

# Forest Management Plan, Adaptive Management Plan, and Performance Measures Update

September 6, 2023 | Board of Forestry



# AGENDA

- Forest Management Plan Context and Development Process
- Draft Forest Management Plan
- Draft Adaptive Management Plan and Draft Performance Measures
- Summary and Next Steps



# Draft Forest Management Plan

Context and Development Process



# HABITAT CONSERVATION PLAN

## Take Avoidance – Current

- Annual operational surveys
- Uncertain and inefficient
- Increasing species listings over time
- Increasing restrictions over time

## Incidental Take Permit – HCP

- Deliberate, planned conservation
- Specific focused monitoring
- Avoid, Minimize & Mitigate impacts to species
- Ensures ESA compliance for 17 species
- Provides operational certainty for 70 years



# GEOGRAPHIC AND POLICY CONTEXT

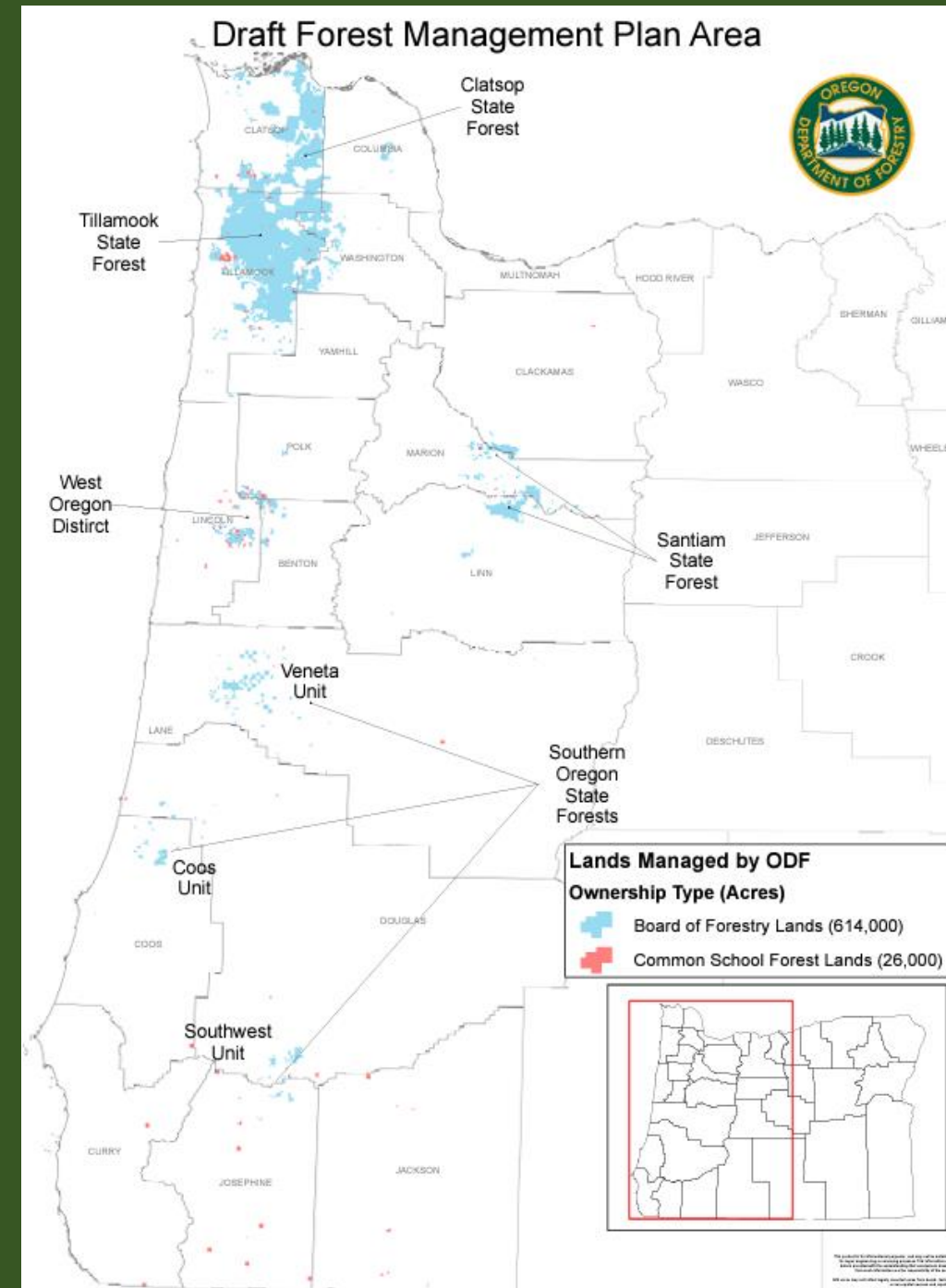
## Geographic Context

State Forest lands managed by ODF's State Forests Division in western Oregon

- 614,000 acres Board of Forestry Lands
- 26,000 acres Common School Forest Lands

## Policy Context

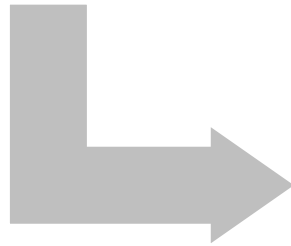
- Oregon Revised Statutes
- Greatest Permanent Value Rule
- State Forests Planning Rule
- Forest Land Management Classification System



# PLANNING LEVELS

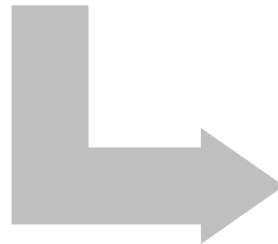
**FMP &  
HCP**

- The Forest Management Plan (FMP) provides overall **high-level** forest management goals & strategies
- The Habitat Conservation Plan (HCP) provides majority of conservation strategies



**IPs**

- Implementation Plans (IPs) are sub geographic plans with **mid-level** objectives, goals & plans



**OPs**

- Operations Plans (OPs) include **operational & project level** detail

# FMP ENGAGEMENT



Tribal Coordination – 6 Tribal Workgroup meetings, Aug 2021-April 2022; Continued Engagement



Forest Trust Lands Advisory Committee Engagement – Ongoing meetings



FMP Meetings Open to the Public – 5 Meetings, 50-70 attendees per meeting, May '21 – Feb '23



FMP Joint Stakeholder Meetings – 3 Meetings, 20-40 attendees per meeting, Aug – Dec 2021



FMP Strategies Public Feedback – 3,322 survey comments, 318 emails



State Partner Engagement – Ongoing meetings with state agencies



Board of Forestry Engagement – Draft Management Approach, Draft Goals and Strategies

# BOARD OF FORESTRY ENGAGEMENT

## Input from Board of Forestry members to date

- Guiding Principles - *approved*
- Draft Management Approach
- Draft Goals and Strategies
- Draft Guidelines

## Opportunities for future direction

- September 6 Board Meeting – Draft FMP, Draft AMP, and Draft Performance Measures

## Upcoming public comment opportunities

- September 6 Board Meeting – Draft FMP, Draft AMP, and Draft Performance Measures
- September 7 Board Meeting – Draft HCP
- Sign up and learn more at:  
[www.oregon.gov/odf/board/pages/bofmeetings.aspx](http://www.oregon.gov/odf/board/pages/bofmeetings.aspx)





# FMP COMPONENTS

INTRODUCTION

MANAGEMENT APPROACH

FOREST RESOURCES, GOALS, AND STRATEGIES

GUIDELINES



# GREATEST PERMANENT VALUE (GPV)

- ORS 530.050, OAR 629-035-0020
- GPV means “healthy, productive, and sustainable forest ecosystems that over time and across the landscape provide a full range of social, economic, and environmental benefits to the people of Oregon”.



