STAFF REPORT

Agenda Item No.:	8
Work Plan:	State Forests Work Plan
Topic:	State Forests Management
Presentation Title:	Western Oregon State Forests Draft Forest Management Plan
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CONTEXT

Forest Management Plans (FMP) provide the overarching management direction for State Forests. These plans are developed pursuant to Oregon Administrative Rule and are approved by the Board of Forestry to codify the Board's finding that management direction in the FMP meets Greatest Permanent Value (OAR 629-035-0020).

After the Board approves a Forest Management Plan, it is required to be adopted as Administrative Rule (OAR 629-035-0030(6)(a)), which requires formal rulemaking under the Administrative Procedures Act (ORS 183.310 – 183.410).

The draft Western Oregon State Forests Management Plan was presented to the Board at its January 2025 meeting to seek consent to initiate rulemaking. This FMP is proposed to replace the current FMPs for the State Forest lands under the Department of Forestry's management in western Oregon. The draft FMP is developed to provide policy direction consistent with the draft Western Oregon State Forests Habitat Conservation Plan (HCP).

Rulemaking

Rulemaking for the FMP is subject to substantial interest and scrutiny from interested parties, including the counties, residents of local communities, recreational users, timber industry, and conservationists. Because of the elevated attention to the FMP, the Department sought to have more robust public involvement and to increase transparency of the FMP and its associated rulemaking process.

With the Board's direction to move forward with the HCP, the Department seeks to implement the FMP and HCP simultaneously. The exact timing of the approval of the HCP by NOAA Fisheries and US Fish and Wildlife Service and the subsequent issuance of the Incidental Take Permits is unknown, but anticipated in summer or early fall of this year.

The State Forests Division initiated the formal rulemaking process on November 1, 2025. Prior to beginning rulemaking, the Division conducted outreach with the nine federally recognized Tribes in Oregon. The rulemaking process included all steps required by the Administrative Procedures Act, including required notifications to stakeholders and the legislature, a public comment period and public hearings. The Department will return to the Board with a summary of the comment received, and the final proposed FMP, which

includes changes recommended to be made based on the comment received. When the expected date of issuance for the Incidental Take Permits is better known, the Department will determine the desired effective date for the new FMP and finalize the rulemaking with the Secretary of State to promulgate the rule consistent with that timeline.

Public Comment Process

The public comment period began on November 1, 2025 and was open through January 31, 2026. Notifications required by the Administrative Procedures Act and a news release were sent on November 1, 2025 to provide the interested public, legislators and others with information about the rulemaking and related comment opportunities. A second news release was sent out on December 29, 2025 to notify about the information session and the public hearings. Four public hearings were held between January 13, 2026 and January 22, 2026. Three of these were held in-person (in Forest Grove, Tillamook, and Eugene) and one was virtual. State Forests Division staff held an information session prior to the first hearing (January 6, 2026) to provide background and context for the plan, a summary of plan content, and to answer questions. A recording of the session was made available on the Department's YouTube channel.

Public Participation and Comment

The information session was open to all but required registration. The registration page was viewed 132 times, resulting in 75 registrations, and 57 attendees. A wide range of stakeholders attended, including representatives of the timber industry and conservation non-governmental organizations, elected officials, state agencies, federal agencies, and the public at-large.

The first public hearing was held virtually. Registration was required and was available starting November 1, 2025. Registration was limited to 50 participants to strike a balance between the length of comment allowed and the number of commenters. Registration filled on January 7th, 2026, and 20 registrants attended the public hearing. A group of stakeholders from Clatsop County, some of whom were not able to register for the hearing, gathered together and joined from a single computer. Twenty-two individuals provided comment, including some who were unable to register ahead of time.

The three in-person hearings were held in Forest Grove, Tillamook, and Eugene. Eleven individuals provided comment in Forest Grove, 15 provided comment in Tillamook, and 31 provided comment in Eugene. Consistent with the information session and virtual hearing, commenters represented a wide range of perspectives and roles. In total 78 individuals provided comment (one commenter spoke at both the virtual and the Eugene hearings).

In total, approximately 2,700 comments were submitted prior to the deadline including verbal testimony, email, and postal mail. The vast majority of comment submitted was emailed, and approximately 89% of the emailed comments were unaltered emails submitted as part of advocacy campaigns.

The Council of Forest Trust Land Counties (CFTLC) submitted a letter (Attachment 1) on behalf of the fifteen counties that receive revenue from State Forest lands. The CFTLC selects members to represent their interests on the Forest Trust Lands Advisory

Committee (FTLAC), which has a statutory relationship to the Board of Forestry and the Department of Forestry. Because of this unique connection, their comments are included as submitted and are not included in the summary. County Commissioners from Columbia, Washington, Tillamook, Clatsop, Lane, Marion, and Coos Counties provided comments, which are included in the summary.

Summary of Public Comment

Comments received have been summarized by major topics. Comments may appear under multiple themes due to the integrated nature of forest management. For example, a commenter may have advocated for an increase of tree age at harvest to provide habitat for species reliant on older forests, while another may have advocated for an increase of tree age at harvest to sequester more carbon. The comment would then appear under both the climate change and wildlife habitat sections to better reflect the full rationale for the suggestion. A broad range of values, beliefs, and recommendations is reflected in the comments received.

All comments received were summarized by major topics/themes (Attachment 2). Comments were not fact checked or otherwise assessed for accuracy or completeness (i.e., statements made by commenters are taken at face value and included in the summary) and no endorsement of any comment is made or implied by the Department in this summary. Evaluation of the comments and recommendations on modifications to the draft FMP will be presented to the Board at a future meeting, as part of a draft final rule that will be subject to a final round of rulemaking prior to Board approval.

Comments are arranged using the following themes:

1. Greatest Permanent Value
2. legal requirements
3. FMP development and public involvement
4. adaptive management
5. cultural and historic resources
6. recreation
7. visual resources
8. timber harvest
9. roads and transportation network
10. labor and employment
11. economic outcomes
12. water quality
13. microclimate
14. climate change
15. habitat
16. forest condition
17. forest health
18. invasive species management
19. fire and fuels management
20. air quality
21. special forest products
22. soils and geology
23. sensitive plants

RECOMMENDATION

Information only.

NEXT STEPS

The State Forests Division will:

1. Return to the Board at its June 2026 meeting to provide recommendations on changes to make to the draft FMP based on the comment, and receive direction from the Board on changes to make to the draft FMP.
2. Re-publish a notice of rulemaking with the Secretary of State to notify interested parties of the final Western Oregon State Forests Management Plan.
3. Return to the Board at its September 2026 meeting for final approval of the FMP.
4. Complete the process with the Secretary of State to adopt the FMP as rule with an effective date that aligns with the issuance of Incidental Take Permits.

ATTACHMENTS

1. Draft Forest Management Plan comments from the Council of Forest Trust Land Counties
2. Summary of public comments

Greatest Permanent Value

1. GPV Statutory Mandate
   1.1. GPV cannot prioritize timber production over other values; all benefits must be delivered across the landscape and over time.
   1.2. GPV requires integrated, enforceable, science-based stewardship.
   1.3. Prioritize economic outcomes and predictable harvests.
   1.4. Prioritize conservation, restoration, climate action, and accountability.
2. Guiding Principle 3
   2.1. This Guiding Principle violates GPV and state law, creating a conflict of interest.
   2.2. Retaining Principle 3 is important to maintain financial self-sufficiency.
3. Climate Change and Carbon Plan
   3.1. Plan must be fully implemented.
   3.2. Climate resilience is a core GPV obligation.
4. Water Quality and Watersheds
   4.1. Recognition of drinking water as a Greatest Permanent Value
5. Economic Arguments
   5.1. Timber revenue remains vital for counties, schools, and rural economies.
   5.2. Do not impose additional harvest restrictions as they would have significant consequences on jobs and local budgets.
   5.3. Active management and predictable harvest levels are critically important.
6. Accountability and Compliance
   6.1. FMP must:
      6.1.1. Require strict adherence to laws and Board-adopted policies.
      6.1.2. Base all actions on best available science.
      6.1.3. Include SMART goals, measurable performance indicators, and transparent reporting.
      6.1.4. Provide for restoration of legacy forests. climate mitigation, fire resiliency, and stewardship for future generations.

6.1.5. Contain transparent enforcement and reporting.

6.2. Revenue Diversification

6.2.1. Obtain/pursue alternative funding mechanisms to reduce reliance on timber receipts to stabilize ODF operations and local services without sacrificing ecological values.

Legal Requirements

1. Compliance with Statutes and Rules
   1.1. The Forest Management Plan (FMP) must comply with:
      1.1.1. ORS 530.050 – Mandates management for Greatest Permanent Value (GPV).
      1.1.2. OAR 629-035-0020 & 0030 – Requires goals, strategies, and measurable outcomes.
      1.1.3. Endangered Species Act (ESA) – Federal and state compliance for listed species.
      1.1.4. Clean Water Act – Protection of impaired watersheds and drinking water sources.
      1.1.5. Forest Practices Act – Maintenance of water resources, air quality, and soil productivity.
2. Best Available Science
   2.1. All actions and decisions must be based on best available science, as required under OAR 629-035-0020(3)(d).
   2.2. The draft FMP contains vague language and lacks scientific justification for goals and strategies.
3. SMART Goals and Accountability
   3.1. Legal requirements call for specific, measurable, achievable, relevant, and time-bound (SMART) goals.
   3.2. Draft FMP lacks enforceable performance measures.
   3.3. FMP is over-reliant on adaptive management without clear triggers or timelines.

