

I am reaching out to you on behalf of the Western Lane Forest Protective Agency (WLFPA) regarding the proposed budget cuts in fire prevention and protection across the state. The WLFPA Board of Directors works directly with ODF staff to develop annual operating budgets that ensure an adequate level of protection.

This adequate level of protection meets both ODF and Landowner objectives and metrics. Our budget wisely invests in fire suppression technology and savings for maintenance/repairs/improvements to facilities. These savings programs allow for fully funded and planned facility/vehicle maintenance which insures the ability to properly respond to fire emergencies. Forcing budget reductions onto Districts that cause any drop below the adequate level of protection as determined by each District with their respective Boards will unfairly increase the risk of damage and loss to private landowners, put public health at risk of increased smoke exposure, and put the environment at risk of damages that could last generations.

Reducing the budget to any forest protective agency will deeply impact the entirety of the state's ability to suppress wildland fire. WLFPA recognizes the fit of each individual district in the complete and coordinated system within Oregon. Districts without active fire are often willing and able to aid off district fires. Budget reductions in any district will reduce that ability to help fellow districts. With reduced local and neighboring support, we will face a significantly increased risk of large fire and escapement. When that occurs, Incident Management Teams will be deployed to suppress these large fires. In the current environment of Covid - 19 the last thing we need are large fire camps that increase exposure to fire fighters and surrounding communities. Budget cuts to prevention will also reduce public outreach and preparedness thus increasing the risk of starts and large fires even further. This increased risk exposes the agency to more expensive budgeting crisis in the future.

We understand the strain Covid-19 has had on our economy and communities, especially when it comes to funding public services. We ask you and the board for continued support in going forward with our proposed budgets. We thank you for your support and urge you to continue voicing the need for a fully funded fire budget with our governor and legislature.

Sincerely,

Garnett Warbrough
President, WLFPA

West Oregon Forest Protective Association
c/o Oregon Department of Forestry
24533 Alsea Highway
Philomath, OR 97370

May 27, 2020

Oregon Board of Forestry and
Peter Daugherty, Oregon State Forester
2600 State Street
Salem, OR 97310

Dear Board of Forestry Members and State Forester,

I am writing on behalf of the members of the West Oregon Forest Protective Association to express our concerns about the proposed cuts to fire protection budgets across the state. For many decades, landowners and the State of Oregon have forged a unique partnership to protect forestlands, the communities they surround, and the many services they provide from the threat of wildfire. Extreme conditions in four of the last five fire seasons have highlighted the need for this "Complete and Coordinated System" to function more efficiently and effectively than ever to minimize the detrimental effects of wildfires in Oregon.

Each spring, forest protective associations across the state meet to review district needs for personnel, equipment and facilities dedicated to fire protection for the upcoming fire season. We plan and budget our expenses to provide an "Adequate Level of Protection," as required in statute, while also taking care to manage landowner and general fund finances responsibly. Cuts to these carefully crafted budgets threaten to take the state below the required Adequate Level of Protection.

A critical aspect of fire protection in Oregon is our philosophy of utilizing aggressive initial attack to effectively control fire starts to minimize total firefighting costs and impacts to the landscape. A reduction in the budget for personnel, equipment and infrastructure needed to support statewide initial attack efforts seriously undermines the goal of keeping fires small. With much of the state already experiencing moderate to severe drought conditions, effective initial attack will be our best strategy for controlling fire impacts and costs.

As you are also aware, the current COVID-19 situation is making life more complicated for all of us, including fire managers across the state. Districts are modifying training programs, fire line tactics, and working to supply their crews with protective gear to assure crew health while meeting our mission. Reduced funding will threaten the effectiveness of fire crews in the face of the unique challenges of COVID-19 preparedness.

As you engage in discussions with the governor and legislature on the topic of funding, please reiterate the necessity of providing an Adequate Level of Protection. It is more important this year than ever before, as investing in initial attack and firefighting resources may keep a 10-acre fire from becoming a very costly 100,000-acre fire.

Thank you for your continued partnership in protecting our forestlands.

Sincerely,

Jeff DeRoss
President, West Oregon Forest Protective Association

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Agency Budget Development – Policy Option Packages

Bill Herber & James Short

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Economic Forecast – June 2020

- \$2.7B revenue reduction in 19-21 biennium
- \$4.4B revenue reduction in 21-23 biennium
- For statewide Current Service Level
 - Effectively 6% reduction in 19-21 biennium
 - 16% reduction in 21-23 biennium
- \$1.6B currently in state reserves, Educational Stability Fund and Rainy Day Fund
 - For more information, Office of Economic Analysis at <https://www.oregon.gov/das/oea>

Package #	Program	Title	General Fund	Other Funds	Federal Funds	Total	Pos (FTE)
100	Fire Protection	Fire Season Severity Resources	\$6,000,000	\$0	\$0	\$6,000,000	0 (0)
101	Fire Protection	Organizational Sustainability & Modernization	\$6,669,137	\$0	\$0	\$6,669,137	27 (27)
102	Fire Protection	Next Generation Severity	\$21,000,000	\$0	\$0	\$21,000,000	0 (0)
130	State Forests	Funding Recreation, Education and Interpretation	\$6,841,329	-\$6,596,872	\$0	\$244,457	1 (1)
150	Private Forests	Supporting Sustainable Family & Community Forestry	\$1,661,374	\$1,107,583	\$0	\$2,768,957	12 (12)
151	Private Forests	Forest Practices Act Effectiveness & Implementation	\$1,432,625	\$955,084	\$0	\$2,387,709	7 (7)
152	Private Forests	Expanded Capacity for Sudden Oak Death Program	\$6,973,137	\$0	\$0	\$6,973,137	9 (9)
160	Partnership and Planning	Forests Climate Change Mitigation and Adaptation	\$3,230,574	\$0	-\$305,568	\$2,925,006	9 (9)
161	Partnership and Planning	Implementing Shared Stewardship	\$3,212,185	\$0	\$0	\$3,212,185	19 (19)
170	Agency Administration	Deferred Maintenance	\$516,202	\$4,885,000	\$0	\$5,401,202	0 (0)
171	Agency Administration	Firefighter Life Safety **	\$1,000,000	\$527,360	\$0	\$527,360	2 (2)
172	Agency Administration	Diversity, Equity, & Inclusion	\$0	\$453,315	\$0	\$453,315	2 (2)
173	Agency Administration	Administrative Modernization	\$0	\$1,485,993	\$0	\$1,485,993	7 (7)
174	Agency Administration	Facilities Capital Management Program Capacity	\$0	\$1,120,091	\$0	\$1,120,091	5 (5)
175	Agency Administration	Toledo Facility Replacement Extension *	\$64,310	\$1,764,358	\$0	\$1,828,668	0 (0)
Totals:			\$58,600,873	\$5,701,912	-\$305,568	\$62,997,217	100 (100)

Department Recommendation

- The Department recommends the Board approve the proposed policy option packages for inclusion in the 2021 – 2023 Agency Request Budget as presented for Board consideration at the July 22, 2020 Board meeting, subject to additional budget instructions from DAS CFO.

EVALUATE BOARD'S AUTHORITY AND CONSTRAINTS ON CLIMATE CHANGE POLICY

ODF Board of Forestry June 3rd, 2020

John Tokarczyk and Danny Norlander
Partnership and Planning Program

AGENDA ITEM B
Attachment 15
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CLIMATE CHANGE WORK PLAN:

- TOPIC A: Analysis of Statutes and Administrative Rules
 - Assess Statutory Authority
 - Establish Climate Change and Forest Carbon Strategic Goal
 - Analyze Existing Policies to Achieve Outcomes in face of Climate Change
 - Identify Gaps in Current Policy

- TOPIC B: Mitigation and Adaptation Efforts

Climate Change and Forest Carbon Work Plan
Issue: Assess Statutory Authority
<i>Milestones</i>
<ul style="list-style-type: none"> • Identify primary questions of interest • Request DOJ analysis • Receive legal analysis and report
Issue: Establish Climate Change and Forest Carbon Strategic Goal
<i>Milestones</i>
<ul style="list-style-type: none"> • Review Goal G in Forestry Program for Oregon • Determine public input for goal revision • Conduct public input • Board workshop to revise goal • Establish new goal
Issue: Analyze Existing Policies to Achieve Outcomes in face of Climate Change
<i>Milestones</i>
<ul style="list-style-type: none"> • Establish sequence to conduct full analysis of statutes and administrative rules • Identify priority for initial analysis • Interim report on initial analysis • Final report on initial analysis • Initiate second priority analysis
Issue: Identify Gaps in Current Policy
<i>Milestones</i>
<ul style="list-style-type: none"> • To be determined following assessment of statutory authority and analysis of existing policies
Issue: Mitigation and Adaptation Efforts
<i>Milestones</i>
<ul style="list-style-type: none"> • Harvested Wood Products and Sawmill Energy Report • Annual Update on Mitigation and Adaptation Efforts • Scenario Planning Model Review • Update on Scenario Planning with focus on Management and Utilization Strategies • To be determined

TODAYS TOPIC: STATUTORY AUTHORITY

- Presentation of potential questions
- Board discussion on their questions
- Final Clarification of questions to Department of Justice



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Attachment 15
Page 3 of 13

TODAYS OUTCOMES:

- A set of questions to provide to DOJ
- Clear expectations and timeline
- Today is not:
 - Legal advice from DOJ

TODAYS TOPIC: STATUTORY AUTHORITY

- Summary
- Background
- Analysis
- Recommendation
- Next Steps

AGENDA ITEM B
Attachment 15
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POTENTIAL QUESTIONS:

Question:	Statute:	Rationale:
<p>Does the authority to supervise all matters of forest policy and management include establishing climate change and forest carbon goals?</p>	<p>526.016</p>	<p>If statute is to maximize benefits, and climate mitigation is included in those benefits, then including carbon considerations could be the policy of the state.</p>
<p>Is carbon storage and sequestration included in "management of all forestlands in Oregon should be encouraged to provide continuous production of all forest benefits?"</p>	<p>526.460</p>	

POTENTIAL QUESTIONS:

Question:	Statute:	Rationale:
Does the Board have the authority to regulate forest carbon under the Forest Practices Act?	527.710	Need to determine if the duties and powers of Board to make rules to provide for the overall maintenance of resources include forest carbon and or climate change.

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Attachment 15
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POTENTIAL QUESTIONS:

Question:	Statute:	Rationale:
Can the Board adopt forest practices rules based on future projections or models, or does there need to be a measurable degradation currently?	527.714	Need to determine the statutory time period and the type of data and information the Board can use in rule making.

POTENTIAL QUESTIONS:

Question:	Statute:	Rationale:
<p>The Good Neighbor Authority (GNA) policy, ORS 526.274(3), list specific outcomes for pursuing projects.</p> <p>Does this specificity limit applications to climate change?</p>	<p>526.274 526.272</p>	<p>ORS 526.274(3) grants the Board authority to establish the goals and objectives for federal forest management. Increasing utilization of GNA may require clarification.</p> <p>Need to clarify the types of management goals allowed when working with federal partners under GNA?</p>

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Attachment 15
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TODAYS TOPIC: STATUTORY AUTHORITY

- Summary
- Background
- Analysis
- **Recommendation**
- **Next Steps**

- Staff will work with the DOE to obtain Department of desired statutory authority and analysis.
- DOE will present the findings to the Board regarding and related to climate change, given what is currently known and what is projected.
- Analysis of current rules and statutes related to FPA, Protection, and State Forests can commence once DOJ clarification analysis is established.
- considered as outlined in the climate change work plan.

TODAYS TOPIC: STATUTORY AUTHORITY

- Public Comment

AGENDA ITEM B
Attachment 15
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TODAYS TOPIC: STATUTORY AUTHORITY

- Clarifying discussion
- Department Expectations
 - Covered in Recommendations
- Board Expectations

WRAP UP



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HELLO, MY NAME IS MARIA SAUSE AND I AM A RESIDENT OF LINCOLN COUNTY

I live in the Coast Range and the topics of forestry and climate change have been in my mind, heart, and action for several years. We have seen privately owned forests clear-cut at an alarming rate, both in the size of cuts and frequency of harvests. Today, we face clear-cuts wherever we go. North West forests used to be one of the world's largest carbon sinks. Even though trees are replanted after being cut, the new generations, all of the same species, raised with pesticides that kill the micro-organisms in the soil and poison all new non-coniferous growth, do not regenerate the same ecosystems that existed, nor the same capacity of the forest to store carbon and emit oxygen. Today, Northwest forests have become one of the biggest carbon emitters in the world. Profits to be made from clear-cutting and pesticide spraying drive the continuing destruction of forestland, and with it the increasing scarcity of water, pollution of streams, and take place at the expense of health and safety of the people and of all life forms that exist in our forests or near them. I hope that the Board of Forestry is aware of the grave injustice to humans and non-humans alike of continuing extraction and replanting of Oregon's forests in the manner it is done today.

There is work being done on carbon offsets as a way to increase carbon storage. That means that the reduction in CO₂ emissions by some people can be used by others to pay for failing to reduce emissions. We do not have the time for such games, which inevitably inhibit the rate at which we could slow down the warming of our planet. Our window of opportunity to prevent catastrophic and irreversible climate change is small and getting smaller. We now have 10 years to change course. Trees must be allowed to grow to an age that gives them the ability to store carbon that truly counts. Most of today's trees grow thin and spindly. We desperately need those huge, centuries old trees that timber companies are so eager to get their saws on, to save our climate and keep our planet home livable for us and all other beings. Let us keep what we have left. It is precious. The Forest Practices Act can be reformed to do that. Forests have grown without pesticides for millions of years, creating the wealth of life and wondrous ecosystems of which so few remain intact. We cannot restore or replace what nature took millions of years to make with chemical intervention or genetic modification. We have to protect what we still have of Nature from further unraveling and destruction. It is we who need to adapt to Nature, not the other way around.

Email submitted: 6/2/2020 5:30:03 PM

Message:

Oregon Department of Forestry should follow policies that prioritize mitigating climate change. Oregon has an opportunity to be an innovative leader in maintaining forests for the highest ecological, social and economic value by focusing on an approach that prioritizes climate protection.

Marshall Gause
31272 Gowdyville Road Cottage Grove, OR 97424 United States
mgause@thoughtcycle.net

Email submitted: Tue 06/02/2020 9:46 AM

Written Testimony:

To: Board of Forestry

From: Greg Jacob, Oregon Chapter, Sierra Club, State Forest Committee

Subject: Agenda Item No 4, Climate Change and Forest Carbon, June 3 meeting

Oregon forests hold significant carbon stores that rival tropical rain forests for carbon density. While prior levels of forest carbon will not be recovered, with changes in forest management, we can see increases from present levels. Current commercial forestry practices are Oregon's largest source of carbon emissions, larger than emissions attributed to transportation. Forty-five to sixty percent of the carbon stored in trees that are logged becomes CO₂ emissions as soon as the trees are removed from the ecosystem and processed into wood products, and one hundred percent of the carbon stored in trees that are logged and then burned for biomass energy becomes CO₂ emissions, making biomass burning more polluting than burning coal (Harmon, et.al. Climate Change, 1996, pp. 521-50).

“Only by substantially increasing forest protection from logging, while also recovering forests which have suffered industrial deforestation, in combination with reducing fossil fuel use and emissions, will we have a greater than 66% chance of keeping additional global warming below 2 degrees Celsius “(from John Muir Project of Earth Island Institute). Adopting forest management practices that maximize carbon sequestration can result in Oregon's forests becoming a part of the solution to the climate crisis rather than part of the problem.

In specific terms, the Clatsop and Tillamook State Forests, according to their Annual Operating Procedure (AOP) for 2018, leave little, if any, room for developing complex structure stands. The AOP's resemble a corporate forest plan designed to meet the established revenue targets. Astoria District, for example, is short of the 2027 target for complex forest, yet it is planning clearcuts on hundreds of acres of complex stands in such sales as Bam Bam, Walk and Crawl, and Summit Shake. The AOPs for both the Tillamook and Astoria districts show a decrease in partial cuts and thinning opportunities. A 2016 USDA publication indicates the habitat and timber value increases associated with thinning in the coast range.

We need to modernize laws to reduce the size of clear cuts, a major source of carbon emissions, and we should protect remaining old growth stands. For those areas that are clear cut, there needs to be more standing trees. The state should manage forests for 80-100 cycles, not 45-60 year cycles, and have greater reliance on thinning procedures.

Greg Jacob
1331 NE Parkside Dr.
Hillsboro, OR 97124
503-747-8005
jacobgk@comcast.net

Date submitted: Wed 06/17/2020 4:47 PM

Board of Forestry,

On behalf of Umpqua Watersheds, a 501 (3)(c) nonprofit group representing conservation interests in Douglas County, I hereby submit written testimony regarding your authority and constraints on implementing climate change policy as directed by Governor Brown's Executive Order 20-04 (EO).

Understanding an administrative agency's legal scope pursuant to an executive order requires a multi-layered approach. Oregon Department of Forestry (ODF) is bound by statutory mandates. In this case, ODF is bound by the Oregon Forests Practices Act (OFPA) and the State of Oregon public policy to "encourage the continuous growing and harvesting of forest tree species...."¹ This statute invests a great deal of discretion to ODF because it recognizes that forestlands are already subject to other laws and regulations that deal primarily with consequences of operations on forestland and not the manner in which operations are conducted.² As such, the Board has exclusive authority to develop and enforce rules pursuant to ORS 527.710.

However, ODF and the Board of Forestry reside beneath the executive branch of Oregon's government. An executive order that is not issued as a result of a declaration of a "state of emergency" does not appear to preempt existing rules and regulations under to ORS 401.165. Nonetheless, an executive order still carries the force of law and is to be considered a directive from the Governor to her administrative agencies so long as it does not conflict with a statutory mandate and/or the executive order is issued to clarify policy objectives of an existing statutory mandate. Within this framework, I implore you to read Governor Brown's Executive Order 20-04 as a directive that does not conflict with your statutory mandate, but instead clarifies a current policy need- to establish policies to address and mitigate GHG emissions to the fullest extent under existing law.

Governor Brown was careful to not include ODF under a specific heading of the EO. Instead, ODF's responsibilities are culminated under the "General Directives" heading. Here, the EO clearly states that "agencies shall exercise any and all authority and discretion vested in them by law" to help facilitate emissions reductions.³ Agencies are also to prioritize and expedite processes and procedures that could accelerate reductions in GHG emissions and consider/integrate climate change and climate change impacts in its policy making decisions.⁴ As such, nothing in Governor Brown's EO conflicts with ODF's statutory mandate and may clearly be read into the OFPA.

While OFPA directs the State Forester to establish rules that will ensure the continuous growing and harvesting of forest tree species, it also specifically directs the Forester to establish rules that

¹ ORS 527.630 (1).

² ORS 527.630 (2).

³ EO 20-04 (3)(A).

⁴ Id. at (3)(B-C).

shall provide for the maintenance of air quality, water resources, soil productivity, and fish and wildlife.⁵ Furthermore, this same section of OFPA directs the Board to determine whether forest practices would conflict with these resource sites. Should a conflict exist, the Board must consult with appropriate agencies and adopt rules that are appropriate to protect air quality, water resources, soil productivity, and fish and wildlife.⁶ As the most current and best available science provides, these resources will be greatly and negatively impacted by the onset of climate change.⁷

Thus, it is most evident that EO 20-04 lawfully directs ODF and its Board to recognize the latest and best available science that may be used to address the climate crisis as it implicates the resources listed in OFPA section 527.710(2). Conclusively, EO 20-04 lawfully directs the Board to generate its policy decisions according to such science.

Thank you for the opportunity to deliver this written testimony.

Sincerely,

Angela D. Jensen

Conservation/Legal Director
Umpqua Watersheds
539 SE Main Street
Roseburg, OR 97470
Office: 541-672-7065
Cell: 802-236-3215
Email: angela@umpquawatersheds.org

⁵ ORS 527.710 (2).

⁶ ORS 527.710 (3)(b-c).

⁷ The science and related policy objectives can be found in Oregon Global Warming Commission reports: <https://www.keeporegoncool.org/reports>

Email submitted: 6/2/2020 5:27:00 PM

Message:

It is crucial that the Department of Forestry has a strategy to address climate change. I want to learn more about policy proposals in this regard.

Katja Kohler
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Marshykat@msn.com

From: [Jack Reis](#)
To: [ODF DL Board of Forestry](#)
Subject: Per Board Meeting June 3 Agenda Item FY 21 AOP
Date: Wednesday, June 03, 2020 2:27:10 PM

Board of Forestry,

We are a business that relies on the sustainable utilization of forests and waterways around the country. One of those critical areas is the North Coast region of Oregon. Last year alone, we traveled to the area for photoshoots and to promote local businesses there to a broader national and international audience. It has been our intention to share the natural beauty of these areas with our customers. As it stands, we will not be able to continue those initiatives.

The immense amount of clearcutting on the North Coast lands, both private and public, is woefully short-sighted. Studies (like those from Oregon State University) have shown that these rainforests have an incredible ability to sequester carbon when preserved for more than just timber harvest. Allowing massive clear cuts introduces toxic pesticides into the surrounding watersheds, which flow through steep-sloped, private timberland.

Furthermore, you refuse to grant your constituents transparency into the process. These families simply have no idea when and where their watersheds will be poisoned, effectively stripping their ability to protect themselves from harm. Your negligence is dangerous and shameful.

The Oregon timber industry has displayed a distinct lack of concern for their actions and the resulting repercussions on the community. The absence of a sustainability plan further indicates to us that your oversight has fallen disappointingly short. As a business that patronizes your lands and rivers, and promotes travel to your communities, your disregard for the broad impact of these decisions is shocking.

The revenue generation tactics you've relied on for several decades are outdated and have put you behind the curve of progress. It is time for the Board of Forestry to stand up for what is right and lead us on a path of sustainability. It is time to take your responsibility seriously. The people and industries that utilize your forests and waterways demand it. If you would like to open a discussion with us on recommendations for adopting a sustainable management policy, we would encourage and welcome that conversation.

Jack Reis | *Director of Marketing*
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Forest Carbon Coalition

Advancing nature's climate solutions

5/6/20

Sent by electronic mail

Jason Miner, Natural Resources Policy Director
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Kristen Sheeran, Director
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Tom Imeson, Chair
Oregon Board of Forestry
BoardofForestry@oregon.gov

RE: ODF implementation of Executive Order 20-04

Dear Mr. Minor, Ms. Sheeran, and Mr. Imeson:

The Forest Carbon Coalition and its Oregon partners have the following recommendations to offer as the Oregon Department of Forestry (ODF) begins to fulfill its duties under Executive Order 20-04 (EO 20-04). We are encouraged that Governor Brown has exercised her authority to accelerate climate action in Oregon through this measure. Given that the industrial logging and wood products sector is Oregon's most carbon intensive and presents one of the state's most serious threats to climate resiliency, we believe it is imperative that ODF exercise any and all authority and discretion to:

- (1) Reduce greenhouse gas (GHG) emissions from industrial logging activities;
- (2) Regrow climate resilient forests on damaged and degraded lands, and;
- (3) Implement these tasks in the most cost-effective manner possible.¹

As ODF prepares its initial submission by May 15th, we want to ensure that the scope of actions proposed by ODF is in line with these mandates. To be in compliance with EO 20-04, we believe ODF's suite of proposed actions must include binding commitments to:

¹ General state agency duties to reduce emissions and climate impacts in a cost-effective manner are set forth in Executive Order No. 20-04 § 3(A-D).

Reduce emissions and climate impacts across all ODF program areas

The directives set forward in EO 20-04 should apply to all ODF operations, regulatory and management programs that have a direct or indirect influence on GHG emissions and resiliency to climate change. These include activities ODF carries out in association with its fire protection, private forests, state forests, administration, and facilities maintenance programs as well as its collaborative activities with managers of national forest and BLM lands. **In its May 15th submission, ODF must provide details of how each of these regulatory and management programs will be modified to meet EO 20-04's mandates.**

Restore nature's carbon storage and sequestration capacity

Compared to the carbon dense ancient and native forests that once dominated Oregon's forested landscapes, the matrix of clearcuts, logging roads and timber plantations that now characterize industrial forestlands and portions of state, federal and other private lands store and sequester far less carbon and are far more vulnerable to the effects of climate change.² According to the most recent Forest Inventory and Analysis (FIA) data, average carbon densities on western Oregon forestlands range between 108 tons per acre on industrial forestlands to 157 tons per acre on national forests. These values are far below the natural capacity of old-growth forests, which can store more than 320 tons carbon per acre.³ Carbon sequestration dead zones now exist where highly productive carbon sinks once stood. Recent clearcuts, in fact, are net emitters of CO₂ for ten to fifteen years after logging.⁴

Industrial forestlands are also more vulnerable to the effects of climate change, weakening the resiliency of forest ecosystems and endangering nearby rural communities. These lands and the waters that traverse them are far more susceptible to drought, disease, wildfire, floods, landslides, low summertime streamflow, thermal pollution, fish kills, regeneration failures and harmful algae blooms than the natural forests and watersheds they have replaced. Each of these facts has been presented to ODF, the Carbon Policy Office and the legislature on numerous occasions over the past several years.⁵

² Krankina, O., D.A. DellaSala, et al. 2014. High biomass forests of the Pacific Northwest: who manages them and how much is protected? *Environmental Management*. 54:112-121.

