

To: Oregon Board of Forestry (Board) and Department of Forestry (ODF)
From: Scott Killops
Subject: Public Comment for the Board of Forestry Meeting on February 4-5, 2026
Key Performance Measures
Date: February 1, 2026

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 Retreat to be held February 4-5, 2026](#). My comment regards the Key Performance Measures (KPMs) agenda item.

Context

The [meeting material posted for the Key Performance Measures agenda item](#) dives right into a “Summary of current key performance measures and proposed actions” with no preamble or context. A little context would go a long way to helping the public understand this discussion. I would propose something like this:

[ORS 291.110](#) requires all state agencies to define a set of Key Performance Measures (KPMs) and to submit an Annual Performance Progress Report (APPR) to the [Legislative Fiscal Office \(LFO\)](#). APPRs for years 2016-2025 are posted on the LFO’s [Key Performance Measures](#) web site. This web site also hosts the [Legislative Process for Proposed Changes to KPMs](#) and the [KPM Budget Instruction Timeline](#). Agency requests to add or delete KPMs must be submitted by April 30 of short legislative session years (even years). This agenda item provides a [Summary of current key performance measures and proposed actions](#). The [ODF APPR for Reporting Year 2025](#) is the most recent available. It contains the current ODF KPMs along with a discussion of “Factors Affecting Results” for each KPM.

KPMs Should Reflect the Agency’s Vision and Strategic Plan

KPMs should reflect the agency’s vision and strategic plan. The current Board/ODF [Vision for Oregon’s Forests \(Vision\)](#) contains five priorities:

- Resilient Forests
- Resilient Communities
- Addressing the Wildfire Crisis
- Climate Leadership
- Organizational Excellence

The [Summary of current key performance measures and proposed actions](#) should be evaluated in terms of how well it covers all five of these priorities. There is no current or proposed KPM for Climate Leadership; at least one should be added. More on this below.

Unfortunately, ODF does not have a current strategic plan. However, Governor Kotek expects all agencies to develop and follow a strategic plan (see [Oregon Agency Expectations](#) and “Strategic Planning (due COB June 1, 2026)” on the [Accountability and Governor's Expectations](#) web site). ODF should endeavor to create a strategic plan containing goals that are [Specific, Measurable, Achievable, Relevant, and Timebound \(SMART\)](#). This should be done ASAP and in parallel with developing proposed changes to ODF’s KPMs. KPMs should be a natural reflection of the SMART goals contained in the strategic plan.

Comments on Specific KPMs

Climate Leadership

The Board/ODF [Vision for Oregon’s Forests](#) contains the priority “Climate Leadership”. The ODF [Climate Change and Carbon Plan](#) also contains the vision, “Oregon’s Board of Forestry and Department of Forestry are national leaders in climate-smart and socially equitable forest policies that promote climate health, resilient forests and watersheds, community wellbeing, and a viable forest products industry.” However, there is no current or proposed ODF KPM reflecting the Climate Leadership priority. At least one should be added.

One candidate Climate Leadership KPM could be carbon sequestration and storage in live trees in Oregon State Forests. In the “State Forests Metrics Update” presented and the [Board meeting on November 3, 2021](#), a “Draft: Carbon storage in live trees and harvested wood products” metric was included, but never adopted. (See slides #97-106 in [20211103-bof-presentations.pdf](#)). More recently, the [Western Oregon State Forests Draft Forest Management Plan Scenarios](#) presented at the [Board meeting on November 18, 2025](#), included the draft performance measure “Carbon Sequestration and Storage: Additional carbon stored in aboveground live trees pool”. One of these drafts could be developed into a new ODF KPM.

KPM #10: State Forests North Coast Habitat

KPM #10 is stated as: STATE FORESTS NORTH COAST HABITAT - Complex forest structure as a percent of the State Forests landscape. The target is 30%. [ODF proposes to change this KPM](#) to ““Adaptive Capacity of Forests,” which includes both coarse and fine filter metrics derived from forest inventory. This metric is still in development but would offer a broader view that aligns better with the current focus on resilient landscapes. It would include such things as forest composition (stand age distributions, density etc.), growth rates, and occurrence of legacy structures (large trees, snags).” I am completely opposed to this proposal. I am in favor of retaining KPM #10 as is with no changes.

The current proposed definition for “Adaptive Capacity of Forests” is found in [Western Oregon State Forests Draft Forest Management Plan Scenarios](#): “The average annual growth rates of trees will be stable or increasing compared to the current estimate available”. Recognizing that the new measure is still in development (which makes it hard to comment on), I believe that the current definition of KPM #10 provides a much more useful and actionable measure than the proposed change.

