

November 18, 2025

Re: Proposed approval of a timber harvest key
Performance measure

Dear Chair Kelley and members of the Board of Forestry:

My name is Susan Lea Smith, Professor Emeritus at Willamette University. I have taught and practiced natural resources and environmental law and policy for the last 45 years. I live in Polk County and frequently visit state forests across the state. Although I belong to various groups, including the Environmental Faith Network of Salem, I comment today as an individual Oregonian not representing any group.

First, I ask that in the future the Board establish a policy that provides a physical location for Board meetings in addition to any virtual participation so that commentors can assure their input is heard by the Board in a timely manner. I had signed up to testify, attended virtually and was ready to testify, but was not given a chance to speak. I made more than a dozen contacts with your staff seeking connect but I was unsuccessful due to technical difficulties. If I had known where I could go to be heard, I would have gone there. Your staff, however, assured me that the Board would review these written comments.

Second, I deeply empathize with those commentors who advocate adoption of a key performance measure setting high harvest levels because they feel their livelihoods will be harmed by reduced

harvests in state forests. I am the granddaughter of an Oregon logger, the daughter of a home builder, and the sister of a log mill owner. I understand the difficulty families face when changing circumstances seem to threaten their way of life. The Department of Forestry ultimately must make a difficult choice about harvest levels in state forests. That choice must be made using a transparent and deliberate process that allows all voices to be heard and must be thoughtful and wise. Today's meeting is not the proper time, place, or means for that decision.

Third, I request that you provide ODF with wise counsel on how to proceed in making that decision because the department seems to be having serious problems with putting the cart before the horse.

As I noted before at the September meeting and explained further in my written comments, ODF is busily clear cutting older, complex, layered habitat outside the Habitat conservation areas in state forests **before** the tree stands within HCAs have matured to provide adequate habitat for E&T species. It is doing that **before** the HCP and incidental take permit have been approved by federal wildlife agencies. This means that ODF and those who log in western Oregon state forests are violating the state and federal ESA as well as the state approved HCP.

Now ODF asks the Board to approve a harvest level key performance measure to implement (with deep unsustainable clear cuts) the not yet adopted FMP, **before** the goals and strategies in the draft FMP that must inform such a decision have been lawfully adopted.

This makes provision of future public comments and hearings on the draft FMP truly a sham. Check with your lawyer but I believe

adopting such a key performance measure that prejudices the results of the FMP rulemaking process would violate OAR 629-035-0030 (6) and ORS 183.335.

We could ask the Court of Appeals to decide that question, but really the Board needs to tell ODF to slow down, listen to public input, and comply with both the substance and procedure required by law. Otherwise, the Board and the Department of Forestry will find themselves trying to defend indefensible decisions before state and federal courts.

I look forward to discussion over the course of the next two months on the substance of the Forest Management Plan.

Thank you,

Susan Lea Smith



To: Chair Kelly, Members of the Board of Forestry, and Interim State Forester Skinner
From: Damon Motz-Storey, Oregon Chapter Director, Sierra Club
Re: Adoption of Draft Forest Management Plan Performance Measures
Date: November 14, 2025

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

The Sierra Club Oregon Chapter has numerous concerns regarding Oregon Department of Forestry (ODF) staff's request for the Board of Forestry to approve a performance measure for implementation of the Western Oregon State Forests Management Plan (FMP).

The FMP is in draft stage and is currently undergoing a public comment period that does not end until January 31, 2026. Approving this performance measure now, with the comment period barely underway, would undermine ODF's claims that they are committed to improving public engagement and transparency, further eroding public trust in the agency.

The draft performance measure in question would increase timber harvest targets for the next ten years. Such an increase would result in clearcutting all remaining older forests outside of Habitat Conservation Areas. This would be in direct contradiction to Key Performance Measure 10, approved by the Oregon Legislature, which requires a minimum of 30% of North Coast state forests to be in complex, layered forest conditions. The Oregon Sierra Club has commented previously regarding ODF's failure to meet this Key Performance Measure, and we urge the board to wait until performance measures can be adopted in the context of a final Forest Management Plan to make sure they assist, rather than hinder, progress toward the mandated level of complex layered forest.

