
Upcoming proposed lumber sales

From Rhonda Piasecki <coyotevibe@yahoo.com>

Date Fri 5/30/2025 5:19 PM

To SFCOMMENTS ODF * ODF <odf.sfcomments@odf.oregon.gov>

Cc FORESTRY Boardof * ODF <boardofforestry@odf.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>

I want to start this letter off by saying how incredibly disappointed and disgusted I am that our own department of forestry relies on income produced by clear cutting. Why are we not following the climate plan and creating a robust conservation plan? Not shuffling around parcels of land for potential clear cutting as if they're playing a deck of cards? Our department of forestry should be conserving legacy forests, not relying on the income that then communities also rely on.

The following proposed clear cuts include Layered and Older Forest Structure stands which should be removed from the list of potential sales. Those complex stands provide so many benefits like habitat, biodiversity, carbon sequestration, coastal communities drinking water/salmon habitat, clean air, fire suppression etc.

Erock has stands that ODF is estimating (likely underestimating) that are 94-99 years old. Unit 2 of Erock is already considered Older Forest Structure which is about as close as we get to true old growth within the Astoria District.

Middle Big Noise Unit 2 has a section with trees estimated to be 95 years old.

Using the HCP as an excuse to go after the last of the big trees/stands is not a professional way of doing business. ODF is failing to meet their own Key Performance Measures (KPM).

Every day I watch log trucks go up and down the coast with big logs on them, every day the hillsides become bare with clear cuts and replaced with tree farms. When is this ever going to change? This isn't sustainable. What would these lumber-reliant communities do when they're all gone and there's nothing left to cut. You'll have to come up with a different plan to raise money. Why not do that now? Bring back the severance tax and tax the lumber companies, they pay nothing to rape our lands. Re-educate lumber-reliant families and communities to learn about sustainable forestry, preserving forests, create recreational and eco-tourism opportunities for income.

We need to rethink the way our forests are being managed before it's too late. The effects of not doing so are far-reaching outside of our local area as our forests here on the coast are important part of mitigating climate change for our planet.

Sent from my iPhone


RE: ODF's FY26 Annual Operations Plan

From Felicia Bryant <felicia28@gmail.com>

Date Sat 5/31/2025 9:34 PM

To SFCOMMENTS ODF * ODF <odf.sfcomments@odf.oregon.gov>

Cc FORESTRY Boardof * ODF <boardofforestry@odf.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>

 1 attachment (50 KB)

clear-cutting.pdf;

[Some people who received this message don't often get email from felicia28@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hello!

I am submitting my written comment regarding ODF's FY26 Annual Operations Plan.

Thank you!
Felicia Bryant

RE: FY26 Annual Operations Plan

I'm writing as a concerned, lifelong Oregonian of a multi-generational logging family.

I just reviewed your Annual Operations Plan for 2026, and urge you to re-read it. While you have listed activities that promote the health of the environment and its animal populations, you then completely erase any good that will do by cutting down the forests.

I'm not sure if you are familiar with how a forest works, but I suggest you look back at your elementary school notes for a refresher.

I know there's nothing I can say to sway everyone's desire of the almighty dollar, but all of the damage this does should also be common sense. It has been stated time and time again the impact clear cutting has on the environment, but in case it has been somehow overlooked, I've included them below:

1. **Loss of Biodiversity:** Clear-cutting destroys habitats for many species of plants and animals, leading to a decline in biodiversity. Species that rely on specific trees or forest structures may face extinction.
2. **Soil Erosion:** Trees play a crucial role in anchoring soil with their roots. Without them, soil can become loose and erode more easily, leading to loss of fertile land and sedimentation in nearby waterways.
3. **Water Cycle Disruption:** Forests help regulate the water cycle by absorbing rainfall and releasing moisture through transpiration. Clear-cutting can disrupt this balance, leading to increased flooding and reduced groundwater replenishment.
4. **Carbon Emissions:** Trees absorb carbon dioxide, a greenhouse gas that contributes to climate change. Clear-cutting releases stored carbon back into the atmosphere, exacerbating global warming.
5. **Altered Ecosystems:** The removal of all trees can disrupt local ecosystems and impact other flora and fauna, leading to changes in plant species composition and the overall health of the environment.
6. **Increased Pollution:** The runoff from disturbed land can carry pollutants into rivers and lakes, affecting water quality and aquatic life.
7. **Impact on Local Communities:** Many local communities rely on forests for resources, recreation, and cultural practices. Clear-cutting can negatively affect their livelihoods and cultural heritage.

I urge you to look at the world around you, and not the inside of your wallet.