³ Seidl, R., Spies, T.A., Rammer, W., Steel, E.A., Pabst, R.J., Olsen, K., 2012. Multi-scale drivers of spatial variation in old-growth forest carbon density disentangled with Lidar and an Individual-Based Landscape Model. *Ecosystems* 15: 1321-1335.

⁴ Turner, D.P., Guzy, M., Lefsky, M.A., Ritts, W.D., Van Tuyl, S., Law, B.E., 2004. Monitoring forest carbon sequestration with remote sensing and carbon cycle monitoring. *Environmental Management* 33(4): 457-466.

⁵ Center for Sustainable Economy, et al., 2018. Input on forest carbon study and policy interventions to reduce the adverse impacts of industrial forestry on climate change and climate resiliency. Submitted to ODF and CPO July 10th, 2018. Portland, OR: Center for Sustainable Economy.

Given these realities, ODF's overriding commitment should be to expedite the recovery of these damaged and degraded lands back into real, climate resilient forests capable of providing sustainable supplies of high-quality wood products while replenishing carbon storage, carbon sequestration and other ecosystem services back to their natural levels. Proforestation and other climate smart practices should be front and center of ODF's strategies to accomplish these goals.⁶ In addition, nature's baseline capacities should inform selection of all ODF targets and desired conditions adopted in the context of EO 20-04 implementation, and ODF should make this explicit in its May 15th submission.

Protect all remaining tracts of carbon rich native and old growth forests

Undisturbed native and old growth forests in the Pacific Northwest are among the most carbon dense ecosystems on Earth.⁷ When they are logged, most of this carbon ends up in the atmosphere. In 1990, forest scientists estimated that the conversion of over 5 million hectares of old-growth forests into tree plantations in western Oregon and Washington has added up to 1.8 billion metric tons of carbon to the atmosphere - a carbon deficit that represents 104 years of Oregon's current in-boundary GHG emissions.⁸

The loss of native and old growth forests continues today, in part due to ODF's failure to take action to stop it. As a result, old-growth forests now exist in mere fragments, estimated by Oregon's Department of Fish and Wildlife at roughly ten percent of their original extent. **To satisfy EO 20-04, ODF must make every reasonable effort to increase the protection for all remaining tracts of these native forests as blueprints for proforestation and climate adaptation, to ensure that rich stores of carbon stay in forests, and to maintain a wide range of ecosystem services of immense value to Oregon's rural and urban communities.**

Natural control of disease is one ecosystem service that is now receiving widespread global attention. We are in the midst of a global pandemic caused, in part, by the loss and degradation of biodiverse forests. In many parts of the world, the destruction of native forests into fragmented patches is increasing the likelihood that viruses and other pathogens will jump from wild animals to humans.⁹ The loss of natural controls on insects, disease, and other

⁶ Moomaw, W.R., S.A. Masino, E.K. Faison, 2019. Intact forests in the United States: proforestation mitigates climate change and serves the greatest good. For. Glob. Change, 11 June 2019: <https://doi.org/10.3389/ffgc.2019.00027>.

⁷ Krankina and DellaSala et al., 2014, note 2.

⁸ Harmon, M., Ferrell, W.K., Franklin, J.F., 1990. Effects on Carbon Storage of Conversion of Old Growth Forests to Young Forests. *Science* 247: 699-702.

⁹ Bloomfield, L.S.P, T.L. McIntosh, E.F. Lambin, 2020. Habitat fragmentation, livelihood behaviors, and contact between people and nonhuman primates in Africa. *Landscape Ecology* 35: 985-1000.

pathogens has been linked to increased likelihood of zoonotic disease transmission.¹⁰ The chilling lessons from SARS-CoV-2 (the virus that causes COVID-19) is a stark reminder that our intrusion into remaining wild areas must halt. As such, ODF's May 15th submission should reflect a commitment to inventorying and protecting all remaining native forests from logging and other human disturbances.

Report and regulate GHG emissions from the logging and wood products sector

Although uncounted in Oregon's official GHG inventory, it is widely understood that the logging and wood products sector is very carbon intensive. As early as 2013, the Oregon Global Warming Commission published estimates of timber harvest related emissions in Oregon. These findings have been updated in OGWC's most recent report to the legislature.¹¹ Between 1990 and 2002 the OGWC report estimated emissions to range between 21 million and 36 million metric tons CO₂ equivalent per year (MMT CO₂-e/yr).¹² In 2017 and 2018, two studies in Oregon - one by OSU researchers and one by Center for Sustainable Economy estimated emissions to average roughly 34 MMT CO₂-e/yr between 2000 and 2015.¹³ These figures, which come from comparing emissions with logging and wood-products sector vs. what the emissions would have been without these activities (with-and-without approach), confirm that logging is Oregon's number one source of GHG emissions.

ODF has resisted this with-vs.-without analytical approach, preferring instead, a with-vs.-with approach that assumes the sequestration on lands previously logged and replanted offset the emissions from this year's logging. The with-vs-with approach hides the true emissions of industrial forest management.¹⁴ **As EO 20-04 is implemented, Oregon must go beyond the limited framework of its existing GHG inventory and honestly account for all aspects of the logging and wood products sector emissions in its biennial update, as suggested by some of the world's foremost forest carbon researchers.**¹⁵ ODF, OGWC

¹⁰ Pongsiri, M.J., J. Roman, V.O. Ezenwa, T.L. Goldbergh, H.S. Koren, S.C. Newbold, R.S. Ostfeld, S.K. Pattanayak, D.J. Salkeld, 2009. Biodiversity loss affects global disease ecology. *Bioscience* 59(11): 945-954.

¹¹ Oregon Global Warming Commission (OGWC), 2018. Forest Carbon Accounting Project Report. Salem, OR: OGWC.

¹² Kelly, Peter. 2013. A Greenhouse Gas Inventory of Oregon's Forests. Salem, OR: Oregon Department of Energy, Oregon Global Warming Commission.

¹³ Law, B.E., et al. 2018. Land use strategies to mitigate climate change in carbon dense temperate forests. *Proceedings of the National Academy of Sciences of the United States of America* 115: 3663-3668; Talberth, J., 2017. Oregon Forest Carbon Policy: Scientific and technical brief to guide legislative intervention. Lake Oswego, OR: Center for Sustainable Economy.

¹⁴ Talberth, J., 2017, note 13, pages 8-10.

¹⁵ Hudiburg, T.W., B. E. Law, W.R. Moomaw, M.E. Harmon, J.E. Stenzel, 2019. Meeting GHG reduction targets requires accounting for all forest sector emissions. *Environmental Research Letters* 14: Article 095005.

and their academic and technical partners have the data and tools needed to make this happen.

Protect drinking water supplies from depletion and degradation

Industrial forest practices have depleted Oregon's drinking water supplies and routinely contaminate these waters with thermal, nutrient, sediment and chemical pollution. Paired watershed studies have found dry season depletion rates to be 50% or more as healthy watersheds are converted into tree plantations.¹⁶ ODF's own modeling has found that hot microclimates in clearcuts significantly boost stream temperatures.¹⁷ Climate change will make water supplies even warmer and scarcer and create synergistic effects that may lead to a dramatic increase in harmful algae blooms (HABs). HABs flourish in waters that are warm, slow moving, and laced with chemicals and fertilizers that nurture their growth. Industrial forest practices worsen each of these contributing factors.

Future changes in climate will intensify the impacts of industrial timber production on Oregon's water supplies. **Given the clear connection between industrial forest practices, water shortages, and the health risks of HABs, ODF's proposed actions must include measures to protect surface drinking water supplies from further degradation.** During the 2019 legislative session, HB 2656 (the Safe Waters Act) was introduced as a means for doing this by prohibiting most forms of clearcutting, new logging roads, and spraying of chemicals and fertilizers in surface drinking water supplies with limited exceptions for ecological restoration and forest carbon storage projects.¹⁸ ODF should embrace this approach as part of its compliance with EO 20-04.

Reduce demand for carbon intensive wood products

ODF, through its own activities as well as through the Oregon Forest Research Institute (OFRI) has been a staunch advocate for storing carbon in wood products rather than leaving it in forests. ODF must abandon this advocacy if it is to comply fully with EO 20-04. Every ton of CO₂ stored in wood products comes at the expense of many more tons released along the way. In contrast, leaving forests standing ensures that carbon not only stays out of the

¹⁶ Perry, T. D., J.A. Jones, 2016. Summer streamflow deficits from regenerating Douglas-fir forest in the Pacific Northwest, USA. *Ecohydrology*. 1-13; Segura, C., K.D. Blandon, J.A. Hatten, J.A. Jones, V.C. Hale, G.G. Ice, 2020. Long term effects of forest harvesting on summer low flow deficits in the Coast Range of Oregon. *Journal of Hydrology* 585: 124749. <https://doi.org/10.1016/j.jhydrol.2020.124749>.

¹⁷ Oregon Department of Forestry. 2016. Oregon Department of Forestry (ODF), 2015. Detailed analysis: predicted temperature change results. Agenda Item 7, Attachment 3 to the meeting packet prepared for the Board of Forestry, June 3rd, 2015. Salem, OR: ODF

¹⁸ HB 2656, 2019 Regular Session. Available online at:

<https://olis.leg.state.or.us/liz/2019R1/Downloads/MeasureDocument/HB2656/Introduced>.

atmosphere but continues to accumulate for centuries. The bottom line is that conventionally produced wood products are very carbon intensive. More so than many substitutes.

Wind, solar and other renewable energy sources are less carbon intensive than woody biomass. Energy from woody biomass, in fact, has been shown to be more carbon intensive than coal.¹⁹ Bamboo, hemp and other fiber alternatives are less carbon intensive than wood-based paper and packaging. Wood buildings may or may not be less carbon intensive than other designs - it all depends on how the wood is sourced, where it is sourced from, and other factors particular to the design of individual buildings.²⁰ As such, as part of its implementation strategy for EO 20-04, ODF should abandon its one-size-fits-all programs that promote woody biomass for electricity production and cross laminated timber and other mass timber products as climate solutions. Instead, **ODF should encourage or permit timber production only when evidence clearly indicates that the harvested wood products will result in lower levels of atmospheric carbon dioxide than would occur without the timber harvest.** Moreover, ODF should propose actions that help industries and consumers reduce wasteful levels of demand for wood products on par with similar demand reduction strategies for fossil fuels.

Leverage reductions in emissions and climate impacts on federal lands

ODF directly manages state forestlands and regulates activities on private lands by administering the Forest Practices Act. But in addition, ODF has lead or co-lead regulatory authority that extends to federal lands as well, through implementation of various joint federal-state programs related to the Clean Air Act, Clean Water Act, Safe Drinking Water Act, Collaborative Forest Landscape Restoration Program and other authorities. Federal forestland managers acknowledge their duties to comply with various standards and procedures adopted by states under these programs.²¹ Thus, in developing its implementation plans for EO 20-04, ODF should take an 'all lands' approach to make full use of its statutory authority and discretion. **In its May 15th submission, ODF should describe each of the authorities it possesses to promote emissions reductions and minimize climate impact on federal forestlands.**

¹⁹ See, e.g. Serman, J.D., L. Siegel, and J.N. Rooney-Varga, 2018. Does replacing coal with wood lower CO2 emissions? Dynamic lifecycle analysis of wood bioenergy. *Environmental Research Letters* 13: Article 015007.

²⁰ Talberth, J., 2020. To save our climate we need taller trees, not taller wooden buildings. Portland, OR: Center for Sustainable Economy. Available online at: <https://sustainable-economy.org/to-save-our-climate-we-need-taller-trees-not-taller-wooden-buildings/>.

²¹ For example, national forest system managers recognize their duties to comply with all "[f]ederal, state or local air control rules, regulations, and directives." Forest Service Manual 2580.1(a).

Reduce climate-related fire risks exacerbated by logging and timber plantations

ODF has been pursuing a risky strategy when it comes to wildland fire management – financing and facilitating commercial logging operations on federal public lands. Many of the commercial ‘thinning’ operations carried out on federal public lands increase, rather than decrease fire risk, and result in higher levels of GHG emissions than if the land were not damaged by logging and fires were simply allowed to burn. Two recent federal court decisions have reprimanded the Forest Service and BLM for promoting commercial logging projects without acknowledging and mitigating their potential to increase rather than decrease fire risk.²² A well-established body of literature has confirmed that mechanical thinning results in a substantial net loss of forest carbon storage, and a net increase in carbon emissions that can substantially exceed those of wildfire emissions.²³ Logging tends to make wildland fires burn more intensely, as well, because it creates hotter drier microclimates, increases in-stand wind velocity, and leaves behind substantial logging residues that provide tinder for wildfires.²⁴

Timber plantations on private lands, not natural forests on federal public lands, present a much higher risk of severe wildfires. Research has shown that fires burn faster, hotter, and more catastrophically in industrial tree plantations than they do in more biodiverse forests on federal public lands.²⁵ This is especially concerning given that most rural communities directly abut these private forests. As such, any efforts to develop thinning projects for wildland fire risk reduction should be focused on these highly flammable tree plantations on private lands adjacent to rural communities and infrastructure. Thinning operations focused on expediting the development of complex, late successional, more fire-resistant forests could have the advantage of increasing carbon storage while reducing community vulnerability to wildfire. Thus, **ODF’s fire protection strategies should be redirected in the context of EO 20-04 to focus on the highest risk lands – private industrial forestlands – and on ways to expedite the conversion of these tree plantations back into fire resistant forests.**

²² Oregon Wild v. Bureau of Land Management and Seneca Sawmill Company 6:19-cv-00247-MC. United States District Court of Oregon. 2019; and Bark; et al. v. United States Forest Service; and High Cascade Inc. No. 19-35665 D.C. No. 3:18-cv-01645-MO. United States Court of Appeals, Ninth Circuit. 2020.

²³ Hudiburg, T.W., et al. 2013. Interactive effects of environmental change and management strategies on regional forest carbon emissions. *Environmental Science and Technology* 47: 13132-13140; Campbell, J.L., M.E. Harmon, and S.R. Mitchell. 2012. Can fuel-reduction treatments really increase forest carbon storage in the western US by reducing future fire emissions? *Frontiers in Ecology and Environment* 10: 83-90.

²⁴ See, e.g. Bradley, C.M. C.T. Hanson, and D.A. DellaSala. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western USA? *Ecosphere* 7: article e01492.

²⁵ Zald, H.S.J., and C.J. Dunn, 2018. Severe fire weather and intensive forest management increase fire severity in a multi-ownership landscape. *Ecological Applications* 28:1068-1080. doi:10.1002/eap.1710.

Adopt a 'polluters pay' approach for funding ODF's climate actions

The cost of achieving EO 20-04's goals should not fall on taxpayers, but rather on the corporations that are most responsible for climate change and loss of climate resiliency. In Oregon, big corporate owners of Oregon's forestlands are the state's worst contributors to climate change. They make profits by forcing society to bear the climate costs that result from their carbon dioxide emissions. In other words, they internalize profits and externalize climate costs, and this imbalance provides incentives for them to engage in forest-management practices that generate more carbon emissions than would occur if they bore the costs, themselves. To correct the imbalance, **ODF should take all appropriate steps to internalize all of the costs now being externalized by their practices and borne by society.**

Advocating for fair taxation is one approach. ODF's funding as well as funding for schools, infrastructure, and social services has been hampered by a steadily declining stream of tax revenues from private forestlands.²⁶ Reversing this trend and establishing fair tax rates to levels commensurate with the damages being externalized from these lands is an efficient, market-based approach that will help solve Oregon's chronic financial woes, decouple county funding from destructive logging on public lands and generate funds needed to responsibly implement EO 20-04.

Carbon taxes are another approach to consider. In 2017, legislation to establish a Forest Carbon Tax and Reward program was drafted to levy taxes based on the social cost of carbon on big industrial forestland emitters.²⁷ This tax would reduce incentives for forest practices that result in high levels of carbon emissions. The revenues generated by the tax would reward practices that increase the amount of carbon stored in Oregon's forests by financing climate-smart alternative practices, such as long rotations, alternatives to clearcutting, and forest carbon reserves. ODF should develop information detailing the feasibility of this proposal and provide other appropriate support.

A third approach is to rescind and redirect subsidies to encourage these climate smart forest practices. Each year, various tax breaks, subsidies, and direct expenditures are granted to forestland owners and mills without any sideboards ensuring that these funds will not be used for the harmful logging practices that are driving climate change. A partial tally of these

²⁶ Green, E., 2018. Cut and run dry: Do Oregon tax laws favor the timber industry? Street Roots 7 Sep. 2018. Available online at: <https://news.streetroots.org/2018/09/07/cut-and-run-dry-do-oregon-tax-laws-favor-timber-industry>.

²⁷ LC 2875, 2017 Regular Session. Available online at: https://sustainable-economy.org/wp-content/uploads/2017/02/LC2875_DRAFT_2017_Regular_Session.pdf.

subsidies suggests the level to be over \$750 million per year.²⁸ In this late stage of the climate crisis, any and all public support for forestry activities on private lands should be reserved for forestland owners who maintain healthy forest cover and implement climate smart practices.

The Forest Carbon Incentives Act of 2019 can serve as an exemplar of legislation to rescind certain subsidies (i.e. tax breaks for logging equipment and logging roads) and make others contingent upon healthy forest cover being present.²⁹ Counties would be required to set aside 30% of increased revenue streams to finance climate smart practices on non-industrial forestlands, and could keep 70% of the increased revenues for schools, infrastructure, and social services. **As it implements EO 20-04, ODF should provide Governor Brown and the Legislature with information they can use to evaluate these innovative, cost effective approaches for financing EO 20-04 implementation consistent with the bedrock principle of polluters pay.**

Promulgate GHG air quality rules under existing OFPA authority

In signing EO 20-04, Governor Brown acknowledged that greenhouse gas emissions are pollutants that endanger public health, safety and welfare.³⁰ As part of its statutory mandate to protect air quality, **ODF has the authority and duty to promulgate air quality rules to regulate these emissions. This rulemaking process should adopt site-specific practices to reduce both direct (i.e. emissions from recently clearcut lands) and indirect (i.e. foregone sequestration) emissions from logging, clearcuts, roads, use of chemical fertilizers and pesticides, slash burning and soil disturbance.**

While CO₂ is the primary pollutant, all other GHG pollutants should be addressed as well. For example, fertilizers applied broadly to timber plantations catalyze nitrous oxide (N₂O) emissions, a gas 300 times more powerful than carbon dioxide. Recent estimates of this effect suggest that for every metric ton of fertilizer applied, between 1.75% and 5% of that weight is converted into N₂O emissions.³¹

²⁸ Green, E., 2019. Taxpayers prop up the biggest carbon culprit in Oregon: timber. Street Roots 18 Oct. 2019. Available online at: <https://news.streetroots.org/2019/10/18/taxpayers-prop-biggest-carbon-culprit-oregon-timber>.

²⁹ HB 2659, 2019 Regular Session. Available online at: <https://olis.leg.state.or.us/liz/2019R1/Downloads/MeasureDocument/HB2659/Introduced>.

³⁰ The EO 20-04 preamble reads, in pertinent part: "Whereas GHG emissions present a significant threat to Oregon's public health, economy, safety, and environment...".

³¹ Shcherbak, I., Millar, N., Robertson, G.P., 2014. Global meta-analysis of the nonlinear response of soil nitrous oxide emissions to fertilizer nitrogen. *PNAS* 111(25): 9199-9204.

Modernize the OFPA to make climate smart practices the law

If managed well, Oregon's forestlands can capture and store more carbon per acre than typical tropical ecosystems. But to do this, Oregon's Forest Practices Act needs to be modernized to make climate smart practices the law and not the exception. Climate smart forestry techniques are those that simultaneously reduce logging related emissions, build carbon stocks on the landscape, maintain or enhance sequestration capacity and improve climate resiliency. Forest carbon reserves, afforestation, reforestation, long rotations, alternatives to clearcutting (i.e. variable density thinning) and ecological restoration of tree plantations to expedite development of old growth characteristics are examples of such climate-smart techniques.

A blueprint for modernization was introduced during the 2017 legislative session. HB 3226 (2017) included provisions for forest-management plans and carbon-storage targets for large corporate owners, science-based buffers for aquatic ecosystems, set-asides for developing carbon rich mature and old growth forests, and mechanisms for public participation.³² **As part of EO 20-04 implementation, ODF should identify all the OFPA changes that need to be made to bring Oregon's forest practices up to the standards set by best available climate science.** HB 3226 provides an important roadmap for doing so.

Halt harmful and costly logging projects on Oregon's public forestlands

One of the most cost-effective actions ODF can take to implement EO 20-04 is to eliminate harmful logging projects that increase emissions and reduce climate resiliency on state forestlands and catalyze similar actions on the state's county, national forest and BLM lands as well. These lands are relatively unimportant from a timber supply perspective but are the only places where public trust resource values – clean water, fish, wildlife, recreation and carbon storage can be maximized. As such, logging these lands is typically not cost effective: it generates social costs far in excess of benefits.

In Oregon, climate-related damages from logging on public forests is at least 10 times and perhaps more than 80 times revenues earned from timber sales.³³ Add to this the fact that public lands logging programs also lose money for taxpayers, further eroding their cost effectiveness. On federal lands, the taxpayer burden of timber sales in Oregon averages at least \$255 million per year over and above any revenues earned.³⁴

³² HB 3266, 2017 Regular Session, available online at:

<https://olis.leg.state.or.us/liz/2017R1/Downloads/MeasureDocument/HB3226/Introduced>.

³³ Niemi, E., 2020. Climate Costs and Risks of Logging on State Forests. Memorandum submitted to ODF 3 November 2019. Available online at: <https://forestcarboncoalition.org/wp-content/uploads/2019/11/BoF-L-2019-1104.pdf>.

³⁴ Figures based on Talberth, J. and E. Niemi. 2019. Environmentally harmful subsidies in the US: Issue 1 - the federal logging program. Portland, OR: Center for Sustainable Economy. Available online at:

For these reasons, **ODF should immediately suspend further implementation of its annual operating plans (AOPs) for state forests for FY 2020 and FY 2021 until it has fully developed its program for implementing EO 20-04 and until it can provide a reasonable accounting of benefits and costs for these logging projects that include climate damages.** Continuing clearcut logging on state forests would run afoul of the core goals of EO 20-04: to reduce emissions that cause climate change and the state's vulnerability to climate change.

In a separate comment letter to ODF, several organizational signatories of this letter have also joined in a call for suspending the state lands logging program. In that letter, they note that, as planned, the FY 2021 AOPs will generate 1.6 million metric tons CO₂-e at a social cost of at least \$667 million³⁵ and further degrade the landscape's resiliency to the effects of climate change.

Thank you for the opportunity to comment on ODF's implementation strategy for EO 20-04. In the coming weeks, we would like to discuss these recommendations with you in more detail. We will contact you soon to schedule this.

Sincerely,

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<https://sustainable-economy.org/wp-content/uploads/2019/05/CSE-Federal-logging-report-May-2019.pdf>.

³⁵ Based on a median social cost of carbon estimated at \$417 per tonne CO₂ by Ricke, K., L. Drouet, K. Caldeira, M. Tavoni, 2018. Country-level social cost of carbon. *Nature Climate Change*, 24 September 2018.

Kris Paul
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Dylan Plummer
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Angelique Orman
Our Revolution Oregon

Maxine Centala
Concerned Citizens for Clean Air

Nick Cady
Cascadia Wildlands

Paula Hood
Blue Mountains Biodiversity Project

Greg Haller
Pacific Rivers

Steve Griffiths
Audubon Society of Lincoln County

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Joy Thomson
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Roy Keene
Our Forests

David Stone
Friends of Douglas Fir National Monument

Cristina Hubbard
Forest Web of Cottage Grove

Kasey Hovick
Umpqua Watersheds

David Tvedt
Our Forests

David A. Moskowitz
The Conservation Angler

Katya Spiecker
Great Old Broads for Wilderness

From: [Alex Bradberry](#)
To: [ODF DL Board of Forestry](#)
Subject: Per Board Meeting June 3 Agenda Item FY 21 AOP
Date: Wednesday, June 03, 2020 1:17:25 PM

Dear Board of Forestry,

I am a resident and business owner on the Olympic Peninsula, but I spend a considerable amount of time fishing the North Coast as well. The immense amount of clearcutting happening on the North Coast lands both private and public is very short sighted. OSU studies have shown that our rainforests have an incredible ability to sequester carbon if we value these forests for more than just timber sales. If you value human life and health more than money, then I ask you why many of our watersheds flow through steep sloped private timberland and by allowing massive clear cuts you in turn allow toxic pesticide spray into the drinking water of nearby communities?

