



Oregon Board of Forestry

Wednesday, March 4, 2026

Public Meeting Agenda

Public Meeting Information

The meeting will be open to the public, allowing for both in-person and virtual attendance. An opportunity for the public to provide live testimony will be available. Instructions to sign up for a live testimony slot can be found on our website: <https://www.oregon.gov/odf/board/Pages/bofmeetings.aspx>. Written testimony may be submitted by emailing the following address: boardofforestry@odf.oregon.gov and will be accepted prior to the meeting date, and up to two weeks after the meeting has ended. Submissions should include meeting date and agenda item number/topic header with the written submission.

In-Person Location:

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

Virtual Meeting Link:

<https://www.youtube.com/c/OregonDepartmentofForestry>

March 4, 2026 Agenda

Consent Agenda

- | |
|---|
| <p>A. Financial Dashboard for September, October, November, December 2025 and January 2026
<i>James Short (Chief Financial Officer)</i>
An executive financial report and summary will be captured monthly to ensure the Board of Forestry has up-to-date information for oversight of the Department's financial condition. This report will include the financial and budgetary status of the Department as well as other ancillary topics as appropriate. This is an information item.</p> |
| <p>B. Board Governance Performance Self-Evaluation
<i>Sabrina Perez (Agency Administration Strategic Advisor)</i>
The Board of Forestry conducts an annual formal evaluation of their performance in meeting best practices of governance as reported in a key performance measure to the Oregon Legislature. This agenda item presents the criteria and timeline to the Board for approval and initiates the annual self-evaluation process. This is a decision item.</p> |
| <p>C. 2025 Government-to-Government Report on Tribal Relations
<i>Cindy Kolomechuk (Tribal Liaison)</i>
This agenda item highlights the department's efforts to promote and enhance government-to-government relationships with the nine federally recognized Tribes of Oregon through annual report. This is an information item.</p> |
| <p>D. North Pendelton Rangeland Fire Protection Association Formation
<i>Levi Hopkins (Wildfire Prevention and Policy Manager)</i>
The purpose of this agenda item is to obtain Board approval to proceed with bringing specific areas of northern Umatilla County, into the Oregon Protection System. This is a decision item.</p> |



Oregon Board of Forestry

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Action and Information

8:30 a.m.	<p>1. Opening Comments and Board Member Introductions <i>Chair Kelly, State Forester Kacey KC, Members of the Board</i> This item serves as an opportunity for the Board Chair to offer housekeeping tips and best practices, and for Board Members to provide introductions. This is an information item.</p>
8:35 a.m.	<p>2. Consent Agenda Items <i>Chair Jim Kelly, Members of the Board</i> This item serves as an opportunity to review and consider items presented on the Consent Agenda. This is a decision item.</p>
8:40 a.m.	<p>3. State Forester Introduction <i>State Forester Kacey KC</i> This item serves as time to introduce and hear from the State Forester. This is an information item.</p>
8:45 a.m.	<p>4. Public Forum <i>Member of the Public</i> Sign-up instructions for providing public comments are posted on the Board's meeting webpage. Comments are limited to three minutes or less and are reserved for remarks on information items and topics off the agenda. This is an information item.</p>
9:15 a.m.	<p>5. Legislative Session Update <i>Derrick Wheeler (Legislative Director)</i> This item serves as an opportunity for the Department to provide an update on the 2026 legislative short session. This is an information item.</p>
9:45 a.m.	<p>BREAK</p>
10:00 a.m.	<p>6. Board Governance Committee Work <i>Ben Deumling (Board Member)</i> The Board will hear from Board Governance subcommittee members on recommendations to the Board Manual and best practices. This is an information item.</p>
10:30 a.m.	<p>7. Forest Trust Land Advisory Committee Testimony <i>FTLAC Members</i> The FTLAC is a statutorily established committee that advises the Board on the management of State Forests and other matters in which counties may have a responsibility pertaining to forestland. This is an information item.</p>
10:45 a.m.	<p>8. State Forest Update on Rulemaking and Performance Measures <i>Mike Wilson (State Forest Division Chief), Justin Butteris (Policy Analyst)</i> This item will provide an update on the rulemaking process for the Western Oregon Forest Management Plan. This is an information item.</p>
11:15 a.m.	<p>9. Performance Measures for Western Oregon State Forests <i>Mike Wilson (State Forest Division Chief), and Tyson Wepprich (Adaptive Management Specialist) Forester)</i> This item is an opportunity for the Board to receive an update on Performance Measures for Western Oregon State Forests Management and provide input for staff. This is an information item.</p>



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12:00 p.m.	LUNCH
1:00 p.m.	<p>10. Governor’s Natural Resource Team Update <i>Geoff Huntington (Senior Policy Advisor), Chandra Ferrari (Natural Resource Policy Advisor), and Amy Schulser, (Climate and Energy Policy Advisor)</i> Overview of Recent Executive Orders. This is an information item.</p>
2:00 p.m.	<p>11. Update on Adaptive Management Program <i>Josh Barnard (Forest Resources Division Chief), Terry Frueh (Adaptive Management Program Coordinator), Seth Barnes (Co-chair AMPC), Stacy Detwiler (Co-Chair AMPC), Jessica Homyack (Co-Chair, IRST), Kelly Burnett (Chair IRST), Lisa Gaines (Director IRST Housing Agency OSU/Institute for Natural Resources)</i> The Adaptive Management Program Committee (AMPC) Co-chairs, the Co-chairs of the Independent Research and Science Team (IRST), and staff from both OSU/Institute for Natural Resources (INR) and ODF will report on the progress of the Adaptive Management Program. This is an information item.</p>
3:00 p.m.	BREAK
3:15 p.m.	<p>12. Tethered Logging Rulemaking <i>Josh Barnard (Forest Resources Division Chief), and Nicole Stapp (Forest Resources Policy Advisor)</i> On March 5, 2025 the Board initiated rulemaking concerning tethered logging as directed by Section 7 of Senate Bill 1501 (2022). At the March board meeting the Department provided a briefing on tethered logging which included an operational overview and current science, and a related field tour was held in September 2025. This agenda item is a continuation of that discussion and includes a decision item for the Board regarding next steps. The Board is accepting testimony on this item. 15 minutes of time will be dedicated to live testimony. This is a decision item.</p>
4:00 p.m.	<p>13. Closing Comments <i>Board Chair Kelly, State Forester Kacey KC</i> This item serves as an opportunity for the Board Chair to address any outstanding work. This is an information item.</p>
4:15 p.m.	Adjourn Meeting

NOTE: Times listed on the agenda are approximate. At the discretion of the chair, the time and order of agenda items—including the addition of breaks—may change to maintain meeting flow. The board will hear public testimony [*excluding marked items] and engage in discussion before proceeding to the next item. * A single asterisk preceding the item number marks a work session, and public testimony/comment will not be accepted.

PUBLIC TESTIMONY: The Board of Forestry places great value on information received from the public. The Board will only hold public testimony at the meeting for decision items. The Board generally accepts written comments on all agenda items except consent agenda items, other items specifically identified in the agenda, and Work Session items [see explanation below]. Those wishing to testify or present information to the Board are encouraged to:

- Provide written summaries of lengthy, detailed information.
- Remember that the value of your comments is in the substance, not length.

Oregon Department of Forestry

2600 State St., Salem, OR 97310

<https://www.oregon.gov/odf>



Oregon Board of Forestry

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Public Meeting Agenda

- For coordinated comments to the Board, endorse rather than repeat the testimony of others.
- To ensure the Board will have an opportunity to review and consider your testimony before the meeting, please send comments no later than 72 hours before the meeting date. If submitted after this window of time the testimony will be entered into the public record but may not be viewed by the Board until after the meeting.
- To provide oral comments at an in-person meeting, register in advance using the information in the meeting agenda and sign in at the information table in the meeting room when you arrive. For virtual meetings, follow the signup instructions provided in the meeting agenda.
- Commenters have two to three minutes to make their comments. Comment on decision items is limited to 30 minutes per decision item.

Written comments for public testimony provide a valuable reference and may be submitted before, during, or up to two weeks after the meeting for consideration by the Board. Send to boardofforestry@odf.oregon.gov. All comments to the Board will become part of the official record of the meeting and made available to the public on the Board's webpage.

WORK SESSIONS: Certain agenda topics may be marked with an asterisk indicating a "Work Session" item. Work Sessions provide the Board with an opportunity to receive information and/or make decisions after considering previous public comments and staff recommendations. No new public comment will be taken. However, the Board may choose to ask questions of the audience to clarify issues raised.

GENERAL INFORMATION: For regularly scheduled meetings, the Board's agenda is posted on the web at <https://www.oregon.gov/odf/board/Pages/bofmeetings.aspx> two weeks before the meeting date. During that time, circumstances may dictate a revision to the agenda, either in the sequence of items to be addressed or in the time of day the item is to be presented. The Board will make every attempt to follow its published schedule and requests your indulgence when that is not possible.

If you are experiencing technical issues or require accommodations, email boardofforestry@odf.oregon.gov or contact the Board Support Office at (503) 302-6344.

To provide the broadest range of services, lead-time is needed to make the necessary arrangements for offsite locations. If special materials, services, or assistance is required, such as a sign language interpreter, assistive listening device, or large print material, please contact our Public Affairs Office at least seven working days before the meeting via telephone at 503-945-7200 or fax at 503-945-7212.



Board of Forestry Public Meeting

A. Financial Dashboard for September, October, November, December 2025 and January 2026

An executive financial report and summary will be captured monthly to ensure the Board of Forestry has up-to-date information for oversight of the Department's financial condition. This report will include the financial and budgetary status of the Department as well as other ancillary topics as appropriate.

This is an information item.



October 1, 2025

Sen. Kate Lieber, Co-Chair
Rep. Tawna Sanchez, Co-Chair
Joint Committee on Ways and Means
900 Court St. NE, H-178
Salem, OR 97301

Re: Oregon Department of Forestry - Monthly financial condition report

Dear Co-Chairs,

The Oregon Department of Forestry (ODF) remains committed to its mission of protecting Oregon's forests and communities while upholding strong financial stewardship. As the 2025 fire season winds down, the agency continues to manage fire-related costs, secure federal reimbursements, and oversee cooperative funding agreements. Although no incident management teams are currently deployed, districts remain in active fire season status, and ODF is closely monitoring cash flow until conditions allow for officially declaring the season closed statewide. The department's finances remain stable, backed by ongoing efforts to ensure transparency, accountability, and preparedness.

Cash and General Fund balances

As of September 23, 2025, ODF's principal cash account balance was \$73.8 million, with the AY27 Protection Division General Fund appropriation balance at \$21.4 million. The agency's September payroll is estimated at \$11 million from the Forestry Main Cash Account, \$2.5 million from the Protection General Fund, and \$900 thousand from the Forest Resources General Fund. In addition, \$7 million in the Landscape Resiliency General Fund will be transferred to the Landscape Resiliency Fund, as required by the budget bill, and is therefore not available for cash flow purposes.

Figure 1 - Cash Fund Balances as of Sept 23, 2025

Fund	Fund Title	Balance
02000	FORESTRY CASH ACCOUNT	\$73,775,831.97
11000	FOREST LAND PROTECTION FUND - EFCC	\$10,496,224.64
56000	URBAN FORESTRY	\$30,263.99
58000	FOREST RESOURCE TRUST	\$1,124,783.20
70000	FACILITIES MANAGEMENT	\$10,597,558.88

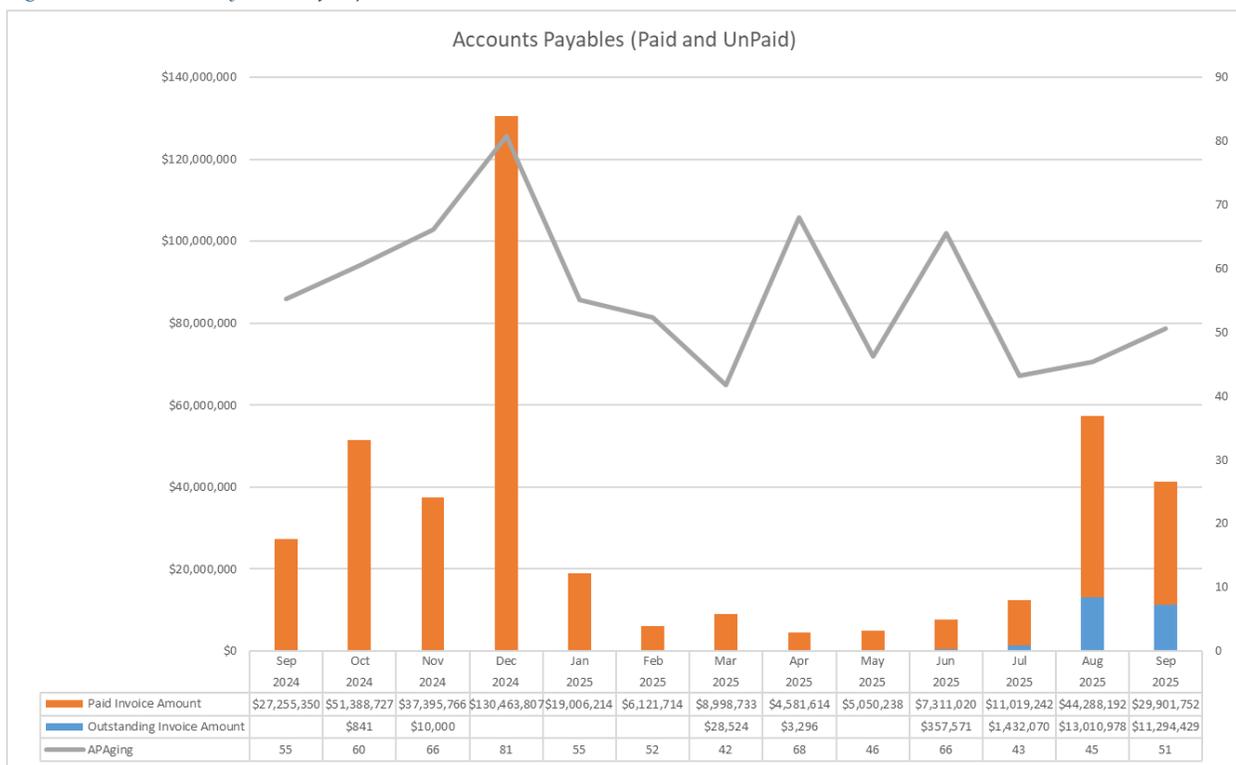
General Fund appropriations as of Sept 23, 2025

Appn	Appn Title	Balance
89905	FOREST RESOURCES	\$50,584,559.77
89908	ADMINISTRATION	\$741,263.59
89920	PROTECTION FROM FIRE	\$21,388,410.44
89995	LANDSCAPE RESILIENCY GF	\$7,000,000.00

Accounts payable

Overall agency spending has eased since the last reporting period (Figure 2), reflecting both the reduction in wildfire activity and a decrease in fire-related payments from the 2025 fire season. At the same time, some vendor payments are taking longer than usual to process, with many accounts extending beyond the standard 45-day timeframe. This delay is largely due to the high number of payments tied to peak fire season operations. The agency is actively working to bring payments back within normal processing timelines by prioritizing fire vendor invoices and coordinating closely across programs. ODF remains committed to meeting its financial obligations, maintaining transparency, and ensuring that vendors are supported as the fire season concludes.

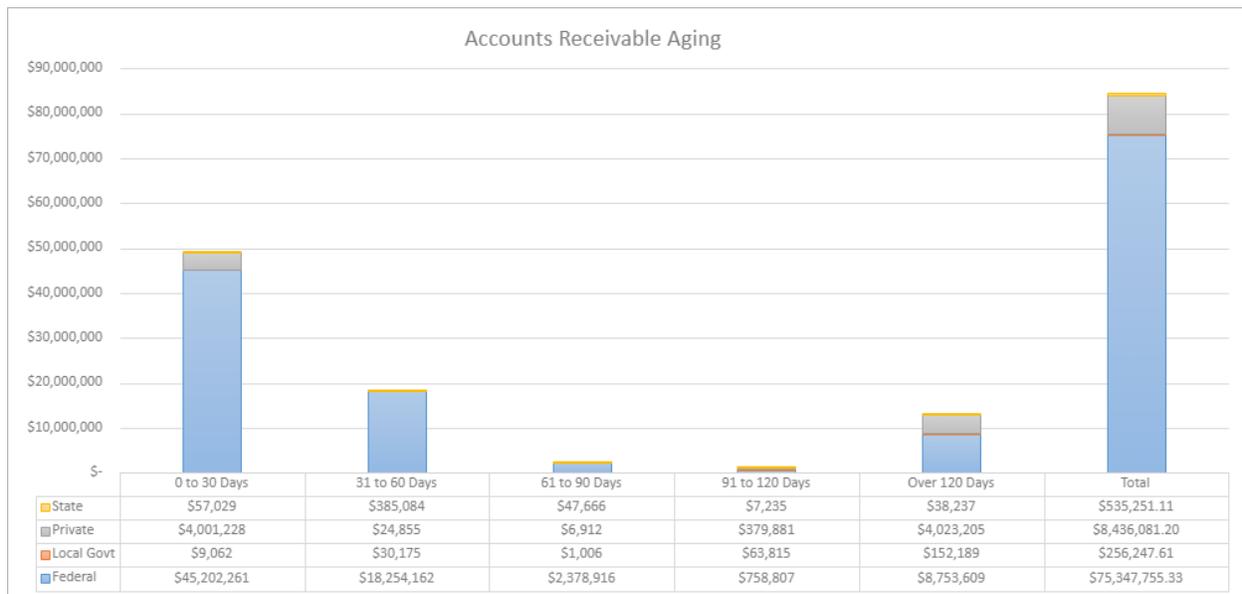
Figure 2 - Accounts Payable as of September 23, 2025



Accounts receivable

In the first quarter of FY26, the agency invoiced \$79.2 million and collected \$50.3 million. Outstanding invoices decreased from the prior period, totaling 320; however, 15% are now more than 120 days past due, representing a 1% decrease from the previous period.

Figure 3 – Accounts Receivable Aging as of September 22, 2025



State Forests financial status

Fiscal year 2026 (FY26) through July revenues from State Forests timber sales added \$4.5 million to the ODF cash account, \$2.6 million of which will be distributed for county payments. State Forests expenses are \$2.5 million which leaves a negative net operating income of (\$588,000). The Forest Development Operating Fund balance is \$21.3 million, which is below the prudent balance of six months operating expenses. Volume harvested through July is 11.5 MMbf which is a negative (5%) change from FY25. The lumber market is currently experiencing significant uncertainty, with declining prices driven by weakening demand in residential construction.

Fire Protection financial status

Outstanding Fire Protection assets and liabilities information

In addition to monitoring current agency-wide accounts payable and accounts receivable, the department also tracks estimated outstanding assets and liabilities related to the Fire Protection Division. Due to the nature of large fires and cooperative agreements—such as ODF providing resources for fires outside its protection jurisdiction—reimbursement for upfront costs incurred by ODF can take several years. Conversely, delays may also occur in receiving federal bills for resources initially paid for by federal partners, as well as in finalizing cost-share settlements that may result in ODF being billed. The table below summarizes the estimated outstanding assets and liabilities (accounts receivable and payable not yet invoiced to or from ODF).

Figure 4– Estimated Outstanding Assets and Liabilities as of September 14, 2025

Summary of Estimated Outstanding Assets and Liabilities (Costs that have not been fully reconciled or billed)		
Category	Assets (AR)	Liabilities (AP)
Coop Billable	\$28,874,317	\$22,529
Large Fire - Non-Cost Share	\$996,775	\$1,728,675
Large Fire - Cost Share	\$103,260,401	\$31,692,849
TOTAL	\$133,131,493	\$33,444,053

Notable updates since the last report include an increase of \$29 million in AR and \$2 million of AP as an additional 7 new cost shares with Federal partners have been signed (for a fire season total of 24) and the Mark’s Creek and Kelsey Peak incidents are being managed by ODF IMT but are 100% billable assistance to the USFS and BLM.

FEMA information

FEMA Public Assistance (PA) grants are awarded to the Oregon Department of Emergency Management (ODEM), which then distributes the funds to ODF. In contrast, FEMA Fire Management Assistance Grants (FMAG) are awarded directly to ODF, providing more immediate access to funds once they are obligated. The FEMA reimbursement process can take several years to fully complete. ODF strives to submit all suppression claims to FEMA and/or ODEM within one year of an eligible incident’s conclusion. Once submitted, claims undergo detailed audits by FEMA and/or ODEM before final payments are issued. Administrative claims take longer to process, as all suppression-related costs must be paid in full before ODF can submit expenses tied to administrative and financial work required by FEMA.

The table below outlines the status of claims by fire year and provides an update on payment progress for each.

Figure 5– FEMA/Public Assistance Outstanding Balances as of September 14, 2025

Summary of Outstanding FEMA FMAG/PA						
Fire Year	Claim Type	Estimate to Invoice to FEMA	Pending Review by FEMA	Amount Obligated by FEMA	Payment Amount Requested	Grand Total Due to ODF
2019	Admin - FMAG	\$0	\$215,943	\$0	\$0	\$215,943
2020	Admin - FMAG	\$85,250	\$0	\$0	\$0	\$85,250
2020	Admin - PA	\$17,017	\$0	\$0	\$0	\$17,017
2020	Fire - PA	\$0	\$297,219	\$0	\$0	\$297,219
2021	Admin - FMAG	\$43,950	\$0	\$0	\$0	\$43,950
2022	Admin - FMAG	\$12,000	\$0	\$0	\$0	\$12,000
2023	Admin - FMAG	\$32,500	\$0	\$0	\$0	\$32,500

2023	Fire - FMAG	\$1,000,000	\$0	\$0	\$0	\$1,000,000
2024	Fire - FMAG	\$24,366,189	\$1,187,069	\$0	\$0	\$25,553,258
2024	Fire - PA	\$17,780,827	\$35,343,625	\$0	\$0	\$53,124,452
2025	Fire - FMAG	\$11,673,768	\$0	\$0	\$0	\$11,673,768
TOTAL		\$55,011,501	\$37,043,856	\$0	\$0	\$92,055,357

Since the last report, Flat FMAG was added to the fire season 2025 ‘estimate to invoice’ total. This increased estimated FEMA claim reimbursements by \$7.7 million. With fire season winding down, ODF’s FEMA finance team will be focused on auditing and submitting claims as soon as possible.

Fire season cost estimate information

Fire season runs from January 1 through December 31, encompassing two partial fiscal years. Incident cost estimates are produced for every incident, no matter the size, with the data coming from the ODF district where the incident occurs. Costs are generated daily for larger incidents and smaller incidents record costs within thirty days of an incident’s end. Gross incident costs are adjusted to reflect a final projected net after Federal cost share recoveries and FEMA claim reimbursements. The result is the final net incident cost, which represents the General Fund obligation.

Figure 6– Fire Season Cost Estimate as of September 14, 2025

Summary of Fire Season 2025 Large Fire Fund (LWFF) Estimated Costs				
	Gross Costs	Other Agency Cost Recoveries	FEMA Cost Recoveries**	Net Costs
LWFF Costs	\$121,241,869	\$58,168,900	\$10,176,524	\$52,896,445
LWFF Adjustment*	\$8,374,052	\$8,374,052	\$0	\$0
TOTAL	\$129,615,921	\$66,542,952	\$10,176,524	\$52,896,445

Since the last report, the largest incident contributing to costs was Flat (8/21), estimated at \$17 million gross and \$3 million net. Through the fire season, the other largest fires contributing to the above costs are Rowena (6/11), Upper Applegate (6/18), Bowers Bridge (6/30), Grizzly Complex (7/7), Eastside Lightning Complex (7/7), Elk (7/8), Cram (7/13), Hagelstein (7/14), Board Shanty (7/17), Scholfield Ridged (8/12), Paradise (9/4), and Highland (9/7) totaling \$92 million gross and \$39 million net costs.

*Large Wildfire Fund (LWFF) Adjustment is for 1) cost share incidents where ODF is not the paying agency, thus upfront costs are not fully bore by ODF, but will result in a final net cost to ODF once a Federal billing is received, and 2) Non-ODF billable incidents where ODF is working on a purely Federal incident and all ODF costs are billable, thus ODF has upfront costs, but no net costs for the incident.

**The FEMA Cost Recoveries total for the fire season does not match the previous section's fire season FEMA total estimate as FEMA pre-positioning claims are included in those numbers, which are Severity funding reimbursements and not tied to LWFF reimbursements.

ODF continues to maintain a strong financial position through prudent oversight of expenditures and careful monitoring of fire-related costs and reimbursements. The agency's cash position remains steady, with billing and collection efforts proceeding as planned. Large fire cost audits are nearing completion, and reimbursement claims to federal partners are being submitted on schedule. While federal payments often take time to process, ODF is meeting all required deadlines and maintains steady progress.

ODF continues to receive federal funding at expected levels, with no changes currently. To prepare for any future adjustments, agency leadership is proactively tracking federally supported activities and related costs. Throughout this work, ODF remains committed to its mission and to maintaining strong financial stewardship on behalf of Oregonians

Sincerely,



Kate Skinner
Interim State Forester

c:
Board of Forestry
Governor's Office
Chief Financial Office
Legislative Fiscal Office
Oregon State Treasury



November 3, 2025

Sen. Kate Lieber, Co-Chair
Rep. Tawna Sanchez, Co-Chair
Joint Committee on Ways and Means
900 Court St. NE, H-178
Salem, OR 97301

Re: Oregon Department of Forestry - Monthly financial condition report

Dear Co-Chairs,

The Oregon Department of Forestry (ODF) remains focused on its mission to protect Oregon's forests and communities while maintaining sound financial stewardship. Fire season 2025, which began on June 1, officially closed in all districts across the state on October 24. As the agency transitions into post-season operations, ODF will continue to prioritize timely payments and completion of all financial activities associated with fire season. The department's financial position remains stable, supported by continued cost containment efforts and a focus on strengthening preparedness amid evolving funding conditions.

Cash and General Fund balances

As of October 23, 2025, ODF's principal cash account balance was \$25.8 million, and the AY27 Protection Division General Fund appropriation balance stood at \$10.5 million. The estimated October payroll includes \$11 million from the Forestry Main Cash Account, \$2.5 million from the Protection General Fund, and \$900,000 from the Forest Resources General Fund. The \$7 million in the Landscape Resiliency General Fund will be transferred to the Landscape Resiliency Fund per the budget bill and is not available for cash flow purposes.