Thank you,

Felicia Bryant


Comments on draft FY26 Astoria AOP

From Avi Goldshmidt <avi.goldshmidt@gmail.com>

Date Sun 6/1/2025 10:33 PM

To SFCOMMENTS ODF * ODF <odf.sfcomments@odf.oregon.gov>

Cc FORESTRY Boardof * ODF <boardofforestry@odf.oregon.gov>; KELLY Jim * ODF <jim.kelly@odf.oregon.gov>; AGPAOA Liz * ODF <liz.agpaoa@odf.oregon.gov>; CURTISS Heath * ODF <heath.curtiss@odf.oregon.gov>; DEUMLING Ben * ODF <ben.deumling@odf.oregon.gov>; JUSTICE Joe * ODF <joe.justice@odf.oregon.gov>; MCCOMB Brenda * ODF <brenda.mccomb@odf.oregon.gov>; LOVECHIO Alexi * ODF <alexi.lovechio@odf.oregon.gov>

 1 attachment (80 KB)

FY26 AOP comments .pdf;

Some people who received this message don't often get email from avi.goldshmidt@gmail.com. [Learn why this is important](#)

Dear ODF, Interim State Forester, and members of the Board of Forestry,

Thank you for the opportunity to comment on ODF's Annual Operations Plan. My comments are specific to the draft FY26 AOP for the Astoria District.

Please see the attachment for my full comments.

Sincerely,

Avi Goldshmidt
Astoria, OR

Dear ODF, Interim State Forester, and members of the Board of Forestry,

I am writing in regards to the draft FY26 AOP for the Astoria District. As a whole, the plan is not consistent with the overall intent of the agency to follow the Greatest Permanent Value. More specifically, it fails to meet the goals, strategies, and objectives of the Northwest Oregon State Forests Management Plan, the Habitat Conservation Plan, Climate Change and Carbon Plan, and the Astoria District 2025 Implementation Plan.

First and foremost, I am concerned about the multiple proposed clearcuts of complex forest stands when the Astoria district is far below their Key Performance Measure of 30% complex stands across the district. My recommendation is to thin and selectively harvest previously managed stands following ecological forest management practices, and abstain from clearcutting complex stands that serve as habitat for a multitude of species, including but not limited to those listed under the Endangered Species Act. Leaving complex forests intact is the best way for ODF to achieve its mission of “protecting, managing, and promoting stewardship of Oregon's forests...” Thus, it is my recommendation to *remove all units containing layered and OFS stands from the Draft Astoria AOP* until the district achieves its goal of 30% complex stands across the district.

Second, I am concerned that every proposed timber sale in the Draft FY26 Astoria AOP is adjacent to threatened and endangered fish streams. It is, again, not consistent with the FMP, HCP, CCCP, and Astoria IP to sacrifice threatened and endangered fish streams for the sake of economic benefit. This skews GPV towards economic benefits over environmental and social benefits. As such, it is my recommendation to *remove all sales adjacent to T&E fish streams* and find areas that will not uphold one component of GPV above all others.

Third, the agency has spent years developing the Habitat Conservation Plan. At the same time, several timber sales in the Astoria district are *within Habitat Conservation Areas*. It is my recommendation to *refrain from harvesting and building roads within Habitat Conservation Areas* until the HCP is complete. As such, I recommend replacing the Vesper Road Thin and Seven Cow Thin alternate sales with areas outside HCAs.

Fourth, I see that the agency is planning to spray 2,000 acres of state forests with herbicides and/or pesticides. This is inconsistent with the best available science that shows the deleterious effects of such chemicals on soil, wildlife, forest health, and human health. In a recent peer-reviewed report from Heliyon Journal titled *Pesticides impacts on human health and the environment with their mechanisms of action and possible countermeasures*, the following is reported:

Despite their advantages in crop production and disease management, the use of pesticides poses significant hazards to the environment and public health. Pesticide elements have now perpetually entered our atmosphere and subsequently contaminated water, food, and soil, leading to health threats ranging from acute to chronic toxicities. Pesticides can cause acute toxicity if a high dose is inhaled, ingested, or comes into

contact with the skin or eyes, while prolonged or recurrent exposure to pesticides leads to chronic toxicity. Pesticides produce different types of toxicity, for instance, neurotoxicity, mutagenicity, carcinogenicity, teratogenicity, and endocrine disruption. (Ahmad et al. 2024)

Not only are pesticides harmful in the ways stated above, but it also costs the agency hundreds of thousands of taxpayer dollars per year to accomplish. The harmful effects of pesticides on soil health makes it harder for the agency to be effective stewards of Oregon State Forests. Therefore, I urge ODF to move away from chemical applications in management decisions, and *remove the 2,000 acres of spraying* listed in the draft Astoria AOP.