Furthermore, you refuse to grant us knowledge of those very times when you will be poisoning these watersheds so residents can protect their families. It is shameful that you have not taken action on these issues.

There are so few businesses in the world that can operate without concern or care for the community and world around them much less without a plan for sustainability, somehow the Oregon timber industry has been successfully doing just that for many decades. As a fisherman and hunter, your disregard for these industries in your decisions for clearcutting and pesticide spraying is also incomprehensible.

If your focus is on revenue using the same tactics for the last several decades, you're already behind. It's time for the Board of Forestry to stand up for what is right and start us on a path of sustainability for all people and for industries who utilize our forests and waterways. If you are having trouble figuring that out, may I suggest the recommendations for adopting climate smart forest management for the future as outlined by the Center for Sustainable Economy and Forest Carbon Coalition.

Alex Bradberry

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Attachment 22
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Waters West Fly Fishing Outfitters
(360)417-0937

From: [Kate Crump!](#)
To: [ODF DL Board of Forestry](#)
Subject: Per Board Meeting June 3 Agenda Item FY 21 AOP
Date: Wednesday, June 03, 2020 12:34:17 PM
Attachments: [ODF scoping letter on EO 20-04 implementation.pdf](#)

Dear Board of Forestry,

I am a resident and business owner on the North Coast. The immense amount of clearcutting happening on the North Coast lands both private and public is very short sighted. OSU studies have shown that our rainforests have an incredible ability to sequester carbon if we value these forests for more than just timber sales. If you value human life and health more than money, then I ask you why many of our watersheds flow through steep sloped private timberland and by allowing massive clear cuts you in turn allow toxic pesticide spray into our drinking water, including that of my community, Rockaway Beach?

Furthermore, you refuse to grant us knowledge of those very times when you will be poisoning our watersheds so we can protect our families. It is shameful that you have not taken action on these issues.

There are so few businesses in the world that can operate without concern or care for the community and world around them much less without a plan for sustainability, somehow the Oregon timber industry has been successfully doing just that for many decades. As a fisherman and hunter, your disregard for these industries in your decisions for clearcutting and pesticide spraying is also incomprehensible.

If your focus is on revenue using the same tactics for the last several decades, you're already behind. It's time for the Board of Forestry to stand up for what is right and start us on a path of sustainability for all people and for industries who utilize our forests and waterways. If you are having trouble figuring that out, may I suggest the recommendations for adopting climate smart forest management for the future as outlined by the Center for Sustainable Economy and Forest Carbon Coalition.

Kate Crump
[Frigate Adventure Travel](#)
541.743.1273

From: [Athena Ferber](#)
To: [ODF DL Board of Forestry](#)
Subject: Dear Board of Forestry
Date: Thursday, June 04, 2020 7:16:39 AM

Dear Board of Forestry,

I am a resident and business owner on the North Coast. The immense amount of clearcutting happening on the North Coast lands both private and public is very short sighted. OSU studies have shown that our rainforests have an incredible ability to sequester carbon if we value these forests for more than just timber sales. If you value human life and health more than money, then I ask you why many of our watersheds flow through steep sloped private timberland and by allowing massive clear cuts you in turn allow toxic pesticide spray into our drinking water, including that of my community in Manzanita-Nehalem area and to the rest of Tillamook County?

Furthermore, you refuse to grant us knowledge of those very times when you will be poisoning our watersheds so we can PROTECT OUR FAMILIES. It is shameful that you have not taken action on these issues.

There are so few businesses in the world that can operate without concern or care for the community and world around them much less without a plan for sustainability, somehow the Oregon timber industry has been successfully doing just that for many decades. As a fisherman and hunter, your disregard for these industries in your decisions for clearcutting and pesticide spraying is also incomprehensible.

If your focus is on revenue using the same tactics for the last several decades, you're already behind. It's time for the Board of Forestry to stand up for what is right and start us on a path of sustainability for all people and for industries who utilize our forests and waterways. If you are having trouble figuring that out, may I suggest the recommendations for adopting climate smart forest management for the future as outlined by the Center for Sustainable Economy and Forest Carbon Coalition.

Sincerely,
Athena F.

Date Submitted: Thu 06/04/2020 9:39 AM

Message:

To Whom it May Concern,

I am a resident and business owner on the North Oregon Coast. The immense amount of clearcutting happening on North Coast lands, both private and public, is very short sighted. OSU studies have shown that our rainforests have an incredible ability to sequester carbon. As much of our water is sourced in the steep western slopes of the Coast Range, it seems short sighted to be logging these forests, and then spraying with poisonous pesticides, for short term economic gain at the cost of the health of our communities.

Furthermore, as you refuse to grant us knowledge of those very times when you will be poisoning our watersheds so we can protect our families, your misguided policies threaten the quality of our lives.

If your focus is on revenue using the same tactics for the last several decades, you're already behind. It's time for the Board of Forestry to stand up for what is right and start us on a path of sustainability for all people and for industries who utilize our forests and waterways.

As the world continues to wake up from the slumber of considering nature and the environment as a "resource" which can be plundered without consequence, I ask that you, as our representatives shift your perspective on our forests from extraction to preservation.

May I suggest the recommendations for adopting climate smart forest management for the future as outlined by the Center for Sustainable Economy and Forest Carbon Coalition?

Sincerely,
Susan C Walsh
scwalsh@nehalemte.net



Request for Temporary Rule in the Siskiyou Georegion

June 3rd, 2020 Board of Forestry Meeting

Introduction



- Highlights of Request to Board
- Department Analysis
- Temporary Rule Language
- Public Comment
- Recommendation
- Next Steps

Department Analysis



- Pause Siskiyou Streamside Protection Review.
- Implement Temporary Rule.

Temporary Rule Language



(2) The vegetation retention requirements for Type SSBT streams apply to harvest type 2 or harvest type 3 units in the following Geographic Regions as described in OAR 629-635-0220: Coast Range, South Coast, Interior, ~~and~~ Western Cascades and Siskiyou. Use rules in OAR 629-642-0100 for Type 1 harvests along SSBT streams.

Table 5 and Table 6 which describe Basal area and live conifer retention requirement will also reflect the addition of and Siskiyou.

Public Comment



Recommendations



- The Department recommends the Board direct the Department to finalize the materials needed to adopt a temporary rule following the process outlined in ORS 183.335(5).
- The Department also recommends the Board direct the Department to pause the Siskiyou Streamside Protection Review except for a limited amount of work to finalize the literature review summary report.

Recommendations



- The Department recommends the Board approve the temporary rule language as described and direct the department to place the temporary rule in effect as soon as possible after the department:
 - Provides training to stewardship foresters, operators and landowners in the affected areas and
 - Completes the update to the Type SSBT stream database, in coordination with ODFW.

Next Steps



- Provide training and education.
- Complete regulatory stream layer.
- File temporary rule language and materials to meet ORS 183.335(5) with Secretary of State Office.

Temporary Siskiyou SSBT Rule

**Testimony by Dana Kjos, Chair -Southwest Oregon Regional Forest Practice Committee
Before the Oregon Board of Forestry – June 3, 2020**

Good morning Chair Imeson, State Forester Daugherty and board members. My name is Dana Kjos and I was a member of your Riparian Rules Advisory Committee (RRAC). I am here today representing the Southwest Oregon Regional Forest Practice Committee (SW-RFPC) as its Chair. Our committee is appointed by this Board and meets throughout the year, as mandated by law, to assist you in developing, reviewing, and identifying the need for new or amended forest practices rules. I am here today to give testimony on the potential implementation of Temporary Siskiyou Streamside Protection Rule.

Our SW-RFPC met last week and discussed your agenda item to implement the temporary SSBT stream rule in the Siskiyou Geo-region. The temporary rule as discussed has unanimous support from the SW-RFPC. However, the SW-RFPC respectfully wishes the board to use caution and implement this rule in a measured fashion as has been common practice in the past when implementing new rules. Time is necessary to allow for proper education and training of landowners and operators, necessary stream layers and technical guidance to be developed and implemented, and applicable forms. Most landowners and operators perform field layout of units and RMAs well in advance of harvest. Layout of an RMA often takes several days, and requires multiple people taking multiple trips to and from a unit. Please do not require operators to re-do already completed field work. Allowing time for implementation will help foresters learn the new requirements and apply them to future layout

Our SW-RFPC also believes that the Board should evaluate using the ODF Monitoring Program in a different fashion than its current use. These questions regarding Siskiyou streams began in 2016, and there has been no substantive data collected regarding stream temperatures specific to Siskiyou Geo-region since that time. We believe that the ODF Monitoring Program should be used to collect data for areas of concern to help make informed decisions based on science going forward.

Thank you for allowing me to give testimony today.

Committee for Family Forestlands

2600 State Street
Salem, OR 97310
503-945-7200
Fax 503-945-7490



June 2, 2020

Dear Chair Imeson and Board of Forestry members,

The Committee for Family Forestlands (CFF) appreciates the support you have given to the concepts and actions outlined in the historic February 10th 2020 [Memorandum of Understanding](#) (“MOU”) signed by forest stakeholders with the intention of to find common ground on a variety of contentious issues related to Oregon’s Forest Practice Act. We have reviewed the request letter submitted jointly by the MOU signatories to Chair Imeson and the Board of Forestry on May 15th. The CFF fully endorses what has been proposed regarding a temporary rule to implement the 2017 Salmon, Steelhead and Bull trout (SSBT) stream rules in the Siskiyou Georegion and other recommendations related to it.

We know you are aware there is a commitment by the MOU signatories to pass legislation that would implement the 2017 Salmon, Steelhead and Bull trout (“SSBT”) stream rules in the Siskiyou Georegion at the next opportunity. This legislative effort is being coordinated with Governor Brown and her staff and we are hopeful that it will move forward successfully.

Looking ahead to the summer of 2020, the Oregon Department of Forestry staff is likely to be operating under challenging circumstances, compounded by COVID-19 and an approaching drought-driven wildfire season. The temporary SSBT rule will fill the gap to allow time for the legislation to be passed and fulfill the commitment in the MOU without creating duplicate efforts from ODF’s staff in the interim.

The CFF supports the recommended actions outlined in the May 15th letter and the adoption of a temporary rule in the Siskiyou Georegion. Thank you for your consideration.

Sincerely,

Evan Barnes, Chair of the Committee for Family Forestlands

cc: Peter Daugherty, State Forester
Lena Tucker, Deputy State Forester
Kyle Abraham, ODF Private Forests Division Chief
Josh Barnard, Private Forests Deputy Chief

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May 27, 2020

Chair Tom Imeson, Members
Oregon Board of Forestry
2600 State Street
Salem, OR 97310

Re: Adoption of temporary rule implementing SSBT stream rules in Siskiyou Geo-region

Dear Chair Imeson and Board of Forestry Members:

I write today to echo the request of signatories to the forestry Memorandum of Understanding, asking that the Board of Forestry adopt a temporary rule to implement the 2017 Salmon, Steelhead and Bull trout (SSBT) stream rules in the Siskiyou Georegion.

Green Diamond owns and manages 1.8 million acres of working forestland in nine states in the US west and south, including 635,000 acres in Southern Oregon and 40,000 acres in the Siskiyou Georegion. Our company testified at a Board of Forestry meeting last summer asking that science guide your decisions in the Siskiyou Georegion as has been the case in developing the SSBT rules on the west side.

While we are not signatories to the MOU, we enthusiastically support the efforts by industry and environmental organizations to come together to consider forest practices rule changes that will offer environmental protection and ensure long-term regulatory stability in Oregon. Within that construct, we believe that a collaborative approach to adaptive management will, in the long run, continue to ensure the scientific approach we requested in our testimony. In the meantime, adoption of this temporary rule provides benefits to public resources in the Siskiyou and allows the Department of Forestry to redirect its energies to the important work the upcoming negotiations will require.

We look forward to hearing the presentation on the final expanded Siskiyou literature review at an upcoming Board meeting. This literature review is one important component in the science-based approach we have advocated and may well inform the negotiations by parties to the MOU.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Davis", is positioned below the word "Sincerely,".

John Davis

Vice President/General Manager

CC: Governor Kate Brown
Peter Daugherty, State Forester
Oregon Environmental Quality Commission
Richard Whitman DEQ Director
MOU signatories via Greg Miller, Bob Van Dyk

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Oregon

Kate Brown, Governor

Department of Environmental Quality
Agency Headquarters
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5696
FAX (503) 229-6124
TTY 711

June 2, 2020

Sent Via Electronic Mail to daugherty.peter@state.or.us

Peter Daugherty, Oregon State Forester
Oregon Department of Forestry
2600 State Street
Salem, OR 97310

Dear Peter,

I am writing to confirm the Oregon Department of Environmental Quality (DEQ) supports the proposal by timber industry representatives and conservation organizations for an extension of the riparian protections currently in place in Western Oregon forests to the Siskiyou Region. Adoption of a temporary rule carrying out this extension would be a positive step in improving water quality protections in this region of Oregon, and would help begin to bring water quality in affected streams back into compliance where water quality standards are not currently met.

DEQ will continue to work with the Department of Forestry to address the ongoing need to evaluate and further define what is needed to implement clean water plans (TMDLs) that are designed to achieve water quality standards in areas where they are not being met. It is my understanding we will be reporting to the Board of Forestry on this effort this fall. I also know the Environmental Quality Commission (EQC) continues to have a high level of interest in how we can bring our respective programs into better alignment, and look forward to our continuing productive work in this arena.

Sincerely,

Richard Whitman
Director

Cc: Kathleen George, Chair, Environmental Quality Commission Chair
Wade Mosby, Commissioner, Environmental Quality Commission and Board of Forestry Liaison

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JEFF GOLDEN
STATE SENATOR
DISTRICT 3



OREGON STATE SENATE

June 3, 2020

Chair Tom Imeson
Members of the Oregon Board of Forestry
boardofforestry@oregon.gov

Dear Chair Imeson and Board of Forestry members:

I write to thank you for taking the very positive step of adopting temporary rules to bring streamside rules in the Rogue-Siskiyou region in line with those prevailing across the rest of Oregon.

Your decision begins to remedy an anomaly that has been a growing sore spot in my corner of the state. A number of my constituents—people interested in outdoor recreation, the health of our native fish runs and ecosystems, or simply in equitable public policy—have asked me why these rules have been different for us than for the rest of the state. After conversations with scientists, state agency staff and policymakers with some background on this issue, I haven't been able to find an answer rooted in sound public policy considerations. This double standard, in the very literal sense of those words, has been an ongoing concern and a driver of cynicism about public resource management. Your decision to direct a temporary rule change is extremely constructive. I'm hopeful both that the change is implemented as expeditiously as possible, and that it leads to permanent protection of qualified streams in southwest Oregon consistent with standards in the rest of the state.

Thanks sincerely your service to the state of Oregon.

Jeff Golden
Senate District 3
Chair, Senate Wildfire Reduction & Recovery Committee

cc: Governor Kate Brown
Senate President Peter Courtney
House Speaker Tina Kotek
State Forester Peter Daugherty

AGENDA ITEM B
Attachment 28



2020 FIRE SEASON

Board of Forestry

June 03, 2020

Doug Grafe, Chief of Fire Protection

Ron Graham, Deputy Chief of Fire Protection

AGENDA ITEM B

Attachment 29

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ShangriLa Lane Fire

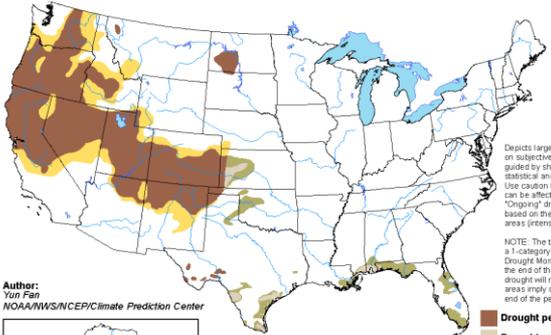
4/21/2020, ODF-SWO District



Drought Outlook and Monitor

U.S. Seasonal Drought Outlook
Drought Tendency During the Valid Period

Valid for May 21 - August 31, 2020
Released May 21

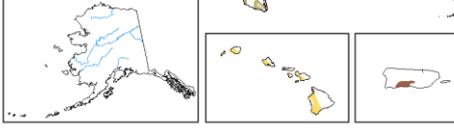


Depicts large-scale trends based on subjectively derived probabilities guided by short- and long-range statistical and dynamical forecasts. Use caution for applications that can be affected by short-lived events. "Ongoing" drought areas are based on the U.S. Drought Monitor areas (precedes of D1 to D4).
NOTE: The tan areas imply at least a 1-category improvement in the Drought Monitor intensity levels by the end of the period, although drought will remain. The green areas imply drought removal by the end of the period (D0 or none).

- Drought persists
- Drought remains but improves
- Drought removal likely
- Drought development likely

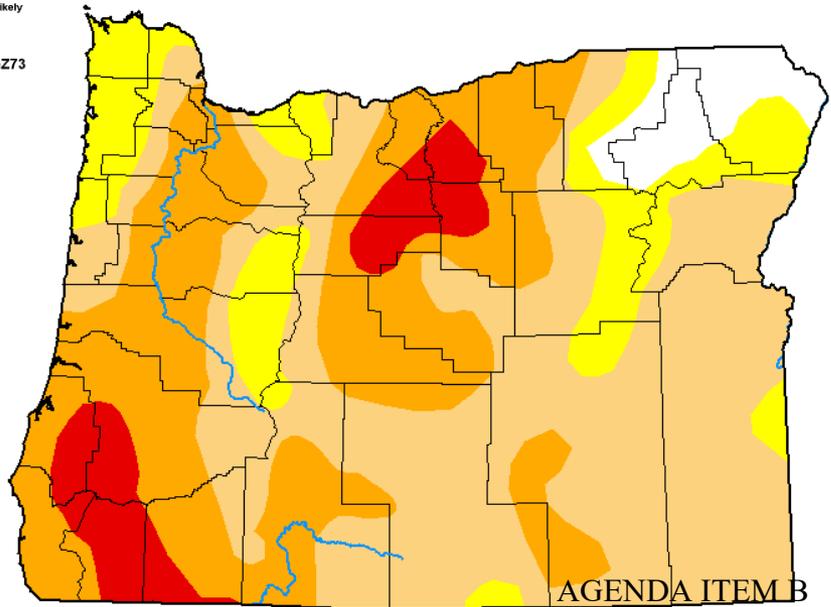
<http://go.usa.gov/3eZ73>

Author:
Yun Fan
NOAA/NWS/NCEP/Climate Prediction Center



U.S. Drought Monitor Oregon

May 26, 2020
(Released Thursday, May 28, 2020)
Valid 8 a.m. EDT



Intensity:

- None
- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. For more information on the Drought Monitor, go to <http://droughtmonitor.unl.edu/About.aspx>

Author:
Curtis Riganti
National Drought Mitigation Center

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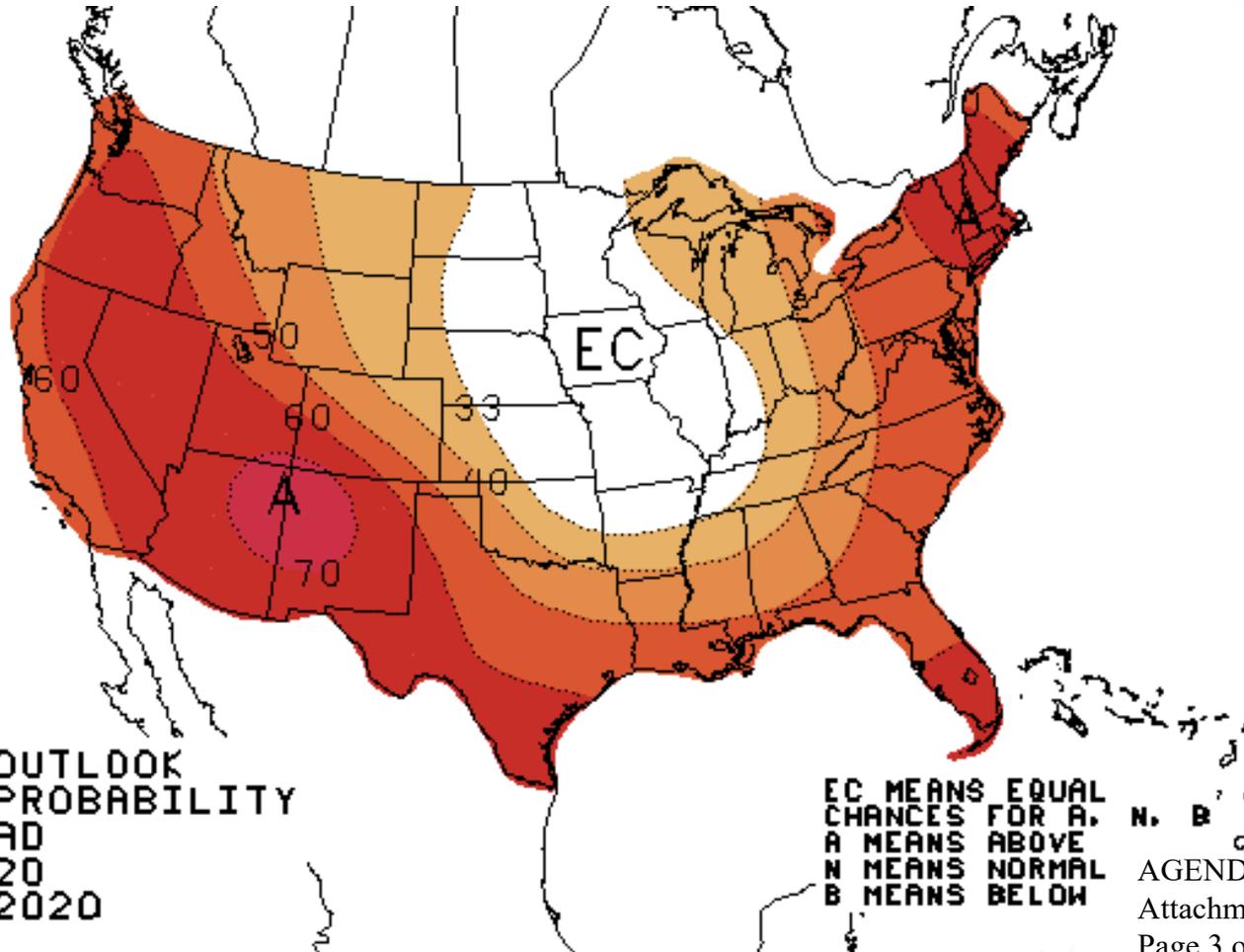