# FMP MANAGEMENT APPROACH

- Vision for how the forest is managed
- How GPV is achieved
- Addresses Key Themes:
  - Sustainability
  - Climate Change
  - Diversity, Equity, Inclusion
  - Adaptive Management
- Landscape context



# GPV AND ECOSYSTEM SERVICES

Provisioning services: food, fuel, timber, special forest products, mineral sources, clean air and water

Regulating services – water, climate, carbon, disease

Supporting services – nutrient cycling , soil formation, primary productivity, biodiversity

Cultural services – recreational, aesthetic, spiritual, and scientific benefits and values



# ECOSYSTEMS

## Ecosystem Services

### Provisioning Services

Timber products, special forest products, food, energy and mineral sources, clean air and water

### Regulating Services

Water quality, water yield, flood mitigation, climate change mitigation, and carbon storage

### Cultural Services

Recreational, educational, aesthetic, spiritual, and scientific benefits

### Supporting Services

Nutrient cycling, soil formation, pollination, seed dispersal, and regional biodiversity

## Services to Ecosystems

### Protecting Services

Fish and wildlife habitat protection, integrated pest management, riparian and water protection, soil protection, ecologically sustainable harvest

### Enhancing Services

Thinning, seedling selection, nutrient cycling

### Restoring Services

Wildlife habitat improvement projects, stream enhancement, promoting carbon storage

### Supporting Services

Cultural and natural resources stewardship practices, culturally significant species ethnobotanical strategy, native seed sources

Reciprocity

# HUMANS

## Ecologically Sustainable Forest Management

*Promotes healthy, resilient, productive, sustainable forest ecosystems through:*

### Conservation Emphasis Areas Distributed Considering a Landscape Context

- Riparian conservation areas
- Habitat conservation areas
- Protected wetlands
- Protected steep slopes
- Strategies for species of concern

### Management of Landscape Conditions

- Composition and structural diversity
- Location of harvest units and roads
- Habitat connectivity

### Management of Stands

- Young stand management
- Thinning
- Regeneration harvests
- Retention of legacy structures in all harvests
- Integrated pest management

*To provide:*

### Social, Economic, and Environmental Ecosystem Services

- Recreation, education, and interpretation opportunities
- Sustainable and predictable production of forest products that generate revenue and support the economy
- Properly functioning aquatic habitats for native fish and aquatic life, habitats for native wildlife, productive soil, clean air and water, and protection against floods and erosion

# EMPHASIS AREAS AND FLMCS

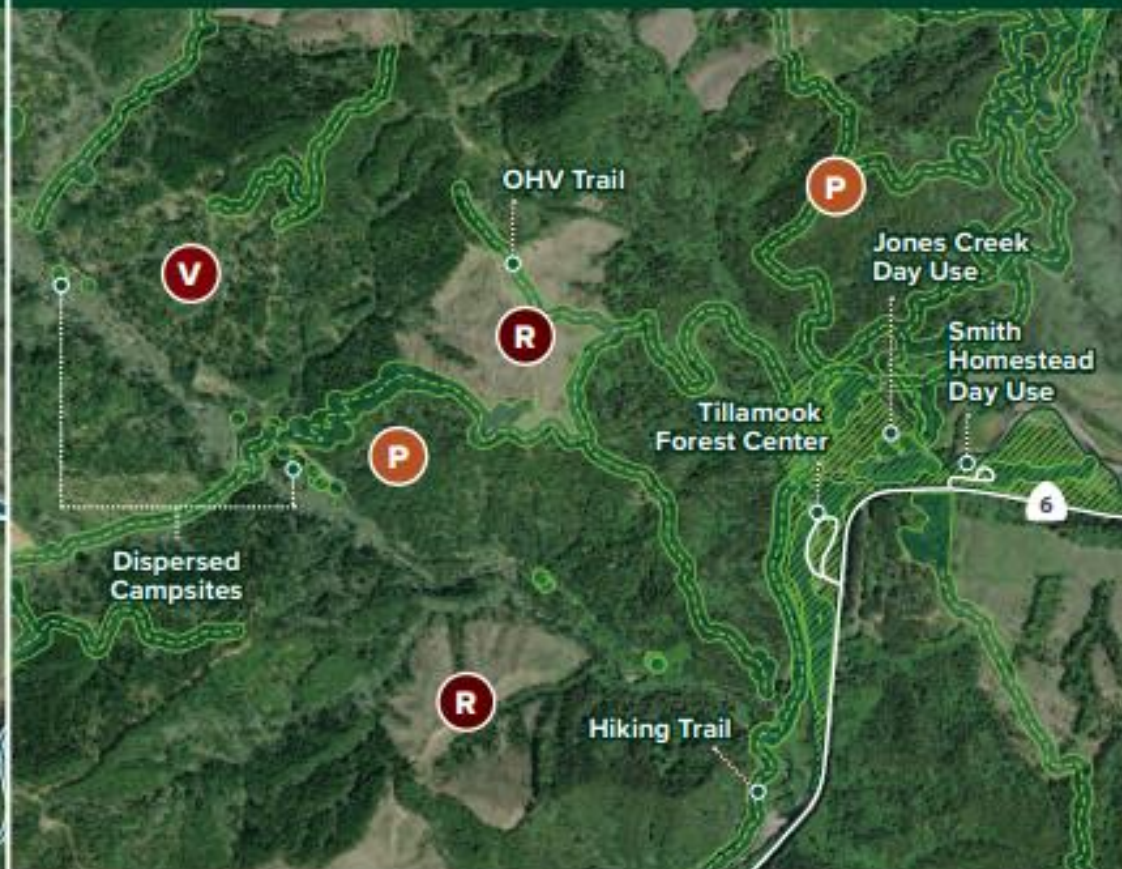
- Resilience and Adaptive Capacity
- Forest Land Management Classification System (FLMCS)
  - General Stewardship
  - Focused Stewardship
  - High Value Conservation Areas
  - Special Use Areas
- Recreation, Education, and Interpretation
- The whole forest is a working forest, working to provide all elements of GPV.



## View A. Wildlife Habitat and Aquatic and Riparian Subclasses






## View B. Recreation Subclass and Selected Facilities



### Legend

#### Timber Harvest Areas

Views A and B

-  Partial cut
-  Variable density harvest
-  Regeneration harvest

#### Wildlife Habitat and Aquatic and Riparian Habitat Subclasses

View A

-  High Value Conservation Area Stewardship Class—RCA
-  Special Stewardship Class—HCA

#### Recreation Subclass

View B

-  Special Stewardship Class
-  Focused Stewardship Class
-  Trail



Image Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

**Note:** the HCA boundary is for illustration purposes only; the area is not designated as an HCA under the HCP.



# FOREST RESOURCES

- Timber Management
- Transportation
- Cultural and Historical Resources
- Recreation, Education, and Interpretation
- Visual Resources
- Special Forest Products
- Mining, Agriculture, Grazing, Administrative Sites
- Soils and Geology
- Carbon
- Air Quality
- Aquatic and Riparian Resources
- Wildlife Habitat
- Sensitive Plants



# RESOURCE GOALS

- Provide for *Tribal access*, and enhancement of cultural and natural resources.
- Identify and protect *culturally significant resources*.
- Identify and protect *historic cultural resources*.



# RESOURCE GOALS

- Provide forest recreation, education, and interpretation opportunities.
- Manage forests in ways that value scenery.
- Provide opportunities for sustainable harvest of special forest products.



# RESOURCE GOALS

- Provide a sustainable and predictable supply of timber that provides for economic opportunity, jobs, and availability of forest products.
- Manage the transportation system in a manner that provides for resource protection, transportation efficiency, safety, and sound fiscal management while meeting forest management objectives.