Figure 1 - Cash Fund Balances as of October 23, 2025

Fund	Fund Title	Balance
02000	FORESTRY CASH ACCOUNT	\$25,852,485.51
11000	FOREST LAND PROTECTION FUND - EFCC	\$10,496,224.64
56000	URBAN FORESTRY	\$30,263.99
58000	FOREST RESOURCE TRUST	\$1,129,035.81
70000	FACILITIES MANAGEMENT	\$10,364,086.78

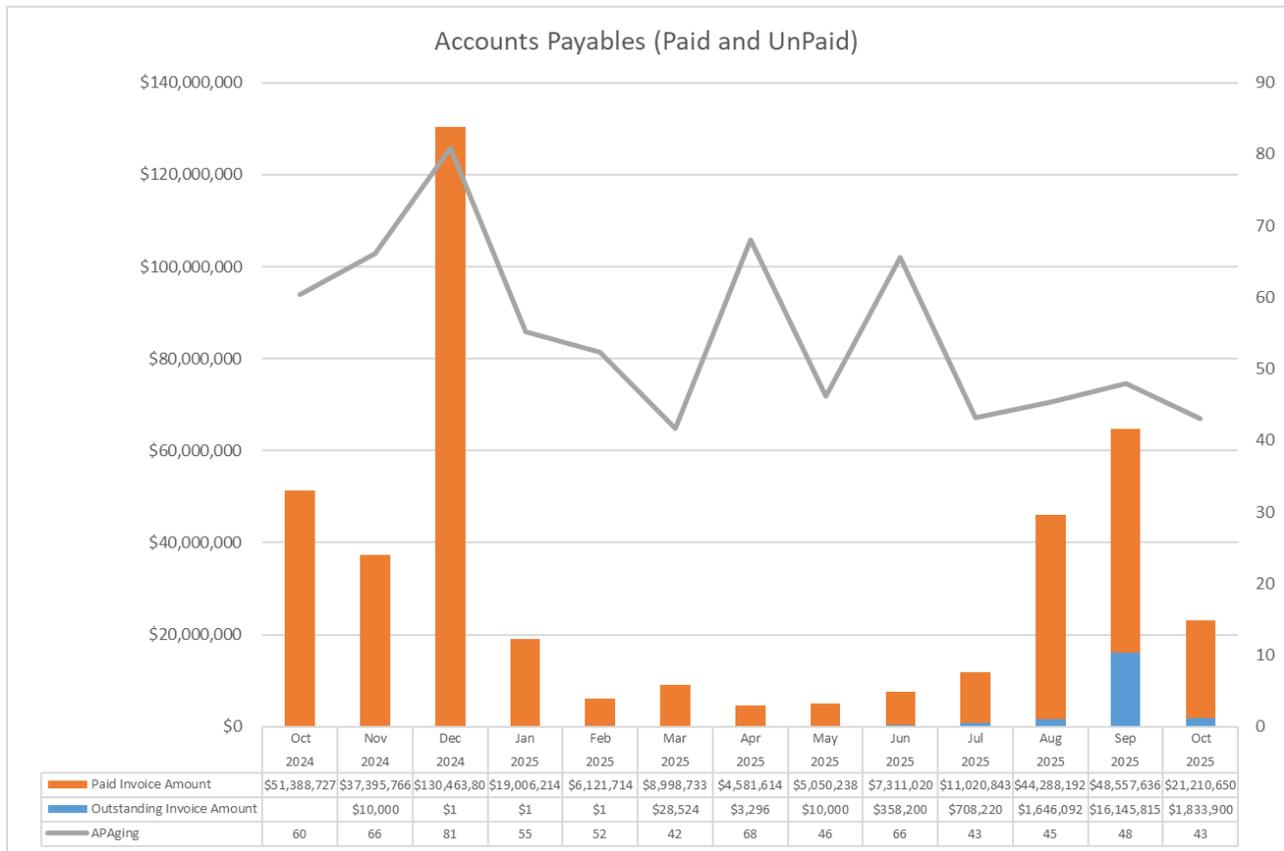
General Fund appropriations as of October 23, 2025

Appn	Appn Title	Balance
89905	FOREST RESOURCES	\$49,097,058.43
89908	ADMINISTRATION	\$723,883.17
89920	PROTECTION FROM FIRE	\$18,372,315.37
89995	LANDSCAPE RESILIENCY GF	\$7,000,000.00

Accounts payable

Department-wide expenditures have decreased since the last reporting period (Figure 2), reflecting the end in fire activity and decrease in fire-related payments from the 2025 fire season. At the same time, the agency’s vendor accounts are aging below the 45-day mark for payment processing.

Figure 2 - Accounts Payable as of October 22, 2025



Accounts receivable

In the first quarter of FY26, the agency invoiced \$85.9 million and collected \$92.6 million. Outstanding invoices increased from the prior period, totaling 347; however, 29% are now more than 120 days past due, representing a 14% increase from the previous period.

Figure 3 – Accounts Receivable Aging as of October 20, 2025



Forest Resources Division financial status

For the first quarter of fiscal year 2026, the distribution of Forest Products Harvest Tax from the Department of Revenue was \$1,967,477, which was \$75,651 above projections. Over the first three months of the biennium, the Forest Resources Division spent \$2,118,410. This amount includes a prorated share of the administrative prorate transfer in the amount of \$610,196. If the Forest Products Harvest Tax revenues continue as projected, the division will cover expenditures for the biennium. The division closely tracks Oregon’s harvest volume and spending patterns and will provide updates as needed.

Fire Protection Division financial status

Outstanding Fire Protection assets and liabilities information

In addition to monitoring current agency-wide accounts payable and accounts receivable, the department also tracks estimated outstanding assets and liabilities related to the Fire Protection Division. Due to the nature of large fires and cooperative agreements—such as ODF providing resources for fires outside its protection jurisdiction—reimbursement for upfront costs incurred by ODF can take several years. Conversely, delays may also occur in receiving federal bills for resources initially paid for by federal partners, as well as in finalizing cost-share settlements that

may result in ODF being billed. The table below summarizes the estimated outstanding assets and liabilities (accounts receivable and payable not yet invoiced to or from ODF).

Figure 4— Estimated Outstanding Assets and Liabilities as of October 13, 2025

Summary of Estimated Outstanding Assets and Liabilities (Costs that have not been fully reconciled or billed)		
Category	Assets (AR)	Liabilities (AP)
Coop Billable	\$36,052,470	\$22,529
Large Fire - Non-Cost Share	\$996,775	\$1,806,633
Large Fire - Cost Share	\$110,561,156	\$32,159,295
TOTAL	\$147,610,401	\$33,988,457

Notable updates since the last report include an increase of \$14 million in AR as an additional 2 new cost shares with Federal partners have been signed (for a fire season total of 26) and the Paradise/Moon Complex incident cost share has been ended with a final estimated billable total calculated.

FEMA information

FEMA Public Assistance (PA) grants are awarded to the Oregon Department of Emergency Management (ODEM), which then distributes the funds to ODF. In contrast, FEMA Fire Management Assistance Grants (FMAG) are awarded directly to ODF, providing more immediate access to funds once they are obligated. The FEMA reimbursement process can take several years to fully complete. ODF strives to submit all suppression claims to FEMA and/or ODEM within one year of an eligible incident’s conclusion. Once submitted, claims undergo detailed audits by FEMA and/or ODEM before final payments are issued. Administrative claims take longer to process, as all suppression-related costs must be paid in full before ODF can submit expenses tied to administrative and financial work required by FEMA.

The table below outlines the status of claims by fire year and provides an update on payment progress for each.

Figure 5— FEMA/Public Assistance Outstanding Balances as of October 13, 2025

Summary of Outstanding FEMA FMAG/PA						
Fire Year	Claim Type	Estimate to Invoice to FEMA	Pending Review by FEMA	Amount Obligated by FEMA	Payment Amount Requested	Grand Total Due to ODF
2019	Admin - FMAG	\$0	\$215,943	\$0	\$0	\$215,943
2020	Admin - FMAG	\$85,250	\$0	\$0	\$0	\$85,250
2020	Admin - PA	\$17,017	\$0	\$0	\$0	\$17,017
2020	Fire - PA	\$0	\$297,219	\$0	\$0	\$297,219
2021	Admin - FMAG	\$43,950	\$0	\$0	\$0	\$43,950

2022	Admin - FMAG	\$12,000	\$0	\$0	\$0	\$12,000
2023	Admin - FMAG	\$32,500	\$0	\$0	\$0	\$32,500
2023	Fire - FMAG	\$1,000,000	\$0	\$0	\$0	\$1,000,000
2024	Fire - FMAG	\$24,366,189	\$1,187,069	\$0	\$0	\$25,553,258
2024	Fire - PA	\$17,780,827	\$35,343,625	\$0	\$0	\$53,124,452
2025	Fire - FMAG	\$11,673,768	\$0	\$0	\$0	\$11,673,768
TOTAL		\$55,011,501	\$37,043,856	\$0	\$0	\$92,055,357

Since the last report, no change to FEMA claim amounts as the last FMAG incident ended on September 5. With fire season ending, ODF’s FEMA finance team will be focused on auditing and submitting claims as soon as possible, focusing on the remaining fire season 2024 claims through the end of calendar year 2025, but this will be contingent on the Federal shutdown and if we can reconcile cost shares with our Federal financial counterparts.

Fire season cost estimate information

Fire season runs from January 1 through December 31, encompassing two partial fiscal years. Incident cost estimates are produced for every incident, no matter the size, with the data coming from the ODF district where the incident occurs. Costs are generated daily for larger incidents and smaller incidents record costs within thirty days of an incident’s end. Gross incident costs are adjusted to reflect a final projected net after Federal cost share recoveries and FEMA claim reimbursements. The result is the final net incident cost, which represents the General Fund obligation.

Figure 6– Fire Season Cost Estimate as of October 13, 2025

Summary of Fire Season 2025 Large Fire Fund (LWFF) Estimated Costs				
	Gross Costs	Other Agency Cost Recoveries	FEMA Cost Recoveries**	Net Costs
LWFF Costs	\$129,819,145	\$63,577,072	\$10,181,326	\$56,060,746
LWFF Adjustment*	\$21,159,025	\$21,159,025	\$0	\$0
TOTAL	\$150,978,170	\$84,736,097	\$10,181,326	\$56,060,746

Since the last report, the largest incident contributing to costs was Paradise/Moon Complex (9/3), estimated at \$8 million gross and \$2 million net. Through the fire season, the other largest fires contributing to the above costs are Rowena (6/11), Upper Applegate (6/18), Bowers Bridge (6/30), Grizzly Complex (7/7), Eastside Lightning Complex (7/7), Elk (7/8), Cram (7/13), Hagelstein (7/14), Board Shanty (7/17), Scholfield Ridged (8/12), Flat (8/21), and Highland (9/7) totaling \$107 million gross and \$41 million net costs.

*Large Wildfire Fund (LWFF) Adjustment is for 1) cost share incidents where ODF is not the paying agency, thus upfront costs are not fully bore by ODF, but will result in a final net cost to

ODF once a federal billing is received, and 2) non-ODF billable incidents where ODF is working on a purely Federal incident and all ODF costs are billable, thus ODF has upfront costs, but no net costs for the incident.

**The FEMA Cost Recoveries total for the fire season does not match the previous section's fire season FEMA total estimate as FEMA pre-positioning claims are included in those numbers, which are Severity funding reimbursements and not tied to LWFF reimbursements.

As fire season concludes, the agency's cash position remains steady, and billing and collection efforts are progressing as planned. Large fire cost audits are being finalized, and reimbursement claims to federal partners continue to be submitted on schedule. While federal reimbursements can take time to process, ODF continues to meet all required deadlines and maintain steady progress. With the close of fire season, the agency is now shifting its focus toward Federal Funds—an opportunity to assess fiscal exposure amid ongoing federal uncertainty, including potential impacts from the federal government shutdown. This focus will help ensure ODF's reimbursement and funding strategies remain resilient and adaptable in the months ahead.

Federal funding levels remain unchanged, and the agency continues to receive payments as expected. Still, in anticipation of any future changes, ODF leadership is proactively tracking federally supported activities and associated costs. The agency remains focused on delivering its mission while ensuring strong financial stewardship for the people of Oregon.

Sincerely,



Kate Skinner
Interim State Forester

c:
Board of Forestry
Governor's Office
Chief Financial Office
Legislative Fiscal Office
Oregon State Treasury



Oregon

Tina Kotek, Governor

Department of Forestry
State Forester's Office
2600 State St
Salem, OR 97310-1336
503-945-7200
www.oregon.gov/ODF

December 1, 2025

Sen. Kate Lieber, Co-Chair
Rep. Tawna Sanchez, Co-Chair
Joint Committee on Ways and Means
900 Court St. NE, H-178
Salem, OR 97301

Re: Oregon Department of Forestry - Monthly financial condition report

Dear Co-Chairs,

The Oregon Department of Forestry (ODF) remains committed to protecting Oregon's forests and communities while maintaining strong financial stewardship. With most 2025 fire season costs paid and county assessments arriving, cash flow has stabilized as we head into the February short session. As we move into post-season operations, ODF will continue prioritizing timely payments and completing all remaining fire-season financial activities. The agency's financial position remains stable, supported by cost-containment efforts and a continued focus on preparedness.

Cash and General Fund balances

As of November 21, 2025, ODF's principal cash account balance was \$17.15 million, and the AY27 Protection Division General Fund appropriation balance stood at \$15.31 million. The estimated November payroll includes \$10 million from the Forestry Main Cash Account, \$2.5 million from the Protection General Fund, and \$900,000 from the Forest Resources General Fund. The \$7 million in the Landscape Resiliency General Fund will be transferred to the Landscape Resiliency Fund per the budget bill and is not available for cash flow purposes.

Figure 1 - Cash Fund Balances as of November 21, 2025

Fund	Fund Title	Balance
02000	FORESTRY CASH ACCOUNT	\$17,150,263.05
11000	FOREST LAND PROTECTION FUND - EFCC	\$11,140,581.30
56000	URBAN FORESTRY	\$30,496.34
58000	FOREST RESOURCE TRUST	\$1,133,418.94
70000	FACILITIES MANAGEMENT	\$8,798,502.07

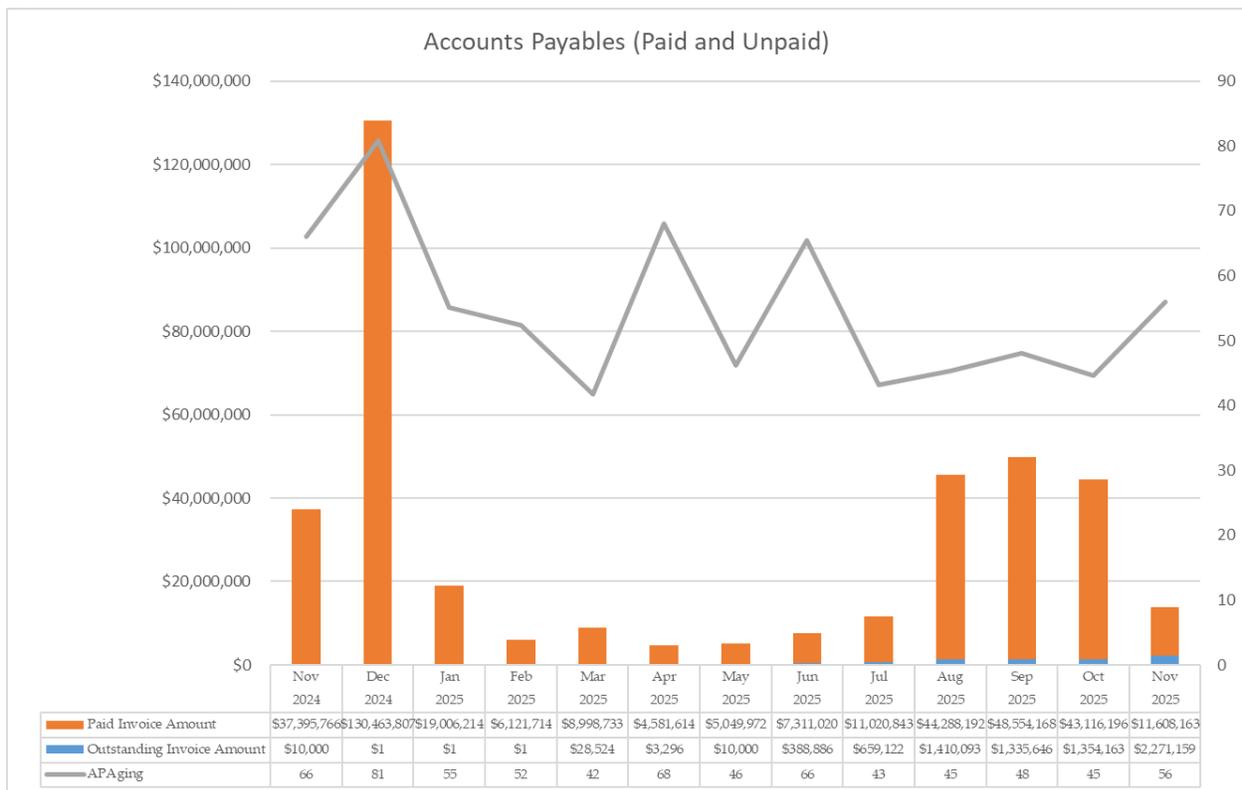
General Fund appropriations as of November 21, 2025

Appn	Appn Title	Balance
89905	FOREST RESOURCES	\$32,271,690.81
89908	ADMINISTRATION	\$706,502.64
89920	PROTECTION FROM FIRE	\$15,318,987.39
89995	LANDSCAPE RESILIENCY GF	\$7,000,000

Accounts payable

Department-wide expenditures have increased since the last reporting period (Figure 2), driven by the wind-down of fire activity and finalizing payments from the 2025 fire season. At the same time, the agency’s vendor accounts show an average aging above the 45-day mark, reflecting the processing of older fire-related invoices.

Figure 2 - Accounts Payable as of November 22, 2025



Accounts receivable

In the second quarter of FY26, the agency invoiced \$15.2 million and collected \$15.4 million. Outstanding invoices increased from the prior period, totaling 883; however, 24% are now more than 120 days past due, representing a 5% decrease from the previous period.

Figure 3 – Accounts Receivable Aging as of November 17, 2025



Fire Protection Division financial status

Outstanding Fire Protection assets and liabilities information

In addition to monitoring current agency-wide accounts payable and accounts receivable, the department also tracks estimated outstanding assets and liabilities related to the Fire Protection Division. Due to the nature of large fires and cooperative agreements—such as ODF providing resources for fires outside its protection jurisdiction—reimbursement for upfront costs incurred by ODF can take several years. Conversely, delays may also occur in receiving federal bills for resources initially paid for by federal partners, as well as in finalizing cost-share settlements that may result in ODF being billed. The table below summarizes the estimated outstanding assets and liabilities (accounts receivable and payable not yet invoiced to or from ODF).

Figure 4– Estimated Outstanding Assets and Liabilities as of November 12, 2025

Summary of Estimated Outstanding Assets and Liabilities (Costs that have not been fully reconciled or billed)		
Category	Assets (AR)	Liabilities (AP)
Coop Billable	\$38,720,337	\$6,800
Large Fire - Non-Cost Share	\$286,900	\$1,883,354
Large Fire - Cost Share	\$111,178,806	\$32,297,159
TOTAL	\$150,186,043	\$34,187,313

Notable updates since the last report include an increase of \$2.5 million in AR and an increase of \$200,000 in AP as fire season 2025 estimates and actuals are being buttoned up. Also, reconciliation of past coop billable balances has occurred, which contributed to an increase in AR. Fire season 2025 ended with a total of 26 cost shares with Federal partners, which now leaves 55 cost shares in total to reconcile with our federal counterparts back to FY23.

FEMA information

FEMA Public Assistance (PA) grants are awarded to the Oregon Department of Emergency Management (ODEM), which then distributes the funds to ODF. In contrast, FEMA Fire Management Assistance Grants (FMAG) are awarded directly to ODF, providing more immediate access to funds once they are obligated. The FEMA reimbursement process can take several years to fully complete. ODF strives to submit all suppression claims to FEMA and/or ODEM within one year of an eligible incident’s conclusion. Once submitted, claims undergo detailed audits by FEMA and/or ODEM before final payments are issued. Administrative claims take longer to process, as all suppression-related costs must be paid in full before ODF can submit expenses tied to administrative and financial work required by FEMA.

The table below outlines the status of claims by fire year and provides an update on payment progress for each.

Figure 5– FEMA/Public Assistance Outstanding Balances as of November 12, 2025

Summary of Outstanding FEMA FMAG/PA						
Fire Year	Claim Type	Estimate to Invoice to FEMA	Pending Review by FEMA	Amount Obligated by FEMA	Payment Amount Requested	Grand Total Due to ODF
2019	Admin - FMAG	\$0	\$215,943	\$0	\$0	\$215,943
2020	Admin - FMAG	\$85,250	\$0	\$0	\$0	\$85,250
2020	Admin - PA	\$17,017	\$0	\$0	\$0	\$17,017
2020	Fire - PA	\$0	\$297,219	\$0	\$0	\$297,219
2021	Admin - FMAG	\$43,950	\$0	\$0	\$0	\$43,950
2022	Admin - FMAG	\$12,000	\$0	\$0	\$0	\$12,000

2023	Admin - FMAG	\$32,500	\$0	\$0	\$0	\$32,500
2023	Fire - FMAG	\$1,000,000	\$0	\$0	\$0	\$1,000,000
2024	Fire - FMAG	\$24,366,189	\$1,187,069	\$0	\$0	\$25,553,258
2024	Fire - PA	\$17,780,827	\$35,343,625	\$0	\$0	\$53,124,452
2025	Fire - FMAG	\$11,673,768	\$0	\$0	\$0	\$11,673,768
TOTAL		\$55,011,501	\$37,043,856	\$0	\$0	\$92,055,357

Since the last report, there has been no change to FEMA claim amounts. ODF’s FEMA finance team continues to be focused on auditing and submitting claims as soon as possible. The goal is to have the remaining fire season 2024 (FMAG and PA) claim submitted by the end of calendar year 2025. Previous fire season admin claims will be next to submit final claims for, followed by beginning final auditing and claim work for fire season 2025.

Fire season cost estimate information

Fire season runs from January 1 through December 31, encompassing two partial fiscal years. Incident cost estimates are produced for every incident, no matter the size, with the data coming from the ODF district where the incident occurs. Costs are generated daily for larger incidents and smaller incidents record costs within thirty days of an incident’s end. Gross incident costs are adjusted to reflect a final projected net after Federal cost share recoveries and FEMA claim reimbursements. The result is the final net incident cost, which represents the General Fund obligation.

Figure 6– Fire Season Cost Estimate as of November 12, 2025

Summary of Fire Season 2025 Large Fire Fund (LWFF) Estimated Costs				
	Gross Costs	Other Agency Cost Recoveries	FEMA Cost Recoveries**	Net Costs
LWFF Costs	\$129,900,024	\$63,577,072	\$10,181,326	\$56,141,625
LWFF Adjustment*	\$21,159,025	\$30,610,112	\$0	\$0
TOTAL	\$151,059,049	\$94,187,184	\$10,181,326	\$56,141,625

Since the last report, fire season has ended, and final incident cost estimates and actuals are being reviewed for accuracy. Through the fire season, the largest fires contributing to the above costs are Rowena (6/11), Upper Applegate (6/18), Bowers Bridge (6/30), Grizzly Complex (7/7), Eastside Lightning Complex (7/7), Elk (7/8), Cram (7/13), Hagelstein (7/14), Board Shanty (7/17), Scholfield Ridged (8/12), Flat (8/21), Paradise-Moon Complex (9/3), and Highland (9/7) totaling \$115 million gross and \$43 million net costs.

*Large Wildfire Fund (LWFF) Adjustment is for 1) cost share incidents where ODF is not the paying agency, thus upfront costs are not fully bore by ODF, but will result in a final net cost to ODF once a federal billing is received, and 2) non-ODF billable incidents where ODF is working

on a purely Federal incident and all ODF costs are billable, thus ODF has upfront costs, but no net costs for the incident.

**The FEMA Cost Recoveries total for the fire season does not match the previous section's fire season FEMA total estimate as FEMA pre-positioning claims are included in those numbers, which are Severity funding reimbursements and not tied to LWFF reimbursements.

With county assessments arriving and most 2025 fire season bills paid, the agency is now looking ahead to the February short session and actively managing cash flow until the state's portion of net fire season costs is received. Large fire cost audits are nearing completion, and reimbursement claims to federal partners continue to be submitted on schedule; while federal reimbursements take time to process, ODF is meeting all required deadlines and maintaining steady progress. As fire season concludes, the agency is shifting its focus to Federal Funds to assess fiscal exposure amid ongoing federal uncertainty, including potential impacts from a federal government shutdown, ensuring reimbursement and funding strategies remain resilient. Federal funding levels remain stable, and payments continue as expected, but ODF leadership is proactively tracking federally supported activities and associated costs in anticipation of any future changes, remaining committed to its mission and strong financial stewardship for the people of Oregon.

Sincerely,



Kate Skinner
Interim State Forester

c:
Board of Forestry
Governor's Office
Chief Financial Office
Legislative Fiscal Office
Oregon State Treasury



January 2, 2026

Sen. Kate Lieber, Co-Chair
Rep. Tawna Sanchez, Co-Chair
Joint Committee on Ways and Means
900 Court St. NE, H-178
Salem, OR 97301

Re: Oregon Department of Forestry - Monthly financial condition report

Dear Co-Chairs,

The Oregon Department of Forestry (ODF) remains committed to protecting Oregon's forests and communities while maintaining strong financial stewardship. With most 2025 fire season costs paid and county assessments arriving, cash flow has stabilized as we head into the February short session. As we move into post-season operations, ODF will continue prioritizing timely payments and completing all remaining fire-season financial activities. The agency's financial position remains stable, supported by cost-containment efforts and a continued focus on preparedness.

Cash and General Fund balances

As of December 30, 2025, ODF's principal cash account balance was \$45.8 million, and the AY27 Protection Division General Fund appropriation balance stood at \$13.52 million. The estimated December payroll includes \$10 million from the Forestry Main Cash Account, \$2.5 million from the Protection General Fund, and \$900,000 from the Forest Resources General Fund. The \$7 million in the Landscape Resiliency General Fund will be transferred to the Landscape Resiliency Fund per the budget bill and is not available for cash flow purposes.