Fifth, instead of logging in or around recreational areas (e.g. Seven Cow Thin, Erock, Middle Big Noise), I would love to see more recreational benefits out of Oregon State Forests. Please develop more hiking trails. I was dismayed to see the clearcut by Gnat Creek Hatchery that was done in September of 2023. What makes recreational areas so special and unique are the old forests they go through. Once you clearcut through a hiking trail, people will stop hiking through it. Please recognize the \$550 million tourism industry on the North Coast and how much it is driven by healthy and mature public forests (Travel Oregon, 2021). I recommend that ODF *refrain from harvesting near recreational areas* and instead focus on more recreational opportunities.

The draft AOP for FY26 in the Astoria District is not consistent with the FMP, HCP, CCCP, and Astoria IP for the emphasis it places on logging over all other benefits and values of Oregon State Forests (clean water, recreation, fish and wildlife habitat, carbon storage). *Please rebalance the priorities of the Astoria District so that all of the above may be equally incorporated into management decisions.*

To sum up, here are my recommendations regarding the draft FY26 AOP for the Astoria District:

- Refrain from logging layered stands and older forest structure until KPM of 30% complex stands across district is met: *Wild Gander unit 6, Scout Walker unit 3, Erock, Middle Big Noise unit 2, Sager*
- Refrain from logging near threatened and endangered fish streams: *Wild Gander, Ridge Walker, Scout Walker, Slough Hill, Erock, Middle Big Noise, Vesper Road Thin, Seven Cow Thin, Sager, Sweet Fry*
- Refrain from logging and road-building within Habitat Conservation Areas and Riparian Conservation Areas: *Vesper Road Thin, Seven Cow Thin*
- Refrain from all pesticide/herbicide applications across the district.
- Refrain from logging by recreational areas (Seven Cow Thin) and create more hiking trails for the enjoyment of all Oregonians.

Sincerely,
Avi Goldshmidt
Astoria, OR

AOPFY26 Comment

From Anna Kaufman <anna.nccwp@gmail.com>

Date Mon 6/2/2025 7:07 PM

To SKINNER Kate J * ODF <kate.j.skinner@odf.oregon.gov>; SFCOMMENTS ODF * ODF <odf.sfccomments@odf.oregon.gov>

Cc HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; FORESTRY Boardof * ODF <BoardofForestry@odf.oregon.gov>; Governor.Kotek@oregon.go <Governor.Kotek@oregon.go>

Dear Interim State Forester Skinner,

Thank you for your work to ensure better communications between ODF and neighbors in regards to the Annual Operations Plans. I was relieved to hear that adjacent landowners received information about ODF's plans and how to comment before the public comment period opened. I feel hopeful that ODF will continue to work to improve their communications with and engagement of the Oregon public.

Still, there is much work to do.

I urge you to use your authority to protect our maturing public forestland. It is the only chance we have at one day having real old-growth again. We simply can no longer ignore the vast amount of science and knowledge about the harmful impacts of clearcutting and pesticide application — not only on our environment locally, but on our climate, the health and safety of our citizens, flora, and fauna, and our economy. We must act now to preserve what's left.

Unfortunately, I am not seeing much concrete action by ODF to protect our public forestland, our climate, and communities. This year, the Astoria District has again put many stands of legacy forest up for auction. Some of the planned cuts that I am most concerned about include Middle Big Noise, Erock, and Sager. These stands contain trees that are between 95 and 124 years old (estimated not with a tree borer, but through imputed data... even Nick Palazzotto said during the recent tour of Middle Big Noise and Erock that these estimates may be inaccurate. These trees could be older). These three cuts also are taking place near domestic points of diversion, and will no doubt impact both the quality and quantity of water because of soil runoff, lack of ground cover, and pesticide residues.

In this age of climate chaos, when carbon sequestration is critical, in this age of mass extinction, when 69% of species populations have declined since 1970 — Why on earth are we cutting the last of our mature second growth on our public forestland? Why are we cutting the last of our structurally complex forests, despite ODF's goal of having at least 30% complex forest structure in the Astoria District by 2025? As you well know, we currently only have about 17 percent. I feel heavy hearted to know that at this rate, our future generations will not have real, wild, mature forests to look at, to learn from, to play within, to be inspired by. What kind of world will they inherit?