# RESOURCE GOALS

- Permit mining, agricultural use, administrative sites, and livestock grazing.
- Maintain natural soil processes, protect soils from damage, and increase soil carbon and other nutrients.
- Contribute to carbon sequestration and storage on state forest lands and carbon storage in harvested wood products.



# RESOURCE GOALS

- Maintain and protect healthy *air quality*.
- Protect, maintain, and enhance *aquatic and riparian resources*.
- Protect, maintain, and enhance forest *drinking water* sources for private and domestic use.
- Protect, maintain and enhance habitat for native *wildlife*.



# STRATEGY EXAMPLES

- Determine a sustainable harvest objective during IP development and complete this harvest objective over the life of the IP.
- Reimagine and adapt recreation, education, and interpretation opportunities across state forest lands.
- Protect, maintain, and enhance aquatic habitat for aquatic and riparian-dependent species.
- Incorporate drinking water effects analysis into planning to protect source catchments.



# FMP GUIDELINES: OVERVIEW

The FMP contains guidelines for:

- Asset Management
- Plan Implementation
- Adaptive Management
- Plan Revision Process and Public Engagement





# FMP GUIDELINES: ASSET MANAGEMENT

	<b>Increasing 3-year Revenue Forecast</b>	<b>Decreasing 3-year Revenue Forecast</b>
<b>*FDF Contains Greater than 12 Months of Operating Expenses</b>	Level 1: Expand existing investments and fund new strategic investments	Level 2: Maintain or expand existing investments and explore additional strategic investments
<b>FDF Contains 6 to 12 Months of Operating Expenses</b>	Level 2: Maintain or expand existing investments and explore additional strategic investments	Level 3: Invest in deferred maintenance and consider small set of new strategic investments
<b>FDF Contains Less than 6 Months of Operating Expenses</b>	Level 3: Invest in deferred maintenance and consider small set of new strategic investments	Level 4: Maintenance to achieve core business and meet legal obligations; no new investments

*\*FDF: Forest Development Fund*

# FMP GUIDELINES: PUBLIC ENGAGEMENT

PLAN LEVEL	PUBLIC ENGAGEMENT AREAS
Adaptive Management Plan	Provide comment on performance measures at Board of Forestry Public Meetings
Implementation Plan	Levels and types of planned management activities
	Priorities and general location of planned management activities
Operations Plans	Suggestions to improve efficiency and effectiveness
	Clarify how planned operations are described
	Offer solution-oriented comments to further achieve Greatest Permanent Value