Forest stands with complex structure provide multiple benefits: wildfire resistance, drought resistance, biodiversity, carbon storage, and ecosystem integrity. They are naturally more resilient than less mature

forest stands. It should be ODF's goal to retain and regenerate as much complex forest structure as possible within the constraints imposed by managing for multiple goals and [Greatest Permanent Value \(GPV\)](#).

That said, it appears that ODF has never made a serious effort to achieve KPM #10's target of 30% complex forest structure on the State Forest landscape. KPM #10 has been stuck below 12% since 2018. In the ODF APPRs for this period, the "Factors Affecting Results" listed for KPM #10 states, "Complex forest structure develops very slowly, and it is anticipated to take decades to to achieve the range of 30 to 50% complex structure now described in the forest management plans". It's obvious that it takes decades to establish new complex forest structure. But it's also obvious that ODF could achieve the KPM #10 target more rapidly if they simply stop clear-cutting existing complex forest stands. ODF has not done this. ODF should retain KPM #10 and declare a moratorium on the harvest of existing complex layered stands until the 30% target is reached.

Addressing the Wildfire Crisis and Resilient Communities

Two KPMs are devoted to the Board/ODF Vision priority "Addressing the Wildfire Crisis": KPM #11 – Fire Suppression Effectiveness; KPM #12 – Prevention of Human Caused Wildland Forest Fires. Mitigating the growing risk of catastrophic loss due to wildland fire in the face of climate change will also require more community preparation, especially in the [Wildland Urban Interface \(WUI\)](#). I think that ODF should create a KPM associated with the number or percentage of [Fire Adapted Communities](#), communities with a [Community Wildfire Protection Plan, Firewise USA](#) communities or something similar that indicates community preparedness. This KPM would also address the Board/ODF Vision priority "Resilient Communities".

Reviewing Annual Performance Progress Reports (APPRs)

For three years in a row (2023-2025) the Board has included ODF's Annual Performance Progress Report in the Consent Agenda for the Board's September meeting. The Board generally does not discuss consent agenda items and does not accept public testimony on consent agenda items. In each of these years at least 38% of ODF's KPMs were "in the red" meaning they were missing their targets by at least 15%. I feel strongly that review of ODF APPRs should be a normal Board meeting agenda item so that ODF can explain corrective actions for KPMs that are significantly below target and the public can be afforded an opportunity to comment.

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

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 Retreat on February 4-5, 2026
ODF Plan for a Strategic Plan
Date: January 30, 2026

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 Retreat to be held February 4-5, 2026](#). My comment is a suggestion that the Board add to the Board Retreat agenda a discussion of ODF's plan to create an agency strategic plan.

On January 11, 2023, Oregon Governor Tina Kotek published a letter outlining her [Oregon Agency Expectations](#). These expectations included:

- Agencies are required to develop and follow a strategic plan using goals outlined by the Governor's office.
- Agencies will post strategic plans with dashboards outlining progress on their public facing web sites.
- Agencies with strategic plans older than 36 months should begin a new planning process, using the standardized template format, with a goal of completing their plans by June 1, 2024.

Historically ODF has captured its strategic plans in a document named the [Forestry Program for Oregon \(FPFO\)](#). The most recent version was produced in 2011 and is still identified on the ODF [About the Board of Forestry](#) web page as ODF's Strategic Plan.

In November 2022 ODF formed an FPFO Subcommittee with membership including both ODF staff and Board members to update the FPFO. This subcommittee eventually decided to rename the FPFO the [Vision for Oregon's Forests \(Vision\)](#) and to use this document to satisfy the Governor's expectations for an agency strategic plan. Early drafts of the Vision included both goals and strategies. However, reviewers of the Vision noted that it did not meet the [Department of Administrative Service's \(DAS\) Review Criteria for Agency Strategic Plans](#), because its goals were not Specific, Measurable, Achievable, Relevant, and Timebound (SMART). The subcommittee and Board acknowledged this. The Vision was rebranded a strategic direction, the strategies were removed, and ODF and the Board stated an intention to follow up with a strategic planning process. The [final draft of the Vision](#) was presented to the Board for approval at the [Board's September 4, 2024 meeting](#). The [Staff Report accompanying this agenda item](#) states:

"RECOMMENDATION

The Department recommends the Board adopt the presented version of the Vision for Oregon's Forests (Vision for Oregon Forests_Final for adoption) as the vision and strategic direction for the Board and Department.