Our historically timber dependent counties, including Clatsop and Tillamook counties, need help transitioning to a new and truly sustainable economy. It is ODF's job to assist in the transition away from clearcutting and automation — let's provide people with jobs in restoration and conservation, in hydrology, geology, and life science. Let's provide people with jobs in selective logging, where appropriate. Let's provide people with jobs in recreation and eco-tourism. Let's reinstate a severance tax and allow our counties to make revenue from the REITs and TIMOs who pay little to nothing, while liquidating vast swaths of our forestland from their offices on Wall Street. There are so many other ways, besides clearcutting, to profit from our state forestland. We will no longer be able to make any revenue from our public forestland once it is all cut down, coated in pesticides, soils barren and depleted. We are seeing it happen. Already, private timberland has decreased in value across the West Coast (according to the Oregon Capital Chronicle, about 10% since 2004 due to increasing droughts and wildfire — which are exacerbated by clearcut logging practices).

I would like to conclude with the following recommendations for ODF regarding their Annual Operations Plans:

1. Continue efforts to improve communication and public education about the Annual Operations Process.
2. Use existing mapping of all domestic and municipal water sources to avoid harvest and pesticide applications near and upslope of all water sources.
3. No more pesticide application (by hand or aerially) in our state forests.
4. Avoid timber harvest in Habitat Conservation Areas (HCAs), especially prior to implementation of the Habitat Conservation Plan (HCP).
5. Prohibit all timber harvest and road construction within Riparian Conservation Areas (RCAs).
6. Retain all complex layered forest structure consistent with the ODF's Key Performance Measures. State forests are far below the 30% threshold established in 2025.
7. Prohibit road building and timber harvest on steep, landslide-prone slopes that have the potential to degrade water quality and spawning habitat.
8. Avoid timber harvest directly adjacent to private homeowners, schools, as well as places of work and recreation.

Thank you for your time and consideration,

Anna Kaufman,
Astoria, OR


Anna Kaufman
Astoria Coordinator
North Coast Communities for Watershed Protection

Written testimony for the June 4th BOF meeting attached

From dbugni@rconnects.com <dbugni@cascadeaccess.com>

Date Wed 6/4/2025 2:05 AM

To FORESTRY Boardof * ODF <boardofforestry@odf.oregon.gov>

 1 attachment (131 KB)

Bugni 2025-06-04 ODF board meeting comments.pdf;

Please find attached our written testimony for the June 4-5 Board of Forestry meeting. Please distribute when you can to the board members (we understand our time of submission is too late for inclusion in a board packet).

Thank you.

David Bugni
30265 SE Kowall Rd.
Estacada, OR 97023

June 3, 2025

Board of Forestry
Oregon Department of Forestry
2600 State St.
Salem, OR 97310

Re: Suggestions regarding riparian management area and fish habitat restorations

To Chair Kelly and members of the Board:

As you continue to address the pressing needs of forest-related riparian management area and fish habitat restorations, we offer some content suggestions to these rules that would incorporate greater incentives and flexibility for small forestland owners (SFOs) to achieve desired future conditions. Oregon's forested watersheds need far more restoration work than has been accomplished, and the rate of such accomplishments has been very slow for a variety of reasons.

First, a little background about us. My wife and I are retired, and we own and manage about 101 acres of forestland in western Oregon near Estacada, which we have been doing for over 30 years. David is a retired civil/structural engineer and has been involved with fish habitat restoration activities in both his professional and SFO roles for many years. In 2019 our family was awarded the joint ODF/ODFW "Fish & Wildlife Steward Award for Forestlands, Northwest Oregon Region, Non-industrial Forestlands"; and in 2021 the "Partnership Award" from the US Forest Service for "land stewardship and outreach in aquatic restoration" in addition to other local awards for our stream restoration work within our own property as well as within our community. We were also ODF's first co-awardees of the "Climate Smart Forestry" award last year, which we are quite proud of. We actively manage our forest for many requirements and uses, ranging from timber harvests to wildlife habitat enhancements, recreation, carbon sequestration & storage (our property is a verified carbon reserve), and riparian/fish habitat restoration. David is a member of the ODF Adaptive Management Program Committee of the PFA and the Committee for Family Forestlands and past chair of the Clackamas River Basin Council (CRBC), which is charged with implementing many stream and riparian restoration projects across the basin. David also initialized and managed the recently completed Clackamas River basin stream temperature study (the most extensive in Oregon), working with PSU and ODFW to better define how climate change, fish thermal tolerance and physical habitat interrelate to maximize and prioritize fish habitat and riparian restoration goals.