3.4. Include Key Performance Measures (KPMs) in the FMP, not just in implementation plans.

3.5. Compliance and progress should be reported.

4. Guiding Principle 3

4.1. Guiding Principle 3, which prioritizes timber revenue for funding, conflicts with GPV and state law.

4.2. Suggested alternatives to timber revenue include carbon credits, recreation fees, and reinstating severance tax.

5. Habitat and Species Protection

5.1. Compliance with federal ESA requires implementation of the Habitat Conservation Plan (HCP) and additional strategies for recovery of 17 imperiled species.

5.2. Failure to meet these obligations could result in legal liability and federal enforcement actions.

6. Water Quality and Drinking Water

6.1. Forest Practices Act and Clean Water Act mandate protection of water resources.

7. Transparency and Public Process

7.1. Legal requirements for public engagement are inadequately met.

7.2. FMP must have:

7.2.1. earlier and more meaningful public input.

7.2.2. Clear documentation of decision-making processes.

7.2.3. Posting of all supporting scientific data and compliance reports.

8. Risks of Non-Compliance

8.1. Litigation from counties, conservation groups, or federal agencies.

8.2. Loss of public trust.

8.3. Delays in plan adoption and implementation.

FMP Development Process and Public Involvement

1. Transparency and Timing
    1.1. Public involvement in the FMP process was not early enough.
    1.2. Public comment periods occurred after major decisions were made, such as submission of the Habitat Conservation Plan (HCP) application.
    1.3. ODF provided limited opportunity for meaningful input to influence policy before finalization.
    1.4. Restructure the public input process to allow earlier engagement during plan drafting and scenario development.
2. Complexity and Accessibility
    2.1. The draft FMP is overly complex and difficult to understand, with:
        2.1.1. Numerous overlapping terms (principles, themes, goals, strategies, guidelines, performance measures).
        2.1.2. Lack of clear relationships between these elements.
    2.2. The FMP should be revised to:
        2.2.1. Be a simplified, well-organized document.
        2.2.2. Contain clear definitions and diagrams explaining the planning and decision-making process.
        2.2.3. Eliminate redundant terminology.
3. Lack of Specificity
    3.1. The draft FMP is vague and non-committal, functioning more like a vision document than a management plan.
    3.2. The draft FMP is missing:
        3.2.1. SMART goals (Specific, Measurable, Achievable, Relevant, Time-bound).
        3.2.2. Enforceable performance measures.
        3.2.3. Clear timelines for implementation.

4. Integration of Existing Policies
    4.1. The FMP fails to fully integrate the Climate Change and Carbon Plan (CCCP), the Governor's Executive Order 25-26 (accelerating climate actions) and the Vision for Oregon Forests.
5. Stakeholder Engagement
    5.1. There should be greater involvement in adaptive management and implementation planning for stakeholder groups, the Tribes, and the Counties.
6. Documentation and Reporting
    6.1. ODF should provide:
        6.1.1. Annual reporting on progress toward goals.
        6.1.2. Public access to scientific data and compliance evaluations.
        6.1.3. Clear explanation of how trade-offs among values (economic, ecological, social) are addressed.
7. Decision-Making Model
    7.1. Figure 4-1 in the draft FMP fails to show relationships among key planning elements.
    7.2. Provide a comprehensive description of the planning and management process early in the document, including:
        7.2.1. How decisions are made.
        7.2.2. How adaptive management will function.
        7.2.3. How performance measures will be applied.
8. Public Sentiment
    8.1. ODF must improve the process, including:
        8.1.1. Earlier, more meaningful public input.
        8.1.2. Transparent decision-making.
        8.1.3. Clear accountability for compliance with laws and policies.
    8.2. ODF has moved goalposts and ignored public feedback in the past, resulting in distrust.

Adaptive Management

1. General Support for Adaptive Management
   1.1. Adaptive management is:
      1.1.1. an important concept for responding to uncertainty and changing conditions in forest ecosystems.
      1.1.2. Critically important to incorporate monitoring, research, and feedback loops into decision-making.
2. Criticism of Current Draft
   2.1. The draft FMP references adaptive management but fails to provide clear, enforceable processes.
   2.2. The draft FMP lacks specific performance measures to evaluate success.
   2.3. There is an over-reliance on vague language like “consider trade-offs.”
   2.4. Adaptive management is presented as a future mechanism, rather than integrated into current planning.
3. Recommendations for Improvement
   3.1. Adaptive management should be tied to specific, measurable, achievable, relevant, and time-bound goals.
   3.2. Require public reporting of monitoring results and adaptive changes.
   3.3. Adaptive management must use best available science, not discretionary judgment.
   3.4. Include adaptive management in Key Performance Measures (KPMs).
   3.5. Link adaptive strategies to measurable outcomes for biodiversity, water quality, and carbon storage.
4. Stakeholder Engagement
   4.1. The Department should have early and meaningful involvement of stakeholders in adaptive management processes.
   4.2. Include industry in decision-making to ensure operational feasibility.

4.3. Ensure the Department obtains public input before major adaptive changes are implemented.

5. Legal Compliance
   5.1. Adaptive management must comply with OAR 629-035-0030 (FMP Planning rule), which requires:
      5.1.1. Monitoring and research to validate assumptions.
      5.1.2. Adjustments based on scientific evidence.
   5.2. The current draft does not meet these legal requirements.
   5.3. Without clear guidelines, adaptive management could:
      5.3.1. Allow unlimited discretion to ODF.
      5.3.2. Undermine accountability for achieving Greatest Permanent Value (GPV).
      5.3.3. Delay implementation of critical conservation and climate strategies.
   5.4. Develop a formal Adaptive Management Plan (AMP) linked to the FMP. This plan must include:
      5.4.1. Triggers for change (e.g., failure to meet habitat targets).
      5.4.2. Monitoring protocols for forest health, water quality, and species recovery.
      5.4.3. Reporting timelines for transparency.

Cultural and Historic Resources

1. Recognition of Tribal Rights and Cultural Values
   1.1. State Forests are ancestral lands for Oregon Tribes and hold significant cultural, spiritual, and subsistence value.
   1.2. FMP should include explicit recognition of tribal sovereignty and treaty rights.
   1.3. FMP must protect cultural resources, including archaeological sites, traditional use areas, and sacred landscapes.
2. Criticism of Current Draft
   2.1. The draft FMP is criticized for:
      2.1.1. Insufficient mention of tribal engagement.

2.1.2. Lack of clear strategies for protecting cultural resources.

2.1.3. Failure to integrate tribal perspectives into planning and adaptive management processes.

3. Recommendations for Tribal Engagement
   3.1. Establish formal consultation protocols with Tribes during plan development, implementation, and adaptive management reviews.
   3.2. Include Tribes in decision-making bodies or advisory committees.
   3.3. Provide early and meaningful involvement, not just late-stage comment opportunities.
4. Cultural Resource Protection
   4.1. ODF must complete comprehensive mapping and inventory of cultural sites in state forests.
   4.2. ODF must ensure confidential handling of sensitive information to prevent site disturbance.
   4.3. Avoidance of logging, road building, or other disruptive activities near cultural resources.
   4.4. Incorporate Traditional Ecological Knowledge (TEK) into forest management strategies.
5. Integration with GPV
   5.1. Cultural values should be explicitly recognized as part of Greatest Permanent Value (GPV) alongside ecological, social, and economic benefits.
   5.2. Cultural resources are non-timber assets that require equal consideration in planning and performance measures.
   5.3. Develop respectful, collaborative relationships with Tribes.
   5.4. Recognize forests are cultural landscapes, not just timber assets.
   5.5. Ensure inclusion of tribal voices in shaping Oregon's forest future.
6. Economic and Social Dimensions
   6.1. Tribal engagement linked to:
      6.1.1. Opportunities for co-management agreements.

6.1.2. Employment in restoration and monitoring projects.

6.1.3. Development of cultural tourism and educational programs.

7. Accountability and Reporting

7.1. Provide annual reporting on tribal engagement and cultural resource protection.

7.2. Ensure public transparency on consultation outcomes.

7.3. Ensure adaptive management triggers are in place if cultural resource protection goals are not met.

Recreation

1. Recreation as a Core Value

1.1. Recreation, including hiking, camping, backpacking, wildlife viewing, fishing, foraging, and educational programs, is a fundamental benefit of state forests, alongside wildlife habitat, clean water, scenic vistas, and climate resilience.

1.2. Forests are public trust resources essential for mental and physical health, community well-being, and Oregon's identity.

2. Criticism of Current Management

2.1. The draft FMP prioritizes timber revenue over recreation and other non-timber values.

2.2. Guiding Principle 3 undermines recreation and conservation goals in favor of timber harvest.

2.3. Clearcutting and industrial-scale logging reduce scenic quality, harm biodiversity and ecosystem health, and negatively impact tourism and outdoor recreation experiences.

3. Recommendations for Recreation Protection

3.1. Halt clearcutting of mature/complex forests until at least 30% of North Coast forests meet mature forest conditions.

3.2. Restore mature forests to enhance recreation, biodiversity, and climate resilience.

3.3. Expand non-motorized recreation opportunities (hiking, biking, camping) and protect trails from logging impacts.

3.4. Align the FMP with other plans including, the 2023–2026 Recreation Strategic Plan, the Recreation Operations Plan, the Integrated Recreation Master Plan, the Interpretive Master Plan, and the Tillamook Forest Center maintenance and visitor engagement strategies.

4. Recreation and Economic Value

4.1. Recreation contributes to the local tourism economy, providing long-term economic benefits that rival or exceed timber revenue.