droughtmonitor.unl.edu



Temperature Outlook

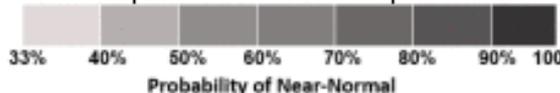
June, July, August 2020



THREE-MONTH OUTLOOK
 TEMPERATURE PROBABILITY
 0.5 MONTH LEAD
 VALID JJA 2020
 MADE 21 MAY 2020

EC MEANS EQUAL
 CHANCES FOR A,
 A MEANS ABOVE
 N MEANS NORMAL
 B MEANS BELOW

N. B.
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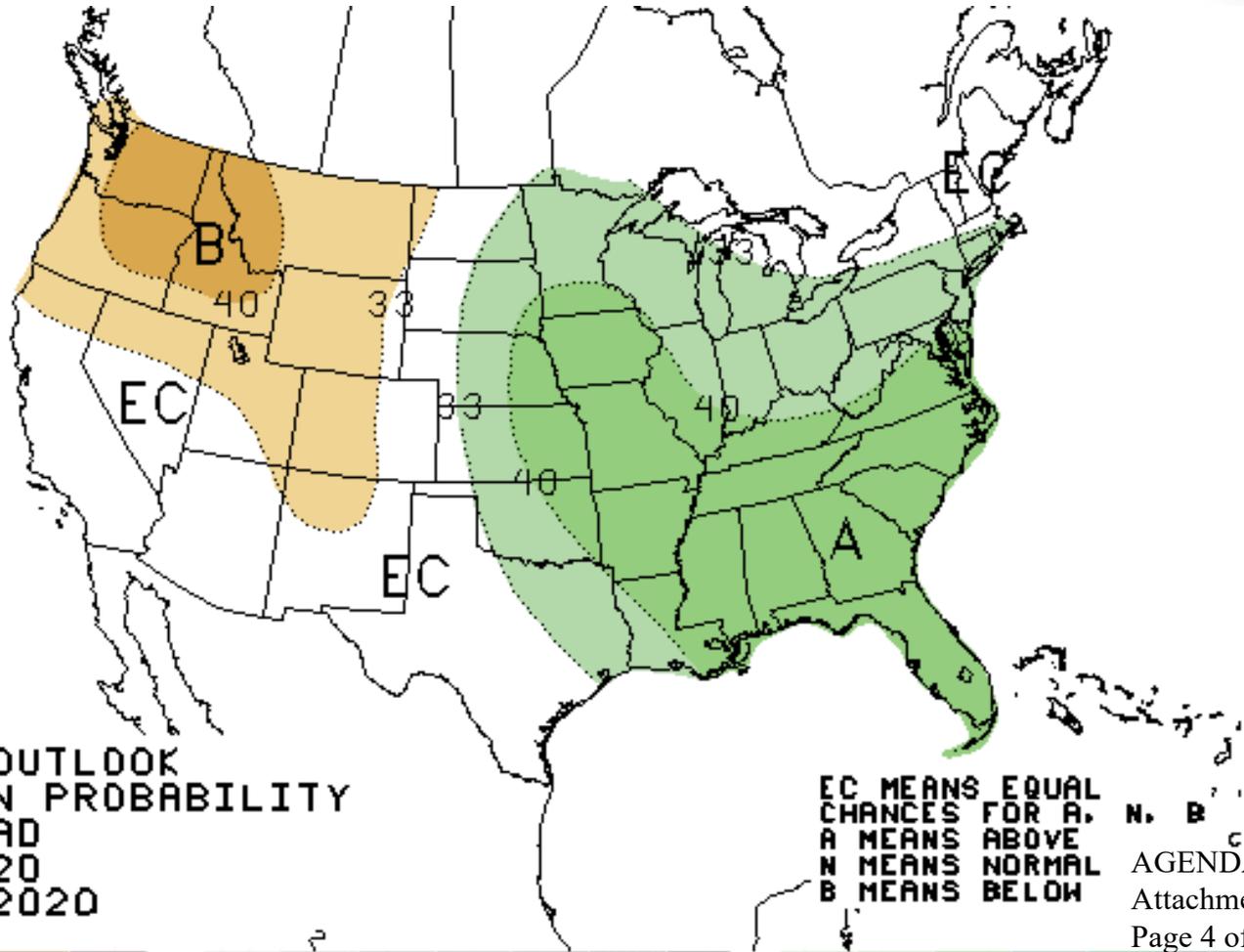


Precipitation Outlook

June, July, August 2020

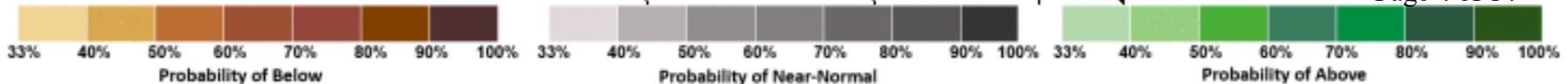


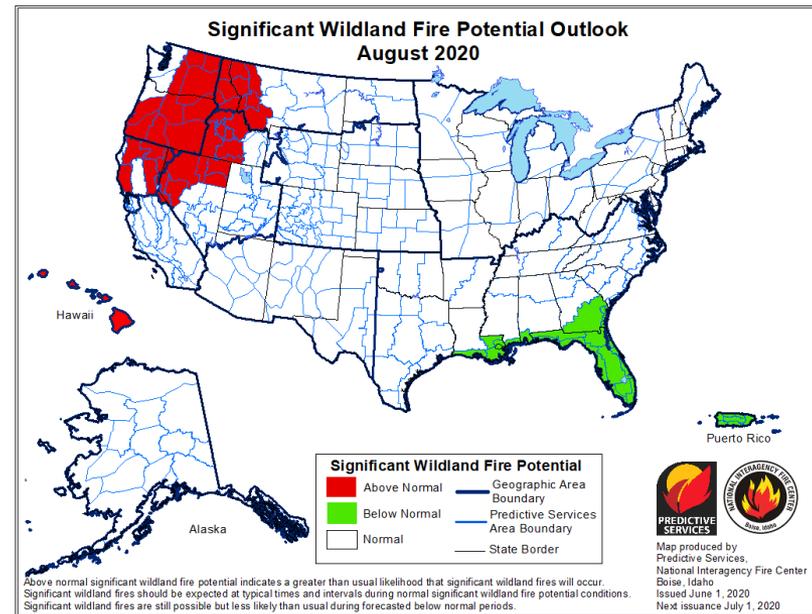
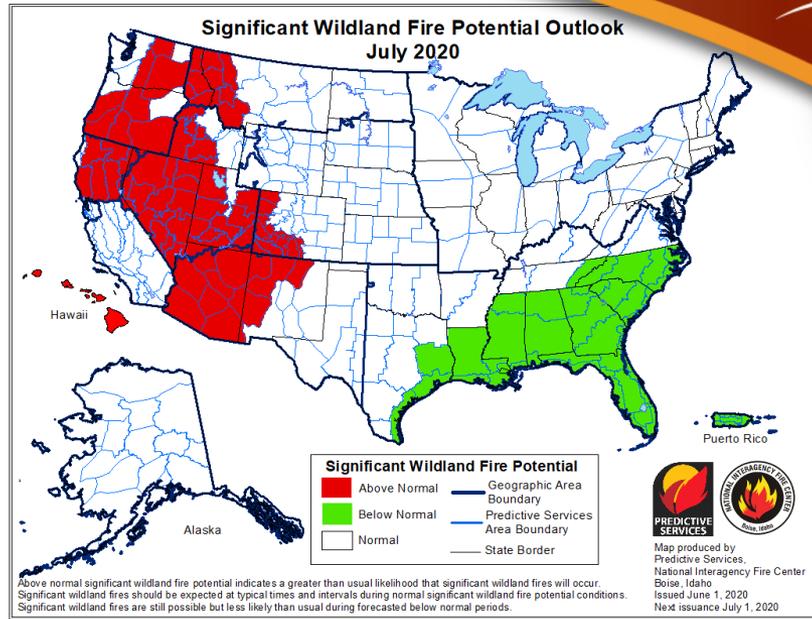
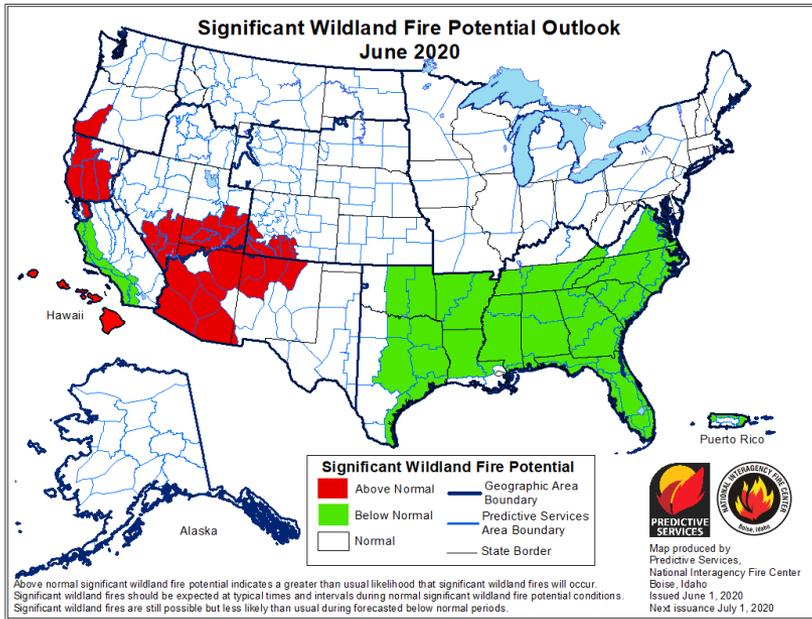
THREE-MONTH OUTLOOK
PRECIPITATION PROBABILITY
0.5 MONTH LEAD
VALID JJA 2020
MADE 21 MAY 2020



EC MEANS EQUAL CHANCES FOR A, N, B
 A MEANS ABOVE
 N MEANS NORMAL
 B MEANS BELOW

AGENDA ITEM B
 Attachment 29
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June, July, August Wildfire Potential



Fire Statistics to date

June 1, 2020

2020 Year To Date

	Fires	Acres
Lightning	16	1
Human	162	186
Total	178	187

10-Year Average (2010-2019 Year To Date)

Lightning	13	10
Human	95	454
Total	108	464

96%

fires kept at 10 acres or less
to date in 2020



2020 vs 10 Year Average

- 71% more human fires
- 23% more lightning fires
- 60% less total acres burned than our 10-yr average

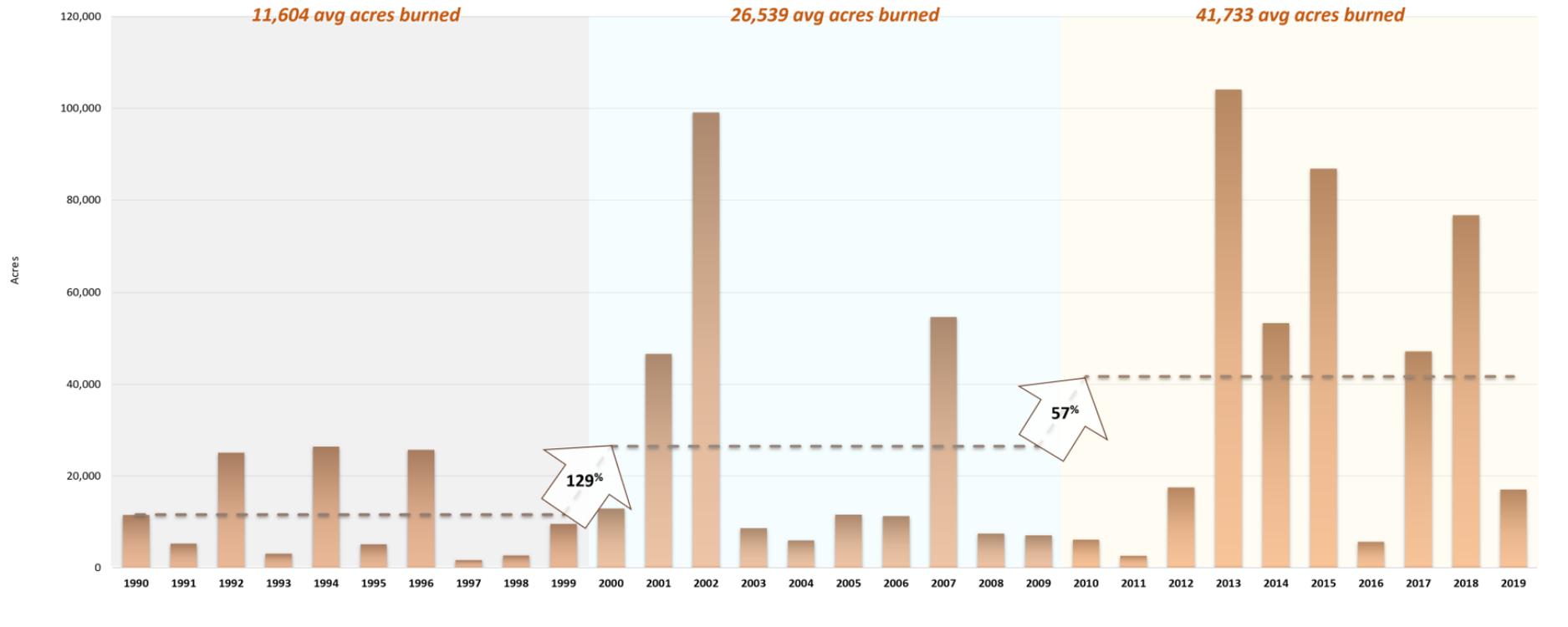


ODF Protected Lands

Average Acres Burned by Decade



ODF Protected Lands - Average Acres Burned by Decade
05/04/2020 ODF Fires data.



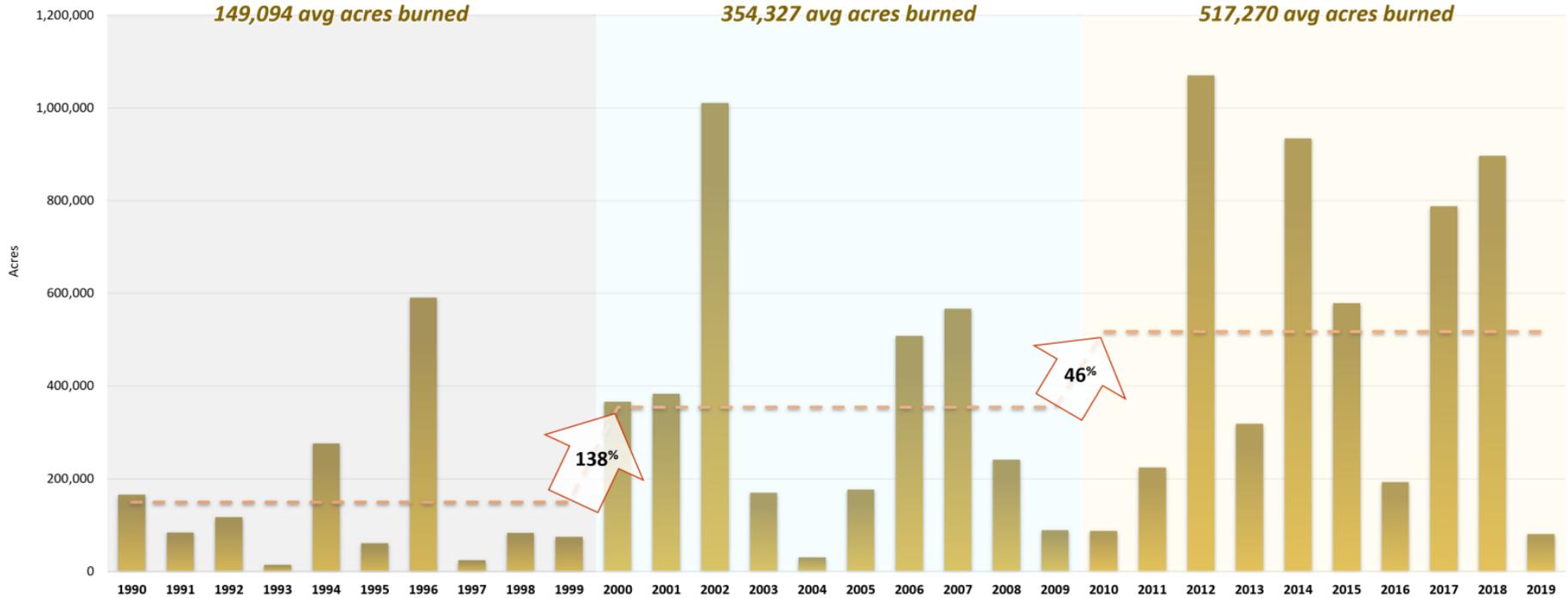


Oregon Statewide - All Agencies Average Acres Burned by Decade



Oregon All Agencies - Average Acres Burned by Decade

05/04/2020 WFDSS, Short, NWCC, ODF.



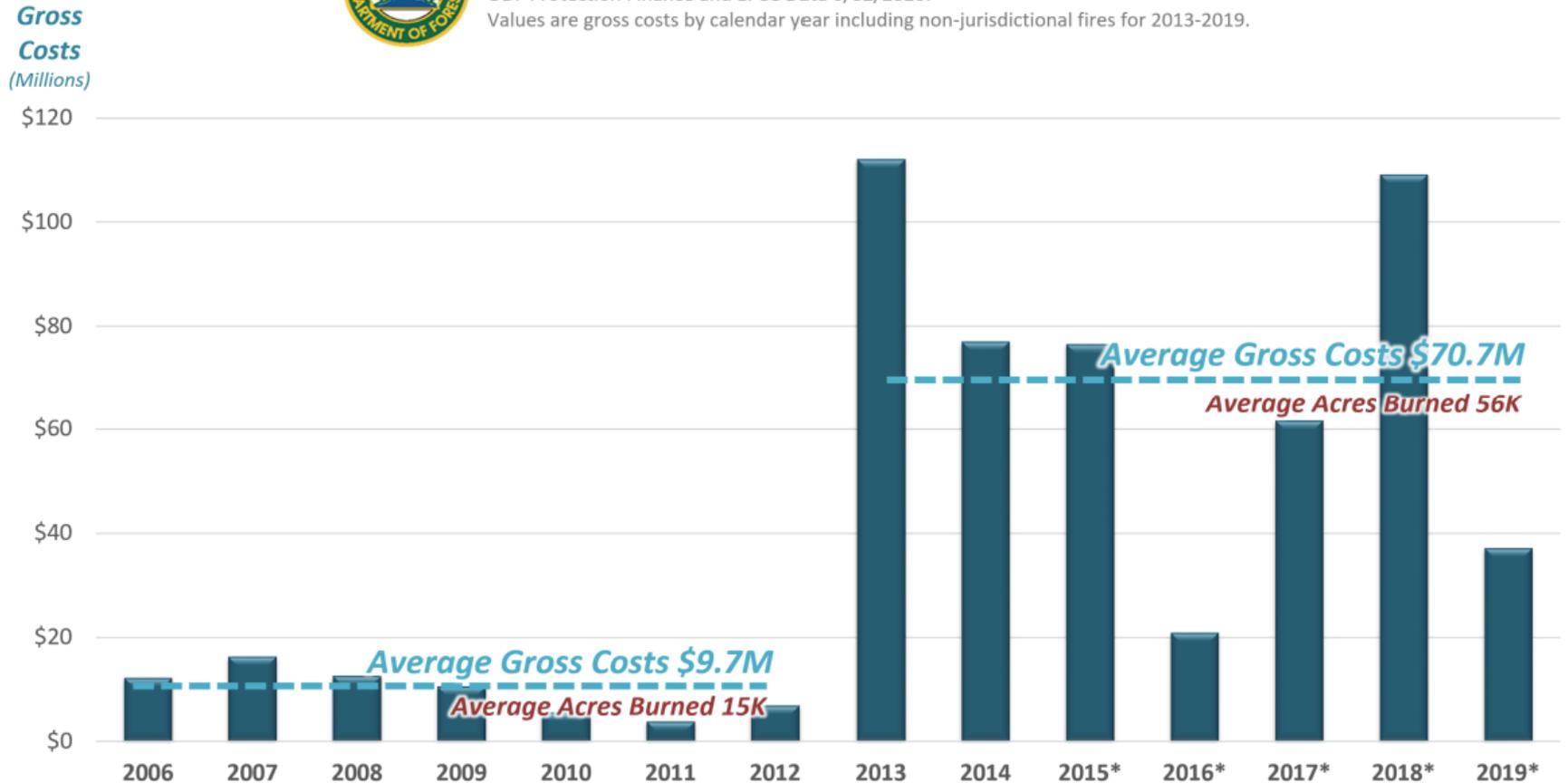
ODF Large Fire Costs 2006 - 2019



ODF Large Fire Costs

ODF Protection Finance and EFCC Data 6/02/2020.

Values are gross costs by calendar year including non-jurisdictional fires for 2013-2019.



*includes draft claims figures



2020 Fire Season Readiness

Covid-19 Preparedness

[OPB Think Out Loud](#)

Readiness/Preparedness

- Training
- Wildfire prevention/public information

Initial Attack

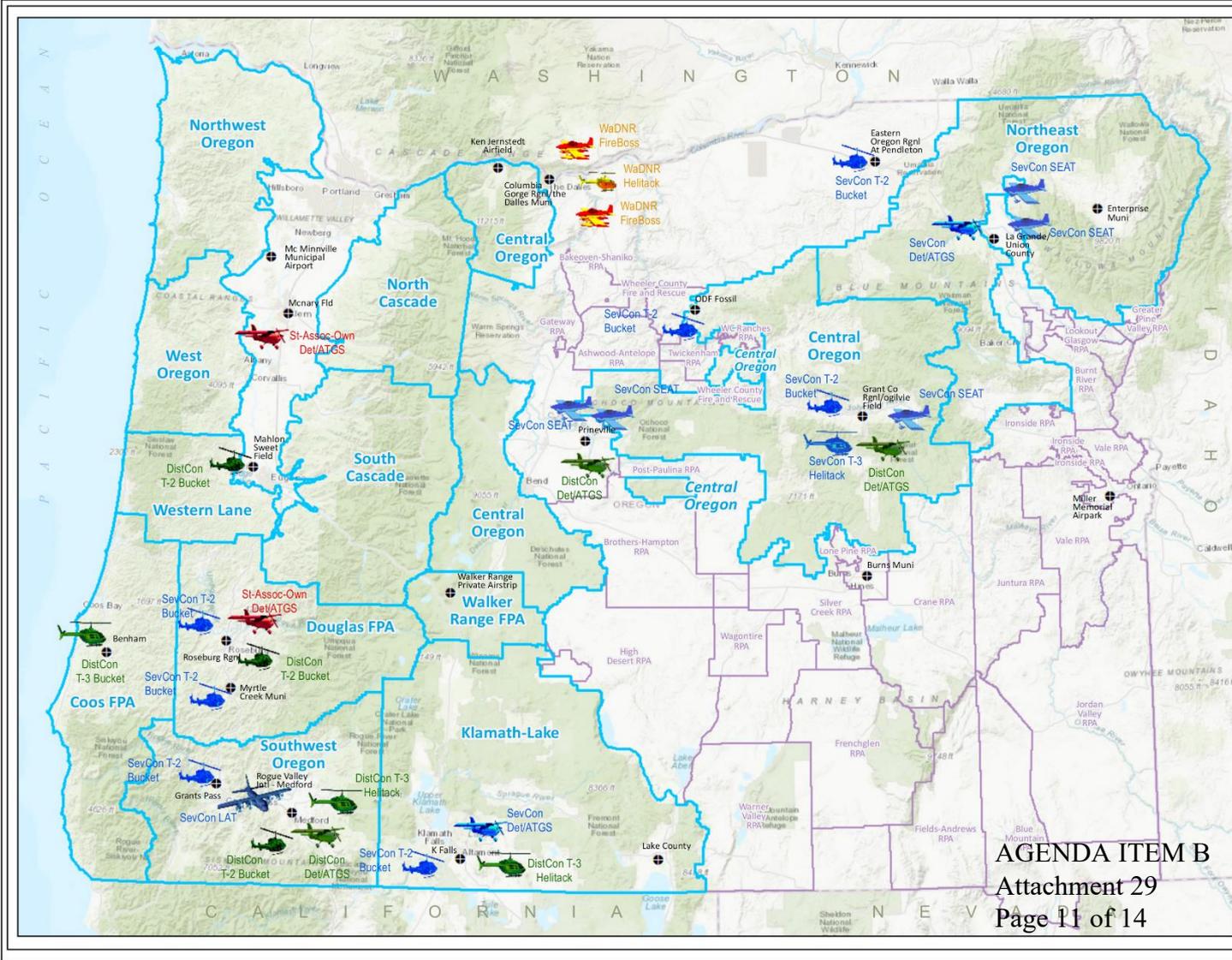
- Aggressive and safe initial attack
- Keep large fires off the landscape

Extended Attack/IMT Support

- Closed Incident Command Post
- Forward operating base camp



Aviation Resources - Including Severity



ODF Aviation Resources

State & Association

Detection/ATGS
150 miles/60 mins

District Contracted

Detection/ATGS

T2 Bucket
60 miles/30 mins

T3 Bucket & T3 Helitack
50 miles/30 mins

Severity Contracted

Detection/ATGS

T2 Bucket

SEAT
75 miles/20 mins

T3 Helitack

LAT
250 miles/60 mins

WA DNR



Fireboss

Helitack

Airports ODF Use

ODF Fire Protection Districts

Rangeland Protection Associations

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May – Wildfire Awareness Month

- 2020 Theme: Oregon, Our Oregon.
- Promotes fire prevention and home protection.
- Combined with COVID-19 messaging to reduce smoke impacts and protect all Oregonians and first responders.



