

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

From: Scott Killops

Subject: Public Comment for the Board of Forestry Meeting on September 3, 2025
Regarding the Natural Climate Solutions Fund Update

Date: September 15, 2025

Chair Kelly, Members of the Board, and ODF Staff,

Thank you for your service and for the opportunity to provide a public comment for the [Board of Forestry Meeting held on September 3, 2025](#). My comment regards the [Natural Climate Solutions Fund Update \(NCSF Update\)](#).

The NCSF Update does a good job summarizing the context and background for the Natural and Working Lands Fund (NWLF) and the Forestry Natural Climate Solutions Fund (FNCSF) created through [HB3409 \(2023\)](#). However, it is apparent from the update that ODF has no implementation plan for the FNCSF. Such a plan would include measurable goals and deliverables, a task list or work breakdown structure, resource requirements and assignments, and a schedule. Without an implementation plan, ODF is making very little progress on the first two of its [three projects approved by the Oregon Climate Action Commission \(OCAC\)](#).

Since the September Board meeting, OCAC has published the [Natural & Working Lands Fund Annual Report – 2025 \(NWLF Report\)](#). Appendix A, Investment Area Descriptions, contains updates for the 13 projects included in this phase of NWLF funding. The updates provided by ODF for the first two of its projects, “P9: Advance Implementation of Climate-Smart Forestry” and “P10: Climate-Smart Forestry Implementation in Partnership with Tribal and Environmental Justice Communities”, are frankly embarrassing. Each update is comprised of two pages of text that make it sound like work is happening, but nothing specific is reported. Virtually nothing has been accomplished on these two projects in the past year.

I don’t want to be too critical of ODF. I appreciate the complexity of the challenges that ODF faces and the resource constraints ODF must work with. I greatly appreciate the dedication and hard work that ODF staff demonstrates every day. But I have to say that the ODF management team is just not serious about climate-smart leadership. There is no implementation plan for ODF’s [Climate Change and Carbon Plan \(CCCP\)](#). The ODF CCCP updates to the Board in [October 2024](#) and [January 2025](#) were both vague and showed very little progress. I believe that the ODF management team must take a more active role if it sincerely wants to realize the Climate Leadership goal expressed in the [Vision for Oregon’s Forests](#).

I provide additional comments regarding the NCSF Update and the NWLF Report in the following pages.

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

Respectfully,
Scott Killops
350PDX Forest Defense Team Member

Comments Regarding the [Natural Climate Solutions Fund Update \(NCSF Update\)](#)

Page 2, Background and Analysis: “Utilization of these funds has provided the ability to further implement the supporting actions contained in the CCCP, which had no previous funding.”

This statement begs the question, why have the supporting actions contained in the CCCP had no previous funding? The [Vision for Oregon's Forests](#) includes the priority “Climate Leadership” with the goal “The Board and Department will build capacity for climate-smart leadership.” What exactly does this mean if ODF is providing no funding for CCCP implementation? The [2025-27 Biennium: Governor's Budget for ODF](#) makes no mention of the CCCP. Why not? Funds needed for CCCP implementation should be included in the Agency Request Budget. If these funds are not approved, stakeholders should be informed of ODF's inability to fully achieve one of its priority goals due to lack of resources.

Page 2, Small and disadvantaged landowners climate-smart forestry implementation: “This project is working with Soil and Water Conservation Districts (SWCDs) to implement climate smart forestry at the local level. Many of the SWCDs have strong existing relationships with forest landowners in their districts. To leverage these relationships and increase adoption of climate-smart forestry practices, ODF is partnering with them to provide incentives, technical assistance, and payment for practice programs managed by the SWCD. Work to finalize the first of the intergovernmental agreements with Tualatin SWCD is near and an increase in pace is expected with further efforts with additional SWCDs across the state taking place. One barrier to further success in expending these funds has been a high staff turnover and reallocation inside ODF and within the SWCDs. This has greatly slowed efforts.”

In the [CCCP Implementation Update to the Board in January](#), ODF discussed working with Tualatin SWCD. Eight months later an agreement is near, but there is no draft of the agreement, no summary of the contents of the agreement, no date for completing the agreement, and no discussion of this partnership on the ODF web site or the [Tualatin SWCD web site](#). What other SWCDs is ODF working with? ODF is not even mentioned in the [Natural Climate Solutions Guide](#) published in January 2025 by the [Oregon Association of Conservation Districts](#). Why is ODF limiting its outreach to SWCD's? The [Committee for Family Forestlands \(CFF\) Annual Report](#) presented at the same Board meeting as the NCSF Update includes the statement, “Climate Smart Forestry. The Board Vision refers to climate smart forestry; the CFF would like to follow what that looks like for SFOs, and to track ODF's Climate Change and Carbon Plan generally.” It appears that the CFF has not even been informed of the FNCSF. Why not?