4.2. The outdoor recreation industry in Oregon supports tens of thousands of jobs and millions in tax revenue, especially in coastal counties.

4.3. Conserved forests correlate with faster community wealth growth, while heavy logging depresses local economies.

5. Accountability and Planning

5.1. The plan should have measurable, time-bound goals for recreation in the FMP.

5.2. Produce maps of recreation resources, scenic classifications, and visual resource management standards.

5.3. Track and publicly report recreation benefits as part of forest management outcomes.

6. GPV Context

6.1. Providing for recreation will help to contribute to clean water (for fishing, swimming), wildlife recovery (for viewing and ecological integrity), and climate resilience (healthy forests for future generations).

6.2. Protecting recreation requires ecological forest management, longer harvest rotations, and reduced clearcutting.

6.3. Prioritize recreation, ecological integrity, and public access over short-term timber profits.

6.4. Recreation is a public trust benefit, integral to Oregon's heritage and future generations' well-being.

Visual Resources

1. Importance of Visual Quality
    1.1. Visual resources—scenic beauty, landscape aesthetics, and viewsheds—are integral to Greatest Permanent Value (GPV).
    1.2. Forests provide:
        1.2.1. Scenic vistas for recreation and tourism.
        1.2.2. Cultural and spiritual value tied to natural beauty.
        1.2.3. Economic benefits through outdoor recreation and travel.
2. Impacts of Current Forestry Practices
    2.1. Industrial-scale clearcutting:
        2.1.1. Creates large, visually disruptive clearings visible from highways, trails, and recreation sites.
        2.1.2. Reduces the scenic quality of state forests, which affects tourism and public enjoyment.
    2.2. Visual degradation undermines recreation and community well-being.
3. Recommendations for Visual Resource Management
    3.1. Avoid clearcutting near high-visibility areas, such as scenic highways, popular recreation trails, and campgrounds and viewpoints.
    3.2. Implement visual resource management standards, including:
        3.2.1. Retention of legacy trees and buffers along roads and trails.
        3.2.2. Smaller, irregular harvest units to mimic natural patterns.
        3.2.3. Longer rotations to maintain canopy continuity.
    3.3. Develop mapping and classification of scenic areas to guide harvest planning.
4. Integration with Recreation and Tourism
    4.1. Visual quality is directly tied to:
        4.1.1. Outdoor recreation experiences (hiking, camping, wildlife viewing).
        4.1.2. Tourism revenue for rural communities.

4.2. Scenic integrity should be treated as an economic asset, not just an aesthetic consideration.

5. Accountability and Monitoring
   5.1. Incorporate visual resource metrics into Key Performance Measures (KPMs).
   5.2. Report on scenic impacts of harvest activities.
   5.3. Implement adaptive management triggers if scenic quality declines.
6. GPV Context
   6.1. Visual resources are linked to:
      6.1.1. Cultural values (sense of place, heritage).
      6.1.2. Mental health and well-being (natural beauty as a public health benefit).
      6.1.3. Climate and ecological integrity, as visually intact forests often correlate with healthy ecosystems.

Timber Harvest

1. Clearcutting and Mature Forests
   1.1. Cease clearcutting, especially in mature and legacy forests (>80 years old).
   1.2. Instate a moratorium on harvesting complex layered stands until at least 30% of state forests meet mature forest conditions, as required by existing rules.
   1.3. Clearcutting is viewed as harmful to biodiversity, water quality, climate resilience, and scenic/recreational values.
2. Rotation Length and Harvest Practices
   2.1. Recommendations to extend harvest rotations to 80–120 years to:
      2.1.1. Increase carbon sequestration.
      2.1.2. Improve habitat for endangered species.
      2.1.3. Reduce wildfire risk compared to short-rotation plantations.
   2.2. Use variable retention harvests and ecological forestry practices instead of large-scale clearcuts.
   2.3. Retain legacy trees and structural diversity during harvest operations.

3. Revenue
   3.1. Retain Guiding Principle 3, which prioritizes timber revenue to fund ODF operations.
   3.2. Delete or amend Guiding Principle 3, because it creates a conflict of interest and prioritizes logging over other values (water, wildlife, recreation).
   3.3. Use alternative funding mechanisms (e.g., carbon credits, severance tax reinstatement) to reduce reliance on timber revenue.
4. Performance Measures and Targets
   4.1. The draft FMP lacks clear, enforceable harvest targets and SMART goals.
   4.2. Establish explicit harvest volume benchmarks for predictability and economic stability.
   4.3. Do not establish any performance measure that accelerates harvest in the short term or segments forests into “sacrifice zones” for timber production.
5. Economic and Social Considerations
   5.1. Timber harvest revenue is essential for funding ODF operations and supporting rural economies and public services (schools, emergency services).
   5.2. Additional timber harvest restrictions will lead to job losses and budget shortfalls in rural communities.
6. Salvage Logging and Post-Disturbance Management
   6.1. Conduct active management after disturbances (fire, windthrow), including salvage logging and rapid reforestation.
   6.2. Do not conduct salvage logging in sensitive areas (e.g., HCAs, steep slopes), as this will result in erosion and habitat loss.
7. Carbon and Climate
   7.1. Harvest results in carbon benefits from sequestration in finished wood products and substitution for carbon-intensive materials.
   7.2. Short-rotation harvests result in net carbon emissions; ODF should use longer rotations and protect older forests.

Roads and Transportation Network

1. Scope and Impact of Road Network
    1.1. Oregon state forests contain over 4,300 miles of roads these are a major source of:
        1.1.1. Sediment delivery to streams, impairing water quality and aquatic habitat.
        1.1.2. Fragmentation of wildlife habitat, reducing connectivity for species like the northern spotted owl and marbled murrelet.
        1.1.3. Increased landslide risk on steep slopes after logging.
    1.2. Roads are linked to higher maintenance costs and long-term ecological degradation.
2. New Road Construction
    2.1. Do not build new permanent roads, especially in:
        2.1.1. Habitat Conservation Areas (HCAs).
        2.1.2. Riparian Conservation Areas (RCAs).
        2.1.3. Steep, erosion-prone terrain.
    2.2. Expanding the road network contradicts goals for water quality, habitat protection, and climate resilience.
3. Road Management
    3.1. Decommission unnecessary roads to reduce sedimentation and restore hydrological function.
    3.2. Prioritize road removal or stabilization in impaired watersheds.
    3.3. Implement best management practices (BMPs) for erosion control, fish passage improvements, and stormwater management.
    3.4. Require environmental impact assessments before any new road construction.
4. Transportation and Access
    4.1. maintain limited road access for recreation and emergency response; however,
        4.1.1. Roads should be minimized and strategically located.
        4.1.2. Avoid roads near sensitive habitats and drinking water sources.
    4.2. Implement seasonal closures to reduce erosion during wet periods.

5. Climate and Fire Considerations
   5.1. Roads can act as fire breaks, but also increase human ignition risk.
   5.2. Integrate road planning with fire management strategies, ensuring roads do not exacerbate wildfire vulnerability.
6. Accountability and Monitoring
   6.1. All existing and proposed roads should be mapped and disclosed.
   6.2. Monitoring sediment delivery and habitat fragmentation impacts.
   6.3. Including road-related metrics in Key Performance Measures (KPMs) for forest health and water quality.
7. GPV Context
   7.1. Roads are a legacy issue from decades of industrial forestry.
   7.2. Reduce road density and restore natural landscapes to improve water quality, wildlife connectivity, and scenic and recreational values.

Labor and Employment

1. Economic Importance of Timber
   1.1. Timber harvest revenue is a primary funding source for ODF and counties:
      1.1.1. Clatsop County receives $22–$25 million annually.
      1.1.2. 98% of state timber sales finance ODF; revenue split: 63.75% to counties, 36.25% to state.
   1.2. Timber-dependent communities rely on harvests for:
      1.2.1. Public services (schools, emergency response).
      1.2.2. Family-wage jobs in mills, trucking, and forestry operations.
2. Employment Statistics and Trends
   2.1. Forestry sector supported 8,869 jobs in 2021.
   2.2. Outdoor recreation sector supported 44,575 jobs in 2022, generating:
      2.2.1. $1.756 billion in income.
      2.2.2. $380 million in taxes.

2.3. Workforce stability is critical; reduced harvest means fewer jobs and less opportunity for rural and Hispanic workers.

2.4. The Oregon Forest Operations and Management Workforce Study shows:

2.4.1. Workforce is aging; ~3,400 new workers needed annually.

2.4.2. Hispanic workers make up a significant share of forestry support roles.

2.5. Treat workforce stability as a real impact.

2.6. Evaluate equity implications of harvest reductions.

2.7. Mill closures (7 in 2024) highlight volatility in timber-dependent employment.

3. Rural Economic Concerns

3.1. Reductions in timber harvest threaten County budgets, ODF financial self-sufficiency, employment stability in rural communities.

3.2. Predictable harvest levels are critical to sustain jobs and revenue.

4. Guiding Principle 3

4.1. Principle 3 (timber revenue funding) prioritizes logging over ecological and social values.

4.2. Diversify funding sources through carbon credits, recreation fees, restoration jobs, and reinstating severance tax.

5. Conservation Perspective

5.1. Clearcutting harms biodiversity, water quality, and climate resilience. Restoration and conservation can create alternative employment opportunities in watershed restoration, recreation infrastructure, and ecological monitoring.