Approving the draft performance measure now would also put constraints on the Board regarding amendment of the draft FMP. The Board should allow for improvements to be made to the draft plan without constraint following the public comment period, by holding off on any vote to approve the proposed performance measure until public comments have been completed and analyzed.



SIERRA CLUB

ODF district staff will have ample time to develop implementation plans following adoption of the FMP and subsequent or simultaneous performance measures, making a vote at the November 18 special meeting unnecessary.

Finally, the prospect of setting annual and decadal harvest levels through approval of the draft performance measure raises legal issues, since [ORS 526.016](#) prohibits the Board from directing the state forester in matters relating to the geographic scheduling and annual volume of timber sales on state forest lands.

For the reasons above, we urge you to wait until the FMP has been finalized before deciding on the draft performance measure.

Sincerely,

Damon Motz-Storey
Oregon Chapter Director, Sierra Club



Dear Acting State Forester Skinner,

November 14, 2025

We are writing today to ask you to halt three planned timber sales in the Astoria District of the Clatsop State Forest. The Middle Big Noise, Eroch, and Sager timber sales are all logging forests that are greater than 94 years old, in contradiction of Governor Kotek's recent Executive Order No. 25-26 and Key Performance Measure 10 (KPM10). Bids open for the Eroch sale on Nov 18th, and bidding has not been scheduled for Sager. Eroch should be paused, and the Sager sale should be withdrawn to preserve these valuable older forests on our public lands. Middle Big Noise has already had a bid accepted, but is one more example of Astoria District logging some of the best remaining forest in the northern Coast Range. These three sales, taken together, comprise hundreds of acres of layered and complex forest that, without action, will be sold for clearcut in a single year.

Within the state forests there is an uneven age distribution, with many young planted forests and few layered and complex old forests, because the state continues to place log production above the other values of the state forests. In 2010, the Northwest Oregon State Forest Management Plan stated that, in the Astoria district, less than 3% of conifer stands are greater than 86 years old and 0.1% of conifer stands are greater than 116 years old (pg 2-82). The hundreds of acres included in these sales are crucial to maintaining the already small percentage of complex and layered forest in this area, and to providing clean, cool waterways and late seral forest for endangered wildlife that depend on these habitats.

A Key Performance Metric (KPM) established by the legislature for ODF is that 30% of the state forest be maintained in layered and complex forest, which basically means old, diverse forest. When this KPM was established in 2015, 31% of the forest in the Astoria District was in complex layered condition. In the intervening years, the Astoria District ODF has steadily logged the old forest in the district in contradiction of this key performance metric, with no consequences or apparent oversight. In 2024, the district only counts 17% of its acreage in layered and complex forest, and plans to log hundreds of additional acres of complex forests in these sales. We signed onto public comments on these Annual Operating Plans, and we participate in public review of ODF policies, but there is not much opportunity for meaningful public review of this clearcut logging on public lands. If public comments are ignored, then change will only come from meaningful oversight, either from within ODF or outside ODF, or from public pressure.

Governor Kotek recently issued Executive Order No. 25-26 "Directing State Agencies to take urgent action to promote the resilience of our communities and natural lands and waters" that supports



the preservation of these areas. One of the best ways to promote resilience in our forestlands is to protect older forests that are less prone to catastrophic wildfire and retain ground water better than young, dense, clear cut forests. But once these old forests are logged, they obviously will take a century to regrow, even if growth is not limited by high temperature and drought associated with worsening climate change. For the Erock sale in particular, there has been extensive recent clearcut logging around the edges of the southern unit, and the cumulative impact on this watershed must be considered for the resiliency of our coastal rivers of lands and waters in Oregon within ten years as compared to baseline conditions established for 2025." Cutting down these existing layered and complex old forests will only move us below the established baseline, meaning that ODF must make up for the loss to meet the Governor's metric. Finally, it is imperative that the areas already set aside as HCAs in the HCP be considered as part of the 2025 baseline as they were already established HCAs. They cannot and should not be counted as potential replacements for cutting down layered and complex forests elsewhere like Erok and Middle Big Noise.