SWCD partnerships aside, the NCSF Update suggests (by omission) that ODF has yet to address many basic planning questions regarding administration of the FNCSF:

- Which climate-smart forestry practices will ODF promote and/or qualify for FNCSF funding?
- What collateral is available or will be produced to describe these practices?
- What forms will incentives take? How many will be available? How large/small will incentives be?
- Who will qualify for FNCSF incentives, given that the program is intending to prioritize serving smaller and disadvantaged landowners? How will ODF define and determine these?
- What forms of technical assistance will be made available? Who will provide this technical assistance?

Page 3, Incentivize Climate-Smart Forestry Implementation in partnership with Tribal and Environmental Justice Communities: “Much like the small and disadvantaged landowner project, these funds are intended to be provided to Tribes to implement the climate-smart forestry practices that apply to their own management direction. These funds will flow through the department’s Urban and Community Forestry program, which has been conducting extensive outreach and relationship building with the Tribes through a federally funded grant program. These funds will help to provide additional resources for Tribes in areas that the federal funds may not have been available or for climate-smart practices that are beyond the scope of those grants.”

The decision to use the [Urban and Community Forestry \(UCF\) Program](#) to facilitate delivery of FNCSEF funds to Tribes is a welcome development, but appears to be very recent. The [UCF web page](#) currently describes HB3409 funding available through the Community Green Infrastructure Grant, but does not mention the Natural and Working Lands Fund. ODF should provide an update on how and when FNCSEF funds will be available to grant applicants via UCF.

Page 3, Establishment of climate-ready seed orchards to support small, disadvantaged, and tribal forestry.

This project appears to be on track and I commend ODF for their execution here.

Page 3, “Overall, these projects will strengthen the adaptation and mitigation efforts that the department is striving for in the CCCP. There have been unfortunate barriers around the full utilization of these funds. Primarily among these are staff changes and loss of capacity which have been difficult to regain. With that stated, there is headway being made and it is expected that there will be further fund utilization in the near term.”

I’m sympathetic to the challenges ODF has faced. But I contend that with a detailed implementation plan and active program management, including regular program updates to ODF senior management, these issues can be raised and worked more aggressively.

Comments Regarding the [Natural & Working Lands Fund Annual Report – 2025 \(NWLRF Report\)](#)

Pages 46-48, ODF | P9: Advance Implementation of Climate-Smart Forestry

Budgeting and Funding: This section is completely unclear. The first table shows “\$250,000 allocated” in FY2025 under “NWL Funds Issued”. Allocated for what? The second table, “Spend Plan Summary”, shows \$1,500,000 for FY2025. We’re now in FY2026. Presumably ODF did not use all available NWLRF money in FY2025. This table should be updated to indicate what money was actually spent in FY2025 and the Spend Plan for the remaining funds looking forward. The narrative description should explain what expenditures in FY2025 were used for.

Description of Investment: Most of the description provided is a restatement of the high level description provided for this project in the [Natural & Working Lands Fund Proposal](#) which was approved by OCAC in January 2024. No additional detail is provided, suggesting that ODF has not created an implementation plan in the intervening year and a half. The description includes this update:

2025 Implementation Update: Implementation has lagged due to budgeting processes and staff reorganization and movement. Existing staff have been identified to take on efforts of the various projects and work will continue with these people. The department is working on outreach and coordination with intended recipients and hopes to be able to provide funds in the near future.

Next Steps: Work to finalize Intergovernmental Agreement language and implementation and set up tracking mechanisms for reporting to ODOE, OWEB, and the Commission. Establishing agreements with recipients will be the primary focus in coming months.

There is nothing specific here. This is not an implementation plan. If an implementation plan exists, it should be referenced. If not, it should be created. If ODF lacks the skills to create an implementation plan, they should hire a skilled facilitator to assist with planning.

Pages 49-51, ODF | P10: Climate-Smart Forestry Implementation in Partnership with Tribal and Environmental Justice Communities

Budgeting and Funding: The second table, “Spend Plan Summary”, shows \$1,000,000 for FY2025. We’re now in FY2026. Presumably ODF did not use all available NWLF money in FY2025. This table should be updated to indicate whether money was actually spent in FY2025 and the Spend Plan for the remaining funds looking forward.