6. Climate and Social Costs

6.1. Logging releases up to 85% of tree carbon, with estimated social costs of $34,000–$100,000 per truckload.

6.2. Forests' role in carbon sequestration and climate resilience seen as critical for long-term economic stability.

7. GPV Context

7.1. Outdoor recreation and tourism are increasingly important for job creation and rural economic diversification.

Economic Outcomes

1. Importance of Timber Revenue
   1.1. Timber harvest revenue is currently the primary funding source for ODF operations and is important for counties, schools, and local taxing districts.
   1.2. Revenues to the Counties from state forest timber sales support essential services like education, emergency response, and infrastructure.
   1.3. Predictable timber harvest levels are critical for economic stability and sustaining rural jobs.
2. Economic Impact of Harvest Restrictions
   2.1. Additional conservation set-asides or harvest reductions could lead to mill closures and job losses, and reduce county revenue, impacting public services.
   2.2. ODF must remain financially self-sufficient without shifting costs to taxpayers.
3. Broader Economic Analysis
   3.1. Ecosystem services, recreation, and climate resilience provide long-term economic benefits that outweigh short-term timber revenue.
   3.2. Outdoor recreation and tourism linked to healthy forests are cited as major contributors to Oregon's economy.
   3.3. ODF must determine the value of non-timber assets (water, carbon, habitat, recreation) and annual reporting of their economic contribution.
4. Performance Measures and Predictability
   4.1. Set clear harvest volume targets and performance measures to ensure predictability for planning and investment.
   4.2. Do not adopt any performance measures that accelerate short-term harvests or segment forests into "sacrifice zones."
5. Funding for Restoration and Climate Goals
   5.1. Restoration projects, climate adaptation, and species recovery require stable funding streams.
   5.2. Leveraging carbon markets for additional revenue.

5.3. Seek state legislative support for alternative funding mechanisms.

6. Economic Equity and Rural Communities
   6.1. Timber revenue is essential for economic equity in rural Oregon, where alternative revenue sources are limited.
   6.2. Overharvesting harms long-term community wealth and resilience, studies link heavy logging to slower economic growth.
7. Risks of Current Funding Model
   7.1. Heavy reliance on timber revenue creates:
      7.1.1. Pressure for short-rotation clearcutting.
      7.1.2. Vulnerability to market fluctuations.
      7.1.3. Legal and reputational risks if ecological mandates are ignored.

Water Quality

1. Drinking Water Concerns
   1.1. Western Oregon state forests supply clean water to over 500,000 residents.
   1.2. Older forests provide higher-quality, more reliable water flows, while clearcutting reduces streamflow by 25–50%, increasing treatment costs for communities.
   1.3. Drinking water should be explicitly recognized as a Greatest Permanent Value (GPV) in the Forest Management Plan (FMP).
   1.4. Prohibit clearcutting in drinking watersheds.
   1.5. Communities impacted by forestry activities should be notified and compensated.
   1.6. Air and water quality should be monitored to track contamination risks.
2. Watershed Management
   2.1. 46% of watersheds in Clatsop County are impaired under the Clean Water Act.
   2.2. Develop restoration plans for impaired watersheds with measurable goals.
   2.3. Include strategies to restore water quality for salmon and aquatic species within 10 years.

2.4. Implement strategies that focus on improving hydrological connectivity and protection of headwaters.

3. Aquatic Habitat Protection
   3.1. Prioritize recovery of salmon and other aquatic species.
   3.2. Expand riparian buffers beyond current standards.
   3.3. Reduce chemical runoff from herbicides and pesticides.
   3.4. FMP should include specific strategies for recovery of 17 imperiled species, going beyond the Habitat Conservation Plan (HCP).
4. Pollution and Chemical Use
   4.1. Logging and aerial spraying will result in sedimentation and chemical contamination.
   4.2. Minimize or eliminate pesticide/herbicide use, especially near streams and drinking water sources.
   4.3. Adopt mechanical vegetation control where feasible.
5. Regulatory and Legal Compliance
   5.1. The FMP must comply with the Clean Water Act, the Endangered Species Act (ESA), and the Oregon Forest Practices Act.
   5.2. Management should be conducted with accountability, transparency, and science-based management.
6. Economic and Social Dimensions
   6.1. The external costs of water degradation, habitat loss, and climate impacts outweigh benefits of harvest.
   6.2. Diversify funding sources, such as carbon credits, recreation fees, and severance tax.
7. Restoration Targets
   7.1. Halt clearcutting of complex stands until ≥30% mature/complex forest condition is achieved.
   7.2. Develop watershed restoration plans with 10-year goals for water quality and aquatic species recovery.

Microclimate

1. Role of Mature Forests in Climate and Weather Regulation
    1.1. Mature and old-growth forests (currently <14% remaining) are critical for:
        1.1.1. Microclimate stability: buffering temperature extremes and maintaining humidity.
        1.1.2. Rainfall interception and inland moisture transport: forests contribute to ~40% of inland rainfall through evapotranspiration and condensation processes.
        1.1.3. Carbon sequestration and climate resilience: large trees and intact soils store significant carbon, reducing greenhouse gas impacts.
        1.1.4. Achieve ≥30% mature forest cover to restore ecological balance and climate functions.
2. Impacts of Clearcutting and Plantation Forestry
    2.1. Clearcutting and short-rotation plantations:
        2.1.1. Increase erosion and sedimentation.
        2.1.2. Raise stream temperatures by ~15% and peak flows by ~20%.
        2.1.3. Reduce summer streamflow by 25–50%, diminishing water availability.
        2.1.4. Lower rainfall retention and resilience, amplifying drought, flood, and fire risks.
    2.2. Clearcutting and short-rotation plantation practices disrupt hydrological cycles and degrade local weather moderation.
3. Scientific Evidence on Forest Loss and Rainfall
    3.1. Research cited in comments (Makarieva, Sheil, Ellison, Bunyard, Herrera-Estrada) supports the “biotic pump” theory, which finds forest loss:
        3.1.1. Reduces inland rainfall.
        3.1.2. Alters atmospheric moisture transport.
        3.1.3. Propagates drought and destabilizes regional weather patterns.

3.2. Satellite data show that deforestation erodes low-pressure zones critical for coast-to-interior moisture flow.

4. Climate Resilience and Microclimate Benefits
   4.1. Mature forests resist wildfire and disease better than plantations.
   4.2. Mature forests provide fog interception and mist capture, increasing precipitation during dry seasons.
   4.3. Plantations are less resilient to climate variability.
   4.4. Plantations are more vulnerable to extreme weather events.

Climate Change and Carbon Sequestration

1. Climate Change as a Central Theme
   1.1. Forest management is critical for climate mitigation, influencing carbon sequestration, water quality, biodiversity, and resilience.
   1.2. Manage under climate-smart forestry, by using longer harvest rotations, less clearcutting, and protect mature and old-growth forests.
2. Mature Forest Protection
   2.1. Mature forests are superior carbon sinks, and provide greater carbon storage, improved water regulation, and enhanced biodiversity and fire resistance.
   2.2. Halt clearcutting until ≥30% of North Coast forests reach complex structure (current coverage is <14%).
3. Critique of Current FMP
   3.1. The draft Forest Management Plan:
      3.1.1. Lacks specific, measurable goals.
      3.1.2. Has insufficient accountability and scientific grounding.
      3.1.3. Has vague principles (especially Principle 3) that prioritize timber revenue over ecological values.
4. Water Resources
   4.1. Nearly half of North Coast/Clatsop County streams are impaired.

4.1.1. Need to develop restoration plans for impaired watersheds.

4.1.2. Add minimum 50-ft no-cut buffers along streams.

4.1.3. Reduce pesticide/herbicide use.

5. Carbon and Climate Resilience
   5.1. Oregon's annual CO_2 removal dropped 38% from 1990–2024.
   5.2. Establish carbon market programs.
   5.3. Set measurable carbon sequestration targets.
   5.4. Extend harvest rotations to maximize carbon storage.
6. Restoration and Ecological Priorities
   6.1. Adopt new silvicultural approaches, such as: Variable retention harvesting, mixed-species replanting, assisted migration, and soil health protection.
   6.2. Recognize and protect non-timber asset values (carbon, water, habitat, recreation).
7. Paradigm Shift in Management
   7.1. End industrial clearcutting.
   7.2. Restore balance between economic and ecological goals.
   7.3. Prioritize forests' multi-benefit public value for climate resilience and biodiversity.

Habitat

1. Central Role of Habitat Protection
   1.1. Habitat protection must be a core priority.
   1.2. Halt clearcutting of mature and legacy forests and restore ≥30% of North Coast forests to complex, layered conditions (current coverage is <14%).
   1.3. Prioritize ecological values over timber revenue.
   1.4. Logging must not override habitat, water, climate, and recreation values.
   1.5. Current approach to ESA compliance violates state law.
2. Habitat Conservation Plan (HCP)
   2.1. Support for the HCP as necessary for compliance with the Endangered Species Act.

2.2. The FMP must add specific recovery strategies beyond HCP commitments.

3. Aquatic Habitat
   3.1. Develop restoration plans for impaired watersheds.
   3.2. Restore water quality for salmon and aquatic species within 10 years.
   3.3. Increase stream buffers to protect riparian habitat.
   3.4. Implement Governor's Executive Order to provide habitat resiliency.
   3.5. Emulate natural disturbances.
   3.6. Use long rotations.
   3.7. Conduct variable retention harvesting.
   3.8. Retain legacy trees.
   3.9. Minimize pesticides/herbicides.
4. Accountability and Transparency
   4.1. Develop and use enforceable standards.
   4.2. Engage with the public and tribes.
   4.3. Conduct annual asset valuation for water, habitat, carbon, and recreation.
5. Forest Management
   5.1. ODF ignores mature forest protection rules.
   5.2. Industrial clearcutting linked to:
      5.2.1. Erosion.
      5.2.2. Increased wildfire risk.
      5.2.3. Water loss.
      5.2.4. Habitat destruction.
   5.3. Shift from timber-centric management to balanced, science-driven stewardship.
6. Intersectional Forest Values
   6.1. Habitat protection tied to improvements in biodiversity, carbon sequestration, water filtration, recreation and scenic vistas, climate mitigation, community health, and intergenerational equity.