Some Board members and public commenters have noted the lack of measurable objectives in the Vision for Oregon's Forests. Without this component, the Vision cannot serve as a functional strategic plan. With the clearer articulation of the purpose of the Vision

1. The Department recommends the Board creates a short-term workgroup with Board and Department representation to determine whether it is necessary to establish overarching, observable and measurable outcomes associated with the goals of the Vision for Oregon's Forests for use in tracking the Board and Department's alignment with their stated shared vision. The workgroup would bring its recommendation to the full Board at its January 2025 meeting."

I don't know whether the workgroup was formed, but its recommendations were not presented to the Board at the [Board meeting on January 8-9, 2025](#). Instead, the [publication version of the Vision was presented for approval as a Consent Agenda item](#). Board member Bob Van Dyk opposed approval on the grounds that the Vision did not satisfy the requirements of a strategic plan. From the [Meeting Summary](#):

"Chair Kelly opened a discussion on agenda item E: Vision for Oregon's Forests. Bob Van Dyk shared concern over "Vision for Oregon's Forests" replacing the strategic plan, "Forestry Program for Oregon", and expressed that "Vision for Oregon's Forests" did not satisfy the requirements of a strategic plan. Chair Kelly invited members of the defunct Forestry Program for Oregon subcommittee to share comments. This included:

- The agency had submitted a different but similar document as its strategic plan to meet requirements of the Governor's office
- The Vision for Oregon's Forests is not intended to be a strategic plan. It operates as a higher-level vision document that can guide the board and agency in its decision making
- There is shared desire for more work to be done in building a strategic plan that offers more details on timelines and goals"

The Vision was approved for publication, but if more work has been done in building a strategic plan it has not been visible to the public. Regarding the first bullet above, in order to satisfy the Governor's expectation for a strategic plan by June 1, 2024, a prerelease version of the Vision was submitted. This version still included strategies, but also the disclaimer that Objectives and Performance/Progress Measures would be "Developed in late 2024-early 2025". This version was included in the [ODF 2025-27 Legislatively Adopted Budget](#) and identified there as "ODF's 2025-2030 Strategic Plan". It is not clear why the Governor's Natural Resources Office accepted this outcome without insisting on and monitoring follow-up work to complete a strategic plan.

Regarding follow-up work, at the [Board meeting on April 23, 2025](#), Acting State Forester Skinner provided a Strategic Planning Update (see slide #3 in [20250423-bof-record-items.pdf](#)). The update included a "Plan for a discussion of high-level concepts at the October retreat". That [Board Retreat was rescheduled to February 4-5, 2026](#), but a discussion of the ODF Strategic Plan is not on the [agenda](#).

To summarize:

- We now have an approved [Vision for Oregon's Forests](#) which is not a strategic plan, but is listed as ODF's strategic plan on the [Oregon Transparency – Strategic Planning](#) web site.
- We have a pre-release version of the *Vision for Oregon's Forests* which is not a strategic plan, but is included in the [2025-27 Legislatively Adopted Budget](#) and identified as the "ODF 2025-2030 Strategic Plan"
- We have both the [Vision for Oregon's Forests](#) and the [Forestry Program for Oregon \(2011\)](#) linked on ODF's [About the Board of Forestry](#) page with the FPFO identified as ODF's strategic plan.
- We don't actually have a current ODF strategic plan, or a plan for a plan, or even a Board Retreat agenda item to discuss a plan for a plan.

Meanwhile, the Governor has updated her expectations. On the [Accountability and Governor's Expectations](#) web site under "Strategic Planning (due COB June 1, 2026)" it states:

- Agencies will develop and follow a strategic plan that also aligns with priorities set forth by the Governor's Office.
- Provide a survey-based progress update on their current strategic plan.
- Email a copy of the current/concluding strategic plan covered by the agency's survey update.
- Email a copy of any new agency strategic plan adopted since June 1 of the prior year (only if applicable).

It will be difficult for ODF to meet the expectations of the second and third bullets since ODF does not have a current strategic plan. However, ODF could still create an updated strategic plan by COB June 1, 2026. The [Accountability and Governor's Expectations](#) web page includes many resources to help them do so. But this will require ODF to create a "plan for a plan" ASAP. For this reason, I suggest that the Board add to the Board Retreat agenda a discussion of ODF's plan to create an agency strategic plan.

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

Respectfully,

Scott Killops

350PDX Forest Defense Team Member