We believe there are two broad categories that ODF (and working with others as needed) should address in more depth to universally and effectively address, through financial incentives and rule flexibility, the many needs of riparian areas and fish habitat restoration within SFO-managed lands. SFOs manage most low elevation, and historically the most productive fish bearing streams in western Oregon. If effective and landscape-scale restoration is to occur there, efforts must be made to get more SFOs on board and more projects completed.

There are three overarching scenarios where such considerations as presented below apply to fish habitat and RMA restoration work:

1. As part of a typical forest harvest operation,
2. As a stand-alone RMA or fish habitat restoration project
3. As part of a post-disturbance harvest project within or including the RMA

Comments on Incentives:

ODF should develop more incentives, in tandem with practicable rules to accelerate the involvement of SFOs to restore portions of their properties along streams. Don't we want more SFOs to embrace such restoration work? Efforts of late appear to deter rather than promote such involvement.

The SFISH program is a great start, but it focuses mainly on fish passage remediation and less on fish habitat restoration. Its direct access to assistance from a Stewardship Forester and user-friendly application is also a plus for simplicity. For what SFISH does, it is set up well. However, its funding and purview are limited. For comparison, CRBC annually spends half of what SFISH is given but the CRBC work is restricted to the Clackamas River basin and still does not scratch the surface of the basin's needs.

The ODFW PFA grant program, more robustly funded than SFISH, is also good but has too much bureaucracy for most SFO's to handle. While Dave has received funding (working through the CRBC), we imagine very few SFOs, if any, will ever apply to it, much less be ranked high enough to receive any funding given all the paperwork and other related requirements.

ODF has a wonderful grants program coordinator in Al DeVos. How can we tap into, and perhaps expand his program to get more SFOs involved and funding secured?

Given that ODF and ODFW have the tools, is it possible to assemble an interdisciplinary and interdepartmental group to help SFOs (perhaps working through the Small Forestland Owner Office as a coordination site) to more easily secure and successfully implement other grants to fund fish and RMA projects, including OWEB funding and federal programs such as some administered through the NRCS? The key is to keep things simple and streamlined for the SFO. A one-stop-shop.

SFOs and their stewarded forests provide the public with many environmental-related services as we all know, and there should be a streamlined approach to 1) getting more SFOs motivated to desire to undertake such projects, 2) educating them on the importance and complexities of enhanced riparian and stream stewardship, and 3) assisting them to secure the necessary funding followed by successfully implementing such restoration activities to achieve everyone's goals.

Comments on greater ODF riparian and stream-related rules flexibility to implement projects:

Motivating the SFO though streamlined funding mechanisms is only one piece of this puzzle. An expansion or rethinking of some of the rules one must follow is another piece. Lately, many SFOs feel under attack by the ever-increasing restrictions placed on their land. This further reduces enthusiasm to participate in many types of projects.

Prescribing relatively simplistic rules to cover the complexities of streamside and in-stream management is not always practicable. This is due to the many variables that exist within these areas, including but not limited to: ecoregion, terrain, SFO land use, current canopy closure and its composition (hardwood and conifer relative abundances for future large wood recruitment), the nature and extents of native and exotic/invasive plant species involved, physical habitat, current water quality and stream temperatures, and the size of, and location within, a watershed, etc. ODF recognizes this in the Plan for an Alternate Practice (PFAP), and such PFAP-allowed situations should be expanded and not reduced. Each situation should be evaluated using the latest science with all the relevant factors considered, on a case-by-case basis, including reasonable desired future conditions and how those conditions will achieve mandated biological goals and objectives. We believe most SFOs and practitioners in the restoration field realize that management to varying degrees, at least at the outset, is required within the RMA to ultimately achieve the desired future conditions in a timely manner.

Based upon Dave's professional work in other areas, a tiered process might work well and allow all team members (the SFO, ODF and others) to achieve the bulk of their goals in a more streamlined, fairer and simpler way. Such a process could unfold thusly:

1. If a project is simple enough, following the prescriptive process in rule may be the best path forward in terms of cost and expediency.
2. If the project is more complicated, other circumstances arise, or where some current rules cannot be completely fulfilled as written, the SFO could work with the Stewardship Forester and ODFW stream restoration biologist to achieve the project goals by following the intent of current rules but deviating from them where needed to achieve specific management objectives (as outlined in a PFAP). Inspections need to occur to make sure all work is properly done according to plan.
3. If the project is so complex that neither the Stewardship Forester nor ODFW biologist are comfortable in approving such a project, a PFAP could also be written but also utilize an ODF-sanctioned committee to timely study, evaluate and propose, if needed, additional recommendations, on a case-by-case basis, to collaboratively achieve project goals following the latest findings in the current bodies of science covering these areas. This committee could be formed from interdepartmental staff and/or private consultants that would volunteer their time for such a cause. Inspections need to occur to make sure all work is properly done according to plan.