Description of Investment: As for Project P9, much of this description is a restatement of the project description from the [Natural & Working Lands Fund Proposal](#) and is both high level and vague. There is nothing here to suggest that any progress has been made in the last year and a half or that an implementation plan exists. It appears that ODF now intends to use the [Urban and Community Forestry \(UCF\) Program](#) to facilitate delivery of FNCSF to Tribes. This is a welcome development, but appears to be very recent. The [UCF web page](#) currently describes HB3409 funding available through the Community Green Infrastructure Grant, but does not mention the Natural and Working Lands Fund. ODF should provide an update on how and when FNCSF funds will be available to grant applicants via UCF.

Pages 52-54, ODF | P11: Establishment of Climate-Ready Seed Orchards

This project appears to be managed much better than P9 and P10 and I commend ODF for this. I only have a couple comments/questions.

Budget and Funding: The “Spend Plan Summary” table shows all available NWLF money being spent in FY2024 and FY2025. But the “2025 Update” narrative says, “This is a long-term project and needs proper planning to take place to ensure success. Will likely need to extend funds into coming biennium due to timing of receiving funds.” Page 3 of the NWLF Report states, “Nearly \$10 million was allocated from the Fund for use in fiscal years 2024 through 2028.” So it seems that ODF should be able to update the “Spend Plan Summary” table to add fiscal years to the spend plan. If the narrative meant that additional funding will be needed, then that should be quantified and specified.

Measurable Outcomes for Reporting: Given that this project appears to be on track, it’s a little surprising that ODF has no “Metrics for Tracking Outcomes” to report.

References

BOF and ODF References

Vision for Oregon's Forests – January 2025

<https://www.oregon.gov/odf/board/bof/vision-for-oregons-forests.pdf>

Natural Climate Solutions Fund Update – September 3, 2025

<https://www.oregon.gov/odf/board/bof/20250903-bof-item-10.pdf>

ODF Climate Change and Carbon Plan – November 3, 2021

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

ODF Seed Programs

<https://www.oregon.gov/odf/working/Pages/seed.aspx>

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 Annual Report – September 2025

<https://static1.squarespace.com/static/59c554e0f09ca40655ea6eb0/t/68c4b18c1c089041ecfd8c89/1757720972097/2025-Natural-Working-Lands-Annual-Fund-Report.pdf>

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>

Soil and Water Conservation Districts

Oregon Department of Agriculture – Soil and Water Conservation Districts

<https://www.oregon.gov/oda/natural-resources/swcd/pages/default.aspx>

Oregon Association of Conservation Districts (OACD)

<https://www.oacd.org/>

OACD Natural Climate Solutions Guide – January 2025

<https://www.oacd.org/natural-climate-solutions-guide>

Tualatin Soil and Water Conservation District

<https://tualatinswcd.org/>



SIERRA CLUB

OREGON CHAPTER

September 3, 2025

Oregon Board of Forestry
2600 State Street
Salem, OR 97310

(Submitted by email)

Dear Chair Kelly and members of the Board of Forestry,

Despite the laudable goals and changing rhetoric of the Oregon Department of Forestry in recent decades, conditions on many state forests have worsened, not improved. On behalf of the 58,000 statewide members and supporters of the Oregon Chapter of the Sierra Club, we ask you to ensure that state forests are managed for multiple values, including clean water, fish and wildlife habitat, biodiversity, climate change mitigation, and low-impact recreation.

In the 2010 Western Oregon State Forest Management Plan, the Board of Forestry and the Oregon Department of Forestry (ODF) committed to the Legislature and the people of Oregon that they would manage 30 - 50% of North Coast state forests as complex, layered forests or older forest structure (pre-old growth).¹ They also committed to practicing climate-smart forestry on our state forests. Meeting these commitments is crucial to restoring North Coast state forests, transforming at least a portion of them from sterile tree plantations into thriving forests that provide more wood products, abundant habitats for fish and wildlife, improved water availability and quality, and a healthier climate.

A dozen years ago, 13% of North Coast forests met this criterion for healthy, climate-friendly forests, according to ODF's own report. Today, that percentage has actually fallen to 12%. Rather than double or triple the percentage of North Coast forests that are truly forests, ODF has chosen instead to degrade them.

¹ Western Oregon State Forest Management Plan 2010. Key Performance Measure 10.

This sad reality reflects ODF's tendency to prioritize business as usual in the planned harvests embodied in district implementation plans and resulting annual operating plans, rather than its commitments to managing for more-intact, climate-smart forests. For example, in the operating plan for the coming fiscal year, ODF plans to clear-cut 633 acres of layered and older forest structure in the Tillamook and Clatsop state forests, at the same time failing to make any progress toward the minimum of 30%.² Over the past three years, the ODF has approved thousands of acres of timber sales in stands with older or complex layered conditions, including the controversial Davis Ridge sale.