Forest Condition

1. Current Forest Condition
    1.1. Concern that state forests are dominated by young, even-aged plantations due to decades of short-rotation clearcutting.
    1.2. Mature and complex forest stands make up less than 14% of the landscape, far below ecological targets. This condition is linked to:
        1.2.1. Reduced biodiversity.
        1.2.2. Lower carbon storage capacity.
        1.2.3. Degraded water quality and hydrological function.
        1.2.4. Increased vulnerability to wildfire, pests, and disease.
2. Desired Future Condition
    2.1. Restore forests to complex, multi-layered structures that emulate natural disturbance patterns.
    2.2. Achieve ≥30% mature/complex forest cover across the landscape, and increased species diversity and structural complexity.
    2.3. Forest condition should reflect Greatest Permanent Value (GPV) principles, balancing ecological, social, and economic benefits.
3. Impacts of Current Management
    3.1. Short-rotation clearcutting and monoculture plantations:
        3.1.1. Simplify forest structure.
        3.1.2. Reduce habitat for imperiled species (e.g., northern spotted owl, marbled murrelet).
        3.1.3. Increase erosion and sedimentation in streams.
        3.1.4. Lower resilience to climate change and extreme weather events.
    3.2. Heavy reliance on herbicides degrades soil health and aquatic ecosystems.
4. Improve Forest Condition
    4.1. Implement Ecological Forestry Practices:
        4.1.1. Longer harvest rotations (80–120 years).

4.1.2. Variable retention harvesting.

4.1.3. Retention of legacy trees and snags.

4.1.4. Mixed-species planting and assisted migration for climate adaptation.

4.2. Reduce Chemical Use:

4.2.1. Phase out aerial herbicide spraying.

4.2.2. Adopt mechanical vegetation control where feasible.

4.3. Soil and Hydrology Protection

4.3.1. Avoid ground-based yarding on sensitive soils.

4.3.2. Maintain riparian buffers and minimize road density.

5. Monitoring and Accountability

5.1. Establish baseline mapping of current forest condition (age classes, structural complexity).

5.2. Develop measurable performance indicators for mature forest coverage, biodiversity, and soil and water health.

5.3. ODF should provide a report and use adaptive management triggers if targets are not met.

6. Integration of Forest Condition

6.1. Wildlife habitat: Complex forests support imperiled species.

6.2. Water quality: Healthy forests regulate streamflow and reduce sedimentation.

6.3. Carbon sequestration: Mature forests store more carbon than plantations.

6.4. Recreation and aesthetics: Diverse forests enhance scenic and recreational value.

Forest Health

1. Definition and Importance

1.1. Forest health is broadly defined in comments as the ability of forests to maintain ecological integrity, resilience to disturbance, and provision of ecosystem services (water, carbon storage, biodiversity).

1.2. Forest health must be prioritized over short-term timber revenue to achieve Greatest Permanent Value (GPV).

2. Current Practices
   2.1. Industrial-scale clearcutting and short-rotation plantations are detrimental to forest health, causing:
      2.1.1. Loss of structural complexity and biodiversity.
      2.1.2. Increased vulnerability to pests, disease, and wildfire.
      2.1.3. Soil compaction and erosion, reducing productivity and water retention.
   2.2. Reliance on herbicides degrades forest ecosystems and aquatic habitats.
3. Improving Forest Health
   3.1. Implement:
      3.1.1. Longer harvest rotations (80–120 years).
      3.1.2. Variable retention harvesting instead of clearcutting.
      3.1.3. Retention of legacy trees and biological diversity.
      3.1.4. Mixed-species planting and assisted migration for climate adaptation.
   3.2. Reduce Chemical Use:
      3.2.1. Phase out/cease use of aerial herbicide spraying.
      3.2.2. Adopt mechanical vegetation control where feasible.
   3.3. Soil Protection:
      3.3.1. Avoid ground-based yarding on sensitive soils.
      3.3.2. Use cable systems to minimize compaction.
   3.4. Fire and Climate Resilience:
      3.4.1. Maintain canopy cover to reduce wildfire risk.
      3.4.2. Incorporate hardwood species (e.g., alder) for natural fire breaks and nitrogen fixation.
4. Monitoring and Adaptive Management
   4.1. Forest health goals should be measurable and enforceable, including:
      4.1.1. Targets for complex forest structure (≥30% coverage).
      4.1.2. Indicators for soil productivity, water quality, and species diversity.

4.2. Adaptive management must include clear triggers for corrective action and public reporting.

5. Integration with Other Values
   5.1. Forest health is linked to:
      5.1.1. Water quality: Healthy forests regulate streamflow and reduce sedimentation.
      5.1.2. Wildlife habitat: Structural complexity supports imperiled species.
      5.1.3. Carbon sequestration: Mature forests store more carbon than plantations.
      5.1.4. Recreation and aesthetics: Healthy forests enhance scenic and recreational value.
6. Economic Context
   6.1. Prioritizing forest health supports long-term economic stability through recreation and tourism, carbon markets, and reduced costs for water treatment and wildfire suppression.
   6.2. Overharvesting and poor forest health are short-sighted and economically risky.
7. Accountability
   7.1. FMP must comply with OAR 629-035-0030, which requires strategies to maintain soil productivity and biodiversity.
   7.2. Transparent reporting on forest health indicators.
   7.3. Integration of forest health metrics into Key Performance Measures (KPMs).

Invasive Species Management

General

1. Threat of Invasive Species
   1.1. Invasive plants and animals are a major ecological concern for state forests.
   1.2. Invasive species degrade:
      1.2.1. Native plant communities
      1.2.2. Wildlife habitat
      1.2.3. Water quality
      1.2.4. Forest regeneration and resilience

2. Recommended Management Actions
    2.1. Early Detection and Rapid Response (EDRR):
        2.1.1. Implement proactive monitoring to identify new invasions quickly.
        2.1.2. Develop rapid response protocols for containment and eradication.
    2.2. Integrated Pest Management (IPM):
        2.2.1. Use a combination of mechanical, chemical, and biological control methods.
        2.2.2. Minimize herbicide use where possible; prioritize non-chemical approaches.
    2.3. Restoration after removal:
        2.3.1. Replant native species to prevent reinvasion and restore ecological function.
    2.4. Prioritization:
        2.4.1. Focus on high-risk areas such as riparian zones, disturbed sites, and roadsides.
    2.5. Coordination and Partnerships
        2.5.1. Collaborate with:
            2.5.1.1. Tribal Nations
            2.5.1.2. Local watershed councils
            2.5.1.3. State and federal agencies
            2.5.1.4. Nonprofits and community groups
        2.5.2. Use regional coordination to prevent cross-boundary spread.
    2.6. Funding and Resources
        2.6.1. Allocate dedicated funding for invasive species management.
        2.6.2. Explore grants and partnerships to support monitoring and treatment programs.
    2.7. Include SMART goals for invasive species control in the FMP.
    2.8. Annual reporting on acres treated, species targeted, success rates of eradication efforts
3. GPV Context
    3.1. Invasive species management affects
        3.1.1. Climate resilience (invasives often thrive under changing conditions)
        3.1.2. Wildfire risk reduction (some invasives increase fuel loads)
        3.1.3. Habitat restoration for threatened species

<u>Barred Owl</u>

1. Barred Owl Threat
    1.1. Barred owls as a major threat to northern spotted owls, which are federally listed as threatened.

1.2. Barred owls outcompete spotted owls for habitat and food, accelerating population decline.

2. Integration with Habitat Conservation Plan (HCP)
   2.1. The FMP and HCP must explicitly address barred owl management as part of species recovery strategies.
   2.2. The current draft is insufficient due to a lack of clear actions or funding commitments for barred owl control.
3. Recommended Management Actions
   3.1. Implement an active removal program (lethal control) with priority in spotted owl habitat areas.
   3.2. Do not implement an active removal program for control of barred owls.
   3.3. Monitor barred owl populations and impacts on spotted owls.
   3.4. Collaborate with U.S. Fish and Wildlife Service (USFWS) and other agencies for coordinated management.
   3.5. Use an adaptive management approach: adjust strategies based on monitoring results.
4. Funding and Resources
   4.1. Allocate dedicated funding for barred owl management, separate from timber revenue.
   4.2. Leverage federal grants and partnerships for implementation.
5. Accountability and Reporting
   5.1. Report on barred owl control efforts and spotted owl population trends.
   5.2. Include SMART goals (specific, measurable, achievable, relevant, time-bound) for barred owl management in the FMP.
6. Legal Context
   6.1. Barred owl management is critical for compliance with Endangered Species Act (ESA) obligations.
   6.2. Failure to address barred owls could undermine the effectiveness of habitat protections and the overall conservation strategy.