# Draft Adaptive Management Plan & Draft Performance Measures

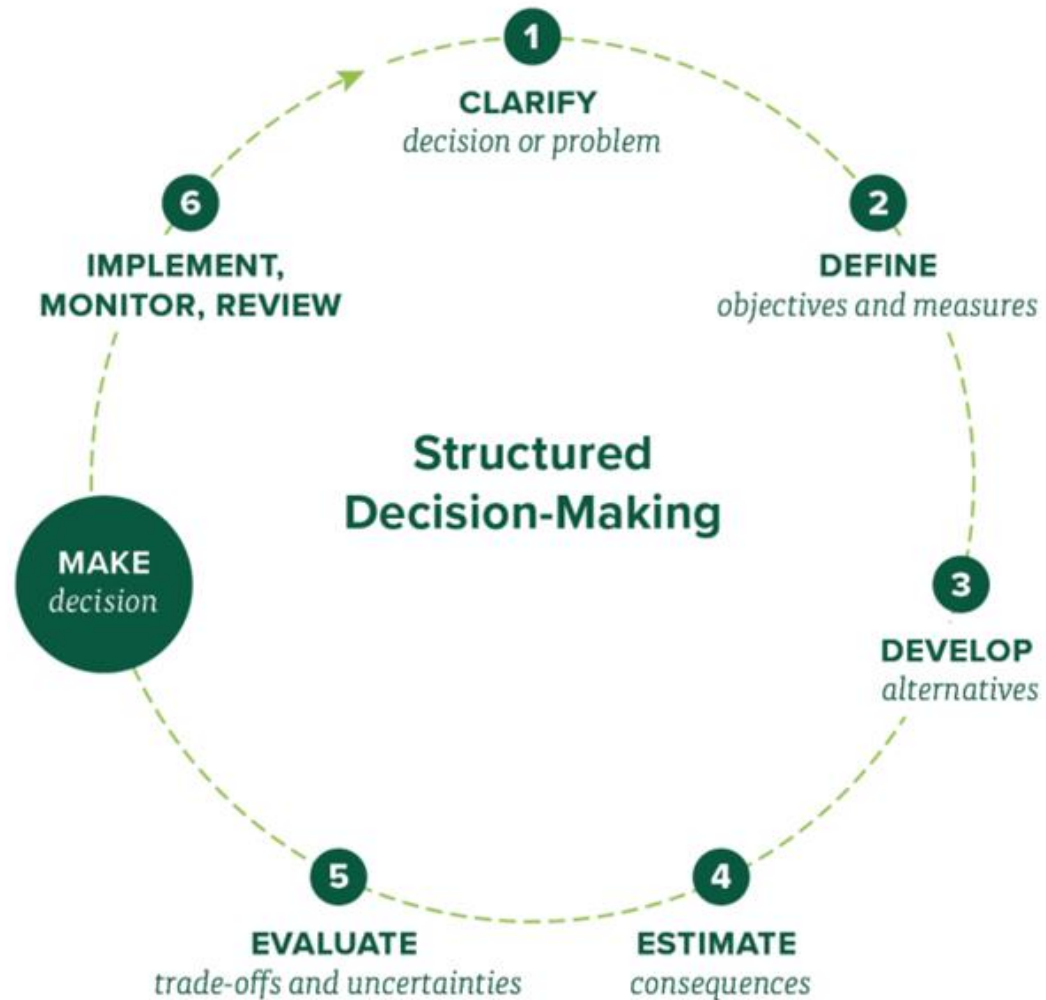


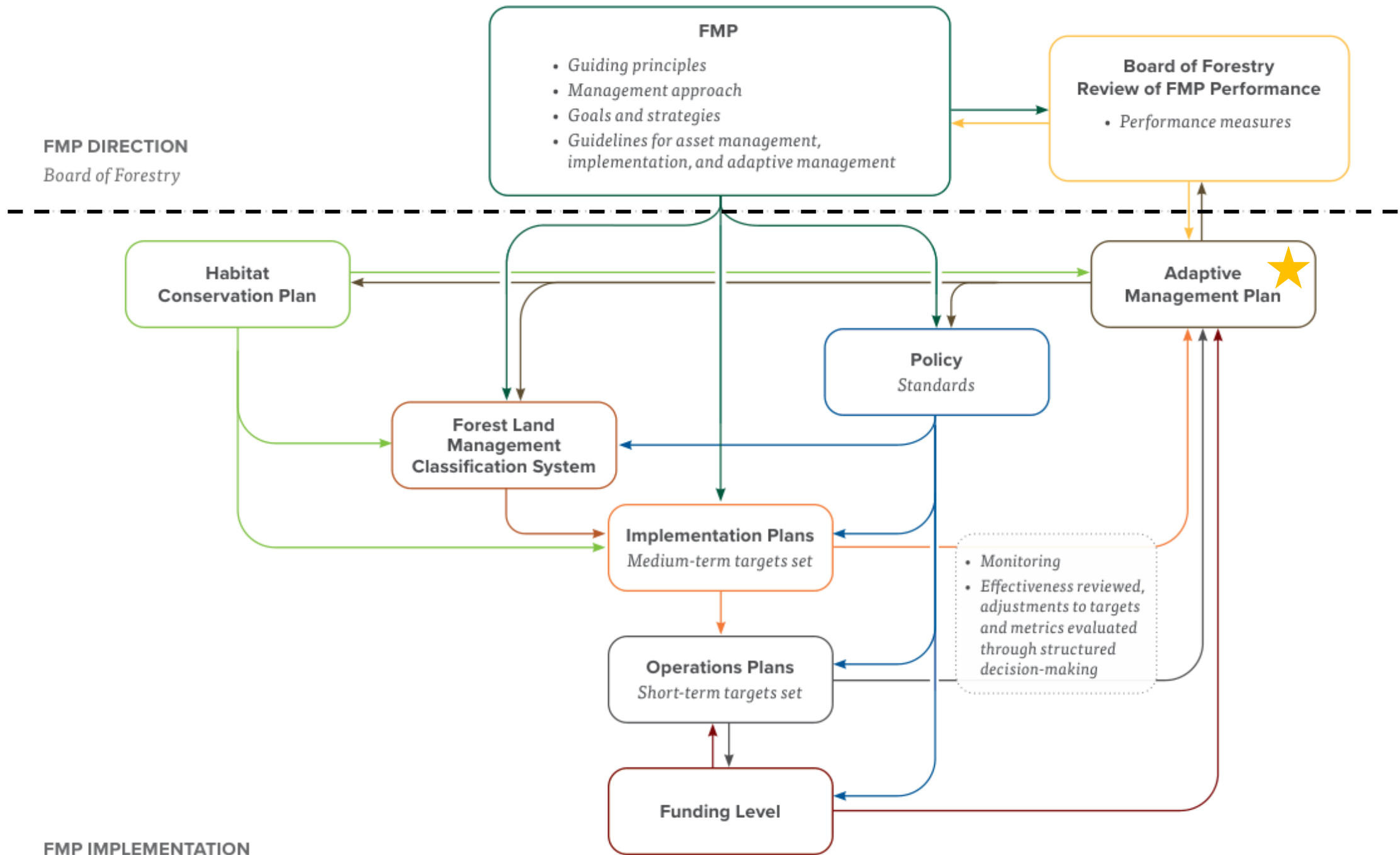
# FMP GUIDELINES: ADAPTIVE MANAGEMENT

The process of implementing plans in a scientifically based, systematically structured approach that tests and monitors assumptions and predictions in management plans and uses the resulting information to improve the plans or management practices used to implement them (OAR 629-035-0000(2)).



# FMP GUIDELINES: STRUCTURED DECISION MAKING





**FMP IMPLEMENTATION**

State Forester / Oregon Department of Forestry Staff

# FMP GUIDELINES: ADAPTIVE MANAGEMENT PLAN

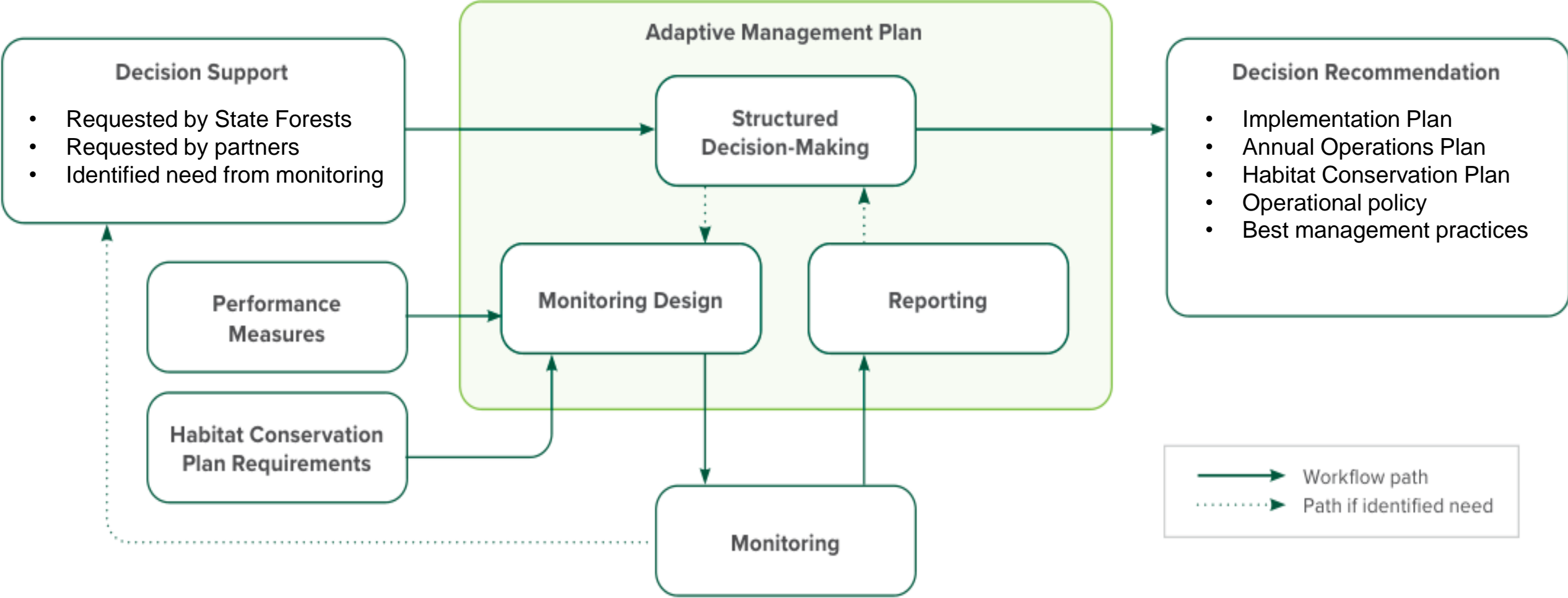
The Adaptive Management Plan (AMP) will provide guidance for:

- Facilitating decision analysis and adaptive management
- Designing monitoring projects
- Reporting monitoring results and decision-making products
- Identifying and integrating information and decision needs within State Forests

Note: State Forests' AMP is not part of the Private Forest Accord's Adaptive Management Program Committee in ODF Forest Resources.



# ADAPTIVE MANAGEMENT PLAN WORKFLOW

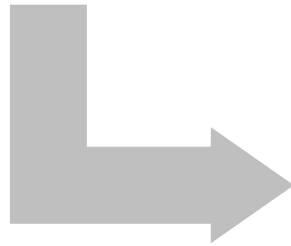




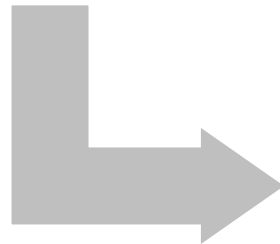
# PLANNING LEVELS



- The **Forest Management Plan (FMP)** provides overall high-level forest management goals & strategies
- The **Habitat Conservation Plan (HCP)** provides majority of conservation strategies



- **Implementation Plans (IPs)** are sub-geographic plans with mid-level objectives, goals & plans

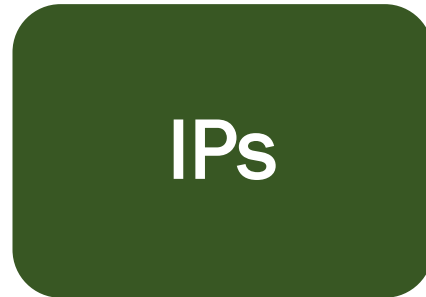
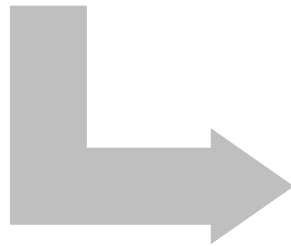


- **Operations Plans (OPs)** include operational & project level detail

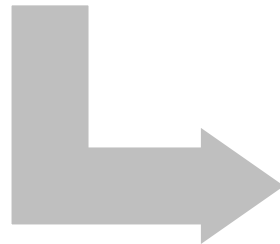
# MONITORING ACROSS LEVELS



- **Performance Measures (PMs)** provide the Board and the public with high-level forest management outcomes
- **Compliance monitoring and effectiveness monitoring** for the Habitat Conservation Plan



- Mid-level monitoring objectives, project prioritization, and targets set during Implementation Plans
- Example: post-fire monitoring in Santiam

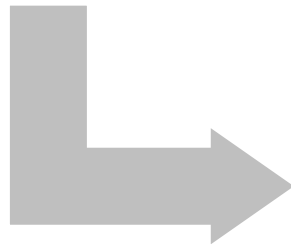


- Project level details in Monitoring Plans

# DECISION SUPPORT ACROSS LEVELS

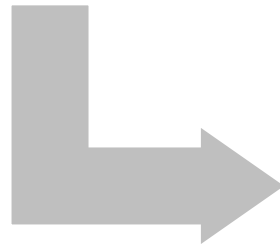
**FMP &  
HCP**

- The Board asks for an analysis for why a performance measure is not meeting a target value or trend.
- Adaptive management coordinated with Federal permitting agencies to meet biological goals and objectives.