Figure 1 - Cash Fund Balances as of December 30, 2025

Fund	Fund Title	Balance
02000	FORESTRY CASH ACCOUNT	\$45,804,641.97
11000	FOREST LAND PROTECTION FUND - EFCC	\$11,262,296.76
56000	URBAN FORESTRY	\$30,607.34
58000	FOREST RESOURCE TRUST	\$1,137,544.28
70000	FACILITIES MANAGEMENT	\$14,131,915.14

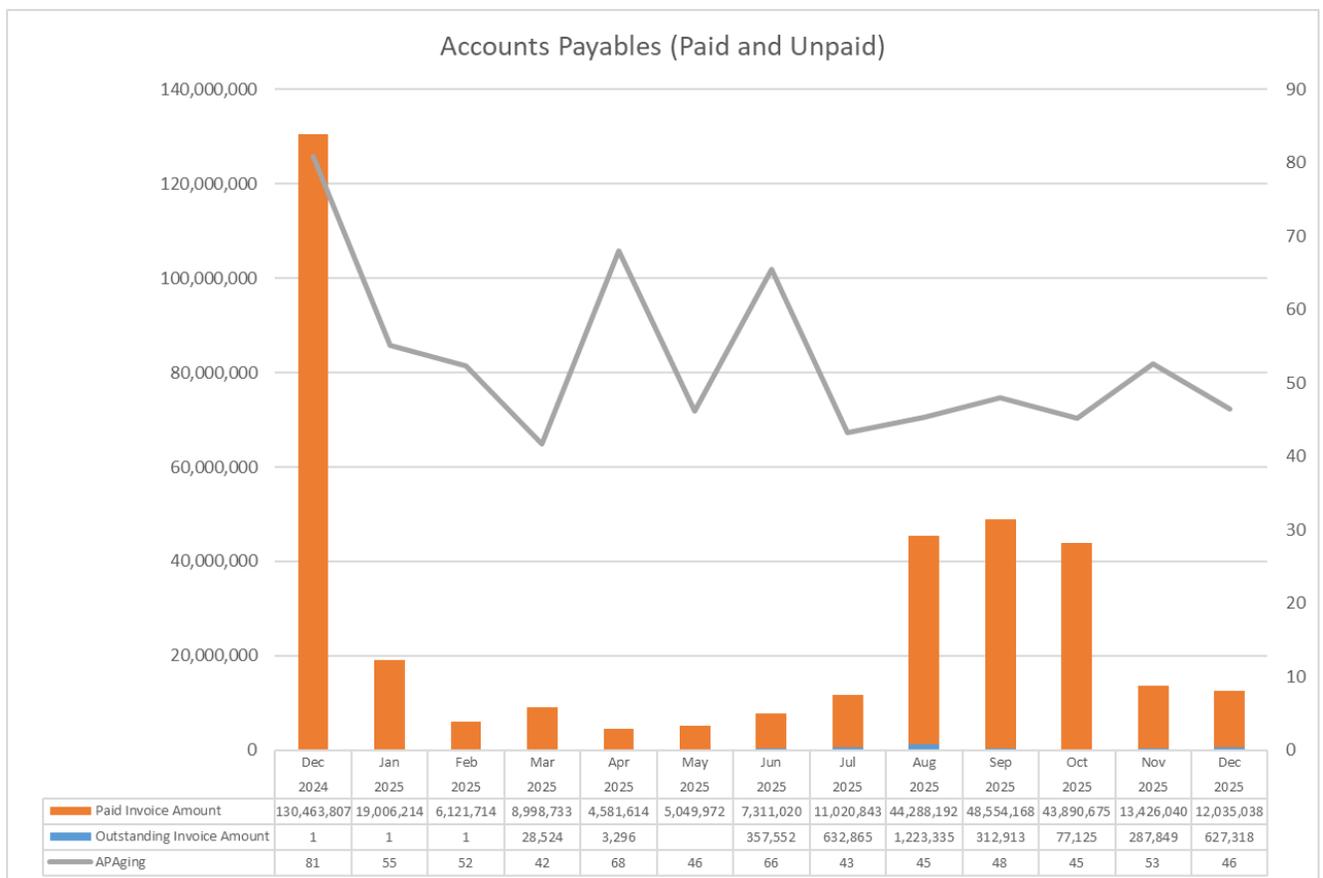
General Fund appropriations as of December 30, 2025

Appn	Appn Title	Balance
89905	FOREST RESOURCES	\$30,550,068.32
89908	ADMINISTRATION	\$689,239.42
89920	PROTECTION FROM FIRE	\$13,522,290.71
89995	LANDSCAPE RESILIENCY GF	\$7,000,000

Accounts payable

Department-wide expenditures have decreased since the last reporting period (Figure 2), represented by normal expenditures for after fire season operations. At the same time, the agency’s vendor accounts show an average aging at the 45-day mark.

Figure 2 - Accounts Payable as of December 23, 2025



Accounts receivable

In the second quarter of FY26, the agency invoiced \$15.2 million and collected \$15.4 million. Outstanding invoices increased from the prior period, totaling 883; however, 24% are now more than 120 days past due, representing a 5% decrease from the previous period.

Figure 3 – Accounts Receivable Aging as of November 17, 2025



State Forests Division financial status

Fiscal year 2026 (FY26) through October revenues from State Forests timber sales added \$23.5 million to the ODF cash account, \$14.6 million of which will be distributed for county payments. State Forests expenses are \$15.4 million which leaves a negative net operating income of \$6.6 million. The Forest Development Operating Fund balance is \$15.3 million, which is below the prudent balance of 6 months operating expenses. Volume harvested through October is 52.6 MMbf which is a positive 8% change from FY25. The lumber market is still experiencing uncertainty, with declining prices driven by weakening demand for residential construction. These declining prices are beginning to be reflected in bids offered by purchasers of State Forests timber sales, with bids coming in closer to the minimum appraised bid compared to recent years. State Forests timber sales continue to sell at auction, but a continued weak market could result in timber sales that do not successfully auction, due to bids that do not meet minimum bid requirements.

Fire Protection Division financial status

Outstanding Fire Protection assets and liabilities information

In addition to monitoring current agency-wide accounts payable and accounts receivable, the department also tracks estimated outstanding assets and liabilities related to the Fire Protection Division. Due to the nature of large fires and cooperative agreements—such as ODF providing

resources for fires outside its protection jurisdiction—reimbursement for upfront costs incurred by ODF can take several years. Conversely, delays may also occur in receiving federal bills for resources initially paid for by federal partners, as well as in finalizing cost-share settlements that may result in ODF being billed. The table below summarizes the estimated outstanding assets and liabilities (accounts receivable and payable not yet invoiced to or from ODF).

Figure 4— Estimated Outstanding Assets and Liabilities as of December 9, 2025

Summary of Estimated Outstanding Assets and Liabilities (Costs that have not been fully reconciled or billed)		
Category	Assets (AR)	Liabilities (AP)
Coop Billable	\$40,565,380	\$0
Large Fire - Non-Cost Share	\$286,900	\$1,841,355
Large Fire - Cost Share	\$104,434,752	\$32,263,631
TOTAL	\$145,287,032	\$34,104,986

Notable updates since the last report include a decrease of \$4.9 million in AR due to clean up work with the Battle Mountain cost share acreage split between the USFS and ODF, which resulted in the USFS owing less for that fire’s costs. Through fire season 2025, there are 55 cost shares in total to reconcile with our federal counterparts back to FY23.

FEMA information

FEMA Public Assistance (PA) grants are awarded to the Oregon Department of Emergency Management (ODEM), which then distributes the funds to ODF. In contrast, FEMA Fire Management Assistance Grants (FMAG) are awarded directly to ODF, providing more immediate access to funds once they are obligated. The FEMA reimbursement process can take several years to fully complete. ODF strives to submit all suppression claims to FEMA and/or ODEM within one year of an eligible incident’s conclusion. Once submitted, claims undergo detailed audits by FEMA and/or ODEM before final payments are issued. Administrative claims take longer to process, as all suppression-related costs must be paid in full before ODF can submit expenses tied to administrative and financial work required by FEMA.

The table below outlines the status of claims by fire year and provides an update on payment progress for each.

Figure 5— FEMA/Public Assistance Outstanding Balances as of December 9, 2025

Summary of Outstanding FEMA FMAG/PA						
Fire Year	Claim Type	Estimate to Invoice to FEMA	Pending Review by FEMA	Amount Obligated by FEMA	Payment Amount Requested	Grand Total Due to ODF
2019	Admin - FMAG	\$0	\$215,943	\$0	\$0	\$215,943
2020	Admin - FMAG	\$85,250	\$0	\$0	\$0	\$85,250

2020	Admin - PA	\$17,017	\$0	\$0	\$0	\$17,017
2020	Fire - PA	\$0	\$297,219	\$0	\$0	\$297,219
2021	Admin - FMAG	\$43,950	\$0	\$0	\$0	\$43,950
2022	Admin - FMAG	\$12,000	\$0	\$0	\$0	\$12,000
2023	Admin - FMAG	\$32,500	\$0	\$0	\$0	\$32,500
2023	Fire - FMAG	\$1,000,000	\$0	\$0	\$0	\$1,000,000
2024	Fire - FMAG	\$24,397,756	\$1,187,069	\$0	\$0	\$25,584,825
2024	Fire - PA	\$17,780,827	\$35,343,625	\$0	\$0	\$53,124,452
2025	Fire - FMAG	\$11,673,768	\$0	\$0	\$0	\$11,673,768
TOTAL		\$55,043,068	\$37,043,856	\$0	\$0	\$92,086,924

Since the last report, there have been minimal changes to FEMA claim amounts. ODF's FEMA finance team continues to be focused on auditing and submitting claims as soon as possible. We are on pace to have the remaining fire season 2024 (FMAG and PA) claims submitted by the end of calendar year 2025. Previous fire season admin claims will be next to submit final claims for, followed by beginning final auditing and claim work for fire season 2025.

Fire season cost estimate information

Fire season runs from January 1 through December 31, encompassing two partial fiscal years. Incident cost estimates are produced for every incident, no matter the size, with the data coming from the ODF district where the incident occurs. Costs are generated daily for larger incidents and smaller incidents record costs within thirty days of an incident's end. Gross incident costs are adjusted to reflect a final projected net after Federal cost share recoveries and FEMA claim reimbursements. The result is the final net incident cost, which represents the General Fund obligation.

Figure 6– Fire Season Cost Estimate as of December 9, 2025

Summary of Fire Season 2025 Large Fire Fund (LWFF) Estimated Costs				
	Gross Costs	Other Agency Cost Recoveries	FEMA Cost Recoveries**	Net Costs
LWFF Costs	\$129,900,024	\$63,577,072	\$10,181,326	\$56,141,625
LWFF Adjustment*	\$21,159,025	\$30,610,112	\$0	\$0
TOTAL	\$151,059,049	\$94,187,184	\$10,181,326	\$56,141,625

There have been no changes since the last report as fire season has ended. Final incident cost estimates and actuality are being audited for accuracy. Through the fire season, the largest fires contributing to the above costs are Rowena (6/11), Upper Applegate (6/18), Bowers Bridge (6/30), Grizzly Complex (7/7), Eastside Lightning Complex (7/7), Elk (7/8), Cram (7/13),

Hagelstein (7/14), Board Shanty (7/17), Scholfield Ridged (8/12), Flat (8/21), Paradise-Moon Complex (9/3), and Highland (9/7) totaling \$115 million gross and \$43 million net costs.

*Large Wildfire Fund (LWFF) Adjustment is for 1) cost share incidents where ODF is not the paying agency, thus upfront costs are not fully bore by ODF, but will result in a final net cost to ODF once a federal billing is received, and 2) non-ODF billable incidents where ODF is working on a purely Federal incident and all ODF costs are billable, thus ODF has upfront costs, but no net costs for the incident.

**The FEMA Cost Recoveries total for the fire season does not match the previous section's fire season FEMA total estimate as FEMA pre-positioning claims are included in those numbers, which are Severity funding reimbursements and not tied to LWFF reimbursements.

With county assessments arriving and most 2025 fire season bills paid, the agency is now looking ahead to the February short session and actively managing cash flow until the state's portion of net fire season costs is received. Large fire cost audits are nearing completion, and reimbursement claims to federal partners continue to be submitted on schedule; while federal reimbursements take time to process, ODF is meeting all required deadlines and maintaining steady progress. As fire season concludes, the agency is shifting its focus to Federal Funds to assess fiscal exposure amid ongoing federal uncertainty, including potential impacts from a federal government shutdown, ensuring reimbursement and funding strategies remain resilient. Federal funding levels remain stable, and payments continue as expected, but ODF leadership is proactively tracking federally supported activities and associated costs in anticipation of any future changes, remaining committed to its mission and strong financial stewardship for the people of Oregon.

Sincerely,

Kate Skinner
Interim State Forester

c:
Board of Forestry
Governor's Office
Chief Financial Office
Legislative Fiscal Office
Oregon State Treasury



Oregon

Tina Kotek, Governor

Department of Forestry
State Forester's Office
2600 State St
Salem, OR 97310-1336
503-945-7200
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February 2, 2026

Sen. Kate Lieber, Co-Chair
Rep. Tawna Sanchez, Co-Chair
Joint Committee on Ways and Means
900 Court St. NE, H-178
Salem, OR 97301

Re: Oregon Department of Forestry - Monthly financial condition report

Dear Co-Chairs,

The Oregon Department of Forestry (ODF) remains committed to protecting Oregon's forests and communities while maintaining strong financial stewardship. With fire season costs paid and county assessments arriving, the agency's cash flow has stabilized as it prepares for the February 2026 Legislative session. As we move into post-season operations, ODF will continue prioritizing timely payments and completing all remaining fire-season financial activities. The agency's financial position remains stable, supported by cost-containment efforts and a continued focus on preparedness.

Cash and General Fund balances

As of January 26, 2026, ODF's principal cash account balance was \$44.5 million, and the AY27 Protection Division General Fund appropriation balance stood at \$10.3 million. The estimated January payroll includes \$7.5 million from the Forestry Main Cash Account, \$1.1 million from the Protection General Fund, and \$1.4 from the Forest Resources General Fund. The 2nd quarter county distribution will be 12.5M. The \$7 million in the Landscape Resiliency General Fund will be transferred to the Landscape Resiliency Fund per the budget bill and is not available for cash flow purposes.

Figure 1 - Cash Fund Balances as of January 26, 2026

Fund	Fund Title	Balance
02000	FORESTRY CASH ACCOUNT	\$44,550,809.75
11000	FOREST LAND PROTECTION FUND - EFCC	\$23,128,787.28
56000	URBAN FORESTRY	\$30,717.82
58000	FOREST RESOURCE TRUST	\$1,141,650.34
70000	FACILITIES MANAGEMENT	\$13,935,289.21

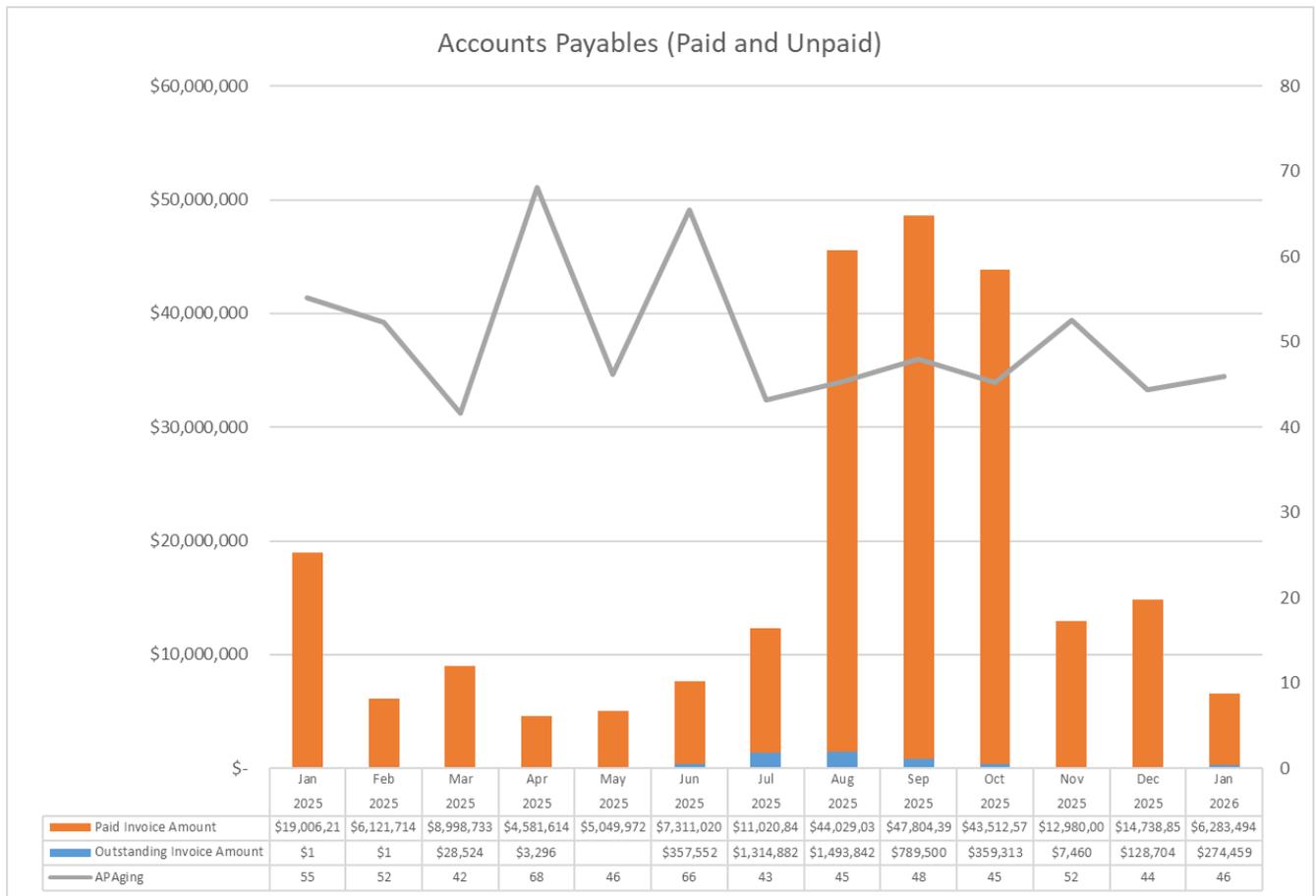
General Fund appropriations as of January 26, 2026

Appn	Appn Title	Balance
89905	FOREST RESOURCES	\$28,236,168.10
89908	ADMINISTRATION	\$671,707.99
89920	PROTECTION FROM FIRE	\$10,263,767.21
89995	LANDSCAPE RESILIENCY GF	\$7,000,000.00

Accounts payable

Department-wide expenditure has decreased since the last reporting period (Figure 2), represented by normal expenditures for after-fire season operations. At the same time, the agency's vendor accounts show an average age at close to the 45-day mark.

Figure 2 - Accounts Payable as of January 23, 2026



Accounts receivable

In the second quarter of FY26, the agency invoiced \$44 million and collected \$40.7 million. Outstanding invoices decreased from the prior period, totaling 760; however, 25% are now more than 120 days past due, representing a 1% increase from the previous period.

Figure 3 – Accounts Receivable Aging as of January 20, 2026



Fire Protection Division financial status

Outstanding Fire Protection assets and liabilities information

In addition to monitoring current agency-wide accounts payable and accounts receivable, the department also tracks estimated outstanding assets and liabilities related to the Fire Protection Division. Due to the nature of large fires and cooperative agreements—such as ODF providing resources for fires outside its protection jurisdiction—reimbursement for upfront costs incurred by ODF can take several years. Conversely, delays may also occur in receiving federal bills for resources initially paid for by federal partners, as well as in finalizing cost-share settlements that may result in ODF being billed. The table below summarizes the estimated outstanding assets and liabilities (accounts receivable and payable not yet invoiced to or from ODF).

Figure 4– Estimated Outstanding Assets and Liabilities as of January 13, 2026

Summary of Estimated Outstanding Assets and Liabilities (Costs that have not been fully reconciled or billed)		
Category	Assets (AR)	Liabilities (AP)
Coop Billable	\$39,160,511	\$0
Large Fire - Non-Cost Share	\$373,500	\$3,706,565
Large Fire - Cost Share	\$94,146,368	\$31,139,191
TOTAL	\$133,680,379	\$34,845,756

Notable updates since the last report include a decrease of \$11 million in AR due to cost shares being reconciled with our federal counterparts. An increase in AP of \$750,000 due to non-cost share incident expenses and corrections hitting the books that will be billed to other entities. Through fire season 2025, there are 52 cost shares (decrease of 3 from the last report) left to reconcile with our federal counterparts back to FY23.

FEMA information

FEMA Public Assistance (PA) grants are awarded to the Oregon Department of Emergency Management (ODEM), which then distributes the funds to ODF. In contrast, FEMA Fire Management Assistance Grants (FMAG) are awarded directly to ODF, providing more immediate access to funds once they are obligated. The FEMA reimbursement process can take several years to fully complete. ODF strives to submit all suppression claims to FEMA and/or ODEM within one year of an eligible incident’s conclusion. Once submitted, claims undergo detailed audits by FEMA and/or ODEM before final payments are issued. Administrative claims take longer to process, as all suppression-related costs must be paid in full before ODF can submit expenses tied to administrative and financial work required by FEMA.

The table below outlines the status of claims by fire year and provides an update on payment progress for each.

Figure 5– FEMA/Public Assistance Outstanding Balances as of January 13, 2026

Summary of Outstanding FEMA FMAG/PA						
Fire Year	Claim Type	Estimate to Invoice to FEMA	Pending Review by FEMA	Amount Obligated by FEMA	Payment Amount Requested	Grand Total Due to ODF
2019	Admin - FMAG	\$0	\$215,943	\$0	\$0	\$215,943
2020	Admin - FMAG	\$85,250	\$0	\$0	\$0	\$85,250
2020	Admin - PA	\$17,017	\$0	\$0	\$0	\$17,017
2020	Fire - PA	\$0	\$297,219	\$0	\$0	\$297,219
2021	Admin - FMAG	\$43,950	\$0	\$0	\$0	\$43,950
2022	Admin - FMAG	\$12,000	\$0	\$0	\$0	\$12,000
2023	Admin - FMAG	\$32,500	\$0	\$0	\$0	\$32,500
2023	Fire - FMAG	\$1,000,000	\$0	\$0	\$0	\$1,000,000
2024	Fire - FMAG	\$24,397,756	\$1,187,069	\$0	\$0	\$25,584,825
2024	Fire - PA	\$17,780,827	\$35,343,625	\$0	\$0	\$53,124,452
2025	Fire – FMAG	\$11,673,768	\$0	\$0	\$0	\$11,673,768
TOTAL		\$55,043,068	\$37,043,856	\$0	\$0	\$92,086,924

Since the last report, there have been no changes to FEMA claim amounts. ODF’s FEMA finance team continues to be focused on auditing and submitting claims as soon as possible.

We are on pace with the remaining fire season 2024 (FMAG and PA) claims submitted by the end of February 2026. Previous fire season administrative claims will be next to submit final claims for, followed by starting the final auditing and claim work for fire season 2025.

Fire season costs information

The 2025 fire season resulted in \$129.9 million in gross suppression costs, with \$57.3 million in net costs remaining after anticipated federal reimbursements and cost recoveries were applied. To close out the season, the Department of Forestry requested \$57,295,787 in General Fund to cover net large fire costs, \$73,600,000 in Other Funds expenditure limitation to allow for payment processing of gross fire-related obligations, and \$12,167,370 in General Fund from the Emergency Board Special Purpose Appropriation to cover the state's share of severity program costs. These requests were incorporated into a budget reconciliation bill for consideration during the 2026 legislative session.

With county assessments arriving and most 2025 fire season bills paid, the agency is managing cash flow in advance of the February 2026 session. Large fire cost audits are continuing, and reimbursement claims to federal partners are being submitted on schedule, with all required deadlines met. The agency continues to focus on federal funds to evaluate fiscal exposure amid ongoing federal uncertainty, including the potential impacts of a federal government shutdown. Federal funding remains stable and payments continue as expected, while ODF leadership proactively tracks federally supported activities and costs to maintain strong financial stewardship for the people of Oregon.

Sincerely,



Kate Skinner
Interim State Forester

c:
Board of Forestry
Governor's Office
Chief Financial Office
Legislative Fiscal Office
Oregon State Treasury

STAFF REPORT

Agenda Item No.:	B
Work Plan:	Administrative
Topic:	Board Governance Performance Self-Evaluation
Presentation Title:	Board Governance Performance Self-Evaluation for 2025
Date of Presentation:	March 4, 2026
Contact Information:	Sabrina Perez, Agency Administration Strategic Advisor (503) 945-7311 sabrina.perez@odf.oregon.gov

SUMMARY

The Board of Forestry conducts an annual formal evaluation of their performance in meeting best practices of governance as reported in a key performance measure to the Oregon Legislature. This agenda item presents the criteria and timeline to the Board for approval and initiates the annual self-evaluation process.

CONTEXT

The governance performance measure for state boards and commissions, “percent of total best practices met by the board” was enacted by the Oregon State Legislature and adopted by the Board in 2006. The measure includes the fifteen standard best practices criteria from the Legislature with additional tailoring designed to meet the Board’s specific needs and interests, including: descriptive text to assist in a shared understanding of the measure, Likert scale measurements, one additional criterion relating to public involvement and communications, and open-ended summary questions. The Board’s target for the annual performance measure is meeting 100% of the total best practices.

The annual assessment is a self-evaluation conducted individually by each board member in the spring. A cumulative summary of the evaluation results and comprehensive analysis is then presented to the Board in June for collective approval of the Board’s performance relative to the performance measure target. The results and analysis are then included in the agency’s *Annual Performance Progress Report*, reporting to the Legislature on all agency key performance measures, and further discussed during the Board’s annual planning retreat.

The Board Governance Subcommittee recently reviewed the evaluation procedures and the full Board recently discussed all legislative key performance measures during their February retreat. Further work is anticipated over the next biennium to refine the Board’s performance evaluation processes. Assessment for this year’s evaluation will continue utilizing the legislative measure as codified and previously conducted.

RECOMMENDATION

The Department recommends the Board of Forestry approve the Board Governance Performance Measure Best Management Practices Self-Evaluation Criteria for 2025 as presented in Attachment 1, initiate the annual self-evaluation period, and complete individual evaluations by April 15, 2026.

NEXT STEPS

Instructions for accessing the evaluation survey will be sent to the Board by email with completion requested by April 15.