Conceptually, the tiered process noted above is employed effectively in some engineering sectors, which Dave has participated in, and could easily be employed here. Another related option is a third-party peer review. Any costs incurred for such services should not be borne by the SFO given the nature of the restoration services they are providing the public.

In summary, effective public policy to maximize RMA and instream restorations should incorporate language geared towards SFOs using financial incentives and reasonable flexibility in rule to achieve everyone's desired goals. Streamside and in-stream restorations are often very complex, given all the variables to properly consider, to be completely addressed by a set of relatively simple prescriptions. To infuse a little goodwill and flexibility into public policy will go a long way towards achieving goals of ecological restoration, recognizing the financial costs that are incurred in such projects, but yet are so needed across the landscape. It will also help to keep forestlands as forestlands by assisting to motivate SFOs in their stewardship and to retain ownership.

We would be pleased to assist in any way we can to provide additional suggestions on this important topic. There is a workable system out there that benefits all involved and will do a more thorough job of expansive, landscape-scale restoration. Thank you for your consideration.

Sincerely,



David & Mary Ann Bugni
30265 SE Kowall Rd.
Estacada, OR 97023

Dan Newton
6600 Hayhurst Rd.
Yoncalla, OR 97499

June 4, 2025

Testimony to The Board of Forestry

Chair Jim Kelly and Members of the Board

Thank you for this opportunity to comment. My name is Dan Newton. I have been part of two stream advisory committees in the 1990s. In addition, I was one of the founders and supporters of the Hinkle Creek Watershed Research project. In my career as a silviculturist, I have been doing large-scale reforestation work for more than 40 years, including restoration of burned-out riparian areas.

Given my experience on stream advisory committees, I would like to emphasize the value of doing a rigorous evaluation of ORS 527.714 prior to adopting new rules. It is a very reasonable ask – we have not been asking for compensation for the take of our assets, but this will help keep our rules science-based and least burdensome.

Let us review the law, along with a few comments on the various sections:

Necessary Findings

- **ORS 527.714 (5)**
 - Certain rules must meet evidentiary criteria:
 - Monitoring evidence of resource degradation
 - Rule reflects available scientific information
 - Objectives clearly defined and restrictions on practices substantially advance the objective
 - Consider alternatives, including non-regulatory approaches, and chose “least burdensome”
 - Resource benefits achieved are proportional to the harm cause by forest practices

*from ODF, Board of Forestry Meeting, John Day, Oregon, Nov. 7, 2012

1. Monitoring evidence of resource degradation
 - *What is degradation? Example: What if actual stream temperatures are colder than optimal for fish? Should a one-degree temperature increase that dissipates within a quarter mile downstream be considered degradation if the fish biomass increases in the harvested section due to greater food supply?*
2. Rule reflects available scientific information.
 - *This needs to include an objective review of science that shows positive impacts as well as negative impacts if any.*
3. Objectives clearly defined and restrictions on practices substantially advance the objective.
 - *Example: if the goal is increasing conifer survival and growth for large wood recruitment, then would restrictions on vegetation management substantially increase the objective?*
4. Consider alternatives, **including non-regulatory approaches**, and choose “least burdensome.”
 - *This is an opportunity for landowners to offer options to accomplish the objective more effectively and/or at lower cost.*
 - *This gets at the feasibility of even accomplishing the proposed rule in actual field conditions.*
5. Resource benefits achieved are proportional to the harm caused by forest practices.
 - *This is where it is important to look at other land uses. Are we being asked to restrict the use of tools that ODOT, residential users (or any other land use) routinely use that already have less restrictions?*

And lastly, and not in ORS 527.714, this is just my recommendation. Consider how ODF will evaluate and enforce compliance. Stewardship foresters have a lot on their plate. They do not need rules that are fuzzy and lack clear enforcement guidelines. You will also get more buy-in from landowners if the rules are clear and they can understand the purpose.

In conclusion, we believe that the BOF should rigorously use ORS 527.714 to sift through the recommendations when deliberating proposed rules that can impact forest landowners. Getting public input will improve the result and OSWA is happy to help with that.

Thank you for the opportunity to comment.

Sincerely,


Dan Newton

Testimony to the Oregon Board of Forestry Regarding Agenda Item 15

From trace hahn <trace.bglogging@outlook.com>

Date Wed 6/4/2025 7:27 PM

To COLLINS Eleni * ODF <Eleni.COLLINS@odf.oregon.gov>

 1 attachment (22 KB)

Testimony to the Oregon Board of Forestry 6_5_25.docx;

You don't often get email from trace.bglogging@outlook.com. [Learn why this is important](#)

Hello,

Please find my testimony letter attached for submittal.