State of Oregon
Department of
Environmental
Quality



**American
Red Cross**

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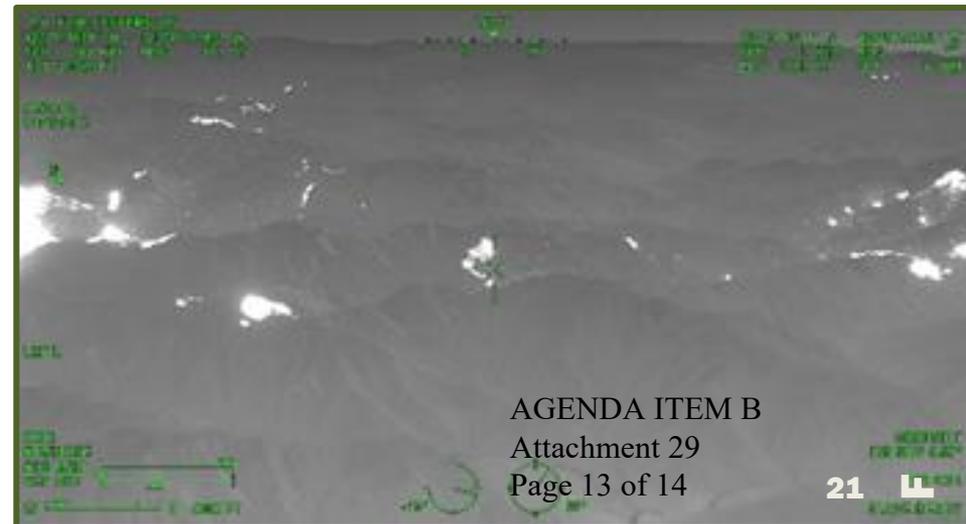




Strategic Investments

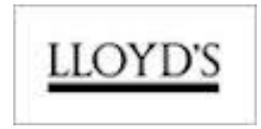
Infrared (IR) & Mapping System

- Night Vision
- Mapping
- Software
- Total investment: \$692,336.00





Oregon's Complete & Coordinated Fire Protection System



AGENDA ITEM
Attachment 29
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Council of Forest Trust Land Counties

Local Government Center
1201 Court Street NE, Ste 300
Salem, OR 97301

David Yamamoto – Chair
Commissioner
Tillamook County

John Sweet – Vice Chair
Commissioner
Coos County

Bill Baertlein
Commissioner
Tillamook County

Kathleen Sullivan
Commissioner
Clatsop County

Jim Bernard
Commissioner
Clackamas County

Will Tucker
Commissioner
Linn County

Bob Main
Commissioner
Coos County

May 3, 2020

Chair Imeson
State Forester Daugherty
Members of the Board of Forestry

For the record, I am Tillamook County Commissioner David Yamamoto, Chair of Forest Trust Lands Advisory Committee.

Let me start with just a brief overview of state forest lands managed by the Oregon Dept. Of Forestry.

The Oregon Department of Forestry manages 729,859 acres of Board of Forestry (BOF) lands for which the Forest Trust Land Counties have a protected and recognizable interest. This interest has been determined by three (3) Circuit Court decisions: Marion County Circuit Court – Tillamook I; Tillamook County Circuit Court – Tillamook II; and Linn County Circuit Court – Linn County Class Action. These lands are to be sustainably managed to provide timber revenue to the state, local schools and communities, and local taxing districts. I would be remiss to not mention that Judge Tom McHill entered the judgement in the Linn County Class Action case on March 6, 2020, and since that day interest is accruing at the rate of \$262,000 per day. The interest accrued to today amounts to \$23,580,000.00.

The CFTLC counties are Benton, Clackamas, Clatsop, Columbia, Coos, Douglas, Josephine, Klamath, Lane, Lincoln, Linn, Marion, Polk, Tillamook, and Washington.

The objectives of the Council of Forest Trust Land Counties (CFTLC) are:

- (1) Protect the trust and contractual relationship between the Forest Trust Land Counties and the State of Oregon, relating to management of the county forest trust land.
- (2) Support sound, active management of county forest trust lands, which fulfills their primary purpose of forest production and their important contribution to long-term community sustainability.
- (3) Protect the flow of revenues from county forest trust lands for essential local public services.
- (4) Support forest trust land counties in other matters where they may have responsibility related to county forest trust lands; and
- (5) Provide an organization that will effectively communicate these objectives.

There has been virtually no net loss of Oregon's 30 million acres of forest land throughout our State's recorded history. At the current rate of harvest, it would take about 100 years to clear cut the entire forest. The current FRA (Forest Resource Assessment) shows there is approximately 17 billion board feet of timber in our state forests. The assessment says that there are only 8 billion board feet without any specific harvest constraints. Please note that timber available for harvest, according to the Department of Forestry is less than ½ of timber available in Oregon. We are growing more than 400 million board feet every year. We are harvesting about 235 million board feet per year. All of this shows that we are continuing to age our state forests into classes that will not be harvestable in the future.

State Forests Annual Operations Plan

The way that Forest Trust Lands are managed is important to Trust Land Counties. Paramount to CFTLC is ensuring Forest Trust Lands are actively managed. Sound management practices lead to high forest production, in turn, sustaining the Department of Forestry budget, providing critical public services, and building strong communities and robust local economies.

In the new COVID-19 reality that we find ourselves, decreasing the harvest on state forests will have economic and social consequences to the State of Oregon, the Department of Forestry, our schools, local governments, and our citizens. Indeed, this is a time to increase harvest levels.

Recently, Oregon's Office of Economic Analysis (OEA) told legislators that, because of the public health measures necessary to flatten the COVID-19 curve, state budgets to June 30, 2021 are underfunded by \$2.7 billion. If the legislature were to use all the reserves at their disposal, they would still be short about \$1 billion in closing the books on the 2019-2021 biennium. Further, OEA is projecting that the state will continue to see substantial revenue shortfalls into 2025. For 2021-2023, a \$4.4 billion decrease and, as the economy begins to rebound in 2023-2025, a \$3.4 billion decrease in the amount of revenue that was expected before COVID.

The Department of Forestry has cash flow problems, is grappling with significant receivables issues, is facing the potential for a significant wildfire season and the challenges of COVID-19, and is facing a court decision with a significant damage award. The probability of being bailed out by a cash-strapped legislature is very low. Increasing the harvest levels for the next few years will be vitally important for the future operation of the Department of Forestry.

The education system in Oregon also benefits from increased harvests. With our unique system of allocating funding by student, additional revenue from harvest will help mitigate cuts to education from reduced tax revenues.

Revenue that is generated from harvest on Forest Trust Lands supports important services at the County level: Sheriff patrol, jail beds, criminal prosecution services, road maintenance, parks and recreation are just a few examples. Public health COVID measures have put a major dent in Transient Lodging Tax, gas tax, park use fees, lottery revenue, immunization fees, and other revenue streams that support county government. Local taxing districts are seeing decreased revenue related to the Stay Home Stay Safe restrictions. As with state revenue, it will take time to rebuild revenue for counties and local taxing districts. Taxing districts that share in timber

harvest revenue include our libraries, schools, ports, and fire districts. These are critical services that help rural communities have a measure of stability and sustainability. Increasing harvest will help maintain those critical services.

It must also be understood that jobs in the woods, our mills, and truck transportation are some of our rural counties best paying, fully benefited, family wage jobs. These family wage jobs contribute significantly to the social stability in Trust Land counties. In most Trust Land Counties, these jobs pay significantly more than the county average wage and pay about twice as much as jobs in the tourism sector.

Annual Average Wage 2019					
	Total Private Sector Average	Forestry & Logging Average	Wood Products Manufacturing Average	Truck Transportation Average	Leisure & Hospitality Average
Oregon	\$54,002	\$53,978	\$51,808	\$55,185	\$23,798
Benton	\$49,331	\$55,481	\$61,672	\$44,498	\$18,135
Clackamas	\$54,680	\$52,772	\$51,199	\$58,467	\$22,676
Clatsop	\$37,807	\$55,778	\$60,857	\$48,313	\$25,263
Columbia	\$38,786	\$52,726	\$47,156	\$50,574	\$18,253
Coos	\$37,037	\$53,624	\$53,934	\$49,848	\$22,791
Douglas	\$39,702	\$48,038	\$53,376	\$49,561	\$18,208
Josephine	\$37,302	\$46,232	\$45,735	\$39,464	\$18,509
Klamath	\$37,643	\$48,381	\$51,628	\$42,780	\$19,103
Lane	\$43,155	\$53,516	\$55,558	\$55,352	\$19,399
Lincoln	\$36,143	\$47,381	\$43,782	\$47,878	\$23,945
Linn	\$44,681	\$54,860	\$53,751	\$55,584	\$18,646
Marion	\$43,382	\$50,714	\$46,143	\$51,833	\$19,818
Polk	\$35,432	\$55,068	\$45,604	\$46,995	\$16,909
Tillamook	\$38,811	\$53,384	\$58,940	\$48,704	\$23,502
Washington	\$74,227	\$52,007	\$55,304	\$50,637	\$23,344

Data - State of Oregon Employment Department - Employment and Wages by Industry

Continuing pressure on timber harvest takes many forms and one of them is objecting to timber sales. The Forest Trust Land Advisory Committee strongly supports the timber harvests that have been proposed. If any action is required, it should be that the Department and the State Forester should increase sales volume to mitigate the many negative economic and social impacts of the COVID-19 response. We fully support the State Forester and District Foresters setting the annual timber sales and cannot support the Board of Forestry making changes to the program. We also note that ORS 526.016 reads in part: “Notwithstanding any other provisions of law, the board shall not supervise or direct the State Forester in matters relating to the geographic scheduling, annual volume and species allocation, appraisals and competitive timber sale techniques used in the sale of forest products from lands managed under the provisions of ORS chapter 530”.

The Forest Management Plan (FMP) and Habitat Conservation Plan (HCP)

County Commissioners have the Public Health Authority for their county. The public health response to COVID-19 has been an immense undertaking at the Federal, State and county level. County Commissioners are at the forefront of the myriad of responses including COVID testing, isolation, contact tracing, shutting down business, and the incredible complexity of Phase 1 reopening, while maintaining a full slate of county services. We have notified the Department of Forestry that we are cancelling FTLAC meetings until there is time to focus away from COVID. The response to the pandemic, the orderly and safe reopening of our local businesses and maintaining county services are the necessary focus for County Commissioners' time.

Currently, it is not a priority for Commissioners to spend time in lengthy meetings focused on process, with no information about harvest levels across counties, revenue that will be generated, or any meaningful metrics that will clarify whether the FMP or FMP/HCP will be good, bad, or indifferent for counties, local governments, and the long-term social and economic wellbeing of our citizens.

Trust Land Counties need a management plan that will see jobs in the woods, the mills and trucking increased or at least sustained. We need to see increased revenue flowing to the Department of Forestry, the schools, Counties, and local taxing districts. We do not support a change to the revenue sharing formula, and we would not support an FMP or an FM/HCP that violates the State's contractual obligations with the Trust Counties.

When we have information that will clarify how the FMP and FMP/HCP relates to our goals, we look forward to a meaningful discussion.

We must remember that timber revenue drives economic development and social stability for rural counties. In an era when the department is struggling to remain financially viable, the best way forward is to increase harvest levels which benefits the department, schools, Counties, and local taxing districts.

I apologize for being so long and detailed but as you can see, actions past, present, and future, have placed many timber dependent counties financially on a knife's edge, with some having already fallen off the edge. The need for increased timber revenue is a fact in post-COVID Oregon.

Timber counties are comprised of hard working, resourceful men and women. We are not looking for a handout, nor even a hand up. We are used to helping ourselves and our neighbors but the ever-increasing roadblocks to our livelihoods are becoming insurmountable.

Respectfully submitted,

David Yamamoto

Tillamook County Commissioner
Council of Forest Trust Lands (CFTLC), Chair
Forest Trust Lands Advisory Committee (FTLAC), Chair

June 3, 2020 Comments to the Board of Forestry by Clatsop Commissioner Kathleen Sullivan

Good afternoon, State Forester, Peter Daugherty, Chair, Tom Imeson,

Board Members: Nils Christoffersen, Cindy Deacon Williams, Mike Rose, Joe Justice, Jim Kelly, and Brenda McComb.

My name is Kathleen Sullivan, I am the current Chair of the Clatsop County Board of Commissioners. I am in my fourth year serving as the Clatsop County Representative on the Forest Trust Land Advisory Committee. It has been my privilege and honor to have come before this board during my term as a County Commissioner. I have enjoyed working with you and respect your expertise and experience. I want to thank you for your service, especially during these times of narrowing available resources. Thank you.

I am speaking today, to once again, go on the record with the Clatsop County Board of Commissioners support of balanced forest management that includes revenue, recreation and habitat. We support the Habitat Conservation Plan. We applaud the historic MOU between the private timber Interests and multiple environmental interests. We believe collaboration is an important tool in problem solving. The challenges facing forest management requires we listen to each other, be willing to compromise, and always keep in mind, we are managing these forests for the greatest common good. The generations to come are depending on us today for their tomorrow.

I would like to thank State Forests Division Chief, Liz Dent and her executive team that traveled to Clatsop County on several occasions to participate in public meetings presenting information and listening to input from the community. Thank you.

Clatsop County borders on the Pacific Ocean and the Columbia River. We are a county vulnerable to the impacts of climate change. Clatsop has an active seafood industry and an active timber industry as well as a substantial hospitality sector. As we have said during this time of Covid-19, Clatsop county is two hours away from 2 million people. Our population can double on a weekend with visitors coming to Clatsop to recreate and relax.

Thus, we are a dynamic county that happens to have the most productive and profitable state forest lands, which is why I continue to be dismayed that FTLAC meetings get canceled, but yet testimony is brought to the board that has not been vetted by all of the members of FTLAC. In these turbulent times in our country nationally, we must be especially mindful of the need for ethical and transparent public process on the local levels. To proceed without full participation of the advisory board casts doubt over the message and mission of the Forest Trust Land Advisory Committee. I ask that this recurring problem with process be corrected. Diversity of ideas and values is the base of resilience in the public process. Thank you.



Oregon State Forests FY2021 Annual Operations Plans Information Item

Topics:

- Planning Hierarchy and Relationships
- State Forests Annual Operations Planning Process
- Public Comments and Preliminary Responses

Presenters:

Liz Dent – State Forests Division Chief

Ron Zilli – State Forests Deputy Division Chief - Planning

Relationship of FMP → IP → AOP

Forest Management Plans

Adopted by BOF

Strategic Plan

- Adopted as Administrative Rule - Equals GPV
- Long Range Plan

Contains

- Guiding Principles
- Goals
- Strategies
- Guidelines for IPs, Asset Management, etc.
- Implementation levels

Implementation Plans

Approved by State Forester

Tactical Plan

- Achieves goals of FMP
- District Specific
- Mid Range Plan

Contains

- District overview of key resources and land ownership
- Management opportunities
- Average annual harvest objective
- Current forest structure
- Desired future forest condition

Annual Operations Plans

Approved by District Forester

Operational Plan

- Achieves IP Objectives
- District Specific
- Fiscal Year Plan

Contains

- Description of harvest operations and forest projects
 - Timber Sales
 - Habitat Improvements
 - Young Stand Mgmt.
 - Recreation
 - Road Mgmt. Projects
 - Monitoring/Research

Relationship of FMP → IP → AOP

Example: Complex Forest Conditions and Harvest Levels

**Forest
Management
Plans**
Adopted by BOF

**Implementation
Plans**
Approved by
State Forester

**Annual
Operations Plans**
Approved by
District Forester

Strategic Plan

- Achieves GPV

Examples:

- Establishes long term goal for desired future condition 30-50%
- Retains all existing old growth, and existing OFS where mapped in Implementation Plans
- Active management framework

Tactical Plan

- Achieves goals of FMP

Examples

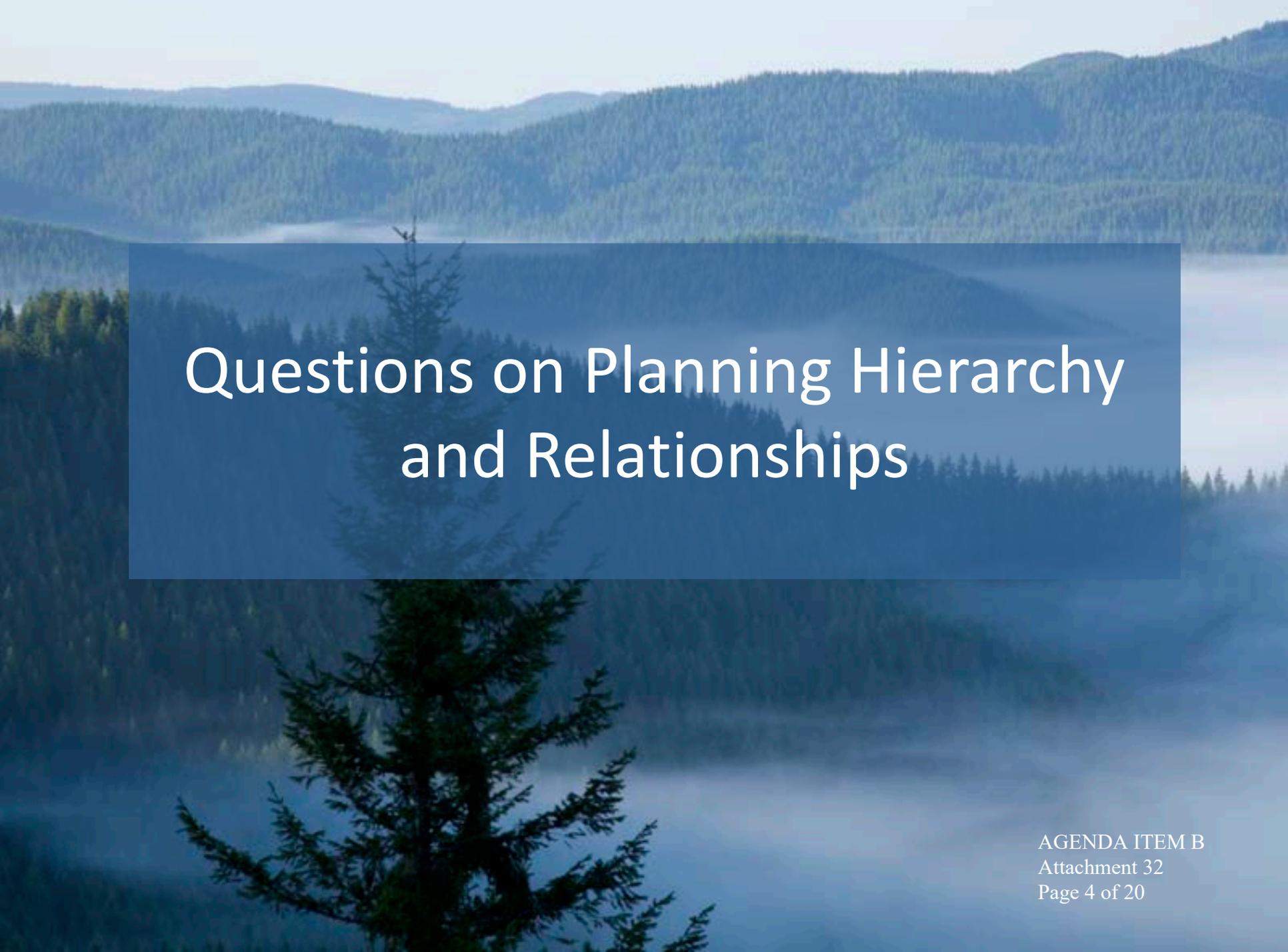
- Mapped landscape design for complex forest development currently 30 – 45%
- Landscape design created collaboratively with resource specialists
- Establishes average annual harvest objective

Operational Plan

- Achieves IP Objectives

Examples

- Harvest prescriptions aligned with mapped Desired Future Condition
- Achieves average annual harvest objective



Questions on Planning Hierarchy and Relationships

State Forests Annual Operations Planning (AOP) Process

Overview:

- AOP development is a multi-year collaborative process
- Aligned with District Implementation Plans and Forest Management Plans
- Results in fiscal year plans for:
 - Harvest operations
 - Road projects
 - Young stand silviculture
 - Aquatic habitat enhancement
 - Recreation projects
 - County/Common School Fund revenues

State Forests Annual Operations Planning

Initial Scoping:

- 1 to 3 years prior to AOP year
- District staff and resource specialists identify timber sale candidate pool, identify trade-offs, and select candidates to move forward
- Threatened and endangered species surveys scheduled where required
- Forest projects for recreation, roads, environmental enhancements and young stand silviculture considered



State Forests

Annual Operations Planning

Internal Review:

- Occurs in the summer/fall prior to AOP year
- Office/field reviews by district staff and resource specialist conducted (GeoTech, Aquatics Specialists, Wildlife Biologists, Division Engineer, etc.)
- Preliminary preoperations reports are prepared that incorporate input from district staff and resource specialists

State Forests Annual Operations Planning

External Review:

- Occurs in the fall/winter prior to AOP year
- AOPs are reviewed by resource specialists from multiple agencies who give feedback specific to their areas of expertise:
 - ODFW Wildlife and Fish Biologists
 - ODOT Archaeologists - cultural/historic resource review
 - OPRD - Scenic Waterways
 - USFWS - T&E information sharing
 - Government to government engagement with Oregon's nine federally recognized tribes



State Forests

Annual Operations Planning Process

Public Engagement:

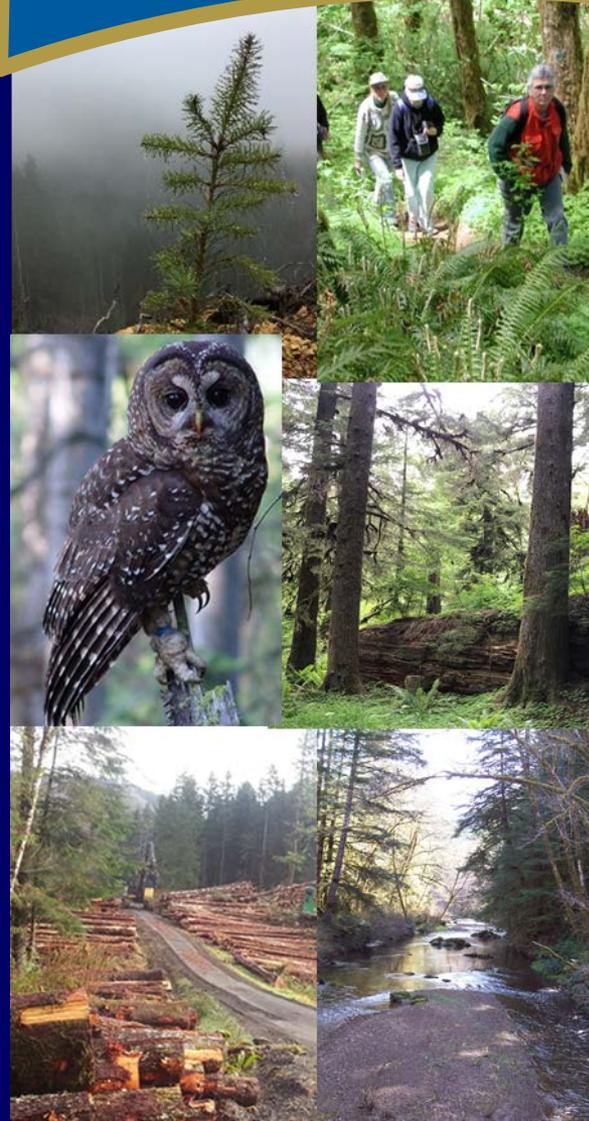
- Ongoing process prior to AOP year
- Two AOP informational sessions were held in February (Astoria and Salem)
- 45-Day Public Comment Period (March – May)
- Web map tool for the public to view sale locations and detailed pre-operations reports
- State Forests Advisory Committee review and feedback
- District engagement with local governments and neighbors

State Forests

Annual Operations Planning Process

AOP Finalization and Approval:

- District Foresters and staff consider public comments and make final refinements to AOPs
- AOPs approved by District Foresters prior to June 30
- Specialist consultation continues as needed during sale layout





Questions on State Forests Annual Operations Planning Process

Annual Operations Plan Public Comment Themes



- Recreation
- Pesticide Use
- Climate Change & Carbon
- Roads
- Slopes and Aquatics
- Targets & Performance Measures
- Timber Harvest

Recreation Public Comments

- Majority of comments voiced support for plans to develop trailheads at a downhill mountain biking trail area and the Wilson River Trail in the Tillamook State Forest
- Others requested increased services including hiking trails, horseback riding, mountain biking, or OHV opportunities
- A few related to maintaining public access and reducing number of gates



Pesticide Use Public Comments

- Requests to:
 - Reduce/eliminate use of pesticides
 - Reduce/eliminate aerial applications
 - Increase communication with public about pesticide use

Climate Change/Carbon Public Comments



- Concerns:

- Planned activities will reduce carbon sequestration
- Make landscapes more vulnerable to wildfires and climate change