Fire/Fuels Management

1. Fire Risk and Forest Structure
    1.1. Older, complex forests are naturally more fire-resistant than young, dense plantations.
    1.2. Clearcutting and short-rotation plantations increase fire risk by:
        1.2.1. Creating large areas of exposed soil and slash.
        1.2.2. Reducing canopy cover, which accelerates drying.
        1.2.3. Increasing fuel loads and continuity across landscapes.
2. Recommendations for Fire Resilience
    2.1. Maintain canopy closure (>75%) to reduce wildfire ignition and spread.
    2.2. Promote mixed-species stands, including hardwoods like alder, which act as natural fire breaks and improve soil moisture retention.
    2.3. Avoid large-scale clearcuts, which create conditions for hotter, more destructive fires.
3. Climate Change and Fire
    3.1. Climate change is expected to increase wildfire frequency and severity, making proactive management essential.
    3.2. Climate-smart forestry improves fire resilience by using longer rotations, reduced reliance on monoculture plantations, and restoration of mature forests for carbon storage and moisture retention.
4. Fuels Management Strategies
    4.1. Use mechanical thinning and selective harvest near communities and roads to reduce fuel loads.
    4.2. Industrial-scale clearcutting worsens fire risk rather than mitigating it.
    4.3. Implement science-based fire refugia strategies to protect critical habitat and maintain ecosystem integrity.
5. Post-Fire Management
    5.1. Conduct salvage logging after fires to recover economic value and replant quickly.

5.2. Do not salvage log in sensitive areas (e.g., steep slopes, HCAs) due to erosion and habitat loss risks.

6. Integration with FMP
   6.1. The draft FMP only contains vague language on fire management (e.g., indirect references to “disturbance events”).
   6.2. Include specific, measurable goals for fire resilience.
   6.3. Align strategies with ODF’s Climate Change and Carbon Plan and wildfire science.
   6.4. Incorporate adaptive management triggers based on fire risk monitoring.
7. GPV Context
   7.1. Fire management is needed to protect:
      7.1.1. Water quality (erosion and sedimentation after fires).
      7.1.2. Wildlife habitat (loss of old-growth refugia).
      7.1.3. Community safety (wildfire impacts on homes and health).
   7.2. Fire resilience should be a core principle of Greatest Permanent Value (GPV).

Air Quality

1. Air Quality as a Forest Value
   1.1. Clean air is a critical ecosystem service provided by forests, and should be explicitly recognized in the Forest Management Plan (FMP) under Greatest Permanent Value (GPV).
   1.2. Forests contribute to:
      1.2.1. Air filtration by removing pollutants.
      1.2.2. Carbon sequestration, reducing greenhouse gas concentrations.
      1.2.3. Microclimate regulation, which indirectly affects air quality.
2. Impacts of Current Forestry Practices
   2.1. Industrial-scale clearcutting and short-rotation plantations:
      2.1.1. Increase dust and particulate matter during logging and hauling operations.

2.1.2. Release stored carbon into the atmosphere, contributing to climate change and degraded air quality.

2.1.3. Use herbicide spraying, raising concerns about airborne chemical drift, which can affect nearby communities and wildlife.

3. Climate Change and Air Quality Link

3.1. Forest loss exacerbates climate change, which in turn worsens air quality through:

3.1.1. Increased wildfire frequency and severity.

3.1.2. Higher levels of smoke and particulate matter during fire events.

3.2. Mature forests are a natural buffer against wildfire smoke, due to their moisture retention and structural complexity.

4. Recommendations for Air Quality Protection

4.1. Reduce clearcutting and adopt longer harvest rotations to maintain canopy cover and carbon storage.

4.2. Phase out aerial herbicide spraying to prevent chemical drift.

4.3. Implement fire-resilient forest management to reduce smoke emissions from catastrophic fires.

4.4. Integrate air quality considerations into Key Performance Measures (KPMs) and adaptive management strategies.

5. Monitoring and Accountability

5.1. Conduct air quality monitoring near logging operations and aerial spray zones.

5.2. Report on chemical use and emissions.

5.3. Include air quality metrics in annual FMP compliance reports.

6. Cultural and Community Health Dimensions

6.1. Airborne pollutants from forestry operations can impact:

6.1.1. Traditional food and medicine gathering.

6.1.2. Respiratory health in rural populations.

6.2. Consult with Tribes and local communities on air quality risks and mitigation strategies.

7. GPV Context
    7.1. Air quality protection is linked to:
        7.1.1. Climate resilience (carbon storage and wildfire prevention).
        7.1.2. Public health (reducing smoke and chemical exposure).
        7.1.3. Economic stability (avoiding costs from health impacts and wildfire suppression).

Special Forest Products

1. Importance of Special Forest Products
    1.1. Special Forest Products such as mushrooms, truffles, cedar boughs, beargrass, salal, and medicinal plants:
        1.1.1. Provide economic opportunities for rural communities.
        1.1.2. Support cultural and traditional practices, especially for Tribes.
        1.1.3. Contribute to biodiversity and ecosystem health.
2. Criticism of Current Draft
    2.1. The draft Forest Management Plan (FMP):
        2.1.1. Contains minimal mention of Special Forest Products despite their ecological and cultural significance.
        2.1.2. Lacks specific strategies or performance measures for sustainable harvest and protection.
        2.1.3. Has an overemphasis on timber revenue, overshadowing other forest values.
3. Threats to Special Forest Products
    3.1. Industrial forestry practices, particularly clearcutting and short-rotation plantations, were identified as major threats:
        3.1.1. Eliminate understory habitat essential for mushrooms and medicinal plants.
        3.1.2. Reduce soil moisture and microclimate stability needed for truffle production.

3.1.3. Herbicide use negatively impacts plant diversity and kills species like beargrass and salal.

3.2. Road building and soil compaction further degrade habitats for Special Forest Products.

4. Recommendations for Protection and Management

4.1. Inventory and Mapping:

4.1.1. Conduct surveys to identify areas rich in Special Forest Products.

4.1.2. Maintain confidentiality for culturally sensitive species.

4.2. Sustainable Harvest Guidelines:

4.2.1. Develop clear rules for commercial and personal harvest.

4.2.2. Limit harvest in sensitive habitats and during vulnerable growth periods.

4.3. Habitat Conservation:

4.3.1. Avoid logging in areas known for high Special Forest Product abundance.

4.3.2. Maintain canopy cover and soil integrity to support fungal and understory plant communities.

4.4. Reduce Chemical Use:

4.4.1. Phase out aerial herbicide spraying.

4.4.2. Adopt mechanical vegetation control methods.

5. Cultural and Tribal Dimensions

5.1. Ensure tribal engagement in Special Forest Product management:

5.1.1. Co-management agreements for culturally significant species.

5.1.2. Integration of Traditional Ecological Knowledge (TEK) into harvest and restoration practices.

5.2. Special Forest Products are essential for ceremonial, medicinal, and subsistence uses.

6. Economic Opportunities

6.1. Special Forest Products:

6.1.1. Support small businesses and local economies.

6.1.2. Provide alternative income streams beyond timber.

6.2. Recommendations include:

6.2.1. Promoting community-based Special Forest Product enterprises.

6.2.2. Developing permits and training programs for sustainable harvest.

7. Monitoring and Accountability

7.1. Include Special Forest Product protection in Key Performance Measures (KPMs).

7.2. Reporting on harvest levels and habitat conditions.

7.3. Implement adaptive management triggers if Special Forest Products decline.

Soils and Geology

1. Importance of Soil Health

1.1. Soil is a critical forest asset, essential for:

1.1.1. Tree growth and productivity.

1.1.2. Water filtration and storage.

1.1.3. Carbon sequestration.

1.1.4. Habitat for microorganisms and understory plants.

1.2. Healthy soils underpin Greatest Permanent Value (GPV) by supporting ecological integrity and long-term forest sustainability.