-Trace Hahn

Trace Hahn, M.E
B&G Logging & Construction
541-929-4770

Testimony to the Oregon Board of Forestry

Regarding Agenda Item 15 – Forest Management Plan Harvest Modeling Review

Submitted for the June 6, 2025 Meeting

By: Trace Hahn, Chief Operations Officer, B&G Logging

Chair Kelly and Members of the Board,

Thank you for the opportunity to provide testimony on the Forest Management Plan (FMP) harvest modeling and its relationship with the Habitat Conservation Plan (HCP). My name is Trace Hahn, and I represent B&G Logging, a business rooted in rural Oregon that depends on responsible, sustainable timber harvest from our state lands.

As you know, the HCP already places more than half of state forestland into Habitat Conservation Areas (HCAs), removing vast acreage from active management. While we recognize the value of habitat preservation, these conservation commitments are substantial and should not be further expanded at the cost of Oregon's rural economies.

The remaining areas—those outside the HCAs—*must* be managed actively and efficiently. The harvest modeling you are reviewing should reflect the reality that the communities who rely on these forests have already given up a great deal. We need you to prioritize maximizing sustainable harvest in the areas still available. The ability of counties to fund basic services, and for families to make a living in timber-dependent towns, hangs in balance.

I also urge you to consider how state spending is being prioritized across the board. For example, the Oregon State Capitol renovation is now estimated to cost over **\$500 million**, far exceeding its original budget. Meanwhile, rural communities are being told to tighten their belts and accept shrinking revenues from timber harvests on public land. It's hard to reconcile these two realities. Why is it acceptable for state government to spend freely on itself, while expecting rural Oregon to absorb cut after cut?

The Board has the opportunity to restore balance—by standing behind active forest management, increasing harvest levels outside HCAs, and reinforcing the principle that working forests can coexist with conservation. We're not asking for more than what's fair—we're asking for a chance to survive and contribute.

Oregon's public forests should work for *all* Oregonians—not just for abstract policy goals, but for real people, real families, and real communities who rely on them every day.

Thank you for your time and attention.

Respectfully,

Trace Hahn

B&G Logging

Public Comment for Board of Forestry Meeting held June 4-5, 2025

From Scott Killops <scott.killops@gmail.com>

Date Thu 6/19/2025 5:59 PM

To FORESTRY Boardof * ODF <boardofforestry@odf.oregon.gov>

Cc Scott Killops <scott.killops@gmail.com>; OCAC Odoe * ODOE <OCAC@energy.oregon.gov>

 1 attachment (111 KB)

20250604-bof-public-comment-fncsf-scott-killops.pdf;

Chair Kelly and Members of the Board,

Thank you for your service and for the opportunity to provide a public comment for the Board of Forestry Meeting held on June 4-5, 2025. My comment regards the Board's oversight of ODF's implementation of the Forestry Natural Climate Solutions Fund (FNCSF). Specifically, I suggest that the Board solicit an ODF update on implementation progress and results at the September or October Board meeting. My full comment is included in the attached PDF file.

Respectfully,

Scott Killops

350PDX Forest Defense Team Member

To: Oregon Board of Forestry (Board) and Department of Forestry (ODF)

From: Scott Killops

Subject: Public Comment for the Board of Forestry Meeting on June 4-5, 2025
Regarding Oversight of the Forestry Natural Climate Solutions Fund

Date: June 19, 2025

Chair Kelly and Members of the Board,

Thank you for your service and for the opportunity to provide a public comment for the [Board of Forestry Meeting held on June 4-5, 2025](#). My comment regards the Board's oversight of ODF's implementation of the Forestry Natural Climate Solutions Fund (FNCSF). Specifically, I suggest that the Board solicit an ODF update on implementation progress and results at the September or October Board meeting.

ODF is collaborating with the [Oregon Climate Action Commission \(OCAC\)](#) on implementation of [HB3409 \(2023\) Sections 53-67, State Policy for Natural Climate Solutions](#). This includes implementation and allocation of the Natural & Working Lands Fund (NWLF) and the Forestry Natural Climate Solutions Fund (FNCSF).