ATTACHMENT

- (1) 2025 Oregon Board of Forestry Governance Performance Measure, Best Management Practices Self-Evaluation Criteria

**Oregon Board of Forestry
Governance Performance Measure
Best Practices Self-Evaluation Criteria for 2025**

Performance Measure: Percent of total best practices met by the Board.

Target: 100%

Period: Annual

ODF Key Performance Measure: #2

Board Adopted: September 6, 2006

Instructions:

This is a sample survey only, not for completion or submittal. The formal evaluation is conducted through an electronic survey platform. Instructions for accessing the survey will be sent to the Board following approval of the 2025 evaluation criteria, process, and timeline.

2024 Oregon Board of Forestry Best Practices Criteria	Strongly Agree	Agree	Disagree	Strongly Disagree
<p>1. Executive Director’s performance expectations are current. <i>The Board understands this to mean that the State Forester’s Position Description is current.</i> <u>Comments:</u></p>				
<p>2. Executive Director’s performance has been evaluated in the last year. <i>The Board understands this to mean that the State Forester’s Position Description is current and that the annual performance appraisal has been completed.</i> <u>Comments:</u></p>				
<p>3. The agency’s mission and high-level goals are current and applicable. <i>The Board understands this to mean that the Board’s <u>Vision for Oregon’s Forests</u> and Oregon Forest Practices Act/Rules are current.</i> <u>Comments:</u></p>				
<p>4. The Board reviews the <u>Annual Performance Progress Report</u>. <i>The Board understands this to mean that the Board reviews the report annually as a meeting agenda item.</i> <u>Comments:</u></p>				
<p>5. The Board is appropriately involved in review of agency’s key communications. <i>The Board understands this to mean agency and Board communications at a policy level, versus a day-to-day operating level.</i> <u>Comments:</u></p>				
<p>6. The Board is appropriately involved in policy-making activities. <i>The Board understands this to mean those policy activities that particularly have a statewide perspective, including holding Board meetings at different geographic locations around the state.</i></p>				

**Oregon Board of Forestry
Governance Performance Measure
Best Practices Self-Evaluation Criteria for 2025**

Performance Measure: Percent of total best practices met by the Board.

Target: 100%

Period: Annual

ODF Key Performance Measure: #2

Board Adopted: September 6, 2006

2024 Oregon Board of Forestry Best Practices Criteria	Strongly Agree	Agree	Disagree	Strongly Disagree
<u>Comments:</u>				
7. The agency’s policy option packages are aligned with their mission and goals. <i>The Board understands this to mean the packages included in the biennial budget process as part of the Agency Request Budget.</i> <u>Comments:</u>				
8. The Board reviews all proposed budgets. <i>The Board understands this to mean the Department of Forestry’s biennial budget at the Agency Request Budget level.</i> <u>Comments:</u>				
9. The Board periodically reviews key financial information and audit findings. <i>The Board understands this to mean significant financial issues and as audits are released.</i> <u>Comments:</u>				
10. The Board is appropriately accounting for resources. <i>The Board understands this to mean critical issues relating to human, financial, material and facilities resources by providing oversight in these areas. This means that the Board receives briefings on such issues as succession management, vacancies, the budget, and financial effects of the fire program.</i> <u>Comments:</u>				
11. The agency adheres to accounting rules and other relevant financial controls. <i>The Board understands this to mean the receipt of the annual statewide audit report from Secretary of State which highlights any variances in accounting rules or significant control weaknesses.</i> <u>Comments:</u>				
12. Board members act in accordance with their roles as public representatives. <i>The Board understands this to mean that they follow public meeting rules, the standard of conduct for Board members, and the public input process. Members received training and information from the Governor’s Office upon appointment.</i> <u>Comments:</u>				

**Oregon Board of Forestry
Governance Performance Measure
Best Practices Self-Evaluation Criteria for 2025**

Performance Measure: Percent of total best practices met by the Board.

Target: 100%

Period: Annual

ODF Key Performance Measure: #2

Board Adopted: September 6, 2006

2024 Oregon Board of Forestry Best Practices Criteria	Strongly Agree	Agree	Disagree	Strongly Disagree
<p>13. The Board coordinates with others where responsibilities and interests overlap. <i>The Board understands this to mean other public agencies and boards with statutory authority connections or overlaps, e.g. the Forest Trust Land Counties, the Oregon Environmental Quality Commission/Department of Environmental Quality; the Oregon Fish and Wildlife Commission/Department of Fish and Wildlife; the State Land Board; local fire districts; the United States Forest Service; the Bureau of Land Management.</i></p> <p><u>Comments:</u></p>				
<p>14. The Board members identify and attend appropriate training sessions. <i>The Board understands this to mean the workshops, symposia, and field tours that accompany some Board meetings, and that the Board receives adequate technical information.</i></p> <p><u>Comments:</u></p>				
<p>15. The Board reviews its management practices to ensure best practices are utilized. <i>The Board understands this to mean carrying out this self-evaluation on an annual basis, conducting the annual Board work plan status check, and by conducting the periodic scan of issues on a biennial basis.</i></p> <p><u>Comments:</u></p>				
<p><i>Listed below is an additional best practice for the Board of Forestry; not included in calculating the percentage adherence to best practices.</i></p>				
<p>16. The Board values public input and transparency in conducting its work through outreach to and engagement of stakeholders and by using its work plan communication tools. The Board also values input and communications with its standing advisory committees, special ad hoc committees and panels and external committees with board interests.</p> <p><u>Comments:</u></p>				
Total Number (Criteria 1-15)				
Percentage of Total in Each Evaluation Category (Criteria 1-15)				
Percentage of Total in “Agree” and “Disagree” (Criteria 1-15)				

**Oregon Board of Forestry
Governance Performance Measure
Best Practices Self-Evaluation Criteria for 2025**

Performance Measure: Percent of total best practices met by the Board.

Target: 100%

Period: Annual

ODF Key Performance Measure: #2

Board Adopted: September 6, 2006

Summary Questions for Consideration:

1. How are we doing?

2. What factors are affecting our results?

3. What needs to be done to improve future performance?

Agenda Item No.:	C
Topic:	2025 Government-to-Government Report on Tribal Relations
Date Presented to Board:	March, 2026
Contact Information:	Kate Skinner, Interim State Forester kate.j.skinner@odf.oregon.gov Cindy Kolomechuk, Tribal Liaison cindy.kolomechuk@odf.oregon.gov

SUMMARY

Under Oregon Revised Statutes (ORS) 182.164, state agencies are directed to develop and implement policy relating to Tribal relations (“Tribe” having the meaning of any federally recognized Indian Tribe in Oregon [2001c.177§1]). Annually, agencies are required to submit a report to the governor and Legislative Commission on Indian Services (LCIS). The report includes the adopted policy, those responsible for developing and implementing agency programs affecting Tribes, the process the agency uses to identify programs affecting Tribes, and the method the department uses to notify employees of the adopted policy [ORS 182.166(3)(a-f)]. The Oregon Department of Forestry (ODF) uses this report to summarize its government-to-government activities guided and required by Oregon Executive Order 96-30, SB 770 (2001), and ORS 182.164 – 182.168. In addition, the governor reestablished the Cultural Items Task Force by signing the signing of [Executive Order 24-06](#), which replaces Executive Order 17-12. In March 2020, state agencies were directed to provide contact information and a timeline for completion. This information can be found in the attachment.

CONTEXT

The [2025 Government-to-Government Report on Tribal Relations](#) highlights the department’s efforts to promote and enhance government-to-government relationships with the nine federally recognized Tribes of Oregon. Our goal is to build and maintain meaningful and respectful relationships with our Tribal partners through direct and intentional discourse. This includes early and often communication on key initiatives, listening to understand their perspectives, and following through on our commitments. This engagement occurs throughout the department at all levels, such as coordination among the State Forester, Board of Forestry, and Tribal leadership, maintaining representation on LCIS Clusters and Workgroups, and supporting critical field level coordination.

Attachment: 2025 Government-to-Government Report on Tribal Relations



2025 Government-to-Government Report on Tribal Relations

January 1, 2025 – January 1, 2026

The Oregon Department of Forestry (ODF) respectfully submits its annual report to the nine Tribes within Oregon. This report also satisfies the requirement to submit an annual report to the Legislative Commission on Indian Services (LCIS) and Governor (Oregon Revised Statute 182.166).

Attached to this report, please find the Oregon Department of Forestry's designation of responsible staff and summary of cultural item efforts in support of the Governor's Executive Order 24-06, which reinforces the department's commitment to strengthen Government-to-Government (GTG) relationships with the nine federally recognized Tribes of Oregon and the Oregon Tribal Cultural Items Task Force (CITF).

Policy adopted under ORS 182.164

It is the policy of the Oregon Department of Forestry, hereafter Department, to promote and enhance government-to-government relations with the nine Tribes of Oregon early and often during the development and implementation of ODF programs that may affect Tribes. It is ODF's intent to strengthen intergovernmental relations, address potential concerns, and enhance the exchange of information and resources for the greater good of all Oregonians. This policy provides a framework for government-to-government interactions and opportunities for ongoing staff-to-staff discussions.

Process to identify which programs affect Tribes

The Department assumes all programs and programmatic changes affect Sovereign Nations, Tribes, Confederation of Tribes, and Tribal Entities. Through ongoing communication, the Department and the Board of Forestry work with the State Forester and staff to evaluate the effectiveness of programs and communication strategies, making appropriate adjustments as needed. Programmatic changes that are legislatively mandated may require more in-depth LCIS involvement to make these assessments and meet requirements. Currently, the Department is engaged in government-to-government communications relating to fire protection and prevention, forest health, management of State Forests, administration of the Forest Practices Act, multi-agency initiatives surrounding climate change, cultural and natural resource management, shared-stewardship, community and urban forestry, and landscape resiliency.

Individuals responsible for programs that affect Tribes

All employees of the Oregon Department of Forestry develop and/or implement policy, programs, and projects affecting federally recognized Tribes or members. The contact list below includes Executive Leadership, Executive Staff, and Intersectional Staff who hold the highest degree of responsibility in the Department's programs and actions, but the Department expects all employees to consider and communicate how actions or inactions affect the Department's relationships with the nine federally recognized Tribes of Oregon:

Executive Staff

Kate Skinner Interim Oregon State Forester 503-354-4065 kate.j.skinner@odf.oregon.gov	Tim Holschbach Interim Deputy State Forester 503-480-9756 tim.j.holschbach@odf.oregon.gov	Kyle Williams Deputy Director Fire Operations 503-779-5278 kyle.h.williams@odf.oregon.gov
Wendy Heckman Deputy Director Administration 503-689-3704 wendy.e.heckman@odf.oregon.gov	Sarah Smith Human Resources Director 971-719-3797 sarah.smith@odf.oregon.gov	James Short Chief Financial Officer 503-302-8478 james.short@odf.oregon.gov

Executive Team

Josh Barnard, Division Chief Forest Resources 503-551-8568 josh.w.barnard@odf.oregon.gov	Michael Curran, Division Chief Fire Protection 541-740-7506 michael.curran@odf.oregon.gov	Mike Wilson, Division Chief State Forests 503-945-7351 michael.wilson@odf.oregon.gov
Justin Hallett, Division Chief Agency Administration 541-891-2103 justin.t.hallett@odf.oregon.gov	Brent Grimsrud Chief Information Officer 503-400-5646 brent.grimsrud@odf.oregon.gov	Joy Krawczyk Public Affairs Director 503-910-4311 joy.krawczyk@odf.oregon.gov
Brian Pew Eastern Oregon Area Director 541-447-5658 brian.pew@odf.oregon.gov	Don Everingham Northwest Oregon Area Director 503-707-4240 don.everingham@odf.oregon.gov	Dave Larson Southern Oregon Area Director 541-621-4101 dave.larson@odf.oregon.gov

Intersectional Staff

Cindy Kolomechuk Designated Tribal Liaison Cultural Resources Primary Rep 503-502-5599 cindy.kolomechuk@odf.oregon.gov	Megan Frizzell Cultural Resources Secondary Rep 503-991-8314 megan.d.frizzell@odf.oregon.gov	Derrick Wheeler Legislative Director 971-375-1258 derrick.wheeler@odf.oregon.gov
Scott Altenhoff Economic Development & Community Services Cluster Primary Rep 971-428-7380 scott.r.altenhoff@odf.oregon.gov	Hilary Olivos-Rood Economic Development and Community Services Cluster Secondary Rep 971-707-8946 hilary.olivos-rood@odf.oregon.gov	Casara Nichols Natural Resources Work Group Secondary Rep Primary Rep 971-482-9261 casara.c.nichols@odf.oregon.gov
Lilah Gonen 971-718-2532 lilah.gonen@odf.oregon.gov	Christine Buhl Natural Resources Work Group Primary Rep christine.j.buhl@odf.oregon.gov	Levi Hopkins Fire Protection Rep 503-949-3572 levi.a.hopkins@odf.oregon.gov

Employee notification on the provisions of ORS 182.162 - 182.168 and the Department Policy on Tribal Government Relations

The Department's Tribal Liaison is the State Forester or designee. For most of the time period covered by this report, Kate Skinner served as the interim State Forester, and Cindy Kolomechuk served as the interim designated Tribal Liaison. As of December 1, 2025, Cindy will serve as the Agency's permanent Tribal Liaison. Last year, ODF established a Tribal Relations Team to support and build our Tribal Relations Program. Members include the Department's LCIS Cluster and Workgroup representatives (identified above), as well as support staff. Currently, Cindy Kolomechuk is the primary point of contact for Tribal Relations for ODF. The responsibilities related to Tribal relations, the development and implementation of training and communication regarding agency initiatives are the roles and responsibilities of the Tribal Liaison, as designated by the State Forester, and in coordination with the Tribal Relations Team and support staff. The Department's policy is available on its Tribal Relations webpage (<https://www.oregon.gov/odf/aboutodf/pages/tribalrelations.aspx>).

Training opportunities and other educational events

Oregon Revised Statute (ORS) 182.166(1) requires, "At least once a year, the Oregon Department of Administrative Services ... provide training to state agency managers and employees ... on the legal status of Tribes, the legal rights of members of Tribes and issues of concern to Tribes."

- No such training occurred.

On May 8, Dr. Deana Dartt and Heron Brae with Live Oak Consulting delivered a 90-minute virtual presentation to ODF's Forest Resources Division (~80 people) entitled **Meaningful Partnerships with Tribal Communities: Why, How, and When**. This presentation introduced the concept of a Shared Stewardship Model and was intended to help participants better understand Tribal priorities/perspectives with the aim of finding mutually beneficial solutions to pressing forest issues in our region. This presentation also included a brief Q&A session following the presentation.

The Protection Division encouraged all staff to watch "Preserving Cultural Artifacts While Fighting Fire." This video was co-produced with the nine federally recognized Tribes and is intended to promote shared respect and understanding of cultural resources protection and identification.

Promoting communications and relationships with Tribes

To effectively implement our policy, the Department prioritizes open and frequent communication across all levels within the Agency. Active listening is fundamental to successful communication and building strong relationships with Tribes.

Below, please find a summary of the Department's communication initiatives and Tribal engagement activities, along with upcoming opportunities for collaborative partnerships and shared stewardship.

Methods of government-to-government communication

State Forester Engagement

- Several times throughout 2025, the State Forester honored our commitment to engage with Tribes at the highest level by inviting each of the nine federally recognized Tribal Councils or Boards of Directors to open channels of communication with ODF. Our goal is to continue to build our relationships at all levels by listening to Tribal perspectives and priorities, and identify opportunities for shared stewardship, cultural and natural resource protection, and capacity building.
- The State Forester sends an annual letter about upcoming major initiatives, major programs or projects and formally requests discourse and engagement with Tribes.

Legislative Commission on Indian Services (LCIS)

- In May, 2025, Board of Forestry Chair, Jim Kelly, Interim State Forester, Kate Skinner, Deputy Division Chief for the Forest Resources Division, Mike Kroon, and interim Tribal liaison, Cindy Kolomechuk addressed the Commission members to formally invite the nine federally recognized Tribes of Oregon to the Ridgetop to Rooftop Landscape Resiliency Summit, held in coordination with the Office of the State Fire Marshal. The Commission encouraged us to work with Tribal staff and invited us to tour some of the landscape resiliency treatments that the Tribes have completed. We were not successful in scheduling a tour this year, and plan to work with the Tribes to schedule a tour in the next year.
- ODF participates in the following LCIS Cluster groups: Cultural Resource Cluster, Natural Resources Work Group, and the Economic Development and Community Services Cluster.
- Our representatives provide quarterly updates developed by Division and District Foresters. These reports inform cluster meeting discussions.

2025 Tribal engagement highlights:
More information can be found in the Division Reports

Shared Stewardship

The Ridgetop to Rooftop Landscape Resiliency Summit

In November 2025, the Oregon Department of Forestry and the Oregon State Fire Marshal co-hosted the Ridgetop to Rooftop Summit to foster a unified, collaborative approach to wildfire resilience across Oregon. Our goal for Tribal engagement was to elevate Tribal voices in achieving landscape resiliency. Agency leadership worked with the nine federally recognized Tribes of Oregon to develop session planning and promote attendance. Tribal governments were present throughout the entire process. The program included a closed Staff to Staff session to provide the space for Tribes to share their experiences, perspectives, and priorities with Agency Leadership. Tribal representatives highlighted the importance of conservation and demonstrated the value of integrating Traditional Ecological and Cultural Knowledge and western science to create resilience and reduce wildfire risk. Throughout the event, it was recognized that tribes have maintained landscape and community resilience for time immemorial. Approximately 280 tribal, public and private representatives attended.

The Prescribed Fire & Cultural Burning Program aims to increase prescribed fire and cultural burning use by providing liability coverage for enrolled burns. This legislation authorizes claims for losses from escaped fires. ODF is collaborating with the nine federally recognized Tribes of Oregon to implement this program.

Capacity Building

- In the 2023–25 biennium, the Landscape Resiliency Program awarded a \$2 million grant to Klamath Tribes to conduct fuels treatments and prescribed fire projects on Tribal lands and across ownership boundaries. Through this project the Tribe hired and trained a Tribal fire crew and completed 4,553 acres of treatment. In Spring of 2025, ODF staff and a USFS representative were invited to visit the Klamath Tribe where the group was shown a presentation on the science behind the treatments and had the opportunity to see the mitigation work completed on the ground through field visits to treatment sites.
- State Forests provided 23,000 seedlings to the Confederated Tribes of Grand Ronde, Coquille Indian Tribe, and Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians.

The Urban and Community Forestry (UCF) program is partnering with nine federally recognized Tribes to administer the Tribal Governments Subaward Grant Program, promoting urban and community forest investments and tree equity in underserved areas. Tribes can submit proposals up to \$1 million by June 30, 2026. No matching funds are required. Professional grant writers contracted through UCF are available to assist Tribes in developing proposals. Three Tribes have already applied and are currently in the grant award phase.

Cultural and Natural Resources Protection

- The \$22 million Forest Legacy Program funding request for Qapqāpa Wildlife Area was successful. This project is a partnership between the Oregon Department of Fish and Wildlife and the Confederated Tribes of the Umatilla Indian Reservation. ODF serves as the passthrough agency for federal funds. The project is an 11,434-acre simple acquisition designed to protect and enhance property that will connect two areas of USFS property in Union County, Oregon. The property includes 5.6 miles of the Grande Ronde River and 6 miles of Beaver Creek, both are very culturally important to the Tribe and home to endangered trout, salmon, and steelhead. This is a strategic opportunity for protection of Oregon's wildlife, water, salmon, biodiversity, habitat connectivity, and recreation opportunities, while fostering climate resilience via land protection and carbon sequestration across the northeast Oregon landscape.
- In 2016, the Tillamook Forest Center (TFC) and the Confederated Tribes of Grand Ronde forged a museum partnership rooted in mutual support and cultural exchange. The Grand Ronde Chachalu museum staff aided with the TFC's 10-year celebration. The TFC reciprocated by attending annual tribal Education and Cultural summits, promoting Chachalu to visitors, and organizing site visits for their volunteers to the tribal museum. The TFC also provided an accredited Certified Interpretive Host training to tribal staff and community members at no cost in 2017, 2021, and again in 2025. The curriculum was customized to include more relevant and inclusive material for Tribes.
- This opportunity is open to all nine federally recognized Tribes of Oregon.

Detailed Tribal communication

State Forests

- The State Forests Division has had ongoing dialogue with the Tribes to incorporate Tribal perspectives and practices into the stewardship of State Forests through the new Habitat Conservation Plan (HCP) and Forest Management Plan (FMP).
- In early January 2025, the State Forester reached out to the Tribes, inviting them to engage with ODF on any area of interest regarding the Draft Western Oregon State Forests HCP and associated Draft FMP. That spring, The Board of Forestry directed State Forests to begin the rule making process for the Western Oregon State Forests Management Plan. ODF began engaging the Tribes prior to initiating the public rule making process. ODF also provided two Information and Listening Sessions for Tribal staff in October and December 2025. Representatives from the Confederated Tribes of the Coos Lower Umpqua and Siuslaw, the Confederated Tribes of the Grand Ronde, and the Confederated Tribes of the Siletz Indians participated. In these sessions, ODF worked with the Tribes to build new 10-year Implementation Plans. In the spirit of shared stewardship, ODF staff will reach out to the Tribes in the coming months to integrate Indigenous Traditional Ecological Knowledge, identify opportunities to encourage access and cultivation of culturally significant plants, discuss protections for cultural resources, and explore opportunities to work in partnership to honor Tribal ties to the lands that ODF currently manages.
- ODF also sought input from Tribes' cultural resources and natural resources staff on Fiscal Year (FY26 and FY27) Operations Plans for the Northwest and Southwest Oregon Forest Management Plans. This provided an opportunity to include Tribal input on specific forest activities such as timber sales, resource protection measures, reforestation, road building, stream enhancement, and recreation projects planned on State Forests for FY26 and FY27. ODF made more intensive and targeted requests for consultation on operations with higher degrees of cultural resource impact concerns, allowing ODF to continue meeting operational goals, while upholding our commitment to cultural resource protection.
- In Spring 2025, ODF offered seedlings to Tribes, providing 23,000 seedlings for reforestation.
- The ODF Office in the City of Toledo has moved to Newport, and ODF is in the process of selling the property. ODF recognizes Tribal sovereignty and, in compliance with ORS Chapter 270, ODF began reaching out to Tribes to assess interest in purchasing the property early in the process.
- In addition to managing forestlands, the State Forests Division includes a Recreation, Education, and Interpretation Program that provides opportunities for the public to engage with State Forests through outdoor activities and educational programming. The program's Tillamook Forest Center (TFC) is ODF's sole interpretive center providing

Oregonians and tourists with a chance to connect with their forests and our shared history.

- **Tillamook Forest Center:** In 2016, the Tillamook Forest Center (TFC) and the Confederated Tribes of Grand Ronde forged a museum partnership rooted in mutual support and cultural exchange. Soon after, staff from the Grand Ronde and the Chachalu Museum helped the TFC enhance their 10-year celebration with events and exhibits. In reciprocity, TFC began attending the tribal biannual Education and Cultural summits, offering Certified Interpretive trainings at no cost, promoting Chachalu to TFC visitors, and taking TFC volunteers to visit the museum. The Grand Ronde museum Director expressed interest in having the Certified Interpretive Host (CIH) training offered at Chachalu for their staff and volunteers. The TFC offered this training workshop in 2017 and again in 2021 and in 2025. Attendees included staff, volunteers, elders, and State of Oregon Capitol staff. The traditional curriculum was customized to include more relevant and inclusive material for the Tribe. This included education specific role-playing activities to address insensitive and inappropriate visitor questions.

Fire Prevention and Protection

In 2025, there were 1,160 fires on ODF-protected lands that burned a total of 24,447 acres. The 10-year average is 938 fires and 136,612 acres burned. ODF has responded to 368 non-statistical fires and 2,228 Non-Fire Crew Actions (smoke checks, reports of fires and violations). To date, ODF has been successful keeping 94% of fires at 10 acres or less. The Legislative Key Performance Measure is 98%. Five fires qualified for FEMA Fire Management Assistance Grants (FMAG) this year, three in the month of June in a one-week time frame, one on July 12, and one on August 22. Statewide across all jurisdictions in 2025, 339,461 acres burned. The 10-year statewide average is 715,581 acres.

As these fires spanned ownership boundaries, ODF worked in coordination with Tribal governments and state and federal agencies to manage and suppress fires across the landscape. The Department executed multiple Delegations of Authority with Tribes, Agencies, and other affected landowners to ensure alignment in fire response strategy, priorities, and protection of cultural and natural resources.

Fire Preparedness

All District leadership and field staff held fire planning meetings to prepare for fire season, including priorities for cultural and natural resources protection. A few examples are as follows:

Northeast Oregon District

Spring Coordination meetings were held among ODF, and The Confederated Tribes of the Umatilla Indian Reservation. Umatilla Tribe Fire Department, and Bureau of Indian Affairs to work toward continuous improvement of fire in response and coordination on and around Tribal lands. Continued engagement with

Department of Natural Resources and the Umatilla Tribal Fire Department surrounding fire response on fee lands within the Northeast Oregon District to include those that fall within and outside of the Umatilla Indian Reservation.

West Oregon

Every fall, staff work with the Grande Ronde and Siletz Tribes to accomplish their smoke management and prescribe fire goals. The Siletz Tribe is a member of our West Oregon Forest Protective Association. A Siletz representative is a board member of the West Oregon Forest Protective Association

The Klamath –Lake District is a member of the [South-Central Oregon Fire Management Partnership](#), an interagency fire management program that provides comprehensive wildland fire service to south central Oregon and northwest Nevada.

The partnership strives to achieve a more efficient, effective and integrated interagency fire management program for all participating agencies on the land administered and protected by each agency. The partnership encompasses all aspects of fire management.

The Prescribed Fire and Cultural Burning Program aims to increase prescribed fire and cultural burning use by providing liability coverage for enrolled burns. This legislation authorizes claims for losses from escaped fires. ODF provides fire protection for Tribal lands covered by ODF agreements and is collaborating with Tribes to learn about cultural/ecological burning techniques and their landscape benefits. In 2025, ODF has been engaged with all of the nine federally recognized Tribes of Oregon to plan examples of this collaboration and implement the Prescribed Fire and Cultural Burning Program to some degree. A few examples of this collaborative work include the following:

The Klamath Tribes

The Klamath Tribes are working through ODF's Certified Burn Manager (CBM) program for cultural and prescribed burn leadership and liability protection through the Prescribed Fire Liability Pilot Fund. They first began using the CBM program for cultural burning in spring 2025. ODF worked with The Klamath Tribe to create and deliver a panel discussion on cross-boundary prescribed burning at the Ridgetop to Rooftop Summit in December 2025.