2. Impacts of Current Forestry Practices

2.1. Clearcutting and short-rotation plantations degrade soil quality by:

2.1.1. Increasing erosion and sedimentation in streams.

2.1.2. Reducing organic matter and nutrient cycling.

2.1.3. Compacting soil through heavy machinery use.

2.2. Road construction and ground-based yarding exacerbate soil compaction and slope instability.

2.3. Herbicide use negatively affects soil microbiomes and nutrient dynamics.

3. Geology and Slope Stability

3.1. There is increased risk of landslides and mass wasting on steep slopes after clearcutting.

3.2. Removal of root systems reduces soil cohesion, increasing susceptibility to:

3.2.1. Erosion during heavy rainfall.

3.2.2. Sediment delivery to aquatic habitats.

3.3. Avoid harvest on unstable slopes and implement slope-specific management guidelines.

4. Recommendations for Soil and Geology Protection

4.1. Harvest Practices:

4.1.1. Use cable yarding instead of ground-based systems on sensitive soils.

4.1.2. Maintain retention patches and root systems to stabilize slopes.

4.2. Road Management:

4.2.1. Limit new road construction in erosion-prone areas.

4.2.2. Decommission unnecessary roads to restore hydrological function.

4.3. Chemical Use:

4.3.1. Reduce or eliminate herbicides to protect soil organisms.

4.4. Restoration:

4.4.1. Reintroduce native vegetation to stabilize soils post-harvest.

4.4.2. Apply mulching and erosion control measures on disturbed sites.

5. Monitoring and Accountability

5.1. Conduct baseline soil mapping and classification of erosion-prone areas.

5.2. Establish performance measures for soil productivity and slope stability.

5.3. Report on soil health indicators and erosion control efforts.

6. GPV Context

6.1. Soil health is linked to:

6.1.1. Water quality: Preventing sedimentation in streams.

6.1.2. Forest condition: Supporting diverse plant communities.

6.1.3. Climate resilience: Maintaining carbon storage in soils.

6.1.4. Wildlife habitat: Providing stable substrates for vegetation and food webs.

Sensitive Plants

1. Importance of Sensitive Plant Protection
   1.1. State Forests host rare, threatened, and culturally significant plant species that require active protection.
   1.2. Sensitive plants are integral to:
      1.2.1. Biodiversity and ecosystem health.
      1.2.2. Pollinator networks.
      1.2.3. Cultural and medicinal uses for Tribes and local communities.
   1.3. Sensitive plant protection should be part of Greatest Permanent Value (GPV).
2. Criticism of Current Draft
   2.1. The draft Forest Management Plan (FMP):
      2.1.1. Contains insufficient mention of sensitive plant conservation.
      2.1.2. Lacks specific strategies or performance measures for protecting rare plant habitats.
      2.1.3. Has an overemphasis on timber production without considering plant diversity.
3. Habitat Threats
   3.1. Primary threats identified:
      3.1.1. Clearcutting and short-rotation forestry, which eliminate understory diversity.
      3.1.2. Herbicide use, which kills non-target species and disrupts soil microbiomes.
      3.1.3. Road construction and soil compaction, reducing regeneration potential.
      3.1.4. Climate change, altering microclimates and increasing stress on rare species.
4. Recommendations for Protection
   4.1. Inventory and Mapping:
      4.1.1. Conduct comprehensive surveys of sensitive plant populations.
      4.1.2. Maintain confidential data for culturally significant species to prevent exploitation.
   4.2. Habitat Management:
      4.2.1. Avoid logging in areas with known sensitive plant populations.
      4.2.2. Expand riparian buffers and protect moist microhabitats.
      4.2.3. Reduce chemical use; prioritize mechanical vegetation control.
   4.3. Restoration:
      4.3.1. Reintroduce native understory species in degraded areas.

4.3.2. Use ecological forestry practices that maintain canopy cover and soil integrity.

5. Integration with Other Plans
   5.1. The FMP should align with:
      5.1.1. Habitat Conservation Plan (HCP) for species recovery.
      5.1.2. Climate Change and Carbon Plan, recognizing sensitive plants' role in ecosystem resilience.
      5.1.3. Tribal consultation for culturally significant plant species.
6. Monitoring and Accountability
   6.1. Establish Key Performance Measures (KPMs) for sensitive plant protection.
   6.2. Report on inventory and restoration progress.
   6.3. Use adaptive management triggers if populations decline.
7. Cultural and Tribal Values
   7.1. Sensitive plants often have traditional uses for food, medicine, and ceremonies
   7.2. ODF should engage with the Tribes on plant conservation strategies and co-management agreements.

Council of Forest Trust Land Counties
1212 Court St. NE | Salem, Oregon 97301

Board of Forestry

Re: Draft Forest Management Plan comments

The Council of Forest Trust Land Counties (CFTLC) represents the 15 counties that, in the 1940s, deeded their forest land to the state for long term management and in exchange receive revenue from said State Forest Lands. CFTLC is represented by county commissioners elected by their peers to the Forest Trust Land Advisory Council (FTLAC). FTLAC has a statutory responsibility to advise the Board of Forestry (BOF) and the State Forester on matters which affect management of the State Forest Lands (ORS 526.156). This comment letter on the Draft Forest Management Plan (Draft FMP), in part, fulfills this duty.

The BOF and the Oregon Department of Forestry (ODF) have a responsibility to manage State Forests for Greatest Permanent Value (GPV), as defined in OAR 629-035-0020. When reviewing the Draft FMP for adoption (as required by OAR 629-035-0030), the BOF should consider:

- Publicly mandated social services provided by counties and taxing districts which depend on revenue generated from these Trust Land Forests.
- The combination of the FMP and the Habitat Conservation Plan (HCP) will constitute a significant commitment to habitat conservation for species of all types, including species listed as threatened and endangered, as well as unlisted species.
- Harvest modeling associated with performance measure development shows state forests can be managed in a way that maximizes biological productivity for timber on land available for harvest while maintaining approximately 80-year rotations, which results in less harvest area and more diverse forest conditions than other harvest options. A presenter invited to the BOF called 80-year rotations "a core tenant of carbon-informed forestry."[1]
- The State Forests offer an important recreational resource for Oregonians. Maintenance of recreation facilities ensures they remain safe, enjoyable, and environmentally sound, and these are paid for by revenue generated on State Forests.
- Timber produced on State Forest lands supports manufacturing jobs. Preserving manufacturing jobs is a strategic goal for the governor. [2]

Below are our comments related to each of the Draft FMP principles

PRINCIPLE 1 – GREATEST PERMANENT VALUE

[1] https://www.oregon.gov/odf/board/bof/20230308-bof-item-06.pdf (pg. 8).
[2] https://www.oregon.gov/gov/Documents/Oregon's_Prosperity_Roadmap_December_2025.pdf

CFLTC supports the management of State Forests, consistent with state law. The Draft FMP principle of Greatest Permanent Value does not fully express the relationship between the Greatest Permanent Value and forest management planning OARs (OAR 629-035-0020, and OAR 629-035-0030). The Draft FMP states, "The FMP will be grounded in the management mandates for BOFL as expressed in the GPV and Forest Management Planning OARs" (pgs. 1-2). However, the management of the State Forests is not merely "grounded" in these OARs. The OARs explicitly provide the direction for the management of the State Forests. The State Forest is expressly directed to "secure greatest permanent value" in OAR 629-035-0020(2). The Board is directed to "review and may revise the forest management plan developed by the State Forester to ensure that it is consistent with OAR 629-035-0020 (Greatest Permanent Value)" (OAR 629-035-0030(4)). All management activities must be assessed against these rules.

CFTLC recommends the FMP principle be revised to state, "The FMP will establish the framework for managing the BOFL for Greatest Permanent Value." This language is consistent with OAR 629-035-0020(1), that describes the forest management plans.

PRINCIPLE 2 – BIOLOGICAL DIVERSITY

Managing, conserving, and restoring State Forest lands contribute to achieving the Greatest Permanent Value benefits listed in 629-035-0020(1). ODF has made a significant conservation commitment with the HCP. The management actions enumerated in the conservation measures in the HCP will result in conservation and restoration of State Forests for biodiversity. These measures include active restoration for Swiss needle cast affected stands, aging alder stands, young stands in Habitat Conservation Areas (HCAs), passive management in HCAs and Riparian Conservation Areas (RCA), contributions to a conservation fund, and maintenance of forests to support dispersal of species outside of HCAs and RCAs.

CFTLC supports managing forests outside of HCA, RCA, and inoperable areas for harvest on rotations that maximize long-term volume production. As described by Dr. Kate Anderson from the Sightlines Institute, on invitation of the Board of Forestry, long-term volume production is maximized by harvesting at the culmination of mean annual increment, or around 80 years for forests in the region. Dr. Anderson recommends pairing these rotations with an HCP to mitigate risks that this rotation strategy could create, exactly like the strategy ODF is taking.[3] While the focus of the HCP is necessarily on federally listed threatened and endangered species, the HCP will provide significant benefits for many species. Conservation of older forests inhabited by species like the northern spotted owl and marbled murrelet, benefits all species that use these

[3] https://www.oregon.gov/odf/board/bof/20230308-bof-item-06.pdf (pg. 20)

forests. Likewise, riparian species benefit from riparian conservation measures as well as from broader upland conservation. Under the CFTLC-supported performance measure for timber harvest, State Forests will develop a roughly balanced age-class distribution, up to age 80, which will provide forest conditions for species that utilize forests in a range of structural conditions.

One aspect of the principle we believe to be incorrect is, "The GPV and Forest Management Planning rules are the BOF's expression of providing conservation." This misstates the relationship between the BOF and Oregon Administrative Rule. It is much more than that. The GPV and Forest Management Planning rules are the expression of the state's direction to the State Forester for managing State Forests. These rules define the management objective and the procedural methods planning. These rules cannot be changed in the FMP. These rules also define the BOF's responsibility to review and approve the plan.

PRINCIPLE 3 – REVENUE

Ensuring sufficient revenue is available to ensure provision of GPV is a fundamental responsibility of the ODF and the policy direction set by the BOF in the FMP. Without adequate revenue, the principles in the FMP cannot be implemented by the State Forester. Failure to provide GPV would be a loss to all Oregonians, a violation of statute, and undercut the agreement between the counties and the state entered into when the lands were deeded to the state in Trust over 50 years ago. Oregon law states that the state has a responsibility to "maintain these lands [State Forests] as forest lands and actively manage them in a sound environmental manner to provide sustainable timber harvest and revenues to the state, counties, and local taxing districts" (OAR 629-035-0020). Not doing so would be inconsistent with state law.

Currently, Oregon statute (ORS 530.110) allocates ODF a share of the revenue from State Forest management, with the remainder going to counties, schools, and taxing districts. This revenue is used to fund operations on State Forests. Periodically, the BOF receives input that this funding mechanism should change. CFTLC worked with the Governor's Office to change the funding split to better fund the department. The Governor's Office chose not to pursue CFTLC's proposal or bring any other proposal to the legislature, indicating that a change in funding was not needed. The FMP must reflect current law. Current law is that ODF is funded from revenue generated from State Forests. The BOF must direct the State Forester to implement the FMP in a manner that ensures adequate funding to provide GVP. The State Forester must then implement the FMP in that manner.

