

Agenda Item No.:	3
Work Plan:	State Forests Work Plan
Topic:	State Forests Management
Presentation Title:	Western Oregon State Forests Draft Forest Management Plan
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CONTEXT

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

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

The draft Western Oregon State Forests Management Plan 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).

BACKGROUND

The purpose of this agenda item is to request that the Board of Forestry take action to repeal the current FMPs for western Oregon State Forests and to adopt the Western Oregon State Forests Management Plan (Attachments 1 and 2) as required by OAR 629-035-0030(6). Over the past several years, Department staff developed proposed FMP drafts and provided reviews and received input at several Board of Forestry meetings and public meetings. Per OAR 629-035-0030(6)(a), when management plans are approved by the Board, the Board shall adopt the plans as administrative rules. At the Board of Forestry meeting on January 8, 2025, the Board directed Department staff to begin the administrative rulemaking process for adoption of the FMP. Subsequently, Department staff published rulemaking drafts of the plan, filed notice of rulemaking with the Secretary of State, and conducted a series of public hearings on the draft plan.

A summary of public comment is included in Attachment 3. Attachment 4 is the recommended Board findings, and Attachment 5 is the recommended Board intent statement.

Following Board adoption of the forest management plan, the Department will continue with a series of more specific processes and planning efforts to implement the plans. The Department will proceed with preparation of implementation plans (IPs). The IPs will be subject to approval by the State Forester, following a public review and comment period. Department staff will continue work with the Board to finalize the Performance Measures.

Rulemaking

The State Forests Division has conducted two rulemaking processes for the draft FMP. The first rulemaking public comment period was held from November 1, 2025 to January 31, 2026, with a report given to the Board at its March 2026 meeting. The second rulemaking public comment period was held from June 1 to June 30, 2026. A brief and succinct synthesis of the comments received during this comment period is found in the next section of this report and a more detailed summary is found in Attachment 3. Prior to beginning rulemaking, the Division conducted outreach with the nine federally recognized Tribes in Oregon. Both rulemaking processes 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 now presents the Board with the final proposed Western Oregon State Forests Management Plan.

Public Participation and Comment

In total, approximately 2,400 comments were submitted prior to the deadline including verbal testimony, email, and postal mail. The majority of comments submitted were emailed, and approximately 98% of the emailed comments were unaltered emails submitted as part of advocacy campaigns.

The public hearing was held virtually. Registration was required and was available starting June 1, 2026. Registration was unlimited, but comment was limited to two minutes in anticipation of having 100 or more commenters. Twelve individuals provided comment. The recording of this hearing is available on the Department's rulemaking page (<https://www.oregon.gov/odf/pages/rulemaking.aspx>).

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 3). 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. A brief comparative snapshot of the comments is presented below, along with areas of alignment and disagreement.

Comparative snapshot by topic

1. Carbon markets

- a. Oppose if they further constrain harvest and yield lower returns than timber.
- b. Delete the strategy or confine to monitoring; no market participation without separate policy process.
- c. Support participation and add an implementation timeline.

2. **Harvested wood products in carbon accounting**
 - a. Support inclusion.
 - b. Support inclusion within systems-based accounting.
 - c. Remove from the goal/strategy.
3. **Harvest approach/complex stands**
 - a. Focus on predictable timber outcomes; unvetted strategies may impact harvest.
 - b. Active management in General Stewardship (thinning, regeneration harvest where appropriate, etc.).
 - c. Reduce clearcuts, lengthen rotations, moratorium on harvesting complex layered stands until $\geq 30\%$ complex.
4. **HCP alignment**
 - a. Make FMP adoption contingent on final HCP approval.
 - b. Tie resilience options to HCAs/RCAs and avoid new constraints beyond HCP/FMP allocations.
 - c. Support HCP with increased protections and strict compliance.
5. **Aquatic/riparian & roads**
 - a. Add science-based mandates; road decommissioning priorities; stronger water-quality protections.
 - b. Focus on clarifying language/balance, and feasibility/cost in sale design.

Areas of general alignment

1. Accountability: Broad support for adopting clear, enforceable performance measures so the public can track outcomes, including ecological and fiscal.
2. Desire for a clear, implementable plan grounded in specifics
 - a. General agreement that the FMP should contain specific information; however, the specific information and level of specificity varies among commenters.
 - b. Alignment on a plan that can be implemented, along with a desire to know the results of the implementation (specific outcomes of interest vary).
3. Value in collaboration/partnerships
 - a. The nature of the collaborations and specific groups to be involved vary among commenters.

Areas of significant disagreement

1. **Funding model & harvest levels**
 - a. **Revenue-anchored position:** maintain harvest levels sufficient to cover ODF costs and county/school distributions, and avoid shifting costs to state taxpayers; large conservation set-asides threaten solvency and invite legal risk.
 - b. **Diversified-funding position:** Decouple ODF financing from timber receipts (modify or delete “timber funds all activities”), accept lower near-term harvests to prioritize ecological outcomes, and replace revenue via carbon markets, longer rotations, or other non-timber sources.
2. **Legal framing**
 - a. Some assert that large non-harvest set-asides violate counties’ revenue interests under case law, risking costly litigation;
 - b. Others maintain GPV obligates ODF to protect multiple permanent values, supporting broader conservation even if harvest revenue declines.