We are asking you to stop these sales and reconsider the greatest permanent value of these forests. In this era of climate crisis, there is no time to plant trees and wait one hundred years for them to mature, we must save the mature forests that we still have. Through sales like Middle Big Noise, Erock, and Sager, ODF runs a real risk of losing their social license to operate. Most Oregonians have no idea that the state of Oregon continues to clearcut mature forest on public lands. We intend to make sure they know about it through a public campaign centered around these sales, if they proceed as planned. We hope that you will stand with us for preserving legacy forests on state lands, and preserving public trust by stopping the bid process for Erock and Sager, and pausing logging of all layered and complex forest until ODF has a clear plan to preserve these forests.

We look forward to your reply.

Sincerely,

Members of the
350PDX Forest Defense Team
Felice.Kelly@gmail.com
tyler@350pdx.org

And Members of the
North Coast Communities for Watershed Protection



November 14, 2025

RE: ODF's recommendation to approve logging of 2.15 billion board feet of state forests over the next ten years

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

The Bird Alliance of Oregon and its over 12,000 members across the state are deeply concerned about the recommendation of the Oregon Department of Forestry to increase logging of 2.15 billion board feet of state forests over the next ten years under the draft Western Oregon State Forests Draft Forest Management Plan. We strongly oppose this recommendation and ask the Board of Forestry to postpone a decision. Here's why:

First and foremost, the draft performance *does not appear to be supported by the law*. State law prohibits the Board from directing the state forester in matters relating to the geographic scheduling and annual volume of timber sales on state forest lands. The draft performance measure would set annual and decadal harvest levels in violation of this statute. ([ORS 526.016](#)).

Secondly it is premature to adopt performance measures prior to the close of the comment period for the draft FMP. It would send the message that the Board and the ODF do not value public comments. It would also hamper the ability of the Board to amend the draft FMP prior to approval, precluding its ability to improve the draft plan. The Board should delay a decision to adopt performance measures for the FMP until after it votes to adopt a final FMP.

The state is already far behind on Key Performance Measure 10 which requires a minimum of 30% of North Coast state forests to be in complex, layered forest conditions. Currently the estimate is at 11.75%. The recommendation to increase logging to 2.15 billion board feet in 10 years would leave little to no complex layered forest outside of Habitat Conservation Areas and make it impossible for ODF to meet Key Performance Measure 10.

Finally, The staff recommendation is inconsistent with the Governor's recent [Executive Order 25-26](#) directing the ODF to take additional measures to protect state forests. The executive order explicitly states that agencies subject to the order (including ODF) must "*advance protection, conservation, restoration, or connection of lands and waters in support of the goal of ten percent in ten years*" and "*seek to maximize implementation of actions with co-benefits such as increased carbon sequestration and biodiversity...enhanced ecosystem health*". The proposal to increase logging to

2.15 billion board feet in ten years clearly will make the goals in the executive order extremely difficult or impossible to achieve.

We urge the Board not to make a decision until after the final FMP is adopted. Thank you for your consideration

Sincerely,

Joe Liebezeit

A handwritten signature in black ink, appearing to read 'Joe Liebezeit', with a large loop at the start and a series of smaller loops and a horizontal line extending to the right.

State Conservation Director
Bird Alliance of Oregon
jliebezeit@birdallianceoregon.org
503-329-6026



To: Chair Kelly, Members of the Board of Forestry, Interim State Forester Skinner
From: Michael Lang, Oregon senior policy manager, Wild Salmon Center
Re: Postpone Adoption of Draft Forest Management Plan Performance Measures
Date: November 14, 2025

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

Wild Salmon Center (WSC) urges you to postpone a decision whether to approve a performance measure increasing timber harvest targets for the next ten years under the draft Western Oregon State Forests Draft Forest Management Plan (FMP). WSC supports a vote on all draft performance measures concurrently with the approval of the final FMP.

The Oregon Department of Forestry (ODF) staff is asking the Board to approve a performance measure to implement the draft FMP, prior to final approval, by establishing decadal and annual timber harvest volumes. The staff recommendation raises several legal, procedural and substantive concerns summarized below.