**IPs**

- Targets from past IP periods evaluated and management adjusted for the next IP.



**OPs**

- Monitoring may show more effective ways to manage resources and best management practices are updated.

# BOARD PERFORMANCE MEASURES (PMs)

- Adaptive Capacity of Forests
- Aquatic Habitat
- Carbon Storage
- Community Engagement and Public Support
- Division Finances
- Economic Opportunities
- Financial Support for Counties
- Harvest and Inventory
- Recreation, Education, and Interpretation Opportunities
- Terrestrial Habitat



# FOREST DEVELOPMENT PMs

## Adaptive Capacity of Forests

- Size classes, composition, stand structure
- Growth rates of tree species by region

## Harvest and Inventory

- Harvest volume
- Inventory growth and projections for Implementation Plans

## Carbon Storage

- Live trees
- Harvested wood products
- Other carbon pools or sources



# SOCIAL AND ECONOMIC PMs

## Financial Support for Counties

- Annual revenue share

## Division Finances

- 6-12 months of operating expenses in the Forest Development Fund

## Economic Opportunities

- Jobs and wages in timber and other industries

## Recreation, Education, and Interpretation Opportunities

- Visitor use and interests

## Community Engagement and Public Support

- Surveys of local and statewide communities



# ENVIRONMENTAL PMs

## Aquatic Habitat

- Habitat conditions for covered species
- Transportation impacts
- Water temperature and channel shading
- Beaver monitoring

## Terrestrial Habitat

- Covered species habitat meets stay-ahead provision in HCP
- Forest structural components: large trees, dead wood, hardwoods
- Habitat connectivity



# AMP NEXT STEPS

- Reporting on a 2-year schedule with online dashboard
- Some Performance Measures may be quantified in FMP modeling outcomes presented to the Board
- Targets for Performance Measures anticipated to be set in spring 2024 by the Board.





# FMP MODELING

## 4 Different Harvest Scenarios

1. Maximum even flow of timber volume
2. #1 but with longer rotations
3. Maximum Net Present Value  
(even flow of timber)
4. Maximum Net Present Value  
(uneven flow of timber)

## 2 Different Geographic Scales

- District by District – current practice
- Geographic Regions
  - North Coast
  - Willamette
  - Southern Oregon



# NEXT STEPS

JUL  
2023

Draft FMP released

SEP  
6/7  
2023

Board of Forestry  
Meeting:  
Draft FMP and  
Adaptive  
Management Plan

Dec  
2023

Board of Forestry  
Meeting:  
Outcomes of  
Modeled  
Scenarios

TBD  
2024

Board of Forestry  
Meeting:  
Decision to  
approve FMP

# Questions



Thank you!





September 18, 2023

Oregon Board of Forestry  
2600 State Street  
Salem, Oregon 97310

Re: FMP comments from Sept. 6th BOF meeting

Dear Chair Kelly and Members of the Board of Forestry:

Here are written comments from 350PDX to expand my oral testimony at the September 6th Board of Forestry Meeting regarding the integration of ODF's Climate Change and Carbon Plan into the Forest Management Plan for Western Oregon State Forests.

Regarding State Forest Management, the Carbon Change and Climate Plan directs ODF to lead by example and demonstrate climate-smart forest management on State Forests to achieve Greatest Permanent Value. This concept will be incorporated into the revision of the Western Oregon State Forests Management Plan (FMP), which "will be implemented to adapt to climate change and mitigate its impacts on the management of state forest lands. The FMP will also contribute to climate change mitigation and sequester carbon" (Board of Forestry approved guiding principle 11 for FMP revision). *CCCP at 20*

The **Supporting Actions** of the CCCP are to be incorporated into agency planning, and there is an entire suite of recommendations for the Forest Management Plan and State Forests Carbon Storage. In line with Executive Order 20-04, the FMP should integrate climate mitigation and adaptation practices including those listed below:

- Slowly extend harvest rotations to increase storage while maintaining wood fiber flow to the forest industry
- Identify areas particularly susceptible to the deleterious effects of climate change and work to conserve them. This includes climate-sensitive habitats, areas of high conservation value, and areas of cultural significance that may become threatened by climate change. This should be done with input from tribal and community-based organizations.
- Explore aspects of community forests and operationalize these interests and facets to the extent practical. Support local non-private forest ownership to meet the goals of the community. Public-private partnerships may provide communities with a greater ability to successfully manage the forests that surround and support them.

- Restore insect and disease impacted areas to productive forests through removal of susceptible species and use of site appropriate species. An example of such areas would be stands in the Coast Range impacted by Swiss needle cast that have greatly slowed or ceased measurable growth. These stands should be managed to restore ecosystem services, including carbon sequestration, through use of appropriate alternative species and stand management.
- Identify areas that have high carbon storage potential, especially for those that can provide benefits for threatened and endangered species habitat, water quality, and educational and recreation opportunities for Oregonians. Establish priorities for these areas that include long-term carbon storage.
- Identify and operationalize carbon storage in harvest operations. Establish a mechanism to maintain forest carbon on the site when stands are harvested by increasing soil carbon with woody debris, utilization of biochar creation to dispose of slash instead of pile burning, and additional alternatives to burning biomass in the forest.

These are clear, specific guidelines for the FMP. And yet, the FMP never mentions the Climate Change and Carbon Plan, nor does it incorporate all these practices.

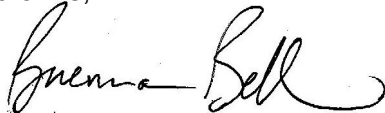
Contribute to carbon sequestration and storage on state forest lands and carbon storage in harvested wood products.

Instead, the FMP provides very general strategies of Long-term Carbon Storage: “Implement silviculture treatments and management actions that improve long-term carbon storage;” “Evaluate proposed actions with respect to carbon storage relative to baseline state forest land carbon inventor;” “Forest managers make decisions on silviculture treatments and the timing of harvest to best achieve a suite of goals and objectives.” *FMP at 72.*

Why do the strategies not include those specifically called for in the CCCP? This is a huge missed opportunity for ODF to “lead by example and demonstrate climate-smart forest management on State Forests to achieve Greatest Permanent Value.”

Please direct ODF to revise the FMP to include all the Supporting Actions for State Lands Planning that the CCCP directed the FMP to include.

thanks,

A handwritten signature in black ink that reads "Brenna Bell". The signature is fluid and cursive, with the first name being more prominent than the last.