The Confederated Tribes of the Grand Ronde

The Confederated Tribes of the Grand Ronde have been using the CBM program both outside and within ODF protection for prescribed and cultural burns since 2024. They have one CBM and where they are not working through the BIA for fire management work, they are using ODF's CBM burn plan template and planning processes.

The Confederated Tribes of the Siletz Indians

ODF is working with the Confederated Tribes of the Siletz Indians to help build capacity for their fire management program. This includes providing their fire manager with focused mentoring to get certified as a National Wildfire Coordination Group Type 2 Burn Boss. Prior to Siletz hiring a fire manager, ODF provided technical assistance to plan and implement cultural burning at their Camp Creek Hills property in fall 2024. ODF, CTSI, and Willamette Ignitions Network delivered CBM classroom training collaboratively in September 2025.

The Confederated Tribes of the Warm Springs

ODF's Prescribed Fire Coordinator is serving on the graduate committee for a student in the Master of Natural Resources program at Oregon State University (OSU). The Warm Springs student is writing a huckleberry management plan for the tribe including the use of prescribed and cultural fire. ODF's Prescribed Fire Coordinator did her master's on the cultural fire management of huckleberry and is providing technical assistance as an advisor. CTWSI otherwise uses BIA fire management planning and NWCG qualifications and are not currently using the liability pilot or Certified Burn Manager program.

Cow Creek Band of Umpqua Tribe of Indians

ODF staff assisted the Umpqua Oak Partnership with accessing grant programs for cultural burning being planned through the Takelma Cultural Center, in coordination with the Education Programs officer. ODF also supported a community education event, blending cultural and prescribed fire management at Glide Elementary School in October 2025. Students in Glide High School's fire management program worked alongside wildland firefighters from Wolf Creek Job Corps and Glide Rural Fire Department to reintroduce fire into an indigenous garden at the elementary school, with a focus on language revitalization and use of cultural plants.

The Confederated Tribes of the Coquille

ODF connected Coquille's education department with the Wild Rivers Forest Collaborative. They worked together to develop a prescribed burn association in *Coquille's* ancestral territory. The Director of the education department attended a prescribed fire training exchange in Ashland and is interested in continuing to work with his tribe to revitalize their fire culture.

The Confederated Tribes of the Coos Lower Umpqua and Siuslaw Indians

The Tribe sent two of their staff members to CBM training in fall 2025 and are preparing to use the program as part of their forestry program.

The Confederated Tribes of the Umatilla Indian Reservation

The Federal Forest Restoration (FFR) Program has continued to collaborate with the Confederated Tribes of the Umatilla Indian Reservation on the 54 North Fuels Reduction & Huckleberry Restoration GNA Project. This 40,000- acre project on the Umatilla National Forest will improve huckleberry habitat and reduce wildfire risk and qualifications for conducting prescribed burning.

The Confederated Tribes of the Burns Paiute

The Burns Paiute Natural Resources/Cultural Resources Director is interested in building capacity for Prescribed and Cultural burning through the Certified Burn program

Forest Resources

November 2025, the Oregon Department of Forestry and the Oregon State Fire Marshal co-hosted the Ridgetop to Rooftop Summit, designed to promote wildfire resilient landscapes. Recognizing that true wildfire resilience requires an integrated approach, the 2025 Summit reflects a deepening partnership between resilient landscapes and fire-adapted communities.

The 2025 Ridgetop to Rooftop Summit: Creating a Wildfire Resilient Oregon was a unique, invitation-only opportunity for Tribal, local, state and federal wildland fire leadership, practitioners, and decision-makers to come together and share perspectives on high-priority topics. This event was intended to foster a unified and collaborative approach to wildfire resilience by deepening mutual understanding, strengthening shared stewardship, and aligning efforts across ownerships and jurisdictional boundaries.

- The agencies recognize that tribal sovereignty and culture are rooted in rich intergenerational knowledge that has guided management practices since time immemorial. These practices are also fundamental to achieving landscape resilience. Agency leadership formally invited each of the nine federally recognized Tribes of Oregon to participate in the Summit. Leadership also invited them to share their perspectives early in the process to help us craft an agenda that reflects their priorities for discussion and action.
- Given their status and the merit their participation brings to the conversation, we waived registration fees and offered lodging for tribal government representatives and staff, upon request.
- Eight Tribal governments were present throughout the entire process. The program included a closed Staff to Staff session to provide the space for Tribes to share their experiences, perspectives, and priorities with Agency leadership. Tribal representatives highlighted the importance of conservation and demonstrated the value of integrating Traditional Ecological and Cultural Knowledge and western science to create resilience and reduce wildfire risk. Approximately 280 tribal, public and private partners were in attendance.

- The Urban and Community Forestry (UCF) Program is administering the federally funded IRA Tribal Governments Subaward program and is continuing to accept proposals until June 30, 2026. Oregon's Federally recognized Tribes and Tribal organizations can use these federal funds to advance planning and monitoring; nature-based education, recreation and engagement; network development and relationship building; workforce diversification and development; nursery capacity building and tree production and maintenance; and adaptive management and state-wide lesson sharing. Up to a million dollars is available to each Tribe with the potential for additional funding to be made available after initial agreements are entered into with each Tribe
- UCF Program staff have continued to be in regular communication with all nine of the Federally Recognized Tribes of Oregon regarding the IRA Tribal Governments Subaward Program. Seven of the nine Tribes have submitted proposals and received grant award letters. The program has executed subaward agreements with three Tribes and anticipates executing agreement with the four other awarded Tribes by the end of the year. We are actively working with the remaining two Tribes to help them develop and submit grant proposals within the next several months.
- Through the Forest Legacy Program, a partnership with the USFS, Oregon is able to apply for and accept federal grants for the purchase of development rights to eligible private forestlands through either conservation easement or fee-title acquisition into public ownership with the goal of promoting stewardship and sustainable management of private forest lands by maintaining working forests that conserve important commodity and non-commodity forest resource and conservation values. ODF serves as the passthrough entity for any Oregon funds received as part of the Forest Legacy Program.
- ODF submitted a funding request for the Qapq̄apa Wildlife Area State-Tribal Partnership Project and the project was awarded \$22 million in funding for FY25. This project is a partnership between the ODFW and the Confederated Tribes of the Umatilla Indian Reservation and is an 11,434-acre fee simple acquisition to protect and enhance property that will connect two areas of USFS property in Union County, Oregon. The property includes 5.6 miles of the Grande Ronde River and 6 miles of Beaver Creek, both are very culturally important to the Tribe and home to endangered trout, salmon, and steelhead. This is a strategic opportunity for protection of Oregon's wildlife, water, salmon, biodiversity, habitat connectivity, and recreation opportunities, while fostering climate resilience via land protection and carbon sequestration across the northeast Oregon landscape.
- In the 2023–25 biennium, the Landscape Resiliency Program awarded a \$2 million grant to The Klamath Tribes to conduct fuels treatments and prescribed fire projects on Tribal lands and across ownership boundaries. Through this project the Tribe hired and trained a Tribal fire crew and completed 4,553 acres of treatment. In Spring of 2025, ODF staff and a USFS representative were invited to visit The Klamath Tribe where the group was shown a presentation on the science behind the treatments and had the opportunity to see the mitigation work completed on the ground through field visits to treatment sites.

- The Federal Forest Restoration (FFR) Program has continued to collaborate with the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) on the 54 North Fuels Reduction & Huckleberry Restoration GNA Project. This 40,000- acre project on the Umatilla National Forest, will improve huckleberry habitat and reduce wildfire risk. ODF contractors worked closely with CTUIR natural resources staff to incorporate their feedback in the development of silviculture prescriptions for the project. Significant progress has been made in 2025 and in 2026 all project planning and compliance work will be complete, and the work will enter the implementation phase. ODF, CTUIR, and Umatilla National Forest staff will work together to implement the 54 North project in 2026 and beyond.
- FFR field staff also participated in the Wildfire Risk Reduction Partnership led by the Cow Creek Band of Umpqua Tribe of Indians (CCBUTI). The partnership works to prioritize forest health and fuels reduction across the Umpqua National Forest, the Roseburg District of the Bureau of Land Management, and adjacent Tribal and private lands.
- The Oregon Seedbank and J.E. Schroeder Seed Orchard hosted natural resources staff from the Confederated Tribe of the Siletz Indians to share details of seed collection and orchard management, discuss seed availability through State Forests surplus and the Seed Bank and provided bags to support the tribe's wild cone collection.
- Northeast Oregon District: ODF is working with the Tribes of the Confederated Umpqua Indian Reservation regarding a violation of the Forest Practices act on private land that included lands within the established boundary of the Umatilla Indian Reservation. Violation was discovered by CTUIR Department of Natural Resources staff and relayed to ODF. Close communication between ODF and CTUIR DNR staff has continued this issue. This issue has brought to light the need for local ODF staff to have closer ties to other CTUIR departments to ensure that all potentially impacted departments are in the know regarding these types of issues. Local staff will be seeking opportunities through known contacts in DNR to ensure communication channels are established and maintained.
- Aerial surveys are conducted annually to assess damage to Oregon forestlands. These efforts are conducted jointly between ODF and the USFS. Due to the limited capacity of our federal partners, aerial survey east of the Cascade Crest was limited to priority geographies. However, the aerial survey included forestlands of the Confederated Tribes of the War the Warm Springs and the Klamath Tribes.
- ODF Presented mass timber housing options at Columbia Pacific NW Housing Summit. We also shared a panel with Tribal business developing modular mass timber housing products. In October, ODF provided a mass timber update including housing opportunities to the Economic Development LCIS cluster.

Agenda Item No.:	D
Work Plan:	Fire Protection Work Plan
Topic:	Ongoing Topic: Rangeland Protection Association Approval
Presentation Title:	Approval to Form the North Pendleton Rangeland Protection Association
Date of Presentation:	March 4, 2026
Contact Information:	Levi Hopkins, Wildfire Prevention and Policy Manager (503) 949-3572, Levi.a.hopkins@odf.oregon.gov

SUMMARY

The purpose of this agenda item is to obtain Board approval to proceed with bringing specific areas of northern Umatilla County, into the Oregon Protection System.

CONTEXT

Rangeland fire protection associations are non-profit, locally governed groups of landowners which have been organized to provide fire protection to crop and rangeland in portions of eastern Oregon. These organizations are formed under the authority of the Board and with assistance from the Department.

Currently, there are 28 Rangeland Protection Associations (RPA) that have previously been approved by the Board of Forestry. The most recent being the Grizzly RPA which was formed in March of 2023. These RPAs protect over 5,224,819 acres of private land and approximately 686,070 acres of state-owned lands. These lands, including federally owned land, combine to encompass over 17.7 million acres.

Several representatives of rangeland owners in Umatilla County have requested the Board hold a public hearing about providing protection from fire for crop and rangelands in the vicinity northwest of Pendleton, Oregon. The Board, on January 7, 2026, authorized a public hearing on the formation request, pursuant to ORS 477.320. A hearing was held at 36788 Kosmos Rd in Stanfield, Oregon, on January 27, 2026.

At the hearing, strong support for the formation of an association was evident in the immediate area. Testimony presented during the hearing indicated a need for organized fire protection, and the local landowners want to assist local wildland agencies with initial attack to prevent more large fires in the area.

These landowners want a way to protect their private property and actively take part in the protection of their lands. The increased level of protection for this area can be achieved by bringing it into the Oregon protection system and forming a rangeland protection association.

RECOMMENDATION

The Department recommends the Board take the following action when it meets on March 4, 2026:

Approve the inclusion of crop and rangeland in portions of northern Umatilla County into a rangeland protection association and direct the Department to assist with the formation of the North Pendleton Rangeland Protection Association, pursuant to ORS 477.320.

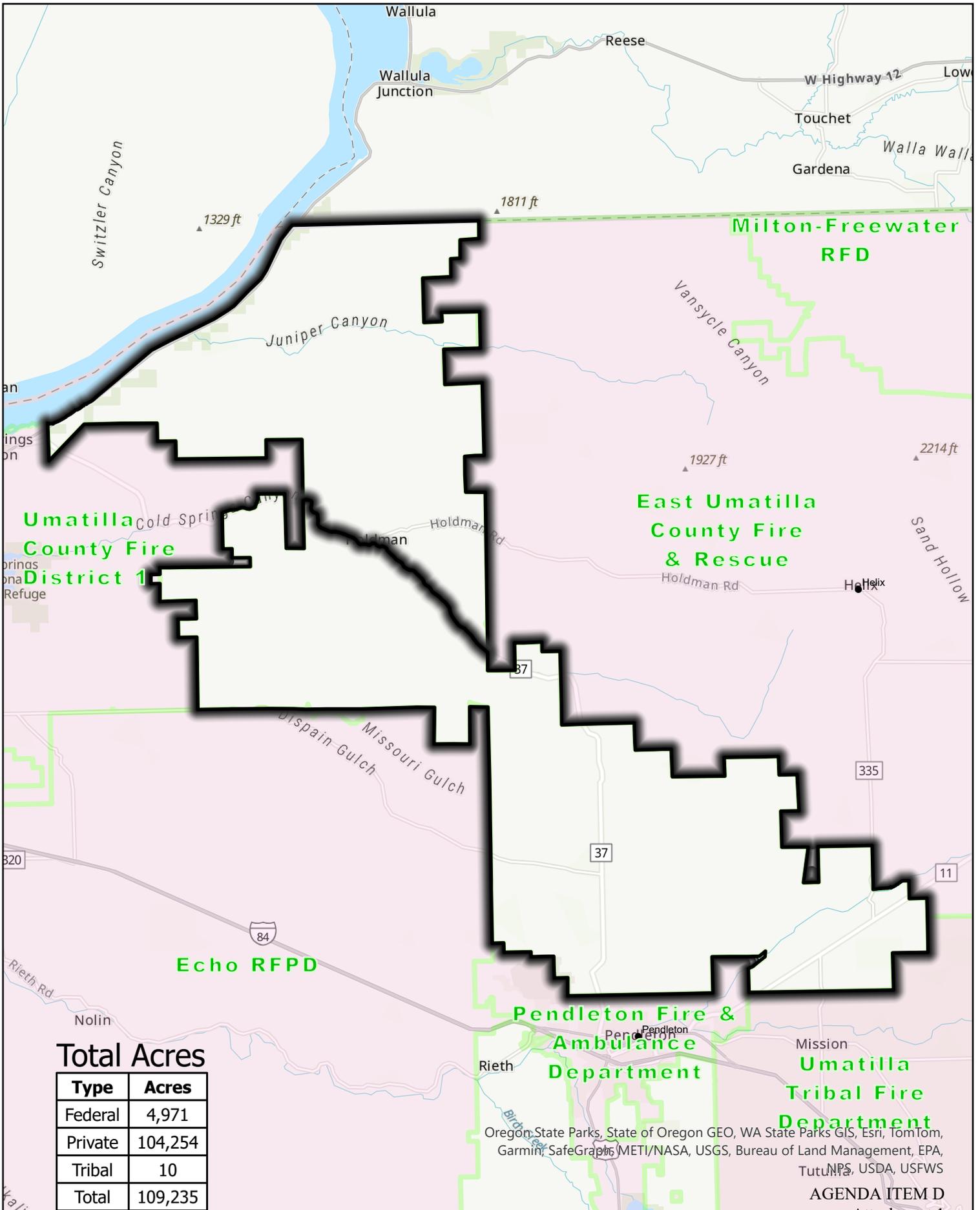
NEXT STEPS

The Department will work with local landowners in the area to form the North Pendleton Rangeland Protection Association. This will include developing mutual aid agreements, providing training as requested, offering FEPP equipment as available, and any other assistance as requested and feasible.

ATTACHMENTS

- (1) North Pendleton Rangeland Association boundary map
- (2) North Pendleton Rangeland Association Formation Public Hearing sign-in sheet
- (3) North Pendleton Rangeland Association Formation Public Hearing Report
- (4) Letter of Support

Proposed North Pendleton RFPA



Total Acres

Type	Acres
Federal	4,971
Private	104,254
Tribal	10
Total	109,235

Oregon State Parks, State of Oregon GEO, WA State Parks GIS, Esri, TomTom, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, TutuNPS, USDA, USFWS

AGENDA ITEM D

**PUBLIC HEARING PARTICIPATION RECORD
REQUEST TO FORM THE "NORTH PENDLETON RFPA" AREA INTO THE OREGON PROTECTION SYSTEM UNDER ORS
477.320**

Location: Bracher Farms Shop, 36788 Kosmos Rd. Stanfield, Or 97875 Date: 1/27/26 Time: 4:00 PM

PLEASE PRINT

NAME & ORGANIZATION	MAILING ADDRESS	TESTIMONY SUBMITTED	
		WRITTEN	ORAL
Larry Parker	P.O. Box 385 Helix, Or 97835		<input checked="" type="checkbox"/>
Tom Peterson	84223 Wallula Rd Helix Or 97835		
Peter McGovern	↓		
Trent Sorey	411 NW 10 th St Bendon	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Tom Sory	78634 S Cold Spring Rd Bendon OR 97601		<input checked="" type="checkbox"/>
Jackie Richmond Andrzejewicz	72220 Tuttle Ln Red Bend		<input checked="" type="checkbox"/>
Sara Andrzejewicz	X Rupp Ranches		<input checked="" type="checkbox"/>
Luz Rupp	176 Kronikewood St Red Bend 97835		<input checked="" type="checkbox"/>
Garin Newton	82696 Stokemans rd Helix OR		<input checked="" type="checkbox"/>
Paul Brache	80238 Vandyck Rd Helix OR		<input checked="" type="checkbox"/>

Revised 20100301

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PLEASE PRINT

NAME & ORGANIZATION	MAILING ADDRESS	TESTIMONY SUBMITTED	
		WRITTEN	ORAL
Bryan & Kathy Jones Jones & Jones Ranches	81654 S. Juniper Canyon Rd. Helix, OR. 97835		X
Jake Divine	41642 hwy 37 Pendleton, OR 97901		
Randy Zupp	176 Kramwood St Richland wa		X
Andy Spratling Tommy Mentzer	P.O. Box 561 Pendleton, OR 97801 Umatilla National Forest (USFS)		X
Todd Thorne	8775 Hwy 37 Pendleton OR		X
Mike Moore	Umatilla N.F.	X	
Sage Duboy	Umatilla County P.O. Box 1594 Pendleton OR		X
Jake Markgraf	75870 Grasswell Rd. Pendleton, OR 97801		X

Revised 20100301

Date: January 28, 2026

To: Oregon Board of Forestry

From: Allison Rayburn, ODF Rangeland Fire Program Coordinator

Subject: Hearing Officer's Report on North Pendleton Rangeland Fire Protection Association boundary expansion ORS 477.320(1)

Hearing Information

Proposed Area: 109,235 acres northwest of Pendleton, Oregon in Umatilla County
Hearing Date & Time: January 27, 2026 @ 4:00 PM
Hearing Location: Bracher Farms; 36788 Kosmos Rd. Stanfield, Oregon
Written Comments Due: January 27, 2026 4:00 PM
Hearing Authorized: Board of Forestry meeting, January 7, 2026
Hearing Officer: Allison Rayburn, ODF Rangeland Fire Program Coordinator

The Public Hearing on the proposal to form the North Pendleton RFFPA and bring those lands into the Oregon Protection System was formally convened at 4:16 PM. at the Bracher Farms shop, after a discussion regarding the proposal. Registration forms were available for people who wished to provide oral comments on the proposed formation. The hearing was closed at 4:30 PM.

30 members of the public representing the area landowners attended the hearing. 15 people who signed the Public Hearing Participation Record form provided oral comments. One provided written testimony. There was a discussion before the hearing to obtain further information on how the RFFPA is funded and the agreements they have in place to work with the Wildland fire agencies.

Summary of Oral Comments

- Larry Parker, landowner, fully support forming a RFFPA.
- Trent Sorey, landowner, fully support forming a RFFPA.
- Tom Sorey, landowner, fully support forming a RFFPA.
- Jack Remillard, retired Pendleton Fire assistant chief/Fire Marshal/Emergency Manager, fully support forming a RFFPA, did recommend looking into forming a rural fire district.
- John Androlewicz, landowner, fully support forming a RFFPA.
- Luz Rupp, landowner, fully support forming a RFFPA.
- Gavin Newtonson, landowner, fully support forming a RFFPA.
- Paul Bracher, fully support forming a RFFPA , commented that this will help with communication and safety.
- Bryan Jones, landowner, fully support forming a RFFPA.
- Kathy Jones, landowner, fully support forming a RFFPA.
- Randy Rupp, landowner, fully support forming a RFFPA.
- Andy Spratling, landowner, fully support forming a RFFPA.
- Todd Thorne, landowner, fully support forming a RFFPA, commented that this will help with communication and safety.
- Sage DeLong, Umatilla County Emergency Manager, fully support forming a RFFPA, commented it will help with communication and safety and be a benefit to the county.
- Jason Hill, Landowner, fully support forming a RFFPA, wanted to thank the Bracher's for their work in getting the RFFPA started.

Summary of Written Comments

- Mike Moore, Umatilla National Forest District Fire Management Officer, submitted a letter of support for the establishment of the North Pendleton RFPA.

A handwritten signature in blue ink that reads "Allison Rayburn". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Allison Rayburn
ODF Rangeland Fire Program Coordinator
Eastern Oregon Area

November 17, 2025

To: Oregon Board of Forestry

RE: Letter of support for the establishment of the North Pendleton RFPA

The Umatilla National Forest has a long standing agreement with the Bureau of Land Management, Vale District for initial attack response on their land that is adjacent to the Forest. This agreement has primarily been managed by the Walla Walla Ranger District due to our proximity to the BLM lands in the proposed North Pendleton RFPA.

As the District Fire Management Office of the Walla Walla Ranger District, I support the establishment of the North Pendleton RFPA. This establishment will allow access to firefighting equipment & clothing, radios for communication, training and an opportunity to improve coordination and support through mutual aid agreements.

It's understood that this will take some time to fully implement but I feel there's a strong desire from the land owner group to make this happen as efficiently as possible. The formation of this RFPA will be another step towards contributing to a more coordinated fire response with state and federal partners in this area.

Sincerely,



MIKE MOORE
District Fire Management Officer





Board of Forestry Public Meeting

1. Opening Comments and Board Member Introductions

This item serves as an opportunity for the Board Members to provide introductory statements, and for the State Forester to brief the Board of Forestry of the Department or related topics of importance. Individual members of the Board can offer comments for the Chair, Secretary, and Board consideration. Comment times may be reduced at the discretion of the Board Chair.

This is an information item.



Board of Forestry Public Meeting

2. Consent Agenda Items

This item serves as an opportunity to review and consider items presented on the Consent Agenda.

This is a decision item.



Board of Forestry Public Meeting

3. State Forester Introduction

This item serves as time to introduce and hear from the State Forester.

This is an information item.



Board of Forestry Public Meeting

4. Public Forum

This item serves as the vehicle for the public to comment on information items or topics not on the agenda. Comment times may be reduced at the discretion of the Board Chair.

This is an information item.



Board of Forestry Public Meeting

5. Legislative Update

This item serves as an opportunity for the Department to provide the Board of Forestry with an update from the 2026 legislative short session.

This is an information item.



Board of Forestry Public Meeting

6. Board Governance Committee Work

The Board will hear from Board Governance subcommittee members on recommendations to the Board Manual and best practices.

This is an information item.



Board of Forestry Public Meeting

7. Forest Trust Land Advisory Committee Testimony

The FTLAC is a statutorily established committee that advises the Board on the management of State Forests and other matters in which counties may have a responsibility pertaining to forestland.

This is an information item.

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
Date of Presentation:	March 4, 2026
Contact Information:	Justin Butteris, Policy Analyst Justin.Butteris@odf.oregon.gov Michael Wilson, State Forests Division Chief Michael.Wilson@odf.oregon.gov

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

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.

Western Oregon State Forests Management Plan - Summary of Public Comment

- 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.

Western Oregon State Forests Management Plan - Summary of Public Comment

- 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 $\geq 30\%$ 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 $\geq 30\%$ 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 $\geq 30\%$ 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 CO₂ 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 $\geq 30\%$ 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).

Western Oregon State Forests Management Plan - Summary of Public Comment

- 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 ($\geq 30\%$ 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

Barred Owl

1. Barred Owl Threat

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

Western Oregon State Forests Management Plan - Summary of Public Comment

- 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

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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_Prosperty_Roadmap_December_2025.pdf



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CFTLC 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)



Council of Forest Trust Land Counties

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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



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1212 Court St. NE | Salem, Oregon 97301

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



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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. CFTLC notes that there may be



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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



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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/Documents/Oregon's_Prosperty_Roadmap_December_2025.pdf



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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/>

STAFF REPORT

Agenda Item No.:	9
Work Plan:	State Forests Work Plan
Topic:	State Forests Management
Presentation Title:	Performance Measures for Western Oregon State Forests Management
Date of Presentation:	March 4, 2026
Contact Information:	Tyson Wepprich, Adaptive Management Specialist Tyson.M.Wepprich@odf.oregon.gov Michael Wilson, State Forests Division Chief Michael.Wilson@odf.oregon.gov

CONTEXT

Forest Management Plans (FMP) provide the overarching direction for state forestlands managed by ODF. These plans are developed pursuant to Oregon Administrative Rule (OAR 629-035-0030) and are approved by the Board of Forestry to codify the Board's finding that the FMP meets Greatest Permanent Value (OAR 629-035-0020).

The State Forests Division (Division) has initiated the rulemaking process for the draft Western Oregon State Forests FMP. Since the FMP is a high-level policy document intended to allow for a broad range of implementation pathways, the Board has considered multiple scenarios with different management approaches consistent with the draft FMP.

At the November 2025 special Board meeting, Division staff presented an implementation pathway based on an updated model scenario. Based on feedback at that meeting, this presentation will show the expected Performance Measures that would result from that scenario.

FMP SCENARIO

The Division's forest activity model emulates how the forest could be managed over time with forest stands grown forward from the current inventory. It projects harvest volumes, revenues, carbon sequestration, habitat quality, and other forest stand metrics across the landscape by simulating decisions which meet a set of management objectives according to model inputs, such as silvicultural practices and landscape constraints.

The Division designed scenarios to include departures from even-flow harvest volumes to provide increased near-term revenue to counties and even out the existing unbalanced stand age distribution over time. The levels of the departures are held constant in 10-year steps similar in duration to Implementation Plans. After 30 years, a harvest floor was set to provide certainty about mid-term harvest and other co-benefits while preserving flexibility and options for the next generation.