We ask that you postpone a decision on the proposed draft performance measures for the following reasons:

- I. **The draft performance measure conflicts with state law.** [ORS 526.016](#) prohibits the Board from directing the state forester in matters relating to the geographic scheduling and annual volume of timber sales on state forest lands. The draft performance measure would set annual and decadal harvest levels in violation of this statute.
- II. Adopting performance measures prior to the close of the public comment period for the draft FMP is inappropriate. This would not allow for meaningful engagement with the public related to the draft FMP. It sends the message that the ODF does not appear to value public input on forest management decisions.
- III. Approval of this performance measure to depart from “even flow” of timber harvest and increase logging on state forests would constrain the ability of the Board to amend the draft FMP prior to approval, precluding its ability to improve the draft plan. The Board should delay a decision to adopt performance measures for the FMP until after it votes to adopt a final FMP.
- IV. The staff recommendation is inconsistent with the Governor’s executive order. The order directs the ODF to lead by example, protect key lands and waters, increase transparency, maximize ecological outcomes, take additional measures

INTERNATIONAL HEADQUARTERS

2001 NW 19th Avenue, Suite 200 • Portland, Oregon 97209 USA • Tel: 503.222.1804 • Fax: 503.222.1805
info@wildsalmoncenter.org • wildsalmoncenter.org

by developing and implementing strategies to enhance climate resilience and protect state forests. The state forest HCP, which has been implemented since 2024, is part of the baseline and cannot be relied on to satisfy the Governor's executive order.

- V. The proposed performance measure could result in clearcutting all remaining older forests outside of Habitat Conservation Areas, in direct contradiction to legislature approved [Key Performance Measure 10](#), requiring a minimum of 30% of North Coast state forests to be in complex, layered forest conditions. Currently, only 11.75% of North Coast state forests are in this condition.
- VI. Approving this performance measure would further erode public confidence that the ODF is accountable to the public, the legislature and to current policies requiring the protection of older complex layered forests.
- VII. The Governor is in the process of hiring a new state forester. The Board should delay consideration of performance measures until a permanent state forester is in place so that they're hands are not tied for 10 years by previous decisions.
- VIII. Finally, a vote on November 18 is unnecessary. The staff will have ample time to implement performance measures and develop district implementation plans after final adoption of the FMP.

For these reasons, WSC urges the Board to postpone decisions on performance measures until after the final FMP is adopted.

Thank you for considering these comments.

Sincerely,

Michael Lang
Oregon Senior Policy Manager
Wild Salmon Center

From: [Therese MacGregor](#)
To: [FORESTRY Boardof * ODE](#)
Subject: Don't do additional economic harm to rural communities
Date: Thursday, November 13, 2025 3:09:26 PM

Dear Board of Forestry,

Thank you for the opportunity to comment on the upcoming decision regarding timber harvest levels for state forests.

I urge the Board to select the highest harvest level available within the Department of Forestry's proposed range. Choosing the highest end of that range aligns with historical averages and is essential to maintaining the financial health of both the Department and the counties that depend on timber revenues.

Higher harvest levels will not compromise the conservation goals already achieved under the HCP. In fact, responsible harvest and active forest management strengthen forest health, reduce disease and wildfire risk and support restoration activities — all while sustaining Oregon's rural economies.

Selecting the lower range would deepen existing budget shortfalls, jeopardize local services and force the Department to ask for more General Fund dollars at a time when overall budgets are already strained.

For the sake of balanced management, fiscal responsibility and the long-term vitality of Oregon's forests and communities, please select the highest sustainable harvest level and ensure that those targets are met in practice.

Thank you for your time and consideration.

Sincerely,

Therese MacGregor
1729 Old Stage Road
Central Point, OR 97502-1044
theresem@cbprowest.com
541-840-2708

| Date | Name | Email |
|------------|-------------------|--|
| 11/13/2025 | Jan Songer | team@Speak4.com |
| | Karen Conner | |
| | Jennifer Phillipi | |
| | Robin Bochsler | |
| | Andrea Michaels | |
| | Madelynn Kent | |
| | Hanse Gomes | |
| | John Fullerton | |
| | Jerry Ames | |
| | Jim Benvie | |
| | Matt Bjorn | |
| | Mike Pihl | |
| | Necky Johnson | |
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| | Don Silbernagel | |
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| | Ross Tovey | |
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| | Amanda Tucker | |
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11/14/2025

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11/15/2025

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11/16/2025

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