Brenna Bell, Forest Climate Manager  
350PDX



September 1, 2023

Oregon Board of Forestry

Sent Via Email

[boardofforestry@odf.oregon.gov](mailto:boardofforestry@odf.oregon.gov)

**RE: Comments on draft Forest Management Plan  
Agenda Item #7**

Dear Chair Kelly and Members of the Board of Forestry:

The Great Old Broads for Wilderness is a national organization with a mission to protect public lands, forest and wilderness; we also advocate for our forests to be managed for climate mitigation. The Cascade-Volcanoes chapter has been involved in the Habitat Conservation Plan for Western Oregon State Forests (HCP), commenting on the draft HCP and the dEIS for the project. We are very interested in the development of the Forest Management Plan, (FMP) as a companion document to the Habitat Conservation Plan. We have commented on the draft strategies in December 2021, and now wish to provide comments to the Board of Forestry ahead of the BOF meeting on September 6<sup>th</sup>.

The presentation to the Board will include the draft Forest Management Plan, the Adaptive Management Plan, and an update on the Performance Measures. It is unclear from reviewing the board packet how these documents will be integrated as they are further developed. We feel quite strongly that the Performance Measures need to be integrated into the FMP. In order to comply with the OAR 629.935.0030, which requires the best available science to be utilized, there must be metrics with measurable outcomes to evaluate progress over time, by the Board and the public.

The Performance Measures are presented in a separate document, but at present no baseline data is included for any of the performance measures. Baseline data must be included in the Final FMP with general targets in the FMP. It is appropriate that more specific goals be set in each Implementation Plan, and actions to achieve the goals be revised utilizing the Adaptive Management Plan, if progress toward the target is insufficient. The target in the FMP must be, at a minimum, a *direction* of improvement over time.

We have comments regarding several of the Performance Measures delineated.

**CARBON.** We have been awaiting the development of the FMP for implementation of the Climate Change and Carbon Plan (CCCP), approved by the BOF on 11/3/2021. So far, we are disappointed in what has been included in the draft FMP and the Performance Measures. The draft FMP states that "Forests in the Coast Range and Western Cascades accumulate some of the highest densities of carbon on Earth through their productivity (p68)." We concur; Pacific

Northwest forests with high productivity, and with low wildfire risk, are uniquely positioned to mitigate climate impacts.

In the section Plan Themes, Climate Change is one of the themes (p10-13). We encourage you to change the emphasis—first, the role that forests can play in climate mitigation, and second, the impacts that climate change has on the forests.

As we have commented previously, the Board of Forestry should include management of the Conservation areas—Habitat Conservation Areas (HCAs) and Riparian Conservation Areas (RCAs)—as Carbon Reserves, consistent with the primary purpose to protect and recover the threatened and endangered species covered by the HCP. This can be a primary implementation of the Climate Change and Carbon Plan. If the Conservation areas are managed for carbon storage and carbon sequestration, there will be less impact on production stands to meet the goals of the CCCP. Carbon strategies could include minimizing thinning within conservation areas, balancing carbon storage with other goals, and no post-fire logging in the reserves, should the areas burn. The HCP includes thinning in 15,000 acres of hardwoods and 15,000 acres of stands of Douglas Fir infested with Swiss Needle Cast. We urge limited thinning, only to promote complex forest stands for covered terrestrial species, with no clearcuts permitted, and light thinning with only limited patches of moderate thinning, for example in the area of young trees of other species to promote their maturation. Two primary factors should be considered for any conservation actions within the conservation areas: promotion of endangered species habitat and preservation, and carbon storage and sequestration.

In general stewardship stands carbon storage is expected to increase over time, but to a lesser extent than in conservation areas. To the extent that Conservation Area management can increase carbon storage and sequestration, the less impact on timber harvest in general stewardship stands for meeting CCCP goals. As stated in the draft FMP, this increase in carbon storage can be expected due to less harvest on steep slopes, more retention of live trees and snags, and longer harvest rotations.

We will be interested in the outcome of the FMP Modeling currently underway, and expected to be completed in the fall and presented to the BOF in a special session in December (per virtual DOF informational presentation on FMP, 8/22/2023). One of the harvest scenarios will look at longer harvest rotations, which can increase carbon sequestration. Since the wood volume is greater when harvesting larger, older trees, the impact may be largely to increase the fluctuation in harvest volume over time.

The draft FMP states that Oregon state forests have an average of 132.5 metric tons of aboveground carbon per hectare (mT/ha) stored in live trees (page 70). Figure 3-11 shows a variation of biomass by District; the data is from 2020 Forest inventory and Analysis Plots prior to the 2020 fires. The Final FMP should provide data comparing the baseline carbon storage in Conservation areas and general stewardship (timber production) stands. Since the HCAs were established to include most older forest stands due to current and potential habitat for terrestrial covered species (eg. Northern Spotted Owl and Marbled Murrelet) we can anticipate higher carbon storage per hectare in the HCAs in the baseline data.

The draft FMP and the Performance standard discuss carbon storage, but fail to provide any methods for measuring sequestration of carbon. This is in direct contrast to the dEIR for the HCP, which focused on sequestration and largely neglected carbon storage. Both metrics are important to measure as baseline and monitoring over time to ensure that both are increasing. The Performance Measures at this time have no targets, all listed as “TBD”, to be determined.



The draft FMP states that “treating harvest residuals differently can increase carbon storage. No alternative slash management techniques are mentioned. One such strategy which should be explored is biochar production, which can be accomplished in forests, with the resulting biochar distributed for improved plant productivity and a long-term mechanism for increasing soil carbon. The slash can be removed for biochar production outside of the forest, and utilized as an agricultural and garden input. Biochar is produced by burning wood in a low-oxygen environment; portable kilns are available for on-site production.

The Goal for Carbon is absolutely inadequate: “Contribute to carbon sequestration and storage on state forest lands and carbon store in harvested wood products. (p71).” This goal could be met *even if the values were decreasing over time!* The Strategy—Long-term Carbon Storage, is better: Implement silviculture treatments and management actions that improve long-term carbon storage. Evaluate proposed actions with respect to carbon storage relative to baseline state forest land carbon inventory.” The goal **must be to increase** carbon sequestration and storage....! As stated previously, this can be focused primarily within conservation areas by co-managing them as carbon reserves. Preservation of mature and old growth trees is a demonstrated action for achieving this goal, within conservation areas, and for targeted tree retention in production stands.

**Adaptive Capacity of Forests.** The Performance Measures document, Attachment 3 of the board packet describes components that will be monitored at 5-year intervals in two emphasis areas: HCAs (within Conservation areas) and General Stewardship (timber production): tree size distribution, tree species composition, stand structure and tree growth rates. The use of lidar will improve data collection. The targets at this stage are non-specific and do not provide any metrics that can be scientifically compared. Table 1 (p3) shows the components, metrics and targets, such as they are, in the two emphasis areas. “The proposed components have adaptive capacity that include forest attributes that increase forest diversity and complexity at stand and landscape levels.”

Our concern is that past Performance Measures have not been met. In 2007, the Board of p adopted Performance Measures for state forest management that included a goal of reaching 17-20% complex forest condition by 2027. Fifteen years later, and just under five years away from the goal’s target compliance date, ODF is well short of this goal (approx. 11% is our understanding of the current compliance level, with the Astoria District being closest at approx. 15%). Despite being well short of the 2027 goal, ODF continues to propose clearcutting in complex stands instead of prioritizing progress towards goal attainment. (Comments by State Forest Coalition on Annual Operation Plans for 2024.) While we don’t have the baseline data of complex forest condition in 2007, in 2013, the Key Performance Measure had a target of 30% complex forests as a percentage of North Coast state forest (2014/2015) and measured 13%. In 2023 the measurement **was reduced to 11.23%**, still with a target of 30%. This is clearly not because forests grow slowly, which they do, but because layered and complex forests were being harvested at a higher rate than they were developing, despite the legislatively-developed performance measures. How is the Board of Forestry to address noncompliance with performance measures, even when they have specific measurable targets? (LFO analysis and report, 2013 and 2023). Just dropping these targets does not address the issue.