Roads Public Comments

- Concerns:
 - Building too many new roads and requests to close more existing roads
 - Hydrologic connectivity of roads to streams
 - Investment levels in road maintenance

Streams and Steep Slopes Public Comments

- Concerns:
 - Planned timber sales on steep slopes near streams
 - All Geotechnical reviews not finalized prior to AOP public comment period

Targets and Performance Measures

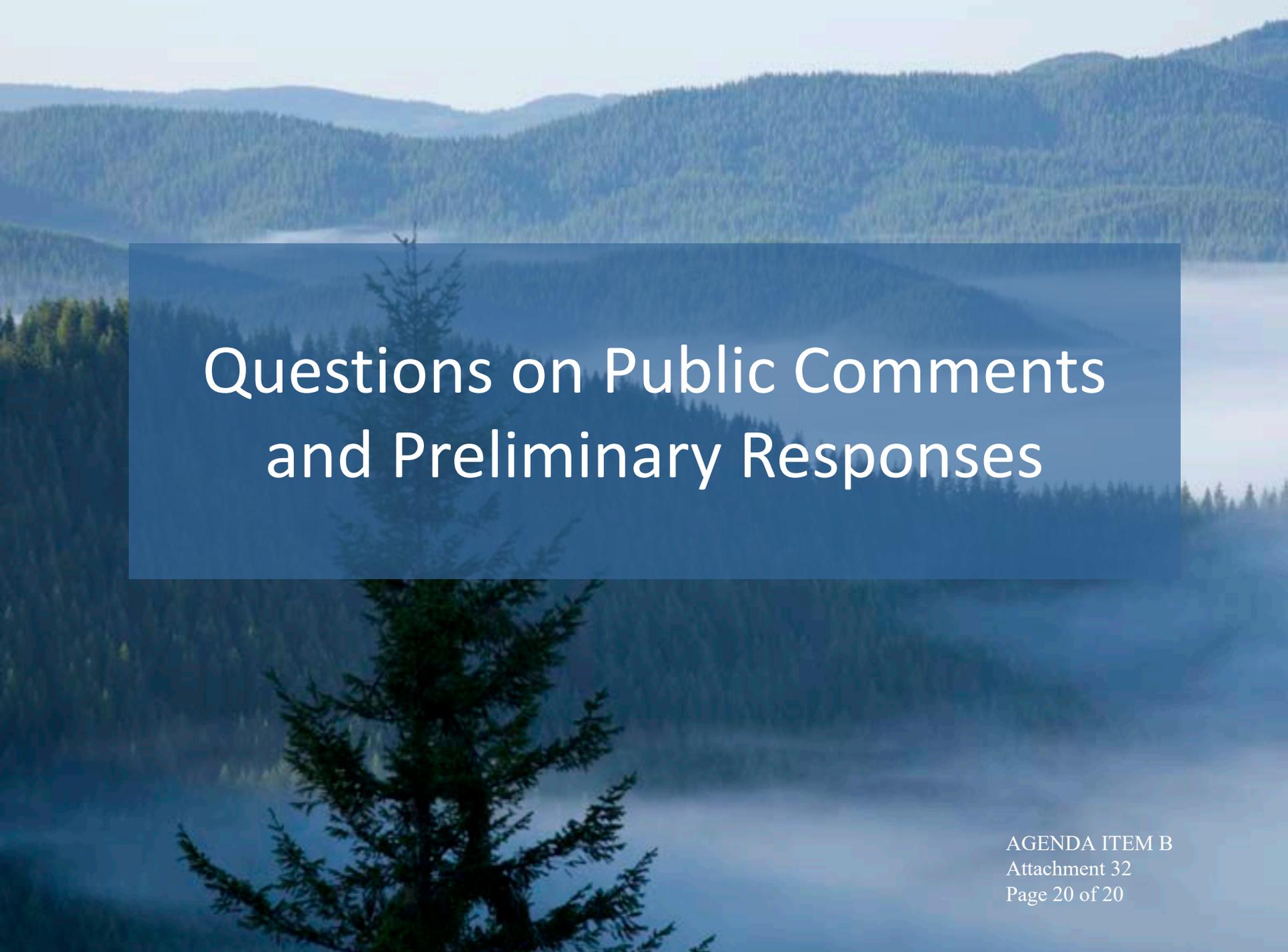
Public Comments

- Concerns:
 - Plans focus on revenue
 - Lack targets for other forest values



Timber Harvest Public Comments

- Concern about clearcutting layered stands/older stands
- Requests to increase harvest/not harvesting growth
- Support for harvesting to generate revenue to rural communities and provide timber related Jobs
- Concern about harvest sustainability



Questions on Public Comments and Preliminary Responses

Email submitted: Tue 06/02/2020 9:13 AM

Written Testimony:

Please add my comments below to the testimony on the 2021 AOP before the Forestry Board at its June 3, 2020 meeting.

I have lived on the Trask River for the last 20 years. I have 14 acres on the river, and am surrounded by the Tillamook State Forest. I have watched the increase in clear-cuts on steep slopes in the Trask Watershed, and have witnessed the decrease in native fish populations, especially Coho salmon. The Trask River and its tributaries muddy up faster and stay that way longer than they used to do. There can be no doubt that fishing populations have declined as a result. While logging roads have increased access to timber stands, they have concurrently blocked access to spawning water for returning fish. It's not hard to understand why fish are in trouble.

More than any other issue I hear about that concerns people is the use of pesticides/herbicides on recently cut timber sites. This practice and how its done harms people, animals, water quality and forest diversity. Currently, citizens living nearby aren't even warned about imminent spraying. Aerial spraying is dangerous, and the effects on life of all kinds is being litigated all over the world. Why can't we get an impartial review of this practice?

I'm particularly concerned about the Trask Watershed given the amount of unsustainable cutting that has been done, and is scheduled ahead. I have personally visited some of the proposed timber sale sites; many are on steep, landslide prone slopes. It's not hard to see the potential for slides and blocked access to spawning water. You can see the results of previous slides on sites located next to the proposed sale sites.

If all you care about is cutting down trees and maximizing profit, the above won't concern you. Business as usual. However, we're talking about public lands with many taxpayers wanting more than clear cuts and spraying. The Department of Forestry has not been responsive to this larger mandate, even though it's been called for numerous times. Token acknowledgment has not resulted in meaningful action, and the 2021 AOP reflects a continuation of the unresponsiveness that has many citizens calling for serious reform. Are our old growth and diverse public timber stands going to pay for DOF management and budget problems? For how long?

Please, throw out management's 2021 AOP and write a new one—one that brings Oregon in line with our neighboring states, and reflects what a magnificent public asset we have in our State forests. They can be much more than tree farms being run for private forest financial interests. Let's create a state agency managing our assets with a much broader view.

Ron Byers
24894 Trask West
Tillamook
rontraskbyers@gmail.com

Submitted: June 15, 2020

RE: 2020 Annual Operations Plan

Over the last 30 years I have written many letters to Oregon Department of Forestry. ODF is my neighbor here in the foothills of the Nehalem River Valley. So is Weyerhaeuser Timber Company. I own 20 acres of forest land alongside West Coal Creek, a fish bearing stream which feeds into Coal Creek, and then the Nehalem River.

In 2006 ODF did a thinning above my land. At the time, I communicated closely with the forester Dave Wells. ODF called their management approach “Structure Based Management,” and were proud that it worked toward a “balance” between the need to harvest trees for state revenue, and the need for a healthy watershed and a forest that could regenerate for generations to come. I now realize those were the “good old days.” With the increased pressure for revenue ODF has more and more moved toward industrial style logging. Even though I understand the need for revenue, this shift is a move in the wrong direction that is accelerating the destruction of our watershed and threatening the health and well being of the people who live here.

Living on the edge as I do, I have experienced the impact of clear cutting. Over the last 4 years, clear cutting over the headwaters of West Coal creek and along its banks has created a “flash stream” which runs with increased velocity and siltation. The force of this has eroded the banks of my land and taken with it many large trees. The damage to the creek and the nearby structures is so severe that this summer ODFW and the Lower Nehalem Water Shed Council will attempt a creek restoration project to slow the creek down and try to create a habitat beneficial to fish.

While we are busily trying to repair the damage of erosion, flooding, mud slides, and polluted waters, it seems that both the logging industry and the Department charged with the responsibility of caring for our home forests, are set on a course of clear cutting coastal forest land for quick profit.

Specifically, residents of the area are concerned about the use of toxic sprays that filter into our drinking water and the air we breathe; and the application of these sprays without notice to residents. We are concerned about the loss of forests evidenced by the clear cut hills. We are concerned about the destabilization of the earth resulting in mudslides and siltation of the water. The Nehalem River is a prime example. After years of collecting silt from tributaries, you can now see an island in the center of the river at low tide.

And, of course, the clear cutting of our forests is a move in the wrong direction in the context of Climate Change, the role of trees in cooling the earth, cleansing the air, stabilizing the earth, and storing carbon. The earth does have incredible powers of regeneration; however, when everything is taken from the hills, toxic spray applied to kill the undergrowth, and the intricate system of plants and fungi--trees may be replanted, but the forest is destroyed.

My hope is that ODF can create a plan for managing our forests which values them as central to the health of the watershed, the wildlife, and the people who live here—not just a source of revenue. The AOP presented does not come close to fulfilling that hope.

Sincerely,
Gwendolyn Endicott
42130 Anderson rd.
Nehalem, Oregon



Oregon Board of forestry,

Thank you for the opportunity to provide comments regarding the Oregon Department of Forestry's (ODF) Annual Operations Plans (AOP's). Our collective associations represent tens of thousands of working Oregonians who strongly support active management of Oregon's forest lands.

We write today to support the Department moving forward with all planned timber sales in fiscal year 2021. After reviewing the AOP's and the planned sales we are confident that all of them are in full compliance with the Boards current Forest Management Plan.

Our associations participate in State led planning processes regularly on behalf of our members. We believe strongly in the tenants of open and transparent government. ODF's process for development and execution of timber sales certainly meets these goals.

It is imperative that State managers and policymakers recognize the wise use of our state resources, protecting where necessary, and allowing ample management for the benefit of citizens. ODF managed lands provide several benefits to local communities, including critical wood and fiber, sustainable family wage jobs, and revenue for rural counties and local taxing districts. Supporting rural Oregon economies and supplying valuable materials for processing, shipment, manufacturing, and ultimately finished products during economically challenging times greatly benefits Oregon's overall economy and speeds recovery. Weather it's toilet paper or plywood, we all depend on those products being there when we need them. Made in Oregon is a slogan that resonates with all native Oregonians, and there is arguably nothing more iconic to our state than the wood products we produce for the country.

In closing, we once again express our support for the slate of timber sales proposed by the Department in their 2021 Annual Operations Plans, and feel strongly that they meet or exceed all environmental requirements under the Boards current Forest Management Plan.

Sincerely,

Oregon Forest & Industries Council

Associated Oregon Loggers

Douglas Timber Operators

Western Wood Preservers

Oregon Small Woodlands Association

To: The Oregon Board of Forestry

From: Northwest Hardwoods

Hampton Lumber Company

Swanson Bros Lumber

Stimson Lumber Company

Cascade Hardwoods

Callahan Resource Management

Freres Lumber Company

B&G Logging, LLC

Seneca Sawmill Company

RSG Forest Products, Inc

Roseburg Forest Products

Swanson Group, LLC

Associated Oregon Loggers

Georgia-Pacific Company

Frank Lumber Company

Stella-Jones

Pacific Fibre Products

Date: May 29, 2021

Dear Oregon Board of Forestry,

Thank you for the opportunity to offer comment on agenda item number 8- State Forests Annual Operations Plan Process Overview. Collectively we represent the majority of purchasers of state timber sales- representing approximately 27% of Oregon Department of Forestry's (ODF) overall operating funds. We are proud to work for a sector that provides benefits to society in so many ways- social, economic, and environmental.

All of the undersigned companies participate intimately in the work of the Annual Operations Plans (AOPs). From engaging in the Forest Management Plan (FMP)/ Habitat Conservation Plan (HCP) policy conversations, to commenting on individual sale plans, our companies are involved from stem to stern, and have been for decades. AOPs are only one avenue for that engagement- processes at ODF are never in short supply. That said, often our comments are made in individual emails, letters, oral testimonies,

AGENDA ITEM B

Attachment 36

Page 1 of 3

etc., and we thought it could be valuable to provide some of these statements collectively in one location.

1. First, you should know that upon our close consideration, these AOPs describe how the activities and projects undertaken by each district will achieve the goals, strategies and objectives of the FMP, and meet or exceed all environmental requirements under the current FMP. This question alone should define the scope of the Boards inquiry.
2. However, for the record, the current FMP woefully underproduces in terms of harvest volume, and overproduces in terms of preservation, as it has for over two decades.
 - a. Early modeling for this FMP projected harvest at or around 279mmbf per year. That “key assumption” was widely publicized and factored into business plans and county budget projections. The delivery, however, has never gotten close to that number in the annual operations plans, and the 2021 AOPs once again fall woefully short at only 232mmbf per year.
 - b. According to ODF documents, under the current FMP, as much as 49% of the forest is constrained or completely off-limits to harvest. This represents an overwhelming conservation commitment, and no reasonable definition of “greatest permanent value” would support sacrificing that much of a productive working forest.
 - c. This failure to produce harvest volume was precisely what triggered the class action lawsuit that the state recently lost, awarding 1.1 billion dollars to counties and special taxing districts.
3. Greatest Permanent Value (GPV) includes social and environmental considerations.
 - a. In every reading of GPV the definition includes the need for consideration of both social and environmental interests. Almost every measure of social health has strong connection with available employment - homelessness, substance abuse, poverty, healthcare, etc. Jobs are vital to the health of every family and every individual in Oregon; they are fundamental to the health of our communities. We are proud of the family wage jobs and community investments we provide and fight hard to maintain those employment opportunities as we compete in a global market. We are also very proud of our environmental track record and strongly believe in the goals of the Oregon Forest Practices Act and sustainable forest management.
 - b. However, for over 20 years the FMP and this Board has been overly focused on the environmental aspects of GPV. Purchasers watch these lands continue to bank annual forest growth at the expense of jobs and revenue to counties and special taxing districts. According to recent ODF data, these forests produce approximately 450mmbf per year. With harvest levels at approximately 230mmbf per year, these represent approximately only 50% of the annual growth of these forests. Compounding year after year, State forests are growing older and denser.
 - c. State Forests are aging and are projected to get older in perpetuity under this FMP. In other words, rotation ages of these forests are far higher than 55 years when the entire forest is accounted for, and the average age continues to grow. According to ODF information, almost 83% of the forests are over 50 years in age, and the age of these forests will increase exponentially under this management plan. Greater balance in the distribution of age classes is imperative over the long term for the success of any future management plan- with or without an HCP.

- d. An over-emphasis on environmental interests, at the expense of a more balanced approach threatens another Elliott Forest debacle- an embarrassing and costly example of mismanagement that our state, and our working State forests, cannot afford.

Thank you for the opportunity to comment on this agenda item.

Sincerely,

Oregon State Timber Sale Purchasers

Cc: Peter Daugherty, Oregon State forester
Liz Dent, ODF State Forest Division Chief

Date submitted: Tue 06/16/2020 11:29 PM

Subject: ODF AOPs

Hello,

As a long time resident of Clatsop County, a real estate broker, a former Park Ranger with a degree in Forestry and a small woodlot owner I feel compelled to comment on the Astoria District's Annual Operation Plan (AOP) for 2021.

I had planned to make specific comments on individual proposed primary and alternate sales. However, after reviewing each sale I must say that I am shocked and disappointed at the amount of older and complex stands proposed for harvest. Across the landscape within the Astoria district mixed stands of conifer and hardwood with trees older than 80 years old are few and far between. With so many plantation type stands both on private and public lands within our region these true forests, with a strong hardwood component, provide true biodiversity.

The department states that it has lofty aspirations to grow more complex stands. Therefore I find it unconscionable that these mature forests, many of them are already in layered condition, are proposed for harvest. It seems that the department, at least the Astoria district, uses their desired future condition label to target the few remaining real forests for harvest while proposing to grow more complex stands in areas of young, even aged stands.

It is well documented that these older forests sequester more carbon. It takes a long time to grow forests like many of these stands so if the state is serious about setting climate goals several of these proposed sales should be canceled.

A few examples caught my attention are:

BamBam - A mixed conifer hardwood stand, 74 years old currently classified as layered

SabaJabi - Mixed conifer stand up to 86 years old some of which is in layered condition

Hard Target - alder and mixed conifer stand up to 84 years old; desired future condition is layered (When it's this old, with a mixture of hardwood and conifer it is well on its way to being layered it seems disingenuous to target it for harvest)

Sage Grass - 84-year-old mixed conifer stand with some hardwoods

Wage Earner - 83-year-old mixed conifer stand with some hardwoods

Walk and Crawl - This 192 acre clear-cut is already in layered condition with trees at least 78 years old with a good hardwood component

Popeye - cancel 24 acre portion of unit seven which is already older for structure at least 84 years old

Rocky - mixed conifer stand 91 to 94 years old!! There are so few trees across the landscape of this age it would be criminal to harvest them

Summit Shake - mixed conifer stand with a hardwood component with trees 80 to 90 years old; some portions already in layered condition

Double North - mixed conifer stand with hardwood component up to 90 years old; some portions of the unit already in layered condition; this sale is within a marbled murrelet management area

Suede Split - domestic water source only one quarter-mile down stream; I know from personal experience having lost my water source due to a clear-cut and living two years with no running water how devastating this can be to neighboring property owners

Blue Bucket - A good portion of this proposed clearcoat is already in layered condition With a decent hardwood component

Threes Company - mixed conifer stand up to 90 years old

As mentioned earlier, with so much of our district in young plantations it does not seem prudent to label these older forests with a desired future condition of non-complex stands while at the same time, stating the need to grow the very type of forest that many of the stands already are.

A well-documented fact is that forests such as many of these, with a good component of Alder, can drastically slow the spread of wildfires. Alder, with its high moisture content, is extremely valuable in forest protection from fire.

A real forest is a mixture of many species of many ages and full of biodiversity and high habitat values. Our northwest Coast Range landscape is predominantly plantation style forestry so the need to retain these real forests is very apparent.

Thank you for taking the time to consider these comments. Please let me know if you'd like clarification on anything I've mentioned.

Sincerely,
Pam Birmingham

Pam Selway Birmingham
Earth Advantage Broker
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Date submitted: Tue 06/16/2020 11:03 PM

Subject line: Criticisms of ODF 2021 AOP for Oregon forests

As a resident of Oregon's North Coast, I write to express disappointment with the Oregon Department of Forestry's proposed 2021 Annual Operating Plan, particularly the clearcuts and herbicide spraying outlined for the Astoria and Tillamook Districts.

1. I visited the East Foley Creek clearcut on June 14, 2020, and was dismayed by the steep slopes being stripped of trees. All foliage which could hold soil in place is gone, making this area ripe for toxic runoff when herbicides are applied, and also for potential mud- and log-slides during next winter's rains.

These toxins and sediments from clearcuts this steep will run via the creek:

- ** into prime salmon spawning grounds in East Foley Creek;
- ** into Miami-Foley Valley where cattle, horses, and sheep are raised; and
- ** into oyster beds and crabbing areas of Tillamook and Nehalem Bays.

2. Several well-researched comments were submitted to the DOF by coalitions from the Oregon Coast and Willamette Valley alleging that the DOF ignores all values to the Oregon public except money. I agree that:

- ** The current AOP seems to ignore the value of long-term healthy air and water contributed by mature, complex forests, as opposed to monocultures of young trees.
- ** No awareness is shown of the value of fire-resistance inherent in larger, older, moister trees.
- ** This AOP clearly never considered the value of managing forests in ways that use fewer chemicals and more hands-on work, thus employing more people and keeping the public's common spaces cleaner.

3. I disagree with assumptions behind arguments from currently-vested groups (such as the logging industry and Commissioner David Yamamoto of Tillamook County) who claim that clearcut logging provides good jobs.

Managing forests more sustainably, with fewer machines, a wider range of harvest techniques, and selective cutting is likely to employ even more people. It would generate a greater variety of jobs and products that could benefit the Oregon public and its environment far more than the current short-sighted clearcut plan.

Thank you for your attention. Please use your creativity and privileges to safeguard the commonwealth of Oregon's State Forests -- not for private interests, but for the health and welfare of all.

Phyllis Thompson
Manzanita, Oregon
peatea0@yahoo.com

Email Campaign Titled: Protect Jobs AND Communities

Campaign hosted by: Oregon Forests Forever, <https://oregonforestsforever.com/>

Message:

Hello,

As an Oregonian, I care about our forests and also about protecting the family wage jobs they provide, particularly in rural parts of our state. That's why I'm deeply troubled to hear that the Board of Forestry is thinking of reducing active management of state forests.

Unemployment levels are at Great Depression levels, and we need to do everything we can to protect the green, family wage jobs for more than 60,000 Oregonians that the forest sector provides. We need to support our small businesses and local mills. If anything, we should be considering ways to increase jobs and revenue for the state, not reducing it!

Please continue smart, sustainable forestry that manages state forests to protect jobs and provide revenue for businesses and the state.

Thank you.

Message Recipients: 364 emails received as of June 17, 2020 at 5:00 p.m.