The [Oregon Climate Action Commission \(OCAC\) Natural & Working Lands Fund \(NWLF\) Annual Report, September 2024](#) indicates that in 2024 the NWLF allocated \$3,250,000 to fund three ODF projects:

Project No.	Agency	Program / Project	Fund Allocation
P9	ODF	Advance Implementation of Climate-Smart Forestry	\$1,500,000
P10	ODF	Climate-Smart Forestry: Tribal and EJ Partnerships	\$1,000,000
P11	ODF	Establishment of Climate-Ready Seed Orchards	\$750,000

For all three of these projects the report states, "Due to staff capacity limitations and other delays, ODF will likely not be able to implement this project within the agency's originally proposed timeframe. ODF will likely request future expenditure limitation approval to extend project implementation into the coming biennium." It would be good to get an update on whether the staff capacity limitations and other delays have been resolved and what the current implementation plans are.

The [Oregon Climate Action Commission \(OCAC\) Natural & Working Lands Fund \(NWLF\) Biennial Report, December 2024](#) includes a Section VI, Actions Planned for 2025, with a Subsection C for ODF which lists seven actions:

- Provide funding to local districts to increase adoption of climate-smart forestry activities through incentives and technical assistance for existing programs.
- Provide funding to tribes that want to implement climate-smart forestry practices on tribal forest lands.

- Work on implementation of ODF's climate-ready seed efforts to provide species and seed that are more climate adapted as informed by future projections.
- Continue implementing associated ODF efforts, such as the Climate-Smart Forestry Award; supporting long-lived wood fiber utilization (e.g., mass timber); and administering forest health treatments to increase resistance, increase adaptation, or direct the forest ecosystem dependent on the local conditions.
- Track and work to secure national and international climate and carbon-related funding through grants and other opportunities.
- Continue efforts around the adoption of a Habitat Conservation Plan (HCP) and a Forest Management Plan for State Forests, and an HCP for private riparian areas, which include climate considerations.
- Continue research projects and efforts that will inform interests in carbon stocks and cycles, land use issues related to forestry, and the effects of climate on insects, diseases, and abiotic factors.

These actions are not stated in a measurable way. It would be good to get an update on specific actions taken and results achieved in 2025.

The [Oregon Climate Action Commission \(OCAC\) Natural & Working Lands Fund \(NWLFF\) Biennial Report, December 2024](#) also includes a Section VII, "Looking Forward: Natural Climate Solutions Investment Potential" with the description, "The following subsections describe the potential and need for additional investments in natural climate solutions identified by ODA, ODFW, and OWEB." There is a footnote stating, "The Oregon Department of Forestry declined to provide content for this section." While understanding the difficult budget cycle for the coming biennium, it would still be good to get an update on ODF's assessment of "the potential and need for additional investments in natural climate solutions", especially since ODF aspires to be a leader in climate-smart forestry.

Anticipating that OCAC will produce another Natural & Working Lands Fund Annual Report in September 2025, I believe that the Board should solicit an update from ODF at the September or October Board meeting to review ODF's progress and results in administering the Forestry Natural Climate Solutions Fund.

Thank you again for your service and for the opportunity to provide a public comment.

Respectfully,

Scott Killops

350PDX Forest Defense Team Member

References

BOF and ODF References

ODF web page – Climate change

<https://www.oregon.gov/odf/forestbenefits/pages/climate-change.aspx>

ODF web page – Forest carbon accounting

<https://www.oregon.gov/odf/forestbenefits/Pages/forestcarbonstudy.aspx>

ODF Climate Change and Carbon Plan

<https://www.oregon.gov/odf/forestbenefits/Documents/odf-climate-change-and-carbon-plan-draft.pdf>

Legislative Reference

Oregon House Bill 3409 (2023) – See Sections 53-67, State Policy for Natural Climate Solutions

<https://olis.oregonlegislature.gov/liz/2023R1/Downloads/MeasureDocument/HB3409/Enrolled>

Oregon Climate Action Commission (OCAC) References

Oregon Climate Action Commission

<https://climate.oregon.gov/>

Natural & Working Lands Fund Biennial Report – December 2024

<https://static1.squarespace.com/static/59c554e0f09ca40655ea6eb0/t/673f73133adc5e767831b698/1732211491655/2024-OCAC-NWL-Biennial-Report.pdf>

Natural & Working Lands Fund Annual Report – September 2024

<https://static1.squarespace.com/static/59c554e0f09ca40655ea6eb0/t/66df4041690d12650cb7e0fc/1725907018175/2024-OCAC-NWL-Fund-Annual-Report.pdf>

Natural & Working Lands Fund Proposal – January 2024

<https://static1.squarespace.com/static/59c554e0f09ca40655ea6eb0/t/6594aea62498db70a925d691/1704242854973/2024-NWL-Joint-Proposal.pdf>