**Aquatic and Riparian Resources.** Issues of concern affecting covered aquatic species include wood deficit in fish-bearing streams, water temperature impairment, and fish-passage

barriers. Performance Measures aquatic habitats.

The expanded riparian buffers delineated in the HCP will make good contributions to the wood deficit, impacted by historic harvest practices close to streams. Stream restoration projects will be warranted in some stream reaches, as determined by monitoring.

Table 3-5 in the draft FMP (p79) demonstrates good effort over the past 25 years of instream restoration projects, removal and relocation of roads to reduce impacts, removal or replacement of culverts that were barriers to fish passage, with 286 miles of fish access restored. Now we need the data of work yet to be done during the next FMP time period. How many fish barriers remain? In the 25-year period, an average of 14/year were removed. We need the data, and a goal for removal of the remaining fish barriers, prioritizing those that block the greatest mileage of fish habitat.

*Forest roads* can exponentially increase sedimentation into stream, degrading fish habitat. We wish to see a survey of all the roads within the Conservation areas in the first 5 years of the FMP/HCP and determination of roads that are no longer needed. These roads should be decommissioned, not merely vacated or closed. Roads not only are a source of sedimentation that can be several times that of undisturbed forest, they can fragment terrestrial wildlife habitat. Areas where one-time thinning will occur in HCAs during the first 30 years of the HCP, road decommissioning can be combined with the thinning project upon completion.

*Water temperature* is a crucial factor for persistence and recovery of salmonids, covered species in the HCP. Table 3-4 demonstrates dire conditions for covered species, that require early and active management. The percent of the planning area with temperature impaired watersheds at least part of the year varies for 46% (Astoria) down to 9% (North Cascade). The increased stream buffers in the HCP will help with shading and harvest limitations in upland areas adjacent to HCAs.

- Given the dire situation, we urge the BOF to adopt the wider stream buffers of the Conservation Alternative, Alt 3, even if the Preferred Alternative 2 of the HCP is selected. This action is warranted, as there will be less impact to water quantity from harvest activities with wider buffers, which also lowers summer water temperatures.

*Beaver management.* The draft HCP (p152) states that on average, ODF addresses 7 beaver-related road issues/year, most in Tillamook and Clatsop State Forests. While ODF does not actively kill beavers, they do sometimes destroy beaver dams if roads are threatened. The draft FMP acknowledges that “American beavers (*Castor canadensis*) can enhance in-stream and riparian habitat through dam construction activities, stream restoration opportunities may also be identified in areas able to support beaver colonization where impounded water would benefit aquatic fish and wildlife species” (p78). However, the draft plan fails to actively promote beavers as a tool to improve water impoundment and reduce stream temperatures. This is especially crucial as climate change increases summer temperatures.

The Aquatic Habitat performance measure re Beaver effects on aquatic habitat has a neutral target of “Report trends from HCP effectiveness monitoring” (Table 2, Performance Measures in

board packet). This should be strengthened in the Final FMP.

We recommend proactive measures to promote beavers:

- 1) Survey for beaver dams and other beaver sign. Identify any vacant suitable beaver habitat.
- 2) Construct beaver dam analogs to encourage colonization of suitable but vacant habitat.
- 3) ODF needs to learn additional techniques to accommodate beavers, such as water-leveling devices in ponds instead of destroying beaver dams.
- 4) Prohibit the hunting and trapping of beaver in state forests; this may require coordination with the Fish and Wildlife Commission.
- 5) Partnership with NGOs that promote beavers, for surveys, improving beaver habitat, and potentially provide relocation sites for beaver causing problems in urban areas.

**Terrestrial habitats.** Our focus is terrestrial habitat within the Conservation Areas. In the Performance Measures for Terrestrial Habitat (Table 4) the target for *Hardwood trees* and understory diversity is listed as “TBD: increasing trend desired through HCA management of diverse habitat. Note that the HCP allows for harvest of 15,000 acres of hardwoods. These are inconsistent, and the Performance target is superior. As we have stated in previous Broads comments, we strenuously object to this, and have not seen any ecological justification for this. The HCP dEIS provided no rationale that this harvest would provide covered species habitat value. Hardwoods are primarily red alder trees in the permit area. In fact, deciduous trees have high habitat value for many wildlife species (mostly non-covered species). They may have less timber value, but conservation areas should be managed for habitat value (and carbon storage), not for timber as harvest is restricted for the permit period. HCP dEIR Section 3.5.3.1 on Forest Structure described hardwood release practices, where red alders are removed to ensure conifer dominance (under Alternative 1, No action). We recommend deletion of this harvest, except for hazard trees close to recreational facilities such as campgrounds, trailheads, boat launches, parking areas. There might be some value in limited felling or snag creation in dominant hardwood stands to promote mixed stands with conifers that could become preferred habitat trees for NSO and Marbled Murrelet. No clearcut or modified clearcut should be allowed in Conservation areas.

We find it appropriate for separate targets for General Stewardship and Habitat Conservation Areas for the performance measures of large trees, dead wood, hardwood trees, connectivity between late seral forest patches, and covered species habitat meets stay-ahead provision in HCP.

*Swiss Needle Cast* (SNC) has been increasing infected areas across the western state forests near the coast; see Figure 3-5 in the draft FMP. Data is needed in the Final FMP of the distribution of moderate and severe SNC infestation within Habitat Conservation Areas. Most impact from SNC is found within 18 miles of the coast. The HCP plans harvest of 15,000 acres of Douglas fir (DF) trees infested with Swiss needle cast (SNC) with HCAs. What is the approximate total acreage of infested DF trees within Western Oregon State Forests? How much is within RCAs? How much in HCAs, where this harvest is proposed? SNC reduces growth rate of infected trees, does not kill trees, although some stressed trees may die in drought conditions. All research I found addresses growth rate impacts, which relate primarily to harvest value. But for trees in HCAs, what is the impact to the habitat value for covered and non-covered terrestrial species? The draft EIS fails to address this important question. We have

been unable to locate any research on the impact of SNC to habitat value. Our recommendation that no harvest of SNC Douglas fir trees inside HCAs be done until a study is conducted (unless such research is available) to determine impact to habitat value for covered species. What infected areas are DF dominant, mixed conifers, mixed hardwood/DF? What areas are heavily infected, moderately infected, lightly infected—with varying impacts to length of needle retention and growth impacts? What would impact of harvest have on carbon storage? Older trees appear to be more resistant to SNC impacts. Our recommendation is for no clearcut harvest within HCAs—clearcut will delay desired mature forest structure and carbon storage. Retention of older infected DF trees, for habitat and carbon storage value, and age class diversity. Replant as mixed conifer species composition, in small gaps with shade tolerant conifers such as Western hemlock. Creating gaps around existing trees of other species will hasten development of complex forest structure, and limit the carbon loss from management activities.

**Transportation.** The draft FMP states there are approximately 4300 miles of roads on state forest lands. While it states that “the road system has the potential to adversely impact natural resources, particularly water quality and aquatic species migration”, there are no goals or strategies to evaluate and reduce the road system by decommissioning unneeded roads. In fact, it seems that building more roads is likely. An analysis of the road system for each district is needed, within the first 5 years of the FMP, with a plan to decommission unneeded roads. As mentioned above in the Aquatic and Riparian Resource Section, this reduction in the roads is especially appropriate within the HCAs. The Final FMP should correct this deficiency.

**Summary.** The Great Old Broads for Wilderness appreciates the commitment of the Board of Forestry to manage our state forests for the greatest permanent value for all Oregonians. We hope these comments will assist the DOF and BOF in development of an improved Forest Management Plan.