For this report, the Division is presenting the scenario that harvests 215 MMBF annually for the first 10 years, with subsequent 10-year steps of 205 and 195 MMBF average annual harvest volume (Scenario 5a from the November 2025 Board meeting). Unlike the previous Board meetings that discussed differences between scenarios, this report will share results from one scenario with upper

and lower levels for each metric that would occur with +/- 5% of cumulative harvest volume variation within the first 30 years. From this range of outcomes, the Performance Measures below will show what the Division believes is achievable in actual implementation plans across social, economic, and environmental benefits.

PERFORMANCE MEASURES

Performance Measures are a select set of metrics that the Board will use to evaluate management commitments and outcomes with respect to the objectives and intent expressed through the FMP guiding principles, management approach, and goals. The Performance Measures have component metrics (Attachment 1) that will be monitored and reported for the Board and others to track management commitments and outcomes readily across a broad range of ecosystem services provided by State Forests. Component metrics will be measured and reported at different time scales depending on the resource. The best time to consider them as a set for adaptive management would be during Implementation Plan revisions.

RECOMMENDATION

Information only.

NEXT STEPS

After this meeting, the Division will:

1. Incorporate Board feedback on the Performance Measures and their components.
2. Present the final draft FMP to the Board in June 2026, and initiate a final round of rulemaking on the final draft.
3. Start modeling for Implementation Plans (to begin in FY2028) to accompany the draft FMP.
4. Present the final draft FMP to the Board in September 2026 for final adoption by the Board.

ATTACHMENTS

1. List of Performance Measures and their component metrics.
2. Performance Measure graphs based on the FMP modeled scenario.

11 Performance Measures (arranged alphabetically) with their component metrics and notes about their measurement and reporting. Note that some have changed since the last presentation to the Board. Other acronyms and terms used in table: emphasis area – land classification into General Stewardship and Habitat Conservation Areas; FIA – Forest Inventory and Analysis, plot network monitored by the US Forest Service; HCP – Habitat Conservation Plan; NSO – Northern spotted owl.

Performance Measures	Component Metrics	Notes
1. Adaptive Capacity of Forests	1a. Stand age class distribution by emphasis area	Acres by stand age classes in scenario forecasts
	1b. Tree species composition by emphasis area	Mean basal area per acre by species group
	1c. Tree canopy layering (structure) by emphasis area	Mean Diameter Diversity Index (DDI)
	1d. 10-year growth rates by species	From FIA plot remeasurements of trees
2. Aquatic and Riparian Resources	2a. Physical attributes in streams (habitat limiting factors)	HCP requirement, not yet monitored
	2b. Water temperature monitored for permit area	HCP requirement, not yet monitored
	2c. Catchment assessment of regeneration harvests	Scenario forecasts stand ages <10 years old
3. Carbon Sequestration & Storage	3a. Carbon sequestration in live trees	Scenario forecasts flux in aboveground carbon
	3b. Live tree carbon storage by emphasis area	Scenario forecasts aboveground carbon
	3c. Harvested wood product sequestration & storage	Modeled from harvest volume
4. Division Finances	4a. Forest Development Fund balance and forecast	Existing annual reporting
	4b. Annual revenue and operating expenses	Existing annual reporting, scenario revenues
5. Economic Opportunities	5a. Timber direct/indirect employment and income	2025 EcoNW socioeconomic report
	5b. Non-timber direct/indirect employment and income	2025 EcoNW socioeconomic report
6. Financial Support for Counties	6a. Revenue transferred to counties and taxing districts	Scenario revenues with market assumptions
7. Habitat Elements for Wildlife	7a. Large trees >30-inch diameter	FIA plot measurements
	7b. Large snags and volume of downed wood	FIA plot measurements

Performance Measures	Component Metrics	Notes
	7c. Connectivity between late seral forest stands	Mean distance between suitable NSO habitat HCP requirement, all scenario meet it.
	7d. Covered species habitat meets stay-ahead provisions	
8. Harvest and Inventory	8a. Acres of management by type (including forest health)	Existing annual reporting, scenario forecasts
	8b. Standing merchantable volume in live trees	Scenario forecasts
9. Recreation, Education, and Interpretation Opportunities	9a. Percent of recreation facilities (not trails) open annually for the recreation season	Access to opportunities
	9b. Critical trail assets (bridges/culverts) in good or better condition	Related to HCP required assessments and best management practices
	9c. Educational interactions with school classes or individual students	Existing annual reporting
10. Transportation	10a. Transportation assessment (hydrological connectivity and fish passage barriers of road system)	HCP requirement, assessment ongoing
11. Tribal Cultural Resources	11a. Development of new Division policies following the FMP goals: <i>Tribal Access and Use of Natural Resources</i> and <i>Cultural Resources Protection</i>	Report on how strategies for these FMP goals are being enacted with Tribal Partners

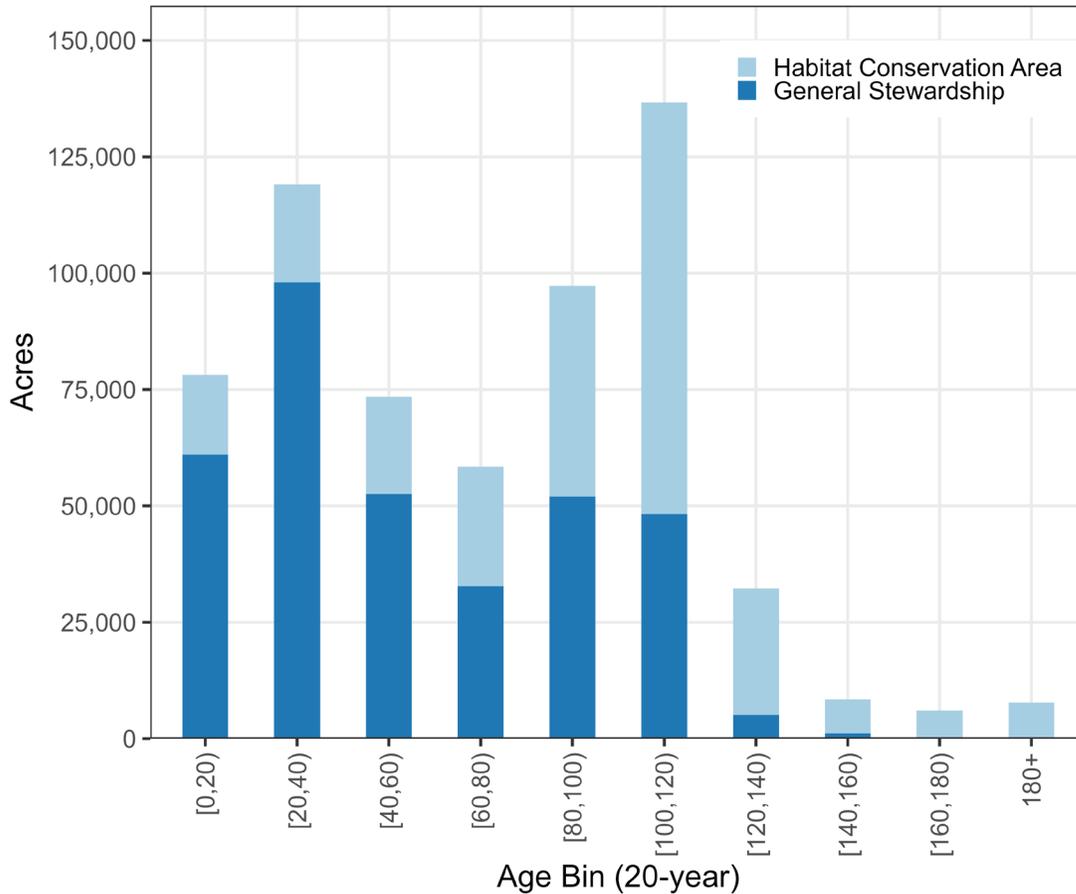
Board Performance Measures

- Graphs of component metrics present the 30-year forecast for FMP modeled scenario 5a. Departure Steps starting at 215 MMBF.
 - Uncertainty ranges are displayed for harvest levels +/- 5% over 30 years, best represented by the forecasts from 5b. and 1a. modeled scenarios. When displayed by emphasis area (General and Habitat Conservation Area), the HCA graph has no uncertainty range because all scenarios had the same HCA management.
 - When available from FIA monitoring, component metrics show the current baseline for State Forests and comparisons to FIA estimates of Federal and Private forestland adjacent to State Forests. These have 95% confidence intervals for sampling uncertainty.
- Performance Measures or component metrics without current monitoring are included with a description of when they would start.

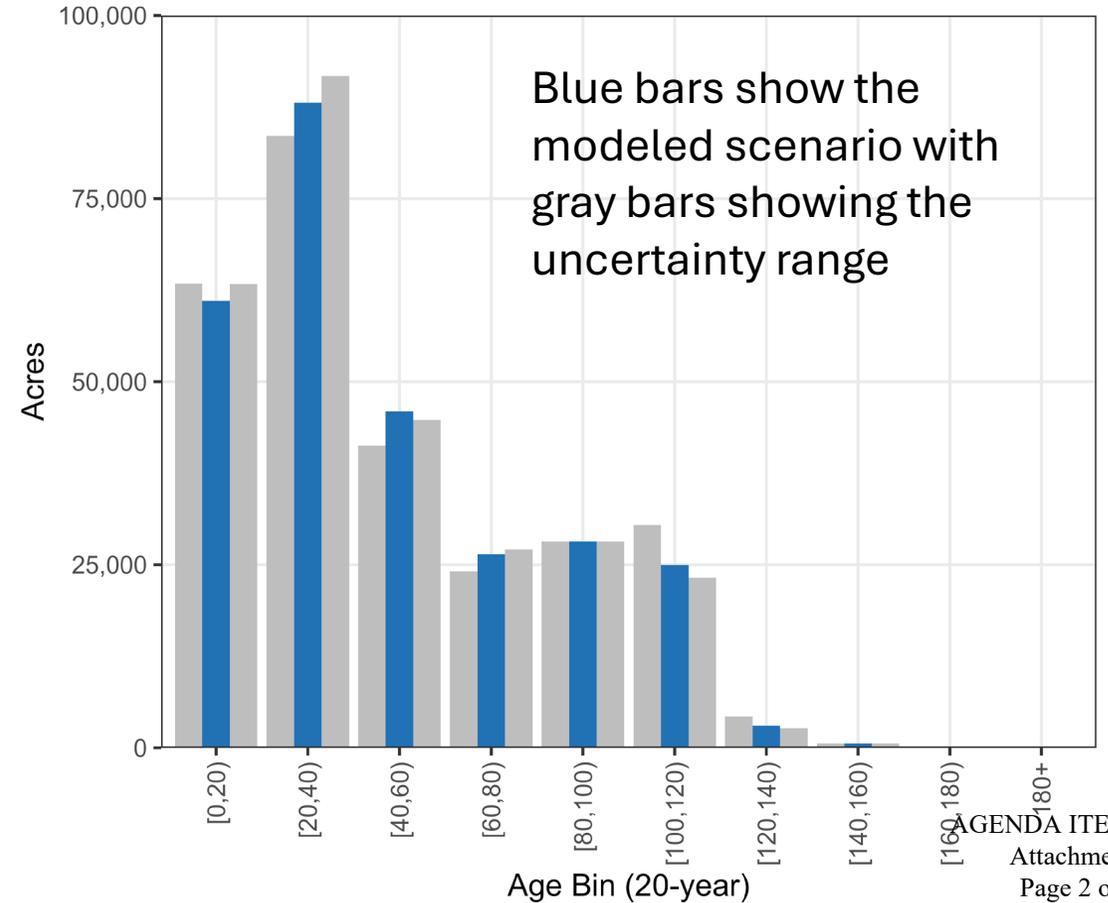
1. Adaptive Capacity of Forests

1a. Stand age class distribution by emphasis area

Current age classes by emphasis area



General stewardship age classes in 30 years

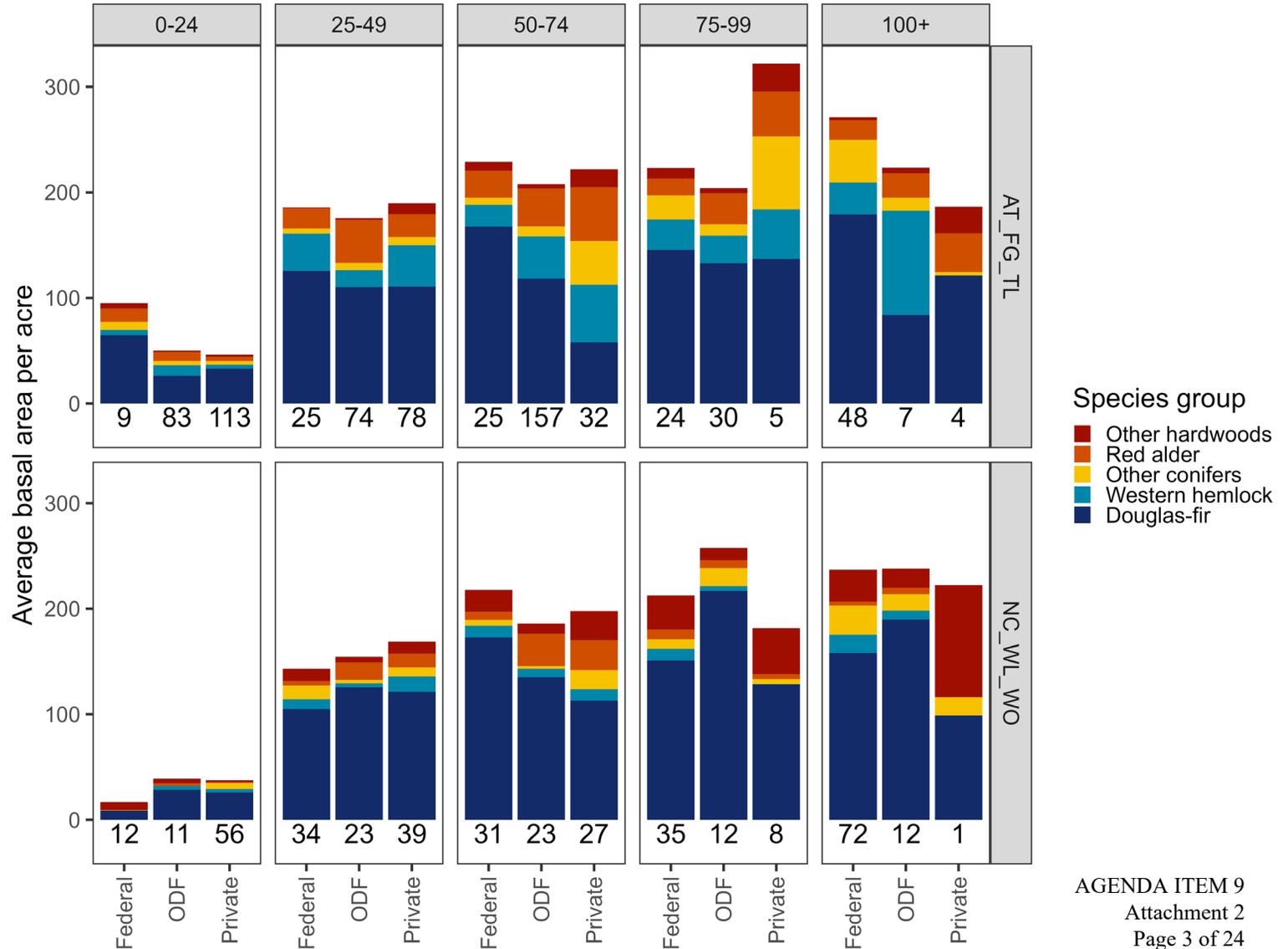


1. Adaptive Capacity of Forests

1b. Tree species composition by emphasis area (slide 1 of 2)

This graph shows the most recent FIA estimates (2013-2022 measurements) of species basal area per acre by ownership group stand age, and georegion.

Stand age is in 25-year groups (columns). Georegion is divided by North Coast districts (top row) and other districts (bottom row). The number of FIA plots averaged in each sample is indicated below the bars.

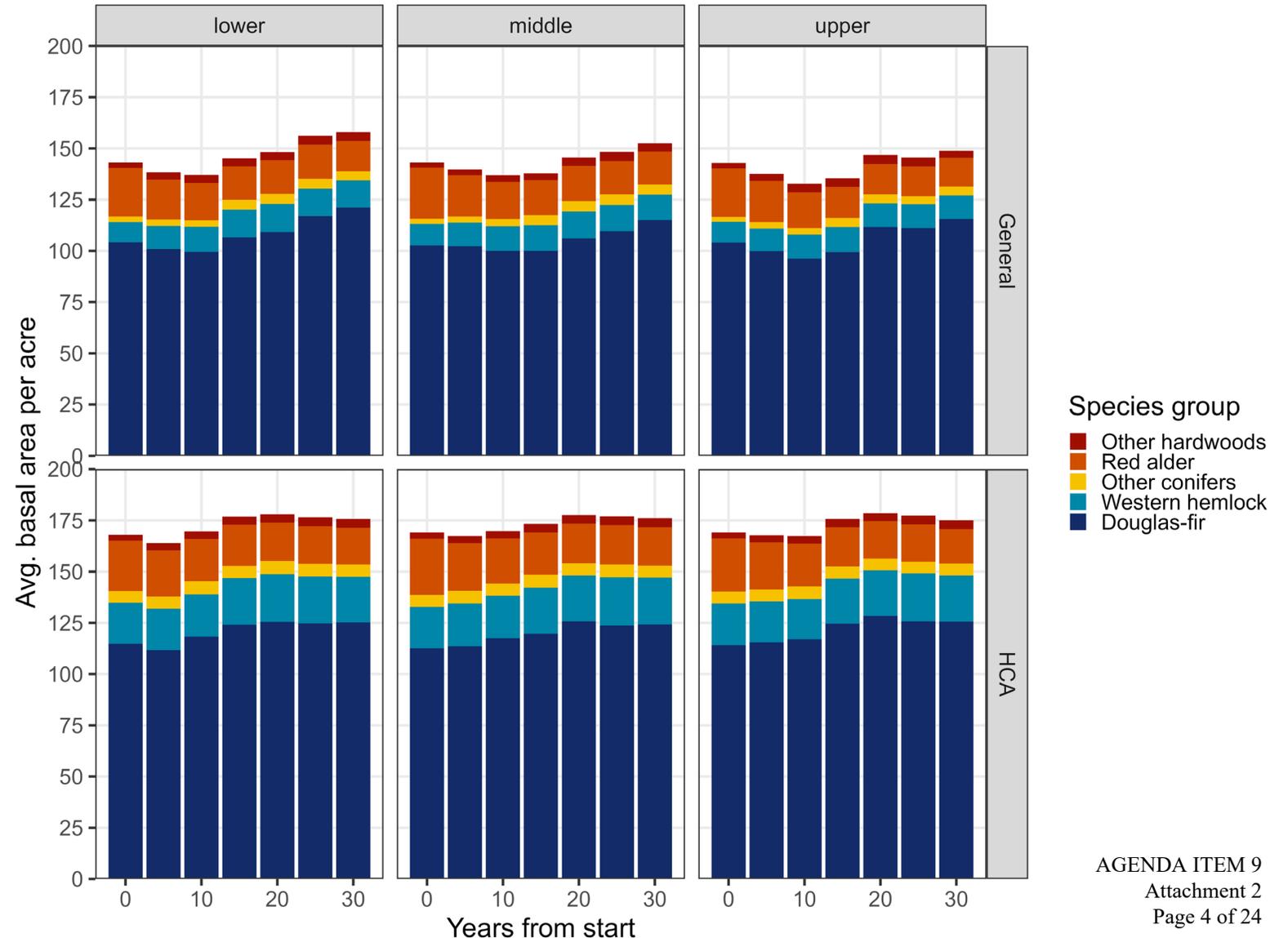


1. Adaptive Capacity of Forests

1b. Tree species composition by emphasis area (slide 2 of 2)

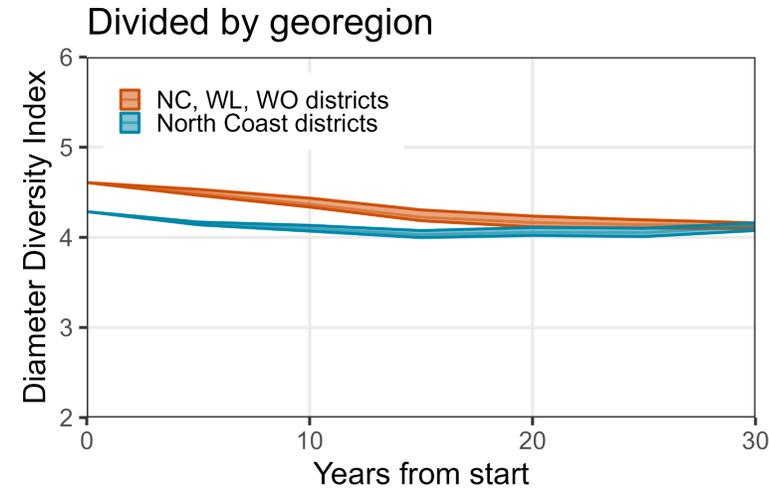
This graph shows the scenario forecast of tree basal area per acre for State Forests by emphasis area (General in top row, and HCA in bottom row).

The columns show the uncertainty range for the presented scenario (middle) and the outcomes with harvest volume of 5% lower (left) or 5% higher (right).



1. Adaptive Capacity of Forests

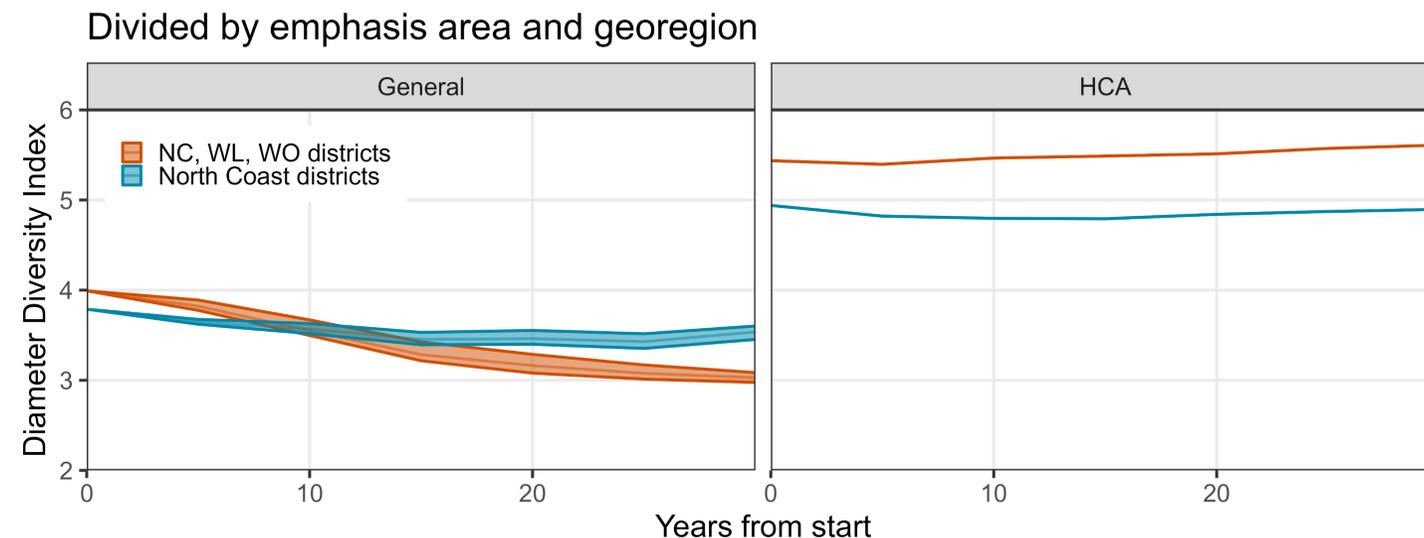
1c. Tree canopy layering (structure) by emphasis area



Diameter Diversity Index (DDI) is commonly used to describe the similarity of a stand's layering to an old-growth stand based on the number of trees in different size classes.

Graphs show the average across all stands in each category.

DDI is a component of the complex forest structure designation in the 2010 FMP (threshold varied by forest type from 5.8-6.5). It is displayed by georegion because the previous Performance Measure for complex forests was for the North Coast districts only.



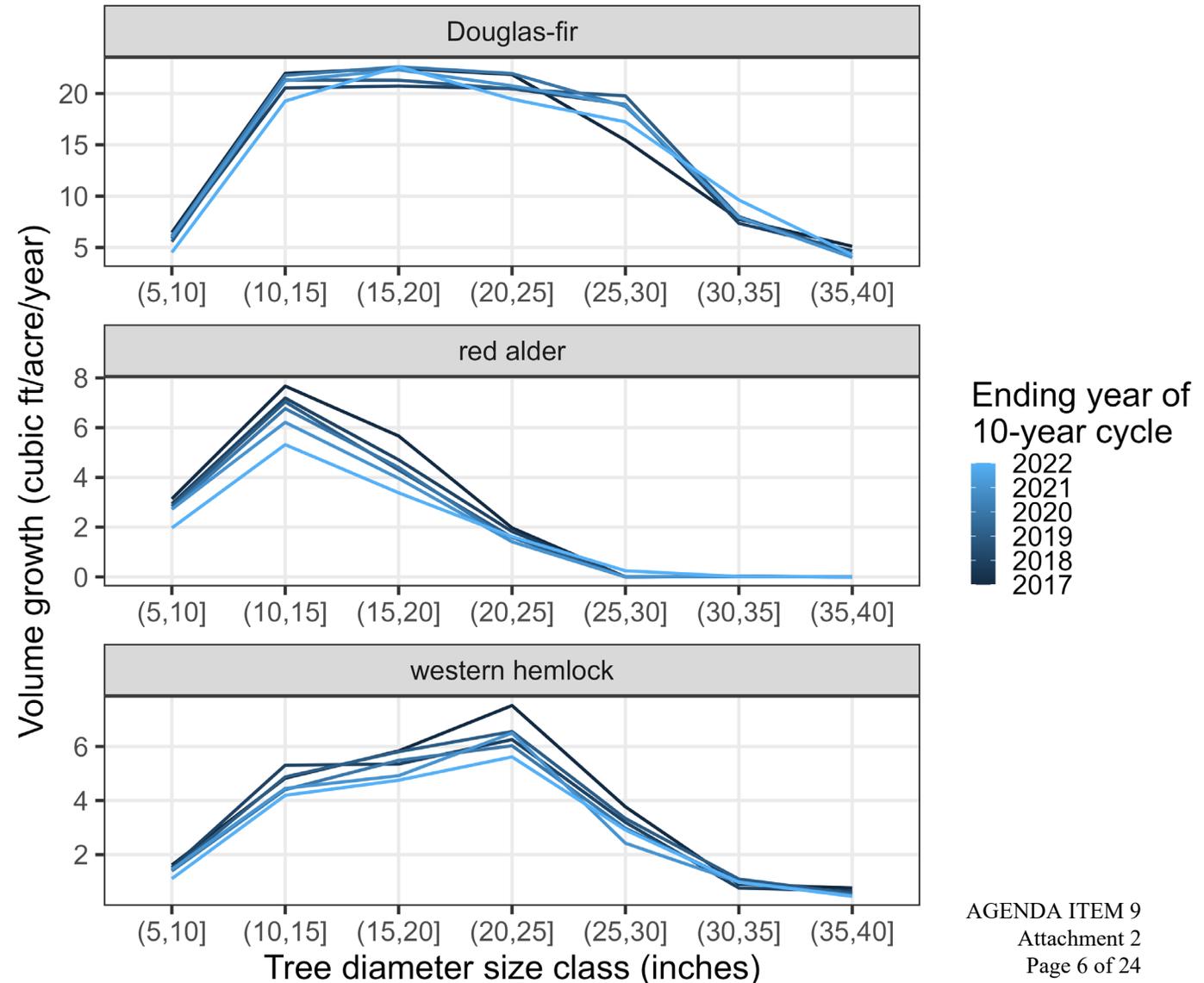
1. Adaptive Capacity of Forests

1d. 10-year growth rates by species

FIA remeasures the same trees on a 10-year cycle. Average growth rates can be analyzed by species, forest type, or region to assess vulnerability to climate change.