Administration Update

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Attachment 40
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Administrative
Branch

Agenda Topics

- Financial Dashboard Projected Design Review and Update – Bill Herber & James Short
- Human Resources Dashboard – Tricia Kershaw
- Facilities Capital Management Plan – Chris Stewart
- Public Information Request Report – Joy Krawczyk

Human Resources Update

Tricia Kershaw

AGENDA ITEM B
Attachment 40
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What We Will Cover

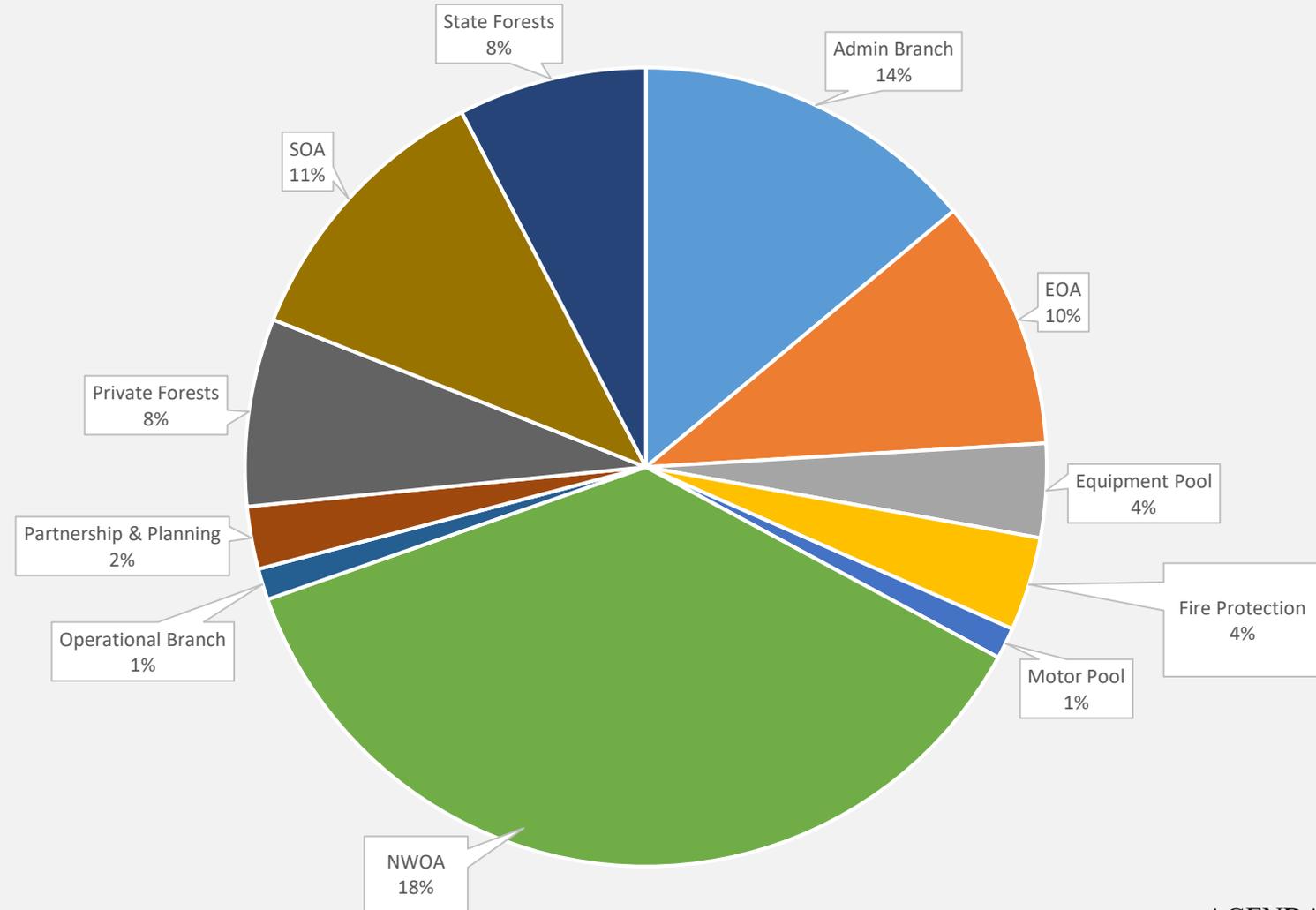
- Position snapshot
- Succession planning
- DEI data
- Recruitment stats
- Safety

Position Snapshot

- 644 Head Count as of 12/31/2019
 - 527 Permanent Positions
 - 60 Seasonal
 - 32 Temporary
 - 25 Limited Duration
- 1116 Head Count during season
 - 530 Permanent Positions
 - 487 Seasonal
 - 72 Temporary
 - 27 Limited Duration

Retirements

Eligible to Retire
Jan 2019 - Dec 2019



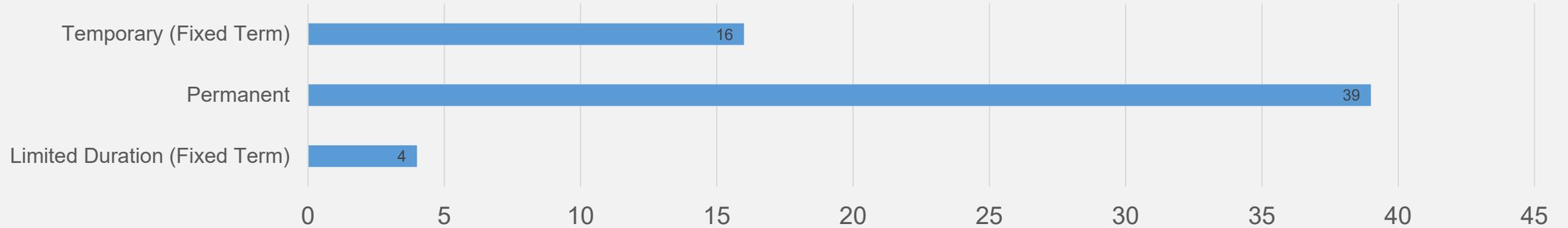
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Succession Planning

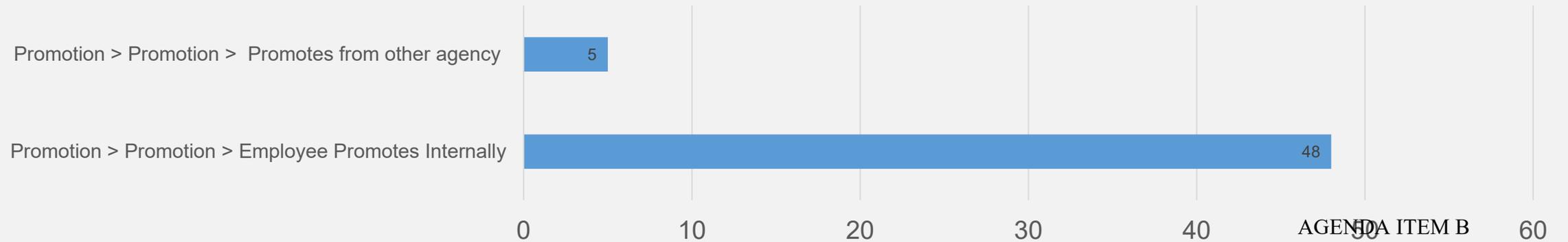
- Our work has been on hold
 - ODF Leadership Trainings
 - DAS Enterprise Trainings
- Utilization of Workday features
 - Opportunity Graph
 - Utilization of Development Plans
- Continuing Developmental and Work Out of Class Opportunities

Recruitments

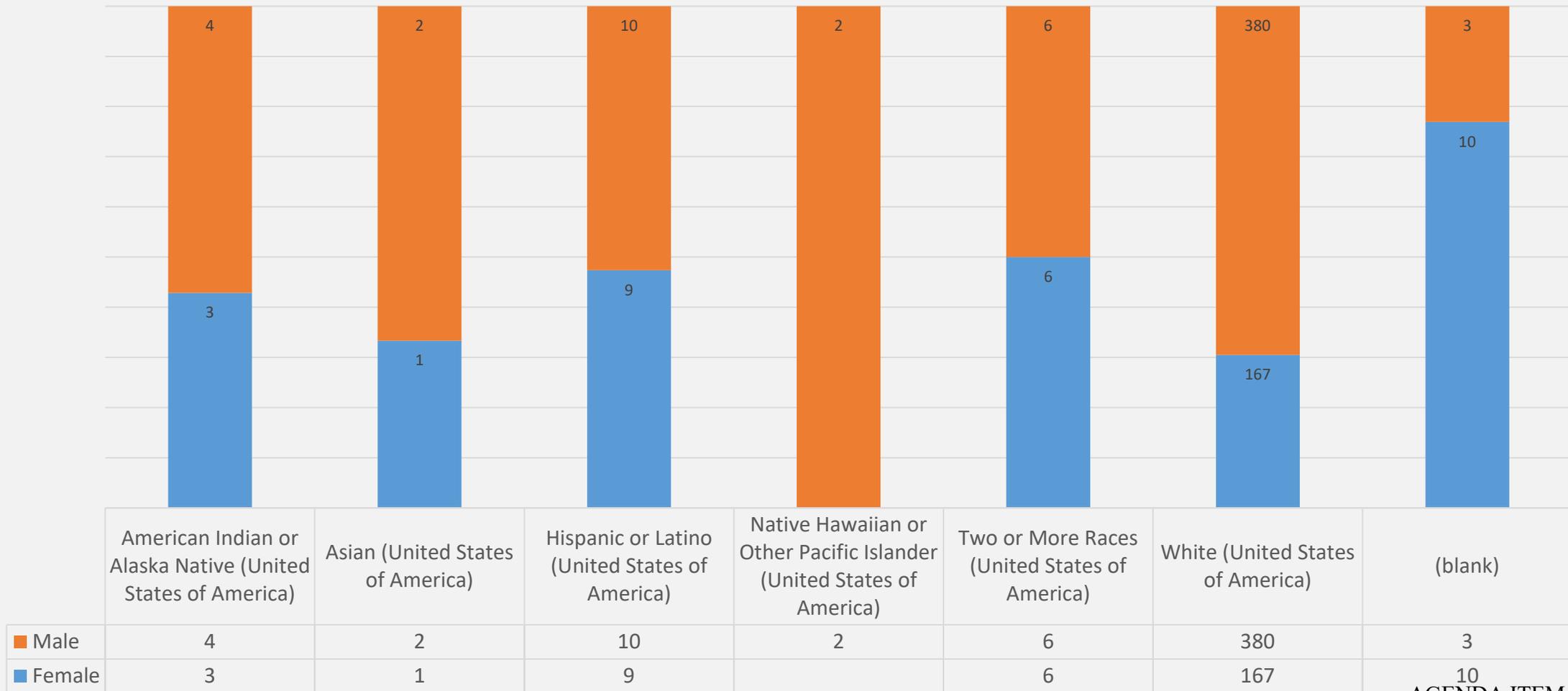
New Hire Types
(excludes Seasonal Hire)
2019



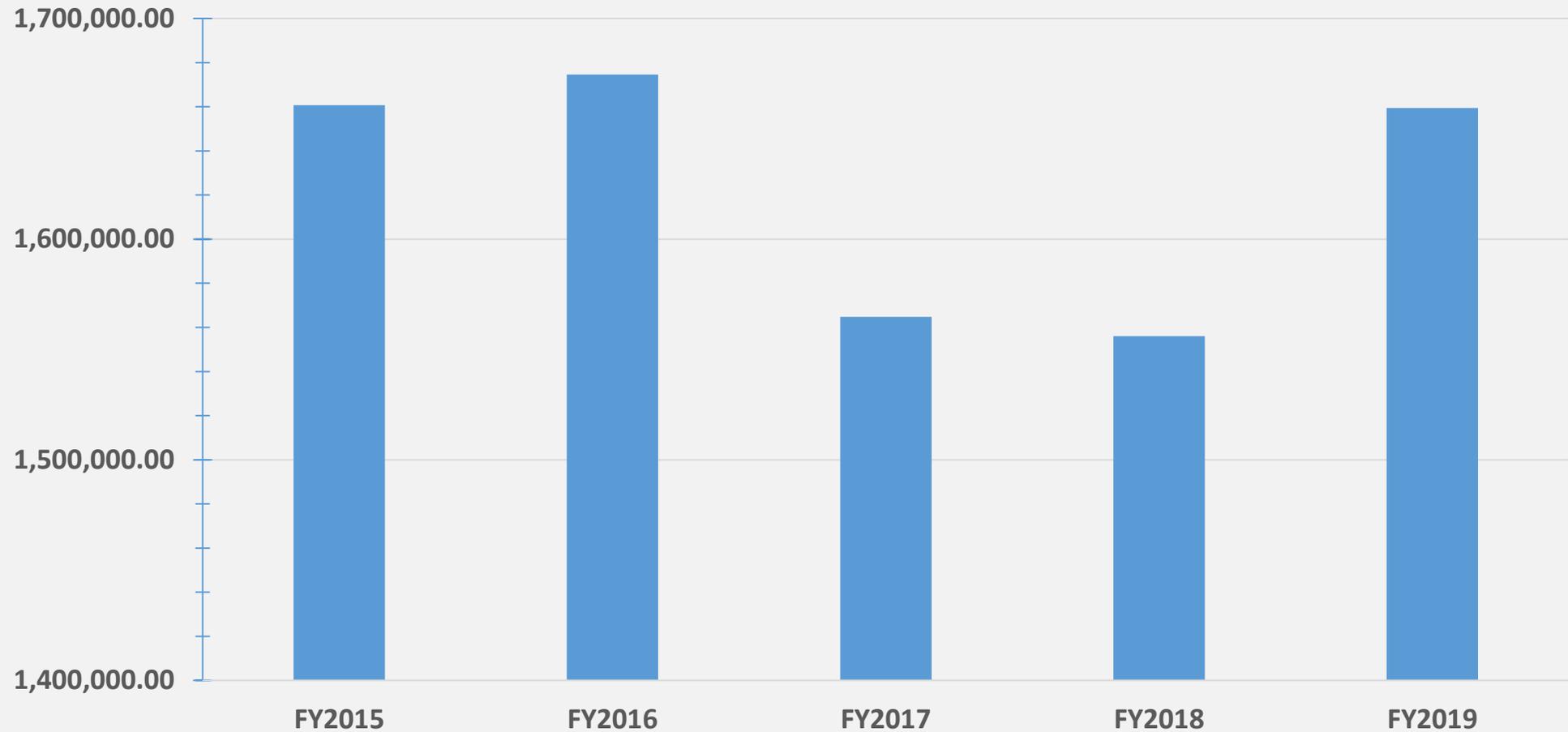
Promotion Type
as of 12/31/2019



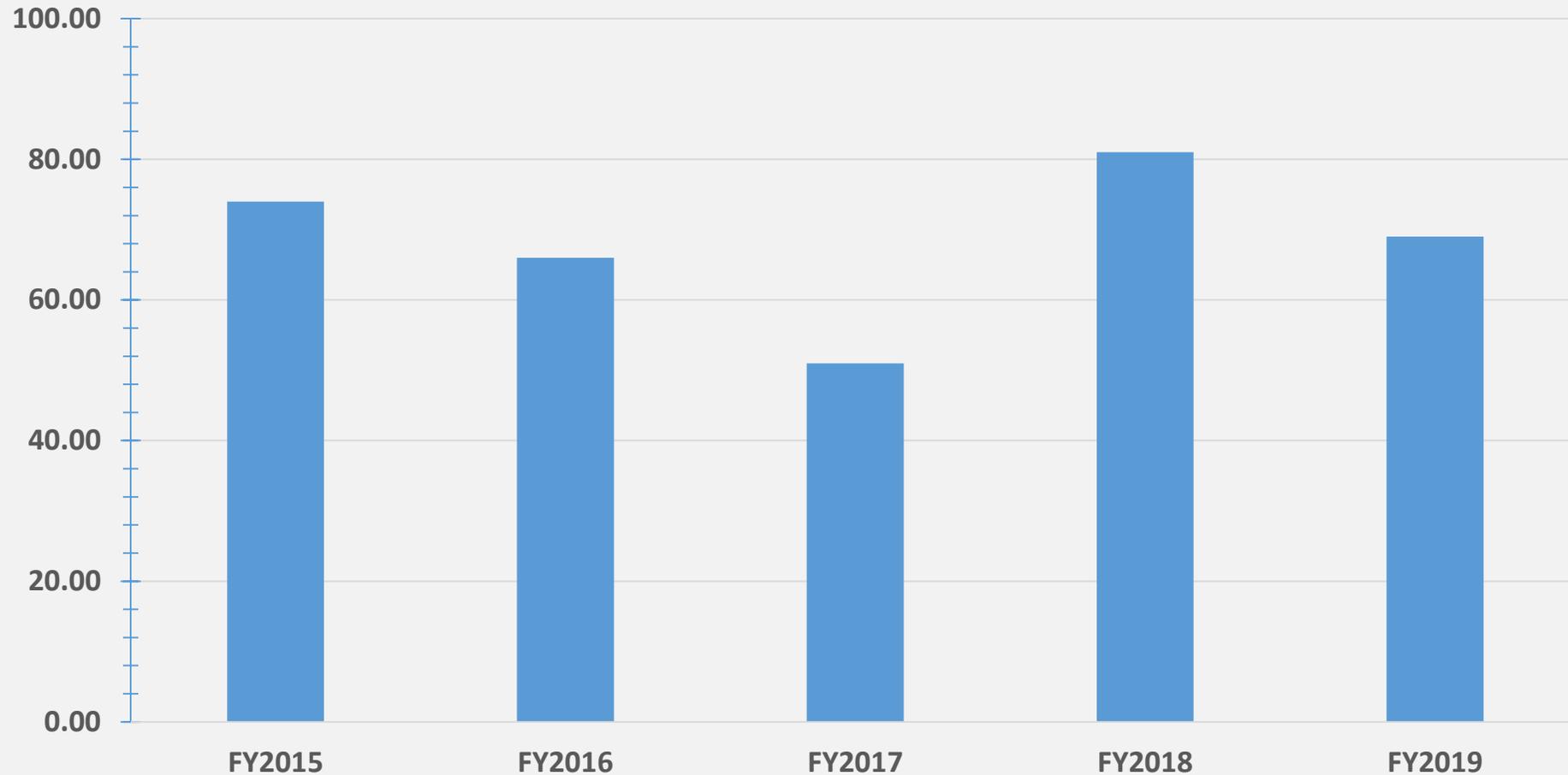
DEI Demographics



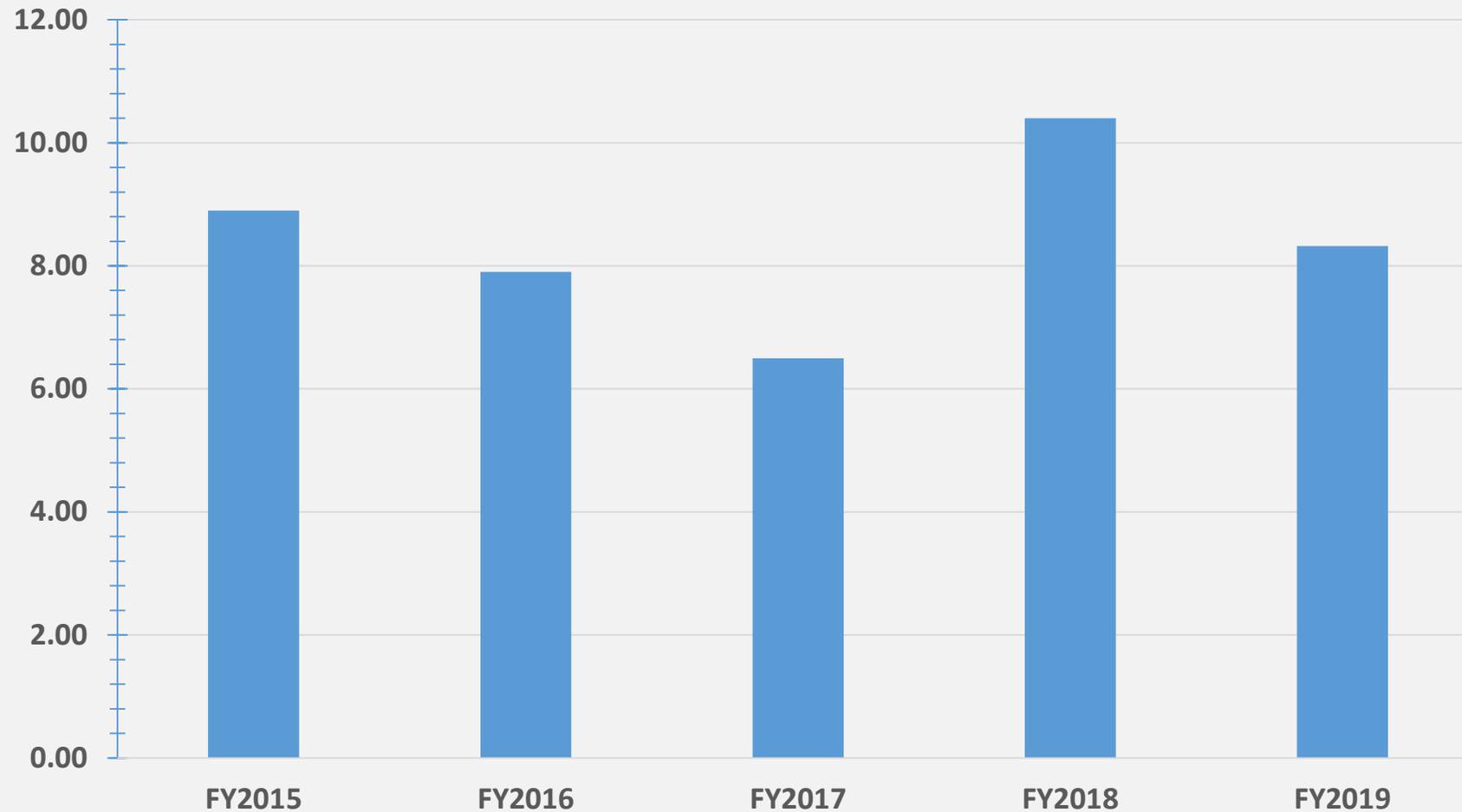
Statewide Safety Statistics- Total Hours Worked



Statewide Safety Statistics - Total Reported Injuries



Statewide Safety Statistics – Claim Frequency Rate



Facilities Capital Management Update

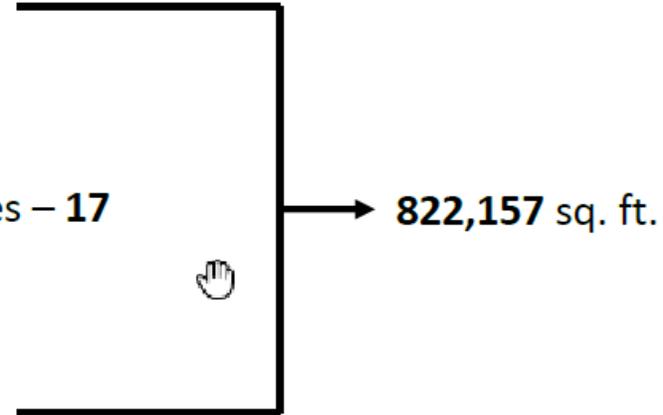
Chris Stewart

AGENDA ITEM B
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Facility Portfolio Stats

Total Structures – **389**

- Buildings – **292**
- Lookouts – **22**
- Communication Sites – **17**
- Fueling Stations – **1**
- Kiosks – **5**
- Vault Toilets – **52**



CRV > \$1M – **35** Structures → Total CRV = **\$157M**

CRV < \$1M – **354** Structures → Total CRV = **\$84M**



CRV = Current Replacement Value

Condition Metric

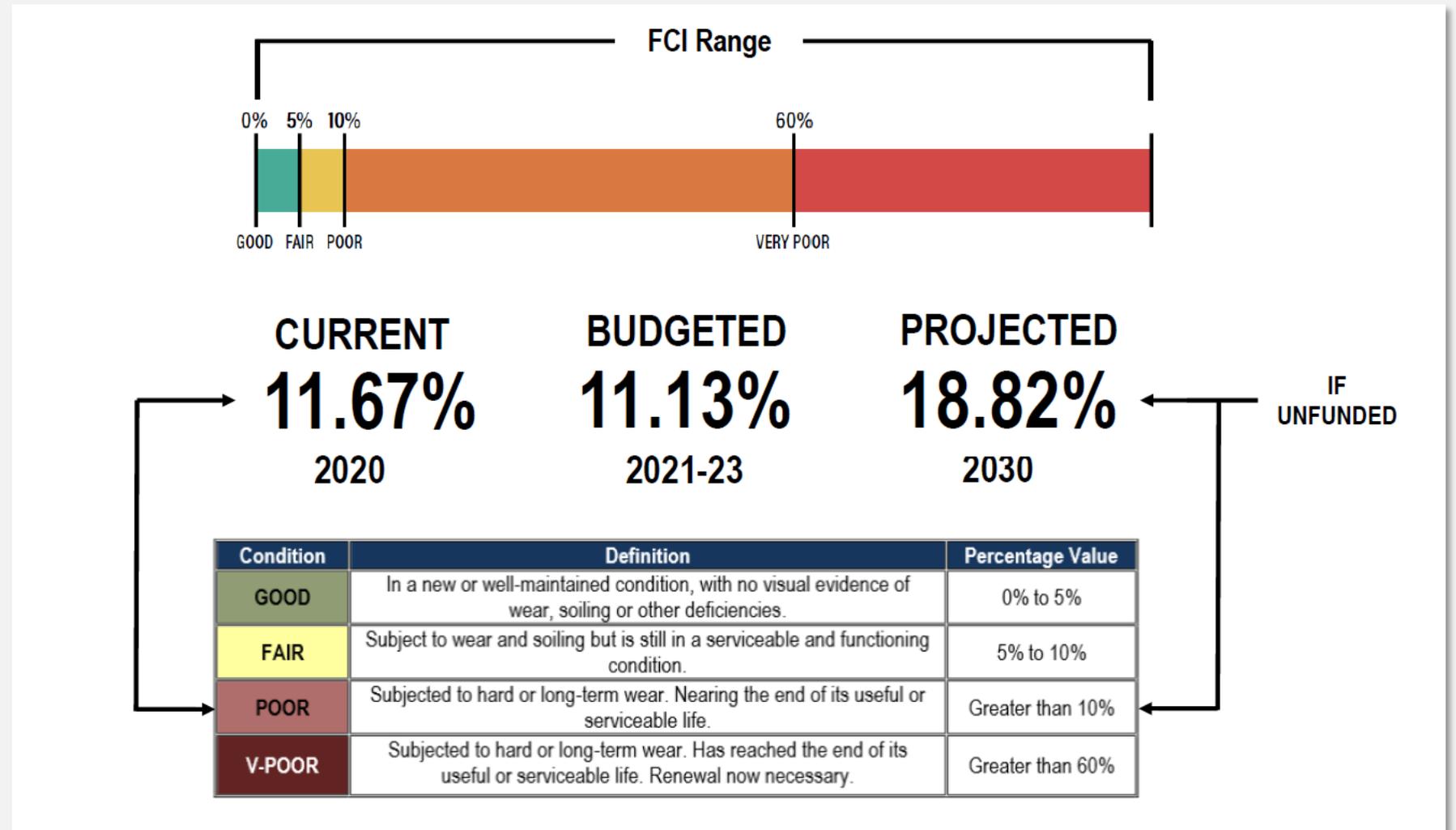
$$\text{Facility Condition Needs Index (FCNI or FCI)} = \frac{\text{Deferred Maintenance + Capital Improvement}}{\text{Current Replacement Value (CRV)}}$$

FCI
↓

Condition	Definition	Percentage Value	
GOOD	In a new or well-maintained condition, with no visual evidence of wear, soiling or other deficiencies.	0% to 5%	← Goal
FAIR	Subject to wear and soiling but is still in a serviceable and functioning condition.	5% to 10%	
POOR	Subjected to hard or long-term wear. Nearing the end of its useful or serviceable life.	Greater than 10%	← ODF Avg.
V-POOR	Subjected to hard or long-term wear. Has reached the end of its useful or serviceable life. Renewal now necessary.	Greater than 60%	←

If the FCNI is 60% or greater then replacement of the asset should be considered instead of renewal.