Sincerely,



Darlene Chirman  
Leadership Team  
Cascade-Volcanoes Chapter  
Great Old Broads for Wilderness



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## **RE: September 2023 Board of Forestry Meeting Written Comments – Agenda Item 7**

Chair Kelly and Board of Forestry Members:

I am writing on behalf of Hampton Lumber, a family-owned forest products company with timberland and sawmills in northwest Oregon. More specifically, I write to provide comments on Agenda Item 7, the draft Forest Management Plan (FMP), Performance Measures (PM), and Adaptive Management Plan (AMP). Hampton appreciates that the Board of Forestry (BOF) is accepting written comments on the plan in connection with its meeting agenda. However, it is concerning that the Oregon Department of Forestry (ODF) would choose to forego an official public comment period on policies of such high importance that will impact state forests for at least a decade. Nevertheless, we hope that the BOF will consider our comments and relay concerns or suggestions to ODF staff.

Throughout the document, there are some positive statements concerning active management of forests, the need for sustainable wood products, and providing jobs and revenue to local economies. We appreciate ODF's acknowledgment of these activities and their importance to rural Oregon in particular.

However, several themes, principles, goals and strategies, PMs, and even the chosen "Management Approach" are concerning and potentially in conflict with active and sustainable management. Our concern is that certain priorities will be used to reduce timber harvests from state forests. For example, economic values or benefits to local communities are not listed as one of the "Plan Themes" and the "Management Approach" appears to heavily lean away from sustainable active management. How does ODF intend to balance the priorities throughout these documents? How will the BOF hold ODF accountable for managing state forests to provide social, economic, and environmental outcomes?

The BOF may not be aware that there was little to no public engagement or feedback on the Management Approach, Guidelines, Performance Measures, or Adaptive Management Plan. This leads to many questions that could have been addressed or avoided prior to ODF submitting these documents to the BOF for review and approval. For example, regarding the Management Approach, we do not know why the Ecologically Sustainable Forest Management approach was

selected or if other approaches were even considered. The public has been critical of ODF's lack of public engagement on the draft Habitat Conservation Plan (HCP), and it is unfortunate that they have not changed their tactics on the FMP.

In any event, please accept the following specific comments on the plan:

### **Draft Forest Management Plan Comments**

- Principle 4 – Social Benefits – should include the social and societal benefits of wood products.
- The “Planning within Emphasis Areas” list in Figure 2-5 on page 27 is mostly repetitive of the list under “Planning Area”, except for the first bullet. ODF needs to explain what the intention of “improve adaptive capacity to climate change” means. The remaining bullets more or less line up with state law, rules, and ODF policies. Importantly, ODF and the BOF do not need to add more restrictions on top of what the HCP or state law requires.
- In Chapter 3, there are many references to increasing stand diversity, but if you look at Figure 3-2 on page 31, it shows that less than a third of stands are homogenous. Stand diversity is helpful for many ecological reasons, but there are dominant, native species like Douglas fir and western hemlock that can and should be the majority stand type on state forests.
- The “Environ” icon<sup>1</sup> should be listed on the Transportation goal. An extensive and well-managed road system allows people to respond to emergencies and natural disasters, like wildfires, storms, etc., during and after an event occurs. This provides a substantial environmental benefit to mitigate and restore stands. The “Environ” icon should also be listed for the Visual Resources goal. State law and other policies require trees to be left along certain roadways, therefore creating environmental benefits.
- On page 68, it states that “harvesting trees reduces the carbon sequestration capacity of the forest.” This is a misleading statement that does not reflect sustainable timber harvests and rotational management. Trees slow carbon absorption as they age. Capturing that carbon in long-lived wood products and replanting stands (which sequester carbon at a faster rate) provides more for climate change mitigation than leaving forests unmanaged.
- Table 3-10 on page 69 is very misleading. Using the color brown misleads the reader into thinking that the manufacturing and use of wood products are harmful, when in fact wood products are a renewable material. Secondly, this graph should be cyclical instead of linear to show the full lifecycle of forests and the use of forest products. ODF should be

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<sup>1</sup> Figure 1-1, page 11, draft FMP

promoting active management of forests to reduce wildfires, disease, and insect infestations, and the use of wood products in place of carbon-intensive materials like steel, concrete, and plastic. ODF should replace this figure with something like what the U.S. Forest Service uses<sup>2</sup>.

- The Carbon goal narrative doesn't include the negative environmental impacts of carbon emitted when trees die due to wildfires, storms, disease, insects, etc. This negative environmental impact should be reflected, and active management should be identified as a tool to mitigate and restore stands.
- The Air Quality goal narrative doesn't mention wildfire smoke and the tremendous health hazard it poses to all Oregonians. Instead, the goal focuses on tourists and prescribed burns. Excluding wildfire smoke is a huge oversight.
- Under the Drinking Water goal, it states there will be a "drinking water effects analysis" but does not explain what that is or how it will be used and incorporated into planning processes. In order to list it under the goal, ODF must have some idea about how this analysis will work. Why isn't there more explanation listed? More details and a justification for the analysis need to be given to stakeholders prior to FMP approval.
- Section 4.1.1 recognizes ODF will lose money under the draft HCP and FMP. This, of course, begs the question as to why ODF would draft and ask the BOF to approve plans that are unbalanced and reduce revenue, not only for ODF but for natural resource-dependent communities, and that lead to unproductive stands that end up costing ODF more to manage.
- The BOF and ODF need to be clear on if, when, and how the public will be engaged before, during, or after any given adaptive management process. This is crucial to provide transparency and trust with stakeholders on management decisions.

### **Draft Performance Measures Comments**

- Concern that Adaptive Capacity of Forests, Aquatic Habitat, Carbon Storage, and Terrestrial Habitats PMs may be overly prescriptive, depending on the final metrics and targets identified in each table.
- The Carbon Storage PM should be titled Carbon Sequestration and Storage. There should be more elaboration on substitution and leakage that will occur if harvest volume is reduced on state forests.
- The Community Engagement and Public Support PM references a 2022 survey that the BOF has said they wouldn't solely rely on. While it states that other surveys are

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<sup>2</sup> <https://www.fs.usda.gov/sites/default/files/Carbon-Graphics-June-2019.pdf>

occurring, the reliance on one survey to provide a baseline is irresponsible and more data should be considered from a variety of sources to truly gauge how Oregonians feel about state forests.

- Division Finances needs to be more specific on what revenue ODF expects to generate with the HCP and FMP and if they insist on policies that reduce state forest revenue, how they expect to make up for that delta of lost revenue.
- Under Economic Opportunities, it's helpful that ODF will be analyzing the direct and indirect impacts of timber harvests. However, this PM should also include metrics to gauge how ODF will contribute to economic opportunities in communities that rely on state forests for their livelihoods.
- Under the Financial Support for Counties PM, it mentions that revenue distributed to taxing districts is not easily tracked by ODF. That information could be provided to ODF from the counties themselves. ODF should include that info in their reporting, especially because some of the revenues distributed to taxing districts are the product of harvests occurring within county boundaries, and ODF should be aware of that information. The BOF should insist on including an identified method and formula to determine an arrearage of timber harvest volume under the Harvest and Inventory PM if harvest levels are not met. Meeting harvest targets will be even more important to counties and taxing districts if revenue is more scarce.

As previously stated, we appreciate that active management and the importance of state forests for rural economies are acknowledged throughout parts of these documents. However, these documents are open to interpretation by the reader. The BOF and ODF must not use the general vagueness of the FMP and supporting documents as an opportunity to restrict harvest opportunities in a manner unnecessary to satisfy approved policies or state law. State forests need to continue to provide the balanced benefits of GPV now and into the future.

Respectfully,

A handwritten signature in cursive script, appearing to read "Laura Wilkeson", with a long horizontal flourish extending to the right.

Laura Wilkeson  
State Forest Policy Director  
Hampton Lumber

cc:

Cal Mukumoto, State Forester, Oregon Department of Forestry  
Michael Wilson, State Forest Division Chief