In this example, average volume growth per acre varies by species and tree size. The lines for each species show remeasurement year. Of these trees, red alder and western hemlock growth has been trending lower in recent years.

The modeled scenarios did not include changes in growth rates due to climate change.



2. Aquatic and Riparian Resources

2a. Physical attributes in streams (habitat limiting factors)

2b. Water temperature monitored for permit area

These components are monitored as HCP commitments and will be available for the Board when they are reported to the Federal Services. The first HCP monitoring report would be expected in November 2027. Physical attributes will be measured in partnership with the ODFW Aquatics Inventories Program. Water temperature monitoring will be developed with HCP adoption.

2. Aquatic and Riparian Resources

2c. Catchment assessment of regeneration harvests

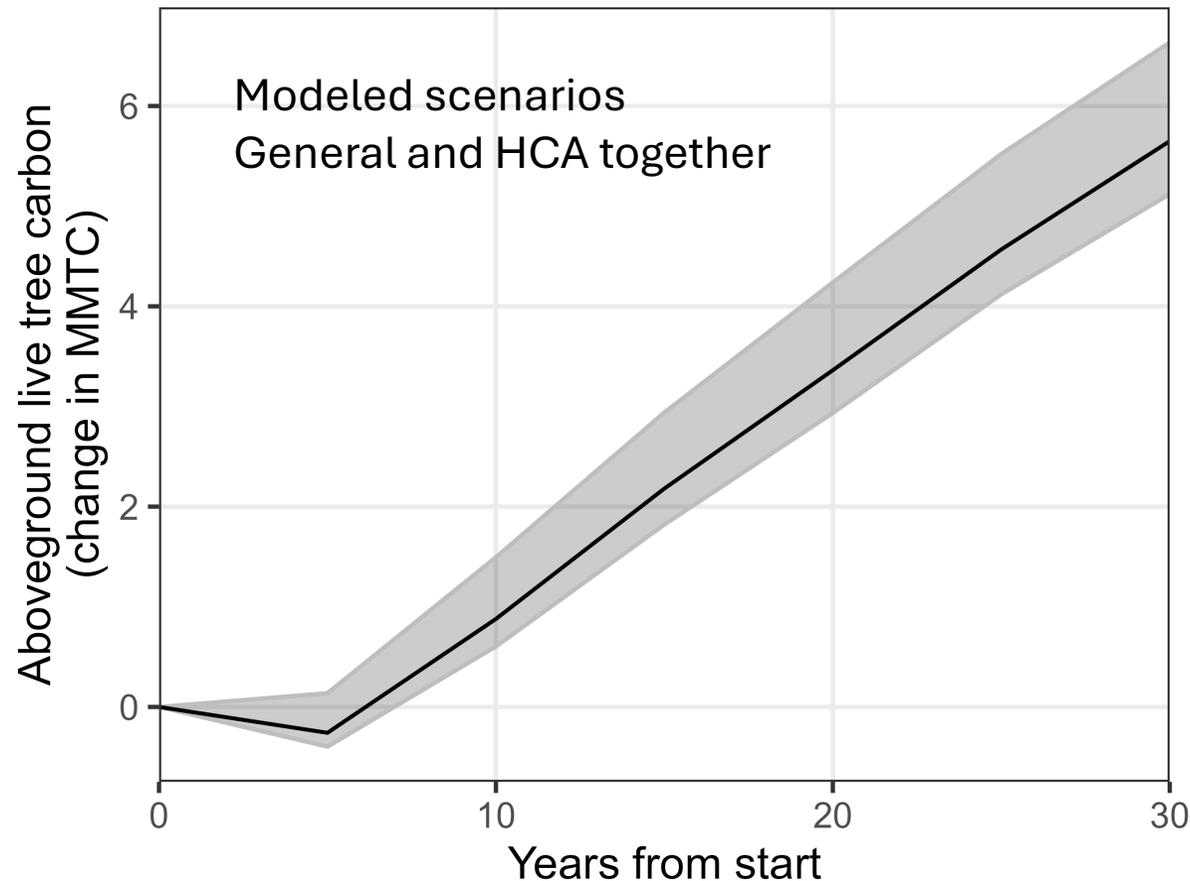
Drinking water source assessment for Public Water Systems with ODF-managed lands comprising more than 10% of the catchment. Forecasted range of the average % of recent (i.e., within 10 years) clearcut harvests over the first 30 years.

ODF will assess HUC10 watersheds by management activity for its prioritization of stream-enhancements projects under the HCP commitments. These assessments will be reported to the Board when performed for the HCP.

PWS Name	Catchment Acres	ODF % of catchment	Average % <10 years old (lower)	Average % <10 years old (upper)
BEAVER WATER DISTRICT	18,647	13	9	13
BERNDT CREEK WATER CORP	35,304	41	7	8
DETROIT WATER SYSTEM	184	32	0	0
FISHHAWK LAKE RECREATION CLUB	10,004	30	7	9
GEORGIA-PACIFIC CPLP WAUNA	86,310	14	4	7
HILLSBORO-CHERRY GROVE	15,565	51	11	17
HILLSBORO-FOREST GROVE-BEAVERTON	115,415	16	7	11
JEWELL SD #8	31,913	58	7	8
LYONS MEHAMA WATER DISTRICT	107,684	14	8	10
PHILOMATH PUBLIC WORKS	85,972	10	8	11
SILVERTON, CITY OF	31,659	14	8	13
TILLAMOOK WATER DEPT, CITY OF	3,074	63	6	7
TIMBER WATER ASSOCIATION	7,787	98	8	11

3. Carbon Sequestration and Storage

3a. Carbon sequestration in live trees

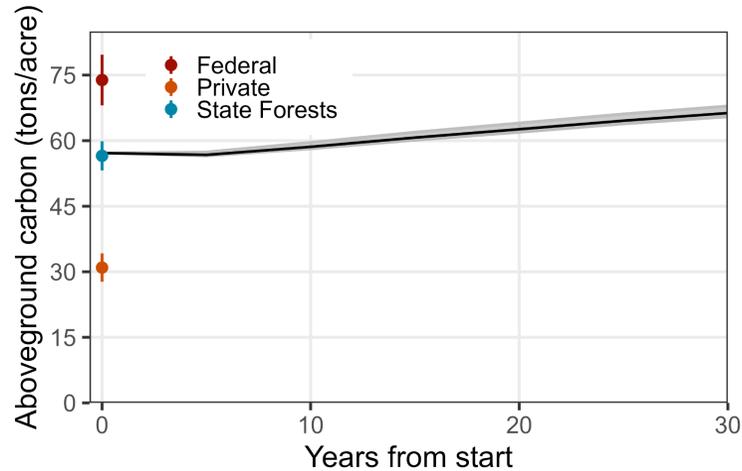


The aboveground carbon is the carbon pool most reliably measured by FIA and State Forests' inventory, even though it excludes belowground tree biomass, soil carbon, and dead wood carbon pools.

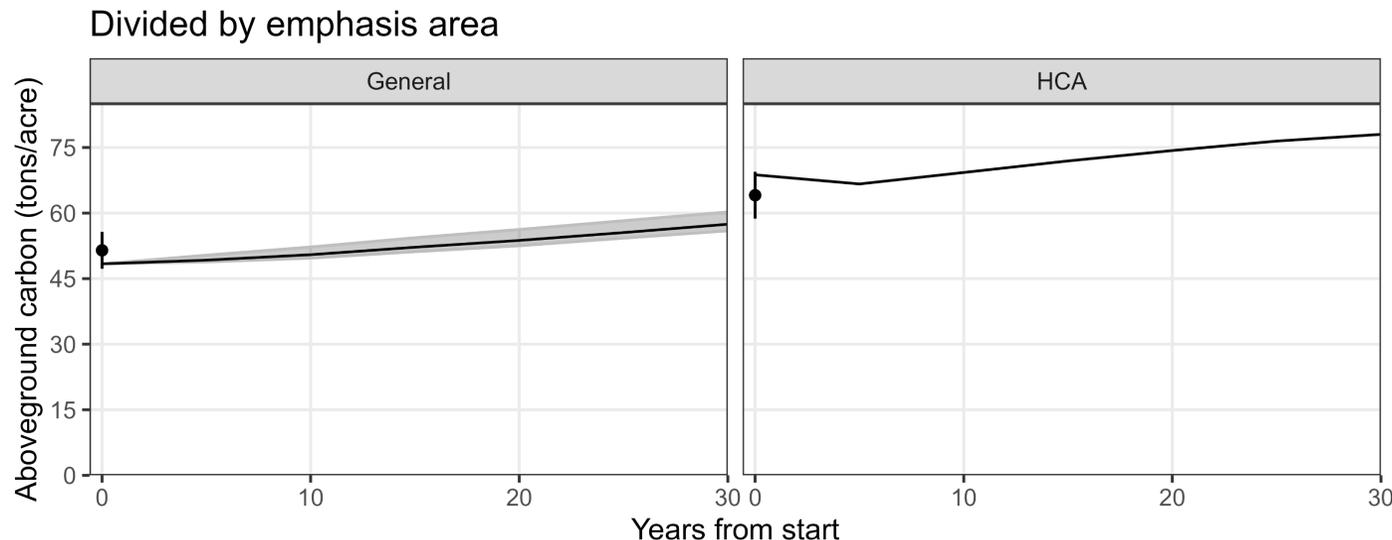
The decline in carbon in year 5 of the scenario is a result of a modeling artifact, where most of the permitted HCA harvests were performed in the first 5 years, rather than being distributed over the first 30 years.

3. Carbon Sequestration and Storage

3b. Live tree carbon storage by emphasis area



The aboveground carbon is the carbon pool most reliably measured by FIA and State Forests' inventory, even though it excludes belowground tree biomass, soil carbon, and dead wood carbon pools.



The decline in carbon in HCAs in year 5 of the scenario is a result of a modeling artifact, where most of the permitted HCA harvests were performed in the first 5 years, rather than being distributed over the first 30 years.

3. Carbon Sequestration and Storage

3c. Harvested wood product sequestration and storage

Sequestration in harvested wood products was calculated from the scenarios with two sets of assumptions about emissions (substitution for more carbon-intensive products and energy capture from biomass burning).



4. Division Finances

4a. Forest Development Fund balance and forecast

4b. Annual revenue and operating expenses

4a. These are reported annually by State Forests Asset Management Unit but were not modeled in the scenarios.

4b. Forecasted annual revenue from the scenarios is below. Operating expenses were not forecasted.

Average annual net revenue distribution modeled over the first 30 years

Scenario	Total net revenue	To Counties	To CSF	To ODF
Lower harvest range	83.4	51.5	2.4	29.3
5: Departure steps, 215 MMBF start	90.0	55.6	2.7	31.6
Higher harvest range	94.1	58.2	2.8	33.1

5. Economic Opportunities

5a. Timber direct/indirect employment and income

5b. Non-timber direct/indirect employment and income

5a. Average annual economic (direct, indirect, induced) contributions of timber harvests (in millions, 2024 dollars), first 10 years of scenario forecast

5b. Not included, as non-timber output from the new scenarios could not be modeled from the Socioeconomic Report.

Scenario	Jobs	Direct	Indirect	Induced
Lower	3472	298	489	1101
Middle*	3866	329	541	1212
Higher*	4094	349	575	1285

*These scenarios were not modeled in the July 2025 Socioeconomic Report. Values obtained from regression of 10 other modeled scenarios.

6. Financial Support for Counties

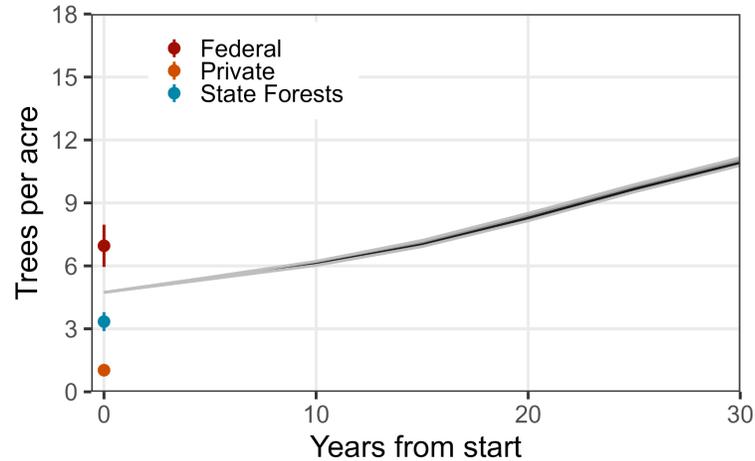
6a. Revenue transferred to counties and taxing districts

Average annual net revenue distribution modeled over the first 30 years

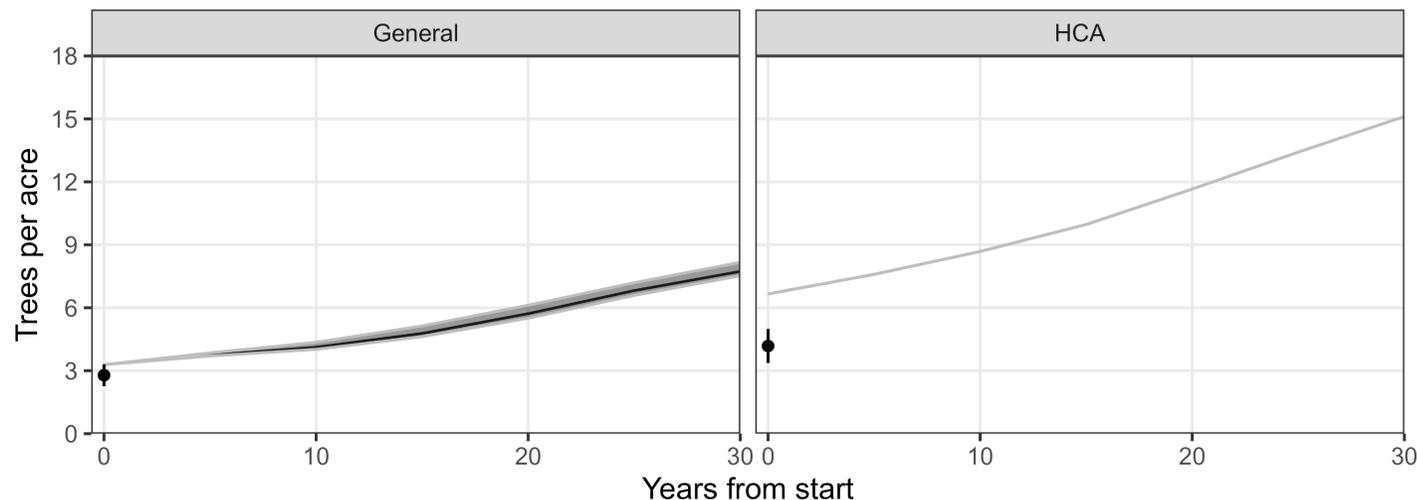
Scenario	Total net revenue	To Counties	To CSF	To ODF
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Higher harvest range	94.1	58.2	2.8	33.1

7. Habitat Elements for Wildlife

7a. Large trees >30-inch diameter



Divided by emphasis area



Large trees are important for covered species in the HCP as well as other native wildlife. It is one component of the complex forest structure designation in the 2010 FMP.

Graphs show the average number of large trees per acre across all stands in each category.

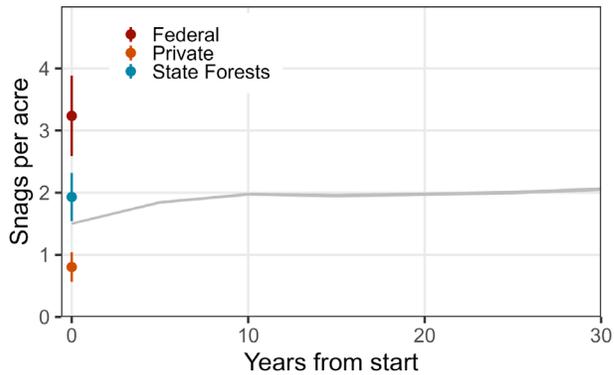
The notable difference in the HCA estimate by FIA (point at year 0) and the scenario may be due to the inventory methods that imputed tree lists for unmeasured stands in the modeling.

7. Habitat Elements for Wildlife

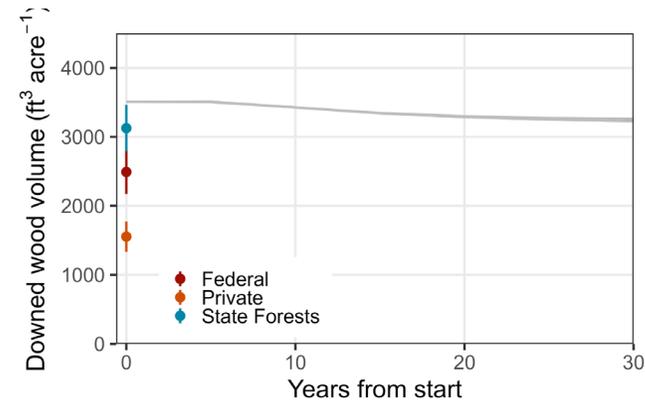
7b. Large snags and volume of downed wood

Note: These metrics were components to assign the “Older Forest Structure” class in the 2010 FMP.

Dead trees >24” diameter (average number per acre)

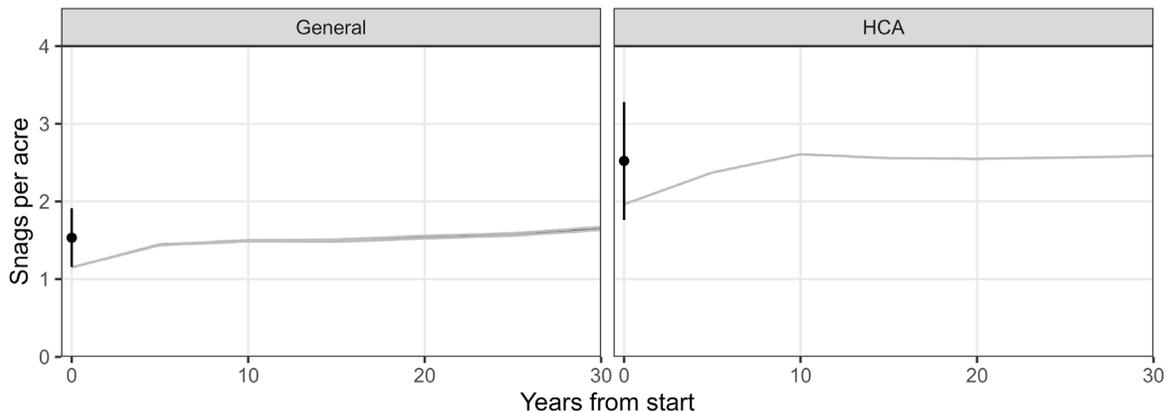


Downed wood >3” diameter (average volume per acre)

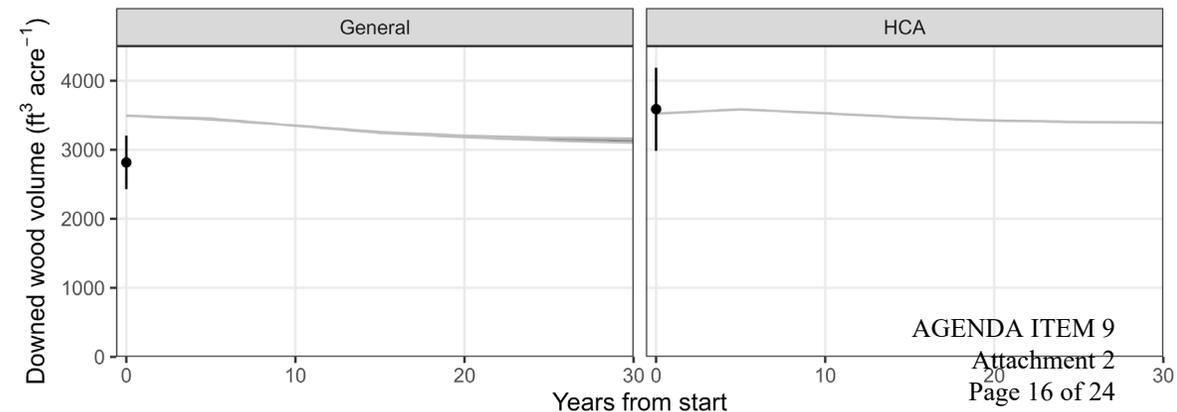


Note that FIA measures wood with different methods than ODF. Volumes will be different in HCP compliance monitoring reports.

Divided by emphasis area



Divided by emphasis area



7. Habitat Elements for Wildlife

7c. Connectivity between late seral forest stands

The draft FMP Wildlife strategy for functional landscapes: Maintain connectivity between habitats, and broad landscape permeability, for diverse wildlife species including species of conservation concern.

The arrangement of Habitat Conservation Areas was designed with future landscape connectivity in mind. This component metric will assess the landscape changes in habitat connectivity for species relying on late seral forest stands. This will help prioritize HCP conservation actions, such as those benefiting Northern spotted owls, to HCAs with higher landscape connectivity to support dispersal.

7. Habitat Elements for Wildlife

7d. Covered species habitat meets stay-ahead provisions for HCP

All scenarios were modeled to meet the HCP Conservation Action 13: Stay Ahead Provision. The current HCP draft reads: “The Stay-Ahead provision will minimize or eliminate the risk of any temporal net losses of habitat associated with the impacts from covered activities; there will always be more acres of new habitat grown and maintained in HCAs than lost to harvest across the permit area—both in any 10-year implementation period and cumulatively throughout the permit term.”

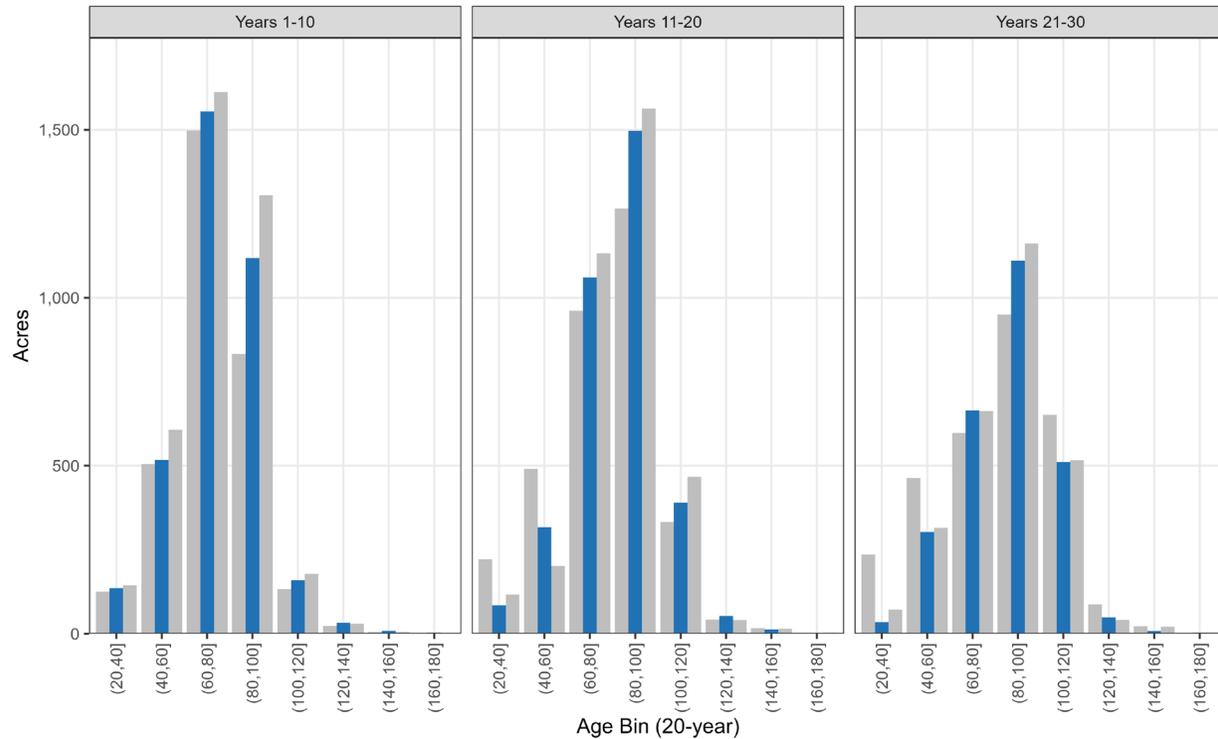
This component metric will be reported to the Board when it is reported to USFWS and NOAA Fisheries annually and during the 5-year check-in and 10-year comprehensive reviews of the HCP. It is derived from modeling covered species habitat from the forest inventory, accounting for modeled growth and depletions from covered activities each year.