CFTLC remains committed to working with ODF to help ensure adequate staffing to achieve GPV, provided the BOF approves our alternative for the timber harvest level performance measure that we presented in our testimony to the BOF on November 18, 2025. Our alternative

is based on modeling by ODF staff, who used the best available information about current conditions in the forest, future growth, and environmental and social commitments expressed in the Draft Habitat Conservation Plan and Draft Forest Management Plan. It also gives ODF the flexibility to operate under current staffing and funding levels while ODF builds capacity to fully provide GPV. **Selecting one of the other performance measure alternatives for the timber harvest level would result in underfunding of the department, counties, schools and local taxing districts which will result in a failure to ensure the provision of GPV.**

PRINCIPLE 4 – SOCIAL BENEFITS

The ability to provide social benefits for all Oregonians is consistent with direction in the Greatest Permanent Value rule. Also stated in the Greatest Permanent Value rule is that: "To secure the greatest permanent value of these lands to the state, the State Forester shall maintain these lands as forest lands and actively manage them in a sound environmental manner to provide sustainable timber harvest and revenues to the state, counties, and local taxing districts" (OAR 629-035-0020(2)). The developers of the OAR envisioned active management and revenue production as a means by which to secure Greatest Permanent Value**. CFTLC supports the provision of social benefits from State Forests. We believe key social benefits include:**

- **Revenue for publicly mandated county social services.**
- **Local employment by public service providers, local manufacturers, local tourism operators, and others.**
- **Public access to State Forest lands and all the benefits this provides.**
- **Maintenance of healthy, productive, and sustainable forest ecosystems that, over time and across the landscape, provide a full range of social, economic, and environmental benefits to the people of Oregon (OAR 629-035-0020)**

The *Economic Analysis of ODF Western Oregon Forest Management Plan Scenarios* report by ECONorthwest, produced for ODF, listed a range of social benefits and did not show any difference in social benefits between management scenarios. Based on this result and data provided to ODF, it is clear that ODF's "maximize volume" scenario provides all the social benefits required. **CFTLC's proposed performance measures would support implementation of this scenario.**

PRINCIPLE 5 – FOREST AND WATERSHED RESTORATION

This principle is consistent with the significant conservation commitment codified in the HCP. Between the HCP, FMP, and forest practices rules, over 50% of State Forests will be in conservation status. CFLTC analyzed the distribution of streams on State Forest lands and found

that 45% of fish bearing streams and 41 % of non-bearing streams are located within Habitat Conservation Areas. Fully, 54% of salmon, steelhead, and bull trout (SSBT) streams are in HCAs. These streams by virtue of being in HCAs will be far removed from operations and any potential impacts that are not mitigated by standard RCA buffers. Additional streams are located on the more than 70,000 acres of land identified by ODF as inoperable. Outside of these areas, streams and waterbodies are protected by riparian buffers that are larger than those required by new forest practices rules that originated from the Private Forest Accord, and which will become a core conservation measure of an HCP, pending federal approval. The State Forest HCP buffers are designed specifically to ensure that cool water temperatures are maintained for salmon and other fish, and to protect salamander habitat.

An easily overlooked part of the HCP, but one that possibly provides the most value to in-stream habitat conditions, are new rules for road construction and water crossings. No longer will roads block fish movement within streams or deliver un-mitigated sediment to the streams.

The need for forest restoration of State Forests is substantial. The BOF has long been concerned about the extent of Swiss needle cast-affected stands (46,000 acres) and aging alder stands (50,000). In addition, the HCP places approximately 50,000 acres of plantation forest under 40 years old in HCAs. These young stands will need thinning to fully achieve their habitat potential. Unfortunately, restoration treatments are limited in the HCP to a maximum of 75,000 acres over 30 years compared to at least 146,000 acres in need of restoration. CFTLC advocated for a more flexible restoration objective within the HCP, to allow ODF to both meet the current need for restoration and to respond to future needs, which was not considered by the BOF or ODF. **CFTLC recommends maximizing restoration treatments consistent with the HCP, to ensure the conservation objectives of the HCP are achieved.**

CFTLC also recommends restoring State Forest lands impacted by fire so they can provide Greatest Permanent Value. The USFS and private landowners in western Oregon are actively implementing fuels management projects. CFTLC recommends ODF to do the same, to protect communities and natural resources.

Principle 6 – Pace and Scale

CFTLC recommends amending this principle, which currently states: "The FMP will be developed and implemented on a scale and at a pace that provide a geographic and temporal range of economic, social, and environmental benefits," to acknowledge that the HCP effectively puts a brake on both the pace and scale of implementation. The principle should add that the FMP will be implemented consistent with the HCP. CFLTC notes that there may be

occasions where faster-paced or larger-scale implementation of activities (e.g., restoration treatments discussed under Principle 5) would provide greatest value, but this value must be foregone, due to HCP commitments.

Principle 7 – Varying Levels of Outcomes

CFTLC understands that ODF's budget will vary over time for reasons beyond the department's control. However, we note that it is the BOF's responsibility to "review and may revise the forest management plan developed by the State Forester to ensure that it is consistent with OAR 629-035-0020 (Greatest Permanent Value)" (OAR 629-035-0030(4). It is the State Forester's responsibility to "manage forest lands as provided in this section by developing and implementing management plans for a given planning area, as provided in OAR 629-035-0030 (Forest Management Planning) to 629-035-0100 (Existing Long-Range Plans)" (OAR 629-035-0020(4)). **Direction by the BOF that would foreseeably result in an inadequate budget to provide Greatest Permanent Value may be inconsistent with state law, as it is the BOF's responsibility to ensure ODF is operating in a manner to provide GPV. The CFTLC performance measure proposal puts ODF in the best position to provide Greatest Permanent Value, by providing ODF with the largest budget possible, without negatively affecting other values.**

Principle 8 – Legal and Regulatory Compliance

CFTLC supports the principle to comply with state and federal laws and rules.

Principle 9 – Tribal Outreach and Engagement

CFTLC supports the FMP principle to, "reach out to and engage with the nine Federally Recognized Tribes of Oregon throughout the planning and implementation processes." We request that ODF continue to clarify what actions taken under this principle differ from those required by law.

Principle 10 – Diverse Input

CFTLC supports the principle of seeking diverse input from Oregonians. As your partner in State Forest Management, CFTLC will continue to provide input towards achieving this principle. We appreciate the opportunity to provide input on various plans put forth by ODF, including this Forest Management Plan, Implementation Plans, Annual Operations Plans, and the Habitat Conservation Plan at FTLAC meetings, testimony at BOF meetings, Joint BOF-FTLAC meetings, and written comment periods. However, while many opportunities are provided to submit comments, we note that ODF has a history of soliciting public input late in the planning

process, reducing the opportunity for the public to affect policy. For example, public comment, including our own, on the proposed HCP occurred after an HCP application had been submitted to the federal services. This limited the opportunity for public comment to result in meaningful changes to the HCP. Additionally, CFTLC requested the ability to participate in Habitat Conservation Plan development, as partners in State Forest management, but CFTLC was denied this opportunity. **We hope this principle results in a restructuring of ODF's public input process to allow for more effective and earlier engagement.**

Principle 11 – Cooperative Efforts

CFTLC supports the principle to "achieve goals through cooperative efforts with other agencies and units of local government, user groups, and organizations." As your partner in State Forest management, CFTLC is ready to contribute to achieving this principle.

Principle 12 – Managing for Climate Change

CFTLC believes managing State Forest lands to account for climate change is vital to maintaining the ability to provide Greatest Permanent Value. Climate change poses a threat to the State Forests in the form of increased incidence of disturbance events and changes in productivity. Impacts could be felt across multiple benefits provided by the State Forests. State Forests should take the threat of increased disturbance seriously to protect all values, not the least of which is the significant conservation commitment proved in the HCP in the form of Habitat Conservation Areas. ODF should also protect communities surrounding state forests from potential disturbance impacts, particularly fire impacts, which can damage homes, property, and human health. **Active management will be key to ensuring the State Forests continue to provide Greatest Permanent Value even as they are impacted by climate change.**

ODF should also consider the climate mitigation value of wood products. In addition to directly storing carbon, the use of wood products often replaces more carbon intensive products. Nowhere is this more apparent than in mass timber applications, but the benefits are not limited to carbon sequestration and intensity avoidance. Mass timber applications require raw materials that match the quality that would be produced by State Forests under the CFTLC alternative for performance measures.[4] Providing this material would support local mass timber manufacturing. Preserving manufacturing is a strategic goal of the governor.[5]

[4] 2025 PNW Regional Mass Timber Market Study - Single Pages.pdf - Google Drive
[5] https://www.oregon.gov/gov/Documents/Oregon's_Prosperity_Roadmap_December_2025.pdf

Council of Forest Trust Land Counties
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Recent news from Portland highlights the state of mass timber in Oregon. Oregon's tallest mass timber building was recently completed. The 12-story building provides affordable, supportive housing to older adults in downtown Portland.[6] The building was designed and built by local companies. However, the mass timber material was harvested and produced in British Columbia.[7] This building highlights a key issue before the BOF. **As the BOF considers performance measures associated with the FMP, the BOF has the opportunity to support local timber production and local manufacturing. Conversely, the BOF can choose to harm local manufacturing and make Oregon more dependent on wood product imports, and at the same time reduce the number of family wage jobs available in our communities and reduce funding to community social services. CFLTC believes in supporting local communities. The BOF should too.**

Thank you for the opportunity to provide comment on the proposed FMP draft available for comment. Please feel free to reach out with any questions you may have about the recommendations above.

Margaret Magruder, Columbia County Commissioner

Chair, Council of Forest Trust Land Counties

Erin Skaar, Tillamook County Commissioner

Vice Chair, Council of Forest Trust Land Counties.

[6] https://archinect.com/news/article/150518672/oregon-s-tallest-mass-timber-affordable-housing-building-completed-by-holst-architecture

[7] https://www.holstarc.com/2025/10/oregons-tallest-mass-timber-building-opens-to-residents/