2020 Metrics

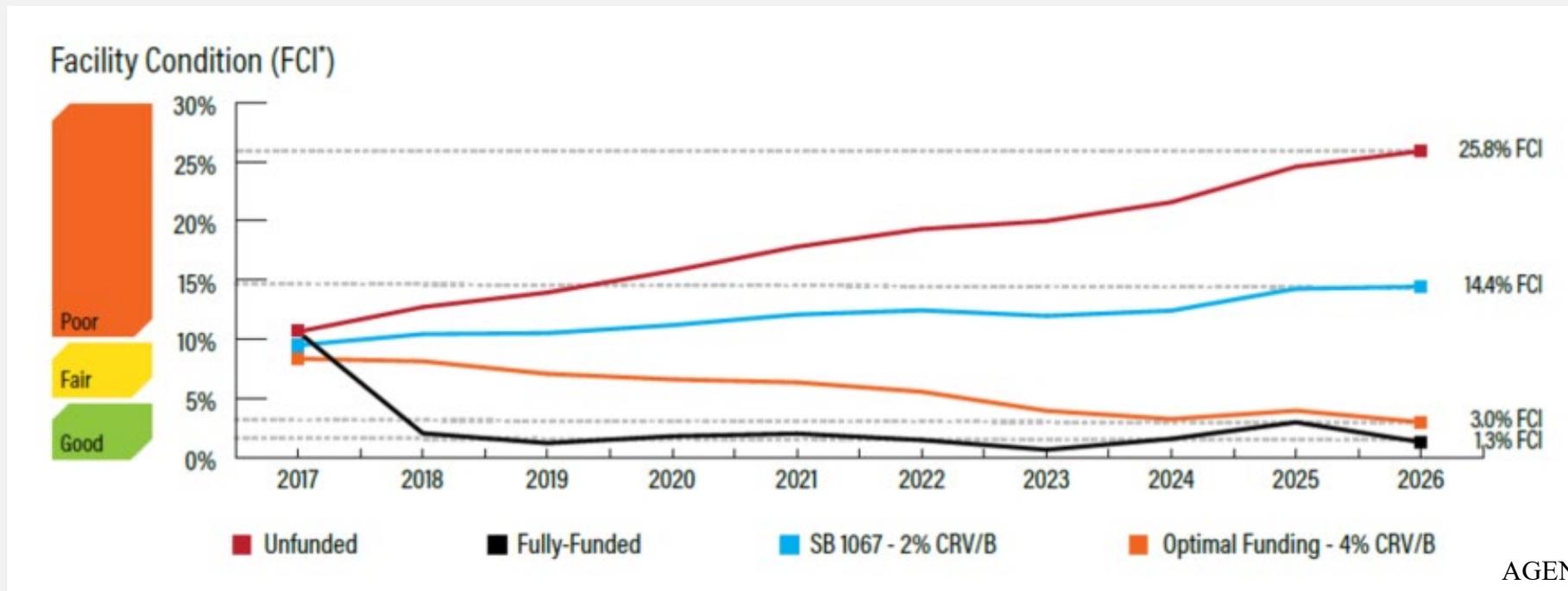


Condition Projections - 2018

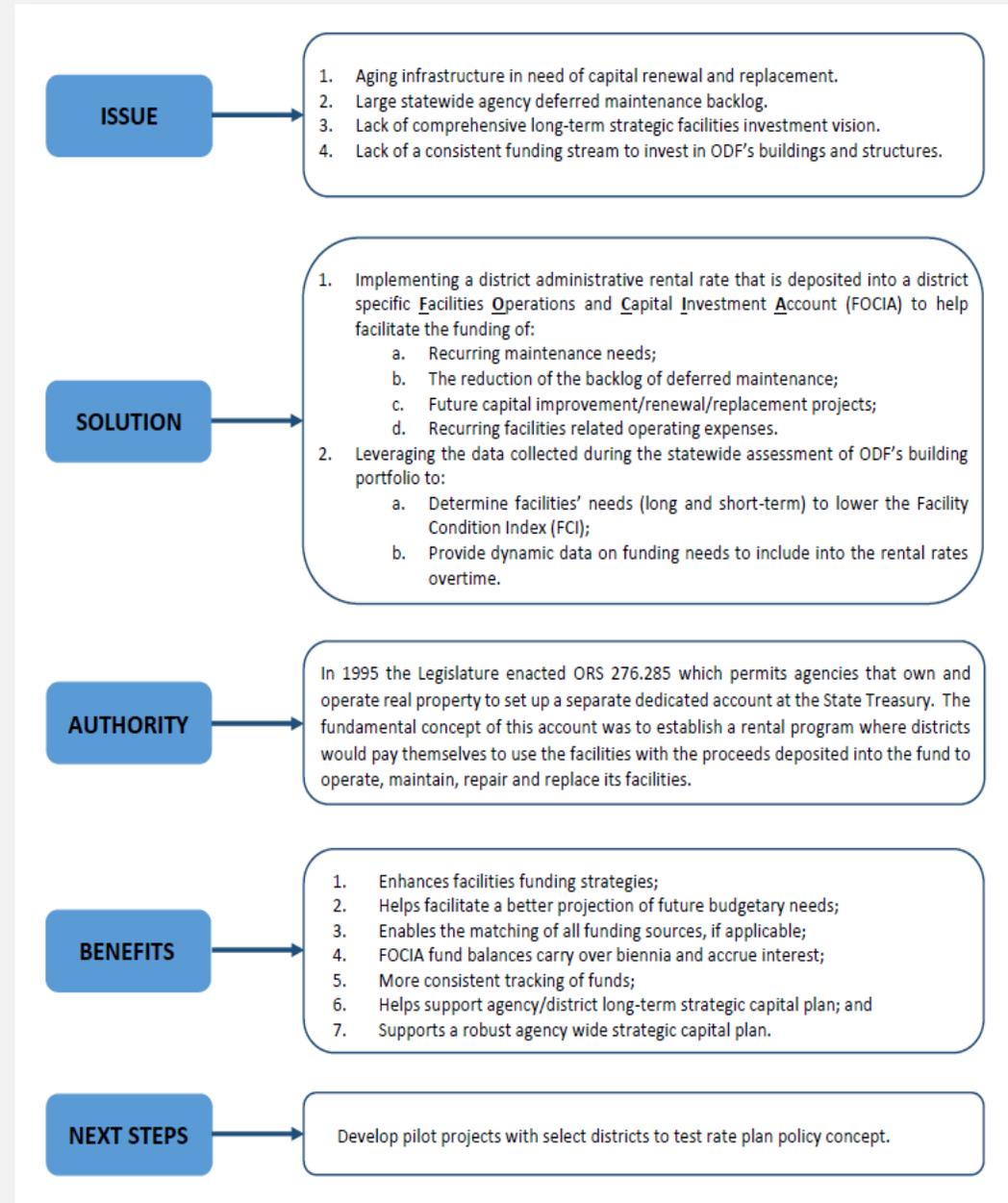
Unfunded - do nothing → 10-year FCI of 25.8% (poor - very poor)

2% of Portfolio CRV – \$5.0M/Biennium → 10-year FCI of 14.4% (poor)

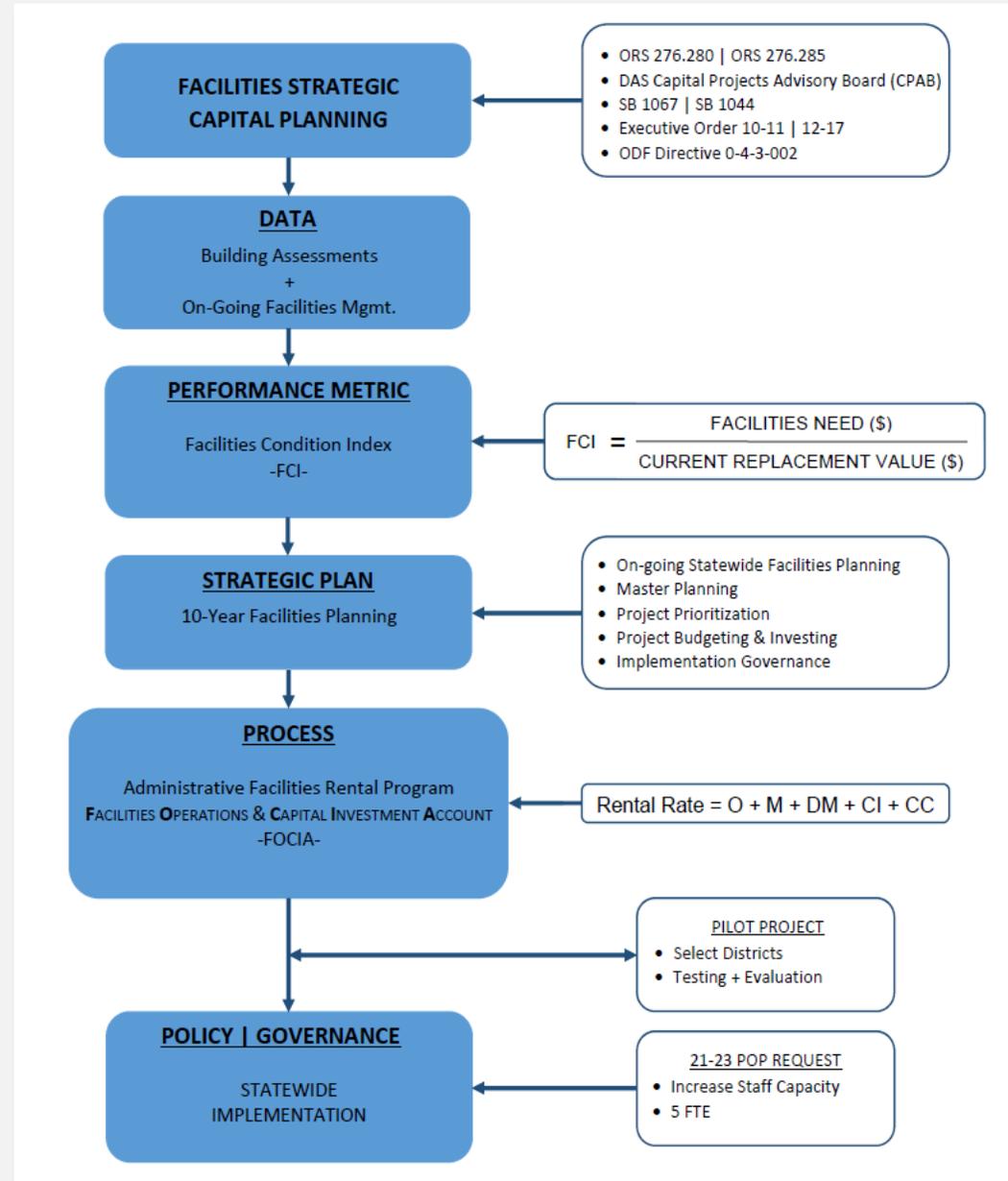
4% of Portfolio CRV – \$9.2M/Biennium → 10-year FCI of 3.0% (good)



Investment Strategy

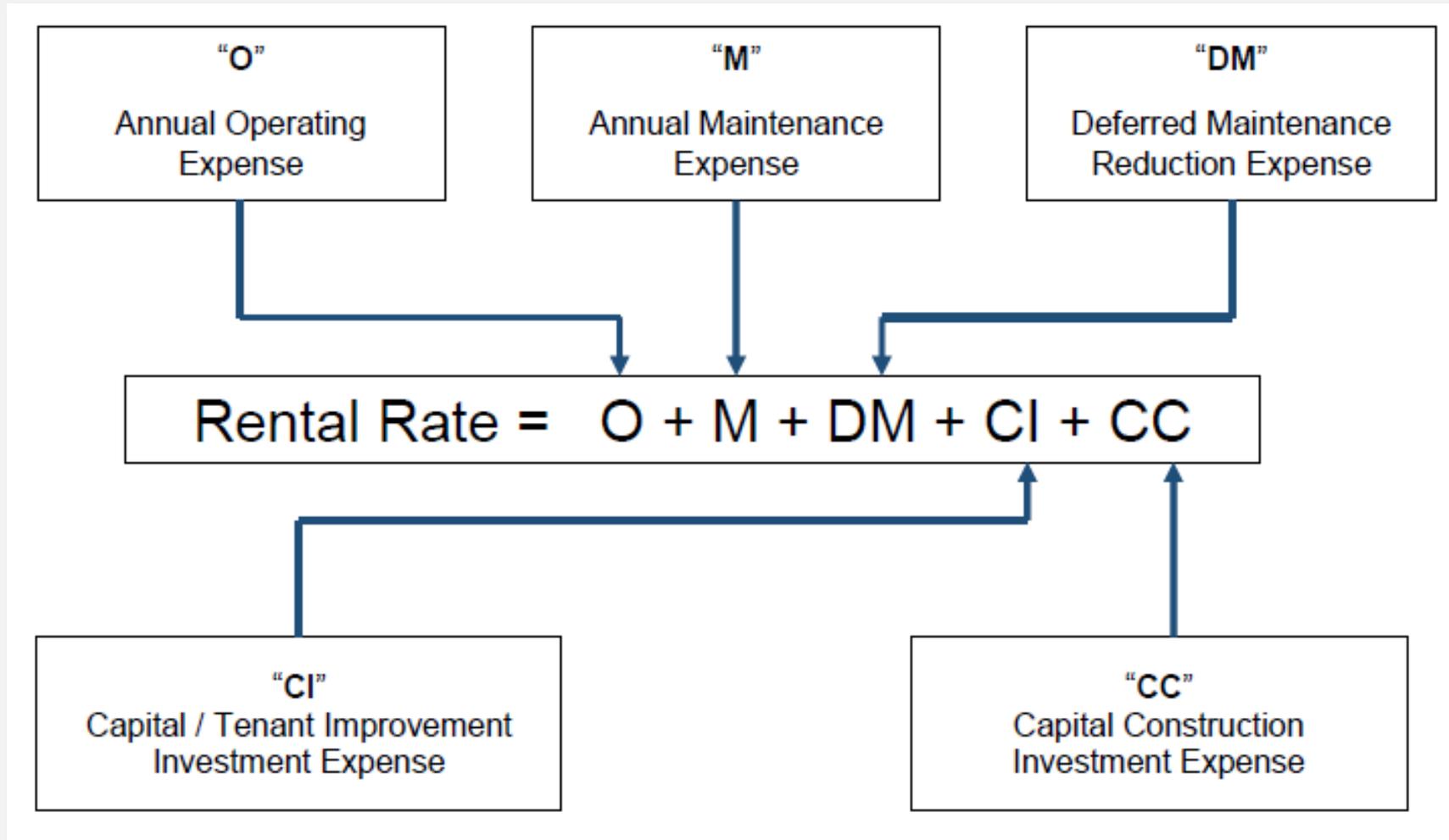


Strategic Plan

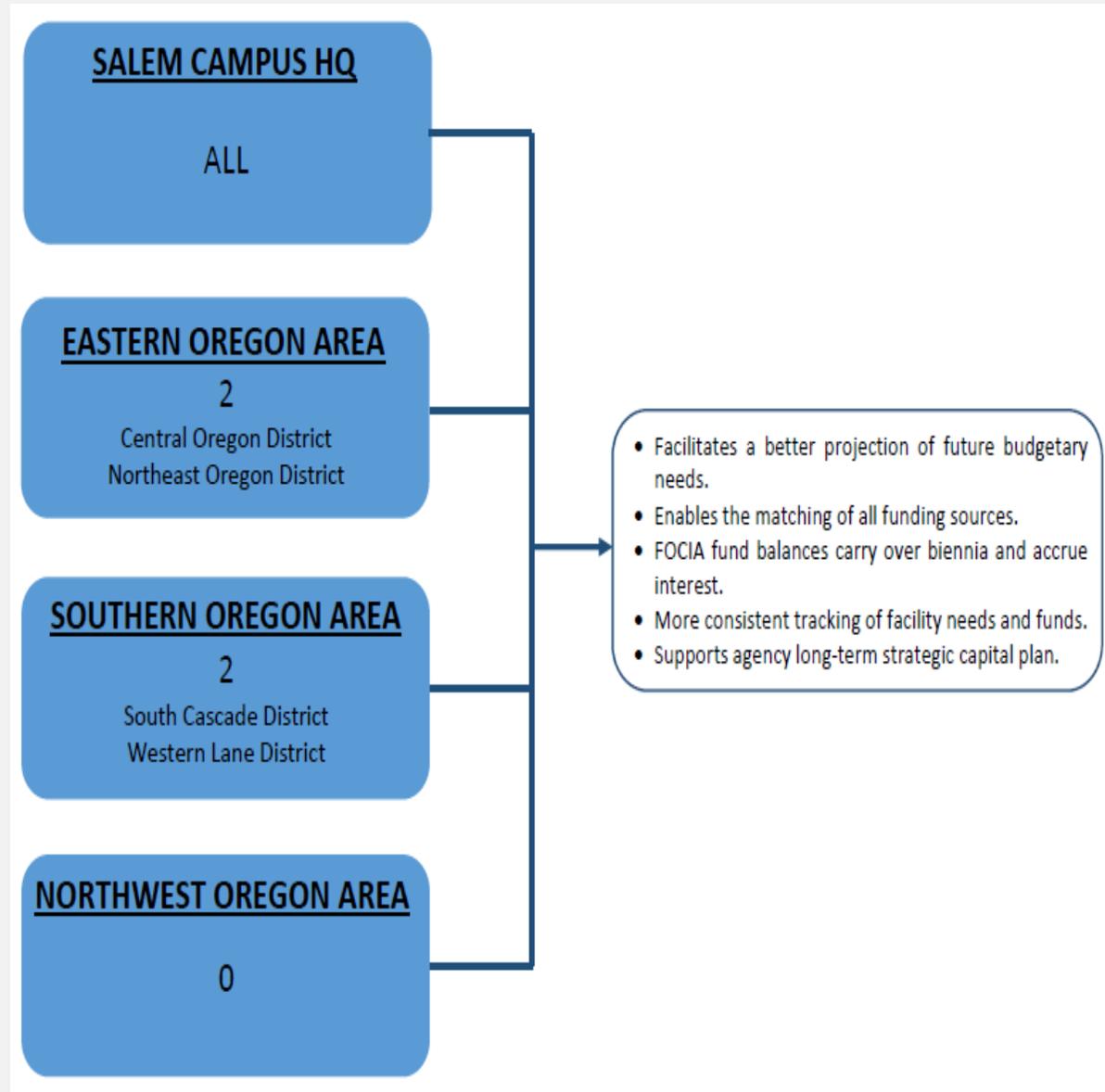


Investment Tool

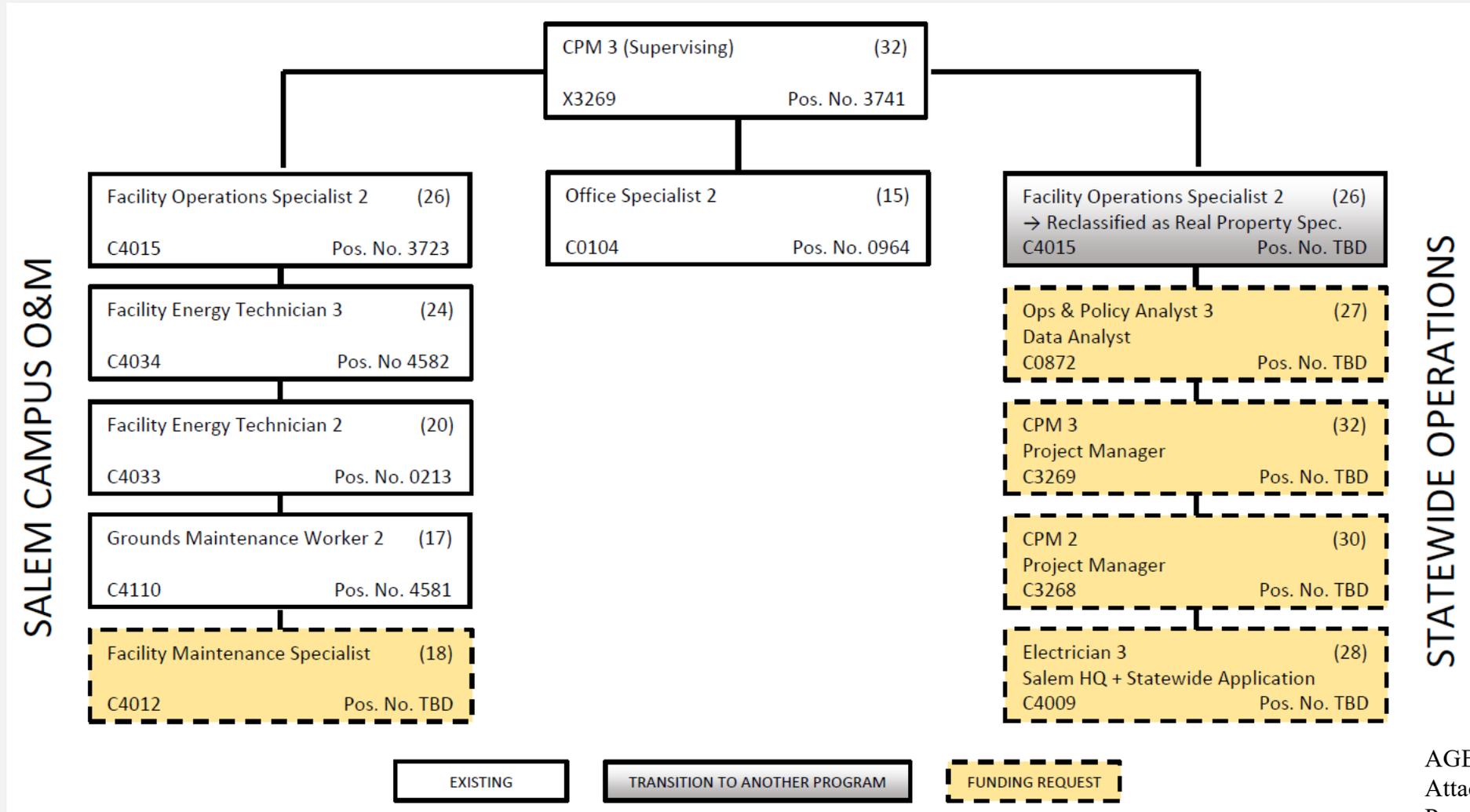
FOCIA Formula



Pilot Projects



Facilities Program Staff Capacity – POP 174



Public Information Request Report

Joy Krawczyk

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ODF & the Public

- Public service—Sharing information and engaging with people is part of every job at ODF.
 - Internal and external
 - Stewardship foresters
 - State Forests recreation staff
 - Firewise coordinators
- Goal: Build and maintain trust.
- Public Affairs Program supports and assists divisions and programs to sustain, enhance and expand their communications efforts.
 - Transparent, accurate, effective (audience-specific)

Public Affairs Program

- Who we are
 - Part of the Admin Branch
 - 8 FTE: 4 PIOs, 1 webmaster, 2 pub. techs, 1 intern (State Fair)
- What we do
 - Plan and advise
 - Produce
 - Connect
 - Media relations
 - Web and social media
 - Public records/public meetings

Requests for information

- People request information from the department in a variety of ways.
 - Phone calls
 - In-person
 - Email
 - Social media messages and comments
 - Questions from the media (on behalf of the public)
- Don't have good data on these.
 - Public Affairs staff aren't the only ones handling many of these—big part of division, program, and field workloads as well.
 - For some of these activities, it would be considerable work to track these due to volume and disbursement, and the data wouldn't have much operational value.
- Public Affairs is responsible for and tracks all of the department's public records requests—required by statute.

Requests for Information, Generally—By the Numbers

About the numbers:

1. Public Affairs Program only.
2. Reactive vs. proactive.

Method	Number
Phone calls (main info line only)	300/month (avg.)
Email (main info address only)	Nearly 700 in 2019
Social media—comments	356 in 2019
Social media—direct messages	71 in 2019
Public records requests	77 in 2019

Public Records Requests (ORS Chapter 192)

- Overall, 77 requests received.
- Capacity
- Data collection
- Time to fulfill
 - Complexity and workload
 - Cost

Category	# of requests (2019)	\$ amount (2019)
Fees estimated	11	\$10,836
Fees waived (including standard waiver)	11	\$5,132
Fees paid	5	\$1,287

2019 Public Records Requests, by requester type