8. Harvest and Inventory

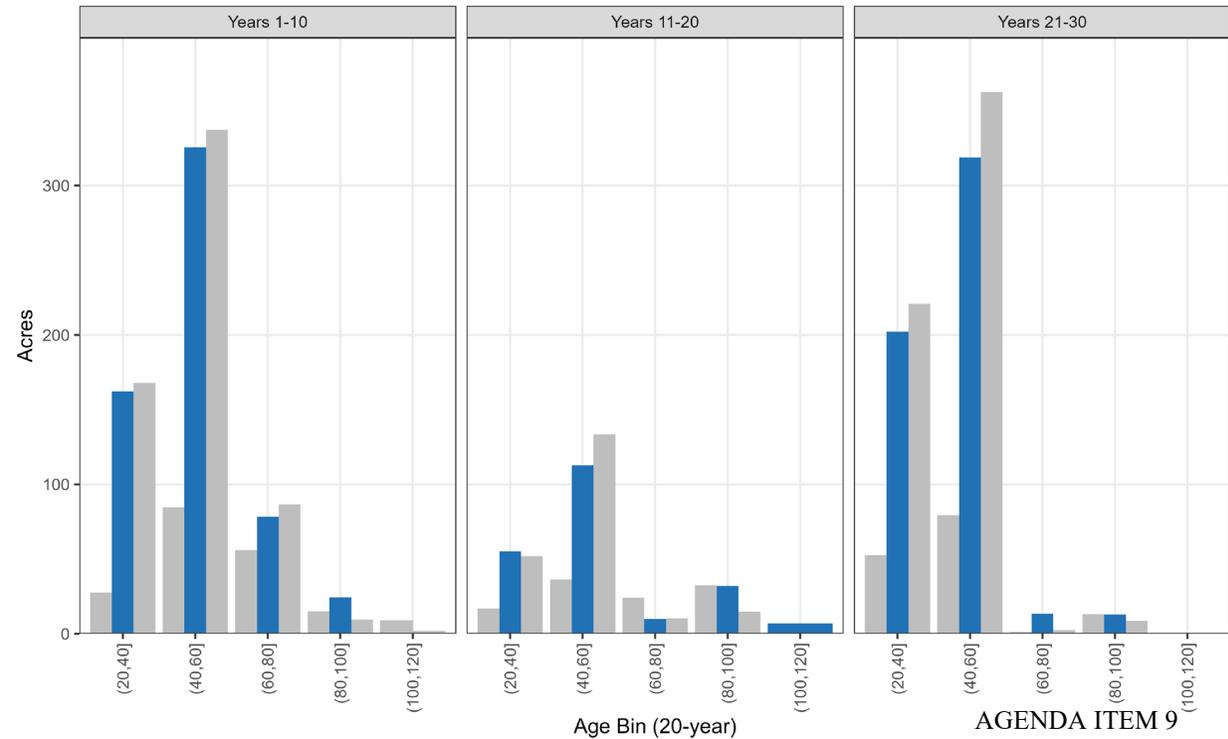
8a. Acres of management by type (including forest health treatments)

Regeneration and thinning acreage for general stewardship emphasis area in the modeled scenario (blue bars) with uncertainty range (gray bars).

Forecasted age distribution of regeneration treatments
General ground only, mean annual acres



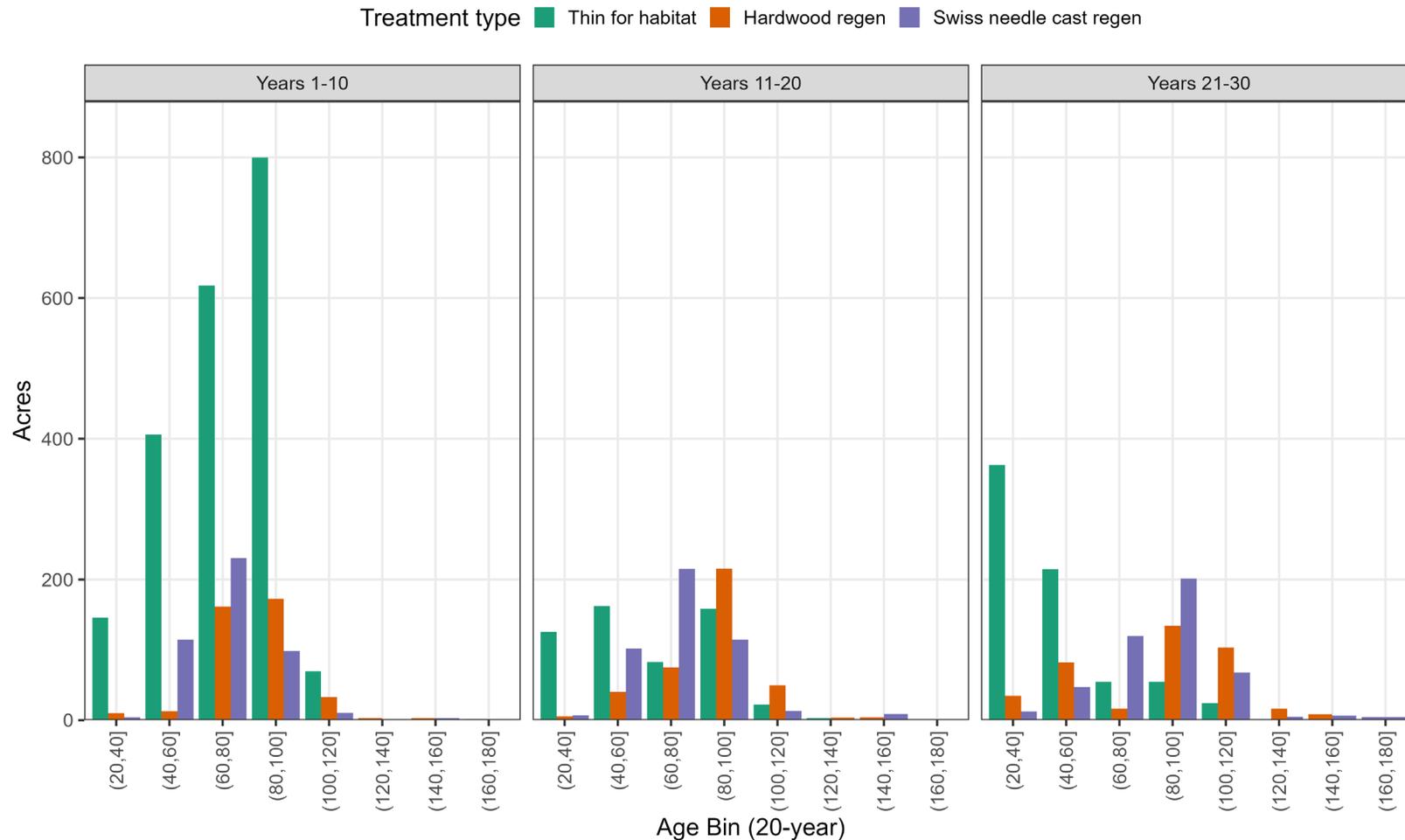
Forecasted age distribution of thinning treatments
General ground only, mean annual acres



8. Harvest and Inventory

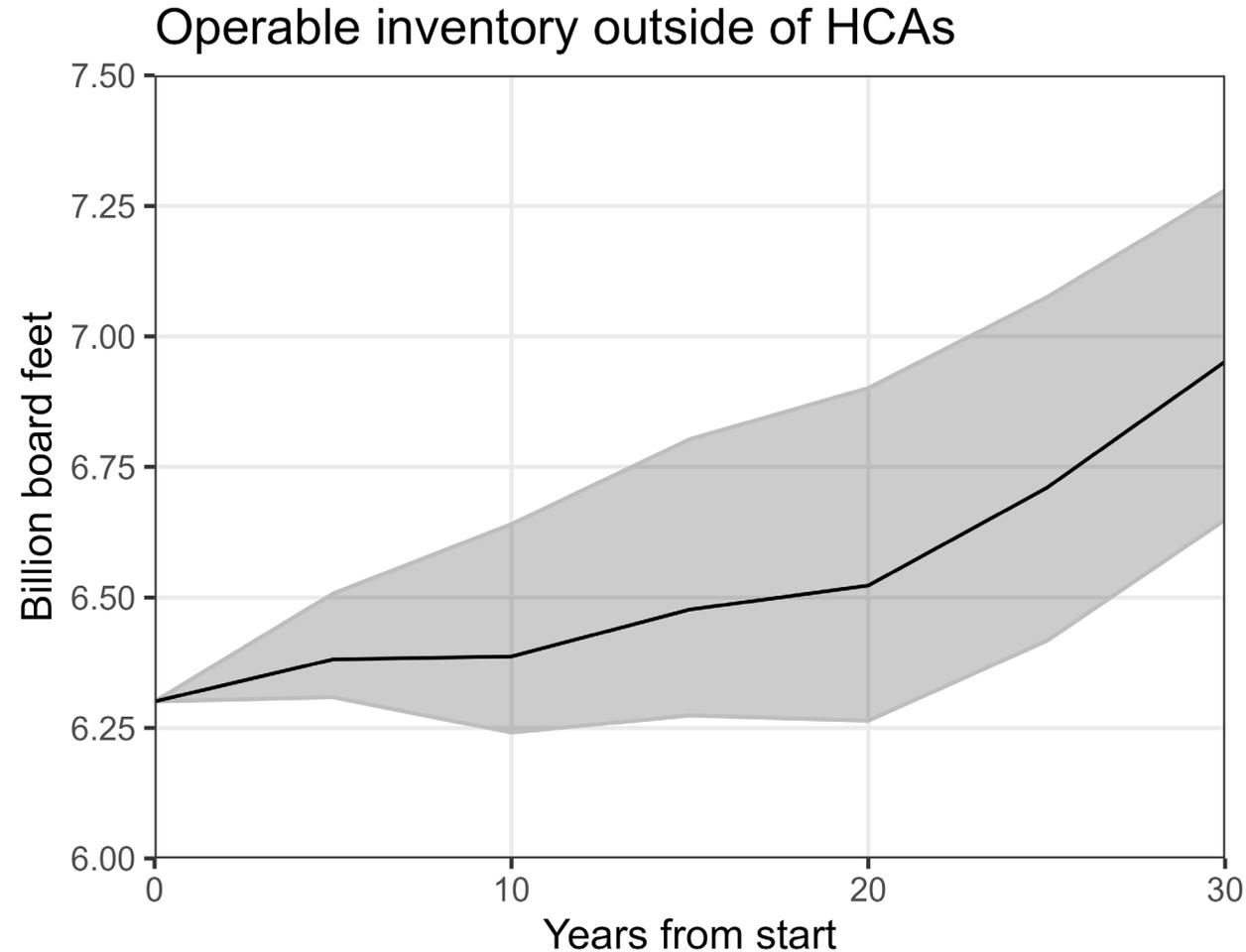
8a. Acres of management by type (including forest health treatments)

Forecasted age distribution of treatments in HCAs
 Same across scenarios, mean annual acres



8. Harvest and Inventory

8b. Standing merchantable volume in live trees



9. Recreation, Education, and Interpretation (REI) Opportunities

9a. Percent of recreation facilities (not trails) open annually for the recreation season

9b. Critical trail assets (bridges/culverts) in good or better condition

9c. Educational interactions with school classes or individual students

These component metrics are proposed Key Performance Measures (KPMs) for the Oregon Legislature. The Board Performance Measures will match the KPMs and will be reported annually once the KPMs are adopted.

They are derived from the FMP REI goals and the HCP commitments to protect aquatic resources.

10. Transportation

10a. Transportation assessment (hydrological connectivity and fish passage barriers of road system)

Assessing and minimizing hydrological connectivity and fish passage barriers on the road network is part of the FMP Transportation goals and the HCP commitments. This assessment is ongoing and will be reported to the Board when it is finalized for HCP reporting.

11. Tribal Cultural Resources

11a. Development of new Division policies following the FMP goals:
Tribal Access and Use of Natural Resources and Cultural Resources Protection

Progress on the Cultural Resources FMP goals and strategies will be reported to the Board as a narrative after FMP approval.



Board of Forestry Public Meeting

10. Governor's Natural Resource Team Update

The Board will hear an overview of recent Executive Orders.

This is an information item.

STAFF REPORT

Agenda Item No.:	11
Work Plan:	Forest Resources Division
Topic:	Implementing Legislative Direction
Presentation Title:	Update on the Adaptive Management Program
Date of Presentation:	March 4, 2026
Contact Information:	Josh Barnard, Division Chief, Forest Resources Division, ODF, Josh.W.Barnard@odf.oregon.gov; Terry Frueh, Adaptive Management Program Coordinator, Forest Resources Division, ODF, Terry.Frueh@odf.oregon.gov; Seth Barnes, Co-chair, AMPC; Stacey Detwiler, Co-chair, AMPC; Jessica Homyack, Co-chair, IRST; Kelly Burnett, Chair, IRST; Lisa Gaines, Director, IRST Housing Agency (OSU/Institute for Natural Resources)

SUMMARY

The Adaptive Management Program Committee (AMPC) Co-chairs, the Co-chairs of the Independent Research and Science Team (IRST), and staff from both OSU/Institute for Natural Resources (INR) and ODF will report on the progress of the Adaptive Management Program.

CONTEXT

The legislature directed the Board of Forestry (Board) to set up an Adaptive Management Program. The Program will help inform future rulemaking and support an application for a programmatic habitat conservation plan (HCP). The goal of the Program is to use the best available science to assess the effectiveness of rules for achieving the biological goals and objectives described in the HCP.

BACKGROUND

In 2022, the legislature adopted the Private Forest Accord (PFA) recommendations through Senate Bill 1501 and 1502, and House Bill 4055. Senate Bill 1501 set the timeline and topics for making changes to the Forest Practices Act and rules from which the Board could apply for a programmatic HCP. The PFA Report further detailed the recommended changes to the Act and forest practices rules, as well as a pathway for an HCP. A key part of the rules is the Adaptive Management Program (Division 603). In addition to the Board, this Program includes the Adaptive Management Program Committee (AMPC) who develops the policy direction for the Program, and the Independent Research and Science Team (IRST) who oversees research and monitoring to address the policy direction.

ANALYSIS

This analysis summarizes past and future work of the two committees (AMPC and IRST) of the Adaptive Management Program.

AMPC

2025:

- Provided an annual update to the Board;
- Elected one co-chair;
- Updated charter;
- Conducted annual review of work accomplished in 2025;
- Completed Amphibians preliminary research questions package;
- Developed and finalized first research agenda;
- Presented research agenda to the Board and received Board approval of the agenda's budget;
- Conversated with IRST regarding scoping proposals on E. Oregon steep slopes and road-stream hydrologic connectivity;
- Provided feedback to IRST on research questions 1 and 2 on amphibians; and,
- Met with IRST to enhance inter-committee collaboration, address some challenges with research questions, discuss respective 2026 work plans, and how to develop researchable questions.

2026:

- Update Board on status of AMPC work;
- Elect a second co-chair;
- Conduct annual review of work accomplished in 2026;
- Regularly synchronize work with IRST;
- Collaborate with IRST to develop an effectiveness monitoring strategy;
- Review IRST scoping proposal on research questions 1 and 2 on amphibians;
- Integrate research questions 1 and 2 on amphibians into research agenda, with a budget for Board approval;
- Refine contextual information and list of relevant rules for third amphibian research question;
- Learn about IRST RFPs for road-stream hydrologic connectivity and E. Oregon steep slopes, and provide courtesy input on RFPs; and,
- Learn about HCP elements that influence the Adaptive Management Program. Elements include Biological Goals and Objectives, effectiveness monitoring framework, ODF's Compliance Monitoring Program, and ODFW's effectiveness monitoring program.

IRST

2025:

Research-related Activities

- Finalized, approved, and submitted the [Eastern Oregon Steep Slopes Scoping Proposal](#) to the AMPC in January 2025 to address AMPC-submitted research questions pertaining to steep slopes in Eastern Oregon;

- Drafted, finalized, approved, and submitted the [Road-stream Hydrologic Connectivity Scoping Proposal](#) to the AMPC in May 2025 to address AMPC-submitted research questions pertaining to road-stream hydrologic connectivity;
- Worked with the AMPC to finalize research questions 1 and 2 for the amphibians research package;
- Drafted a chronology of events, starting at the delivery of the research question packages, for each current active research areas – eastern Oregon steep slopes, road-stream hydrologic connectivity, and amphibians – that will be continually updated until the final report for each research area has been completed;
- Based on the AMPC/Board approved research agenda, began drafting a road-stream hydrologic connectivity RFP;
- Made significant progress on a preliminary draft of the literature review for the amphibians scoping proposals for research questions 1 and 2;

Processes and Administrative Activities

- Used our IRST member nomination process to recommend two new members for the IRST, and onboarded two new members;
- Modified the charter to create co-chairs, and elected a co-chair;
- Drafted a succession plan presentation to ensure effective continuity through staggered IRST member terms;
- Developed and finalized the IRST FY26 annual work plan, as required in rule;
- Developed a general RFP process per rule, incorporating elements of planning, drafting and issuing RFPs, proposal review, and awarding projects;

Meetings

- Held 12 scheduled monthly meetings, and four additional meetings, to advance work products in 2025. Twelve meetings are scheduled through December 2026;
- IRST co-chairs met regularly with INR staff for IRST meetings and operations planning
- IRST ad hoc committees met to advance the work on both scoping proposal and request for proposal development, the amphibians literature review, and roles of research and monitoring in Oregon's Adaptive Management Program;
- IRST co-chairs met with the AMPC co-chairs, approximately quarterly;
- Convened a joint meeting with the AMPC in October that created a shared understanding of the work of both committees and progress to date, shared information about the roles of research and monitoring in adaptive management, discussed status and plans for research topics, and enhanced the efficiency and effectiveness of IRST-AMPC communications; and,
- INR staff met weekly with the AMPC coordinator to ensure alignment with work products and expectations; INR also attended AMPC meetings.

2026:

- Finalizing the IRST succession plan;
- Reviewing the best available science document;
- Working on the FY27 IRST workplan;

- Implementing competitive RFP process for eastern Oregon steep slopes research and road-stream hydrologic connectivity, including recruiting peer reviewers, selecting, awarding, and administering the research projects;
- Completing and submitting amphibians scoping proposal for question 1 and 2;
- Drafting amphibians scoping proposal for question 3;
- Drafting an RFP for questions 1 and 2 for the amphibians research;
- Collaborating with the AMPC on developing an effectiveness monitoring strategy; and,
- Reporting to the AMPC and the Board on progress of the research agenda.

RECOMMENDATION

This item is information only.

ATTACHMENTS

None.

Agenda Item No.:	12
Work Plan:	Forest Resources Division
Presentation Title:	Tethered Logging Rulemaking
Date of Presentation:	March 4, 2026
Contact Information:	Josh Barnard, Division Chief, Forest Resources Division, ODF, josh.w.barnard@odf.oregon.gov , Nicole Stapp, Policy Advisor, Forest Resources Division, ODF, Nicole.l.stapp@odf.oregon.gov

SUMMARY

On March 5, 2025 the Board initiated rulemaking concerning tethered logging as directed by Section 7 of Senate Bill 1501 (2022). At the March board meeting the Department provided a briefing on tethered logging which included an operational overview and current science, and a related field tour was held in September 2025. This agenda item is a continuation of that discussion and includes a decision item for the Board regarding next steps.

CONTEXT

In 2020, conservation and forest industry groups offered to revise the Forest Practices Act (FPA) and forest practice rules through a memorandum of understanding to include mediated discussions, known as the Private Forest Accord (PFA). Later that year, the Legislature passed [SB 1602](#) which set helicopter pesticide application requirements and required the Governor to facilitate mediated sessions between conservation and forest industry groups. As a product of this collaborative process, the [2022 PFA Report](#) was drafted and released by an author group comprised of representatives from those discussions. During the 2022 Legislative Session, [SB 1501](#) and [SB 1502](#) passed making substantial changes to the FPA and requiring the Board to incorporate the recommendations of the PFA Report into the forest practice rules through the adoption of a single rule package to support the development of the PFA habitat conservation plan (HCP). Additionally, SB 1501 (2022) required two additional rulemaking efforts; the completion of post-disturbance harvest rulemaking and the initiation of rulemaking concerning tethered logging.

BACKGROUND

Section 7 of SB 1501 (2022) required the Board to initiate rulemaking for tethered logging by March 17th, 2025. Unlike other PFA rulemaking, a completion date was not prescribed, instead the Board is to prioritize the rulemaking and determine whether or not to promulgate a rule regarding tethered logging practices. The legislation also provides the Board with discretion in deciding whether to solicit and consider reports pertaining to tethered logging from the Adaptive Management Program Committee (AMPC) and the Independent Research and Science Team (IRST).

At the March 2025 Board of Forestry meeting, the Department, along with guest speakers, presented on the practice of tethered logging, its intersections with past and present forest practice rules, and the available science on the topic. On the September 2025 field tour, board members were able to observe active tethered logging operations and hear from ODF field staff, landowners, operators, representatives from Oregon State University and the Associated Oregon Loggers on the use and impacts of tethered equipment and desired next steps. The Department is now returning with an analysis.

ANALYSIS

Tethered logging consists of utilizing cable winch systems on ground-based equipment to stabilize and assist equipment operations on steep slopes. The cable system allows the equipment to operate

on slopes where damage to soils would occur without the assistance of the cable system. Tethered logging is a standard practice under the forest practice rules except in two situations: 1) when locating compacted or excavated skid trails within 100 feet of stream channels on steep or erosion-prone slopes or 2) when operating on high landslide hazard locations.

Prior to beginning tethered logging operations in these areas, operators are required to submit a Plan for Alternate Practice (PFAP). PFAPs are subject to Department review and approval and are used to prescribe specific practices for the protection of resources based on the site conditions of an operation.

1. Operations within 100 feet of stream channels on steep or erosion-prone slopes.

The need for a PFAP within 100 feet of a stream channel is based on Oregon Administrative Rule (OAR) 629-630-0150 which requires operations that will result in excavated or compacted skid trails on steep or erosion-prone slopes, to locate skid trails at least 100 feet from any stream channels. For the purposes of this rule, steep or erosion-prone slopes include slopes over 60% and slopes over 40% where soils consist of decomposed granite-type materials or other highly erodible materials.

When the use of tethered equipment was newly emerging, the soil impacts were unknown. Working with the Regional Forest Practice Committees (RFPCs), the Department started requiring operators to file a PFAP to more closely track these types of operations and their impacts. With the information presented during the March 2025 meeting and the September 2025 tour, it appears the use of tethered equipment does not inherently result in compacted or excavated skid trails.

If the Board agrees with this assessment, the use of tethered equipment within 100 feet of a stream channel on steep or erosion-prone slopes would no longer prompt an automatic need for a PFAP and be considered standard practice within existing rule language. This would allow for regulatory and operator efficiency while maintaining resource protections when the use of tethered equipment will result in compacted or excavated skid trails without the need for rulemaking.

Board Options:

- a) The Board determines no further Board action is needed at this time and closes rulemaking related to OAR 629-630-0150. This would end the need for a PFAP for this particular rule unless the operation will result in compacted or excavated skid trails.
- b) The Board determines it is necessary to continue rulemaking related to OAR 629-630-0150 and provides direction to the Department on the desired impact of continued rulemaking. The requirements of the Administrative Procedures Act, ORS 527.710 and ORS 527.714 would apply to the rulemaking.

2. Operations on high landslide hazard locations.

The need for a PFAP when operating tethered equipment on high landslide hazard locations is prompted by OAR 629-630-0500 (4) which prohibits the operation of ground-based equipment in these areas. As defined by the forest practice rules, high landslide hazard location means a specific site that is subject to initiation of a shallow, rapidly moving landslide as identified by the criteria specified in rule.

These PFAPs are reviewed for resource and public safety concerns and are only approved in instances where there are no downslope public safety risks. Due to significant variability amongst high landslide hazard locations, these reviews often require careful consideration of the specific site conditions to determine the appropriate risk rating and necessary best practices to mitigate risks for both public safety and resources.

A recent update to FERNS, the electronic notification system, requires notifiers to select the rule a PFAP is being requested under improving data collection around PFAPs. However, just over 80% of the time tethered logging notifications are submitted with both OAR 629-630-0150 and 629-630-0500 selected, likely out of an abundance of caution. Anecdotally, the Department believes a majority of these PFAPs are related to OAR 629-630-0150 which may be resolved depending on the option the Board chooses to move forward with, however we don't have clear data.

If the Board moves forward with option (a) related to OAR 629-630-0150, the Department will be able to collect accurate data on the volume of PFAPs, which would just be those being sought for tethered logging on high landslide hazard locations and evaluate those PFAPs to determine if there is any level of consistency in the best management practices needed that lend themselves to being standardized. Using this data the Department could return to the Board in the future if the volume of PFAPs related to this rule indicate a need to address the topic for regulatory and/or operator efficiencies.

Alternatively, if the Board is interested in allowing the use of tethered equipment in these areas as standard practice, eliminating the need for a PFAP, rulemaking will be needed as the current rule prohibits the use of any ground-based equipment in these areas.

Board Options:

- a) The Board determines no further Board action is needed at this time and closes rulemaking related to OAR 629-630-0500 and directs the Department to return to the Board if a future need for action is identified. This would continue the need for PFAPs for tethered logging operations on high landslide hazard locations. The Department would then track the volume and consistency of these PFAPs to inform whether future Board action is needed for regulatory and/or operator efficiencies.
- b) The Board determines it is necessary to continue rulemaking related to OAR 629-630-0500 and provides direction to the Department on the desired impact of continued rulemaking. The requirements of the Administrative Procedures Act, ORS 527.710 and ORS 527.714, would apply to the rulemaking.

RECOMMENDATIONS

The Department recommends the Board select the options below which would close the tethered logging rulemaking initiated under the requirements in SB 1501 (2022).

- 1) The Board determines no further Board action is needed at this time and closes rulemaking related to OAR 629-630-0150.
- 2) The Board determines no further Board action is needed at this time and closes rulemaking related to OAR 629-630-0500 and directs the Department to return to the Board if a future need for action is identified.

NEXT STEPS

If the Board adopts the staff recommendations the Department will notify operators that a PFAP is no longer automatically needed when using tethered equipment within 100 feet of a stream channel and begin detailed tracking related to the use of PFAPs on high hazard landslide locations.



Board of Forestry Public Meeting

13. Closing Comments

This item serves as an opportunity for the Board Chair to address any outstanding work.

This is an information item.