It is time for the Board of Forestry and ODF to provide leadership and meet their commitments to restore the ecological integrity of state forests.

On behalf of the Oregon Sierra Club's Forest team, we request the Board:

- (1) Direct its staff to comply with Key Performance Measure 10 by not approving any timber sales in mature forests with complex layered structure until each North Coast state forest achieves the minimum 30% required by KPM 10.
- (2) Direct the ODF staff to ensure annual harvest objectives are consistent with Key Performance Measure 10.

Thank you for the opportunity to comment.

Susan Lea Smith
Oregon Chapter Sierra Club Forest Team

² In Sierra Club's FY 26 AOP comments, we noted KPM #10 and the harvest of layered stands. We recommended canceling or modifying clearcut timber sales in layered and old forest structure until the minimum goal of 30% is achieved. We renew that call.



Sent by email

To: Chair Kelly, Board of Forestry members, Interim State Forester Skinner
From: Michael Lang, Senior Policy Manager, Wild Salmon Center
Re: Compliance with Key Performance Measures
Date: September 2, 2025

Dear Chair Kelly, members of the Board of Forestry and Interim State Forester Skinner,

Wild Salmon Center submits the following written testimony regarding the Key Performance Measures Report ([Report](#)), which is an information item on the Board's agenda for its September 3rd meeting. Wild Salmon Center (WSC) is a nonprofit organization based in Oregon that works to protect and restore healthy forests, abundant clean water, and thriving wild salmon populations across the state and around the Pacific Rim based on solutions grounded in science.

Key Performance Measure 10 (KPM 10) was originally approved by the Board and the Legislature following 2010 updates to the Western Oregon Forest Management Plan. KPM 10 requires that a minimum of 30% of the North Coast state forests be in complex, layered stand conditions.

The 2010 Forest Management Plans states the following at page C-43:

The uniform, even-aged forest stands produced under traditional forest management can not support the diversity of species found in most natural stands, or in managed stands that have a complex vertical structure. The species found in low-diversity plantations usually are habitat generalists or aggressive habitat specialists that exclude other species from the limited number of available niches. As increasing acreages are managed in low diversity stands, the species that are excluded from low-diversity plantations may become scarcer, some even to the point of classification as threatened or endangered. **For this reason, under this forest management plan, forest management will be used to develop complex stands with multi-layered forest canopies.** (Emphasis added)

Contrary to the goal set in 2010, complex layered forest structure has declined in the past 15 years. In 2013, The ODF reported that 13% of the Tillamook and Clatsop state forests were composed of complex, layered forest structure. In 2024-25, the Oregon

Department of Forestry (ODF) reports that 11.75% of these state forests are complex layered stands, far below the target of 30%.

The Report claims the factors affecting the results include the slow development of the complex forest structure, however it fails to mention that the ODF continues to clearcut stands with complex layered structure without regard for KPM 10.

This is particularly true in the Astoria District. Over the past three years, the ODF has approved thousands of acres of timber sales in older or complex layered conditions, including the controversial Davis Ridge sale.

In the 2026 Annual Operations Plans (AOPs) alone, the ODF approved a total of 633 acres of clearcuts in “Layered” and “Old Forest Structure” in the Tillamook and Clatsop states forests.

The State Forest Coalition reviewed the draft AOPs and provided detailed written comments raising concerns that these timber sales were inconsistent with KPM #10 and recommended postponing timber sales in layered and older forest structure until the goal of KPM 10 is met.

In the staff's [response](#) to public comments on the AOPs, the ODF acknowledges that its Implementation Plans are inconsistent with the Forest Management Plan and KPM 10, explaining that the KPMs have to be “balanced” with the harvest objectives approved in the Implementation Plans. Since the Forest Management Plan is a rule, the Implementation Plans and the AOPs for the Tillamook, Astoria and Forest Grove Districts appear to violate this Board-approved rule.

Wild Salmon Center recommends the following actions to comply with KPM 10 and the 2010 Forest Management Plan.

- Avoid clearcut timber harvest in complex, layered stands until a minimum of 30% of North Coast state forests meet this target.
- Develop a timeline for compliance with KPM 10.
- Add language to the draft Forest Management Plan stating that all district Implementation Plans and AOPs are required to comply with KPMs and other Board-adopted plans and policies.

Thank you for considering these comments and recommendations.