3. **Jobs & rural economies**

- a. Lower harvests result in fewer jobs and contracts, harming mill towns and suppliers; stresses active management as both ecological and economic.
- b. Job declines attributed to mechanization, cautioning against overstating policy impacts; argue that ecological degradation undermines recreation economies and long-term community well-being.

4. **Active management**

- a. Comments call for halting clearcutting of older stands until older-forest thresholds are met, and to reduce harvest levels
- b. Others emphasize thinning/regeneration harvests and fuels management as necessary tools to reduce wildfire risk and support revenues.

Forest Management Plan Implementation

The Forest Management Plan is developed following the requirements of the Forest Management Planning Rule (OAR 629-035-0030). The Forest Management Plan is to be developed by the State Forester to “*establish the general management framework for the planning area of forest land.*” The State Forester is also required to “*develop implementation and operations plans that describe smaller-scale, more specific management activities within the planning area.*” The draft FMP contains the required elements (e.g., guiding principles, goals, strategies, and guidelines); however, some details used for implementation are found in other policy documents, such as the HCP, operational policy, or the Forest Practices Act (for the State Forests Division, much of the FPA is implemented through a Stewardship Agreement).

The State Forests Division is pursuing an alternative method for compliance with the federal Endangered Species Act by applying for incidental take permits from the U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration – National Marine Fisheries Service. The incidental take permits will require the Division to manage Oregon State Forest lands in compliance with a Habitat Conservation Plan. The Western Oregon State Forests Management Plan contains guiding principles, goals, and strategies that are compatible with the Western Oregon State Forests Habitat Conservation Plan.

During operations planning and implementation, State Forests staff specialists and foresters collaborate to ensure all resource goals are met. The outcome of this integrated forest management approach can be visualized through maps demonstrating how goals are emphasized in specific areas and how harvest operations are modified to achieve desired outcomes.

Additional details and clarity with respect to the outcomes associated with the management of State Forest lands for the first decade of the Western Oregon State Forests Management Plan (e.g., Performance Measures, HCP monitoring) will be provided with the development of the initial Implementation Plans. The Department intends to develop an implementation plan (commencing with operations in fiscal year 2028 and contingent upon receipt of incidental take permits) consistent with model parameters and assumptions in the model run described as “Scenario 5 – Departure Steps – Run A” presented in the November 2025 staff report and will continue to treat Swiss Needle Cast and other forest health issues.

RECOMMENDATION

The Department recommends the Board of Forestry:

1. Approves the final draft Western Oregon State Forests Management Plan (Attachment 2) and directs the State Forester to complete the permanent administrative order to adopt the FMP as an Administrative Rule.
2. Directs the State Forester to continue to implement management under current IPs until issuance of incidental take permits and July 1, 2027.

Recommended Motions

The Department recommends the Board make the following motion:

Consistent with the Findings and Intent Statement in the Board packet, I move the Board to repeal and adopt the rules as set forth in Attachment 1, which incorporates by reference the Western Oregon State Forests Management Plan in Attachment 2, to become effective following issuance of incidental take permits by the United States Fish and Wildlife Service and National Marine Fisheries Service. The Board directs the State Forester to continue State Forests management under existing implementation plans until issuance of the ITPs and July 1, 2027.

Alternative

The Board may choose not to take the recommended action. In this case, the Department will not file a permanent administrative order to adopt the FMP as rule. The Department will continue to plan operations based on the existing FMP as implemented through the Stewardship Agreement and existing Implementation Plans.

NEXT STEPS

If the Board takes the recommended actions, the State Forests Division will:

1. File a final administrative order with the Secretary of State to adopt the FMP as Administrative Rule.
2. Begin development of Implementation Plans to implement the Western Oregon State Forests Management Plan, with a target to begin implementation for fiscal year 2028 (July 1, 2027).
3. Begin development of Operations Plans for fiscal year 2028 to operationalize the Implementation Plans.
4. Return to the Board at its September 2026 meeting to further refine the draft Performance Measures.
5. Return to the Board at its January 2027 meeting to provide the Board with modeling results and to adopt the Performance Measures.

ATTACHMENTS

1. Forest Management Plan Rules for Repeal and Adoption.
2. Final Draft Western Oregon State Forests Management Plan (July 2026).
3. Summary of Public Comment.
4. Board of Forestry Findings – Western Oregon State Forests Management Plan.
5. Board of Forestry Intent Statement on Adopting the Western Oregon State Forests Management Plan.

Forest Management Plan Rules for Repeal and Adoption

REPEAL: 629-035-0105

RULE SUMMARY: This will repeal the current Northwest Oregon State Forests Management Plan (OAR 629-035-0105(a)), Southwest Oregon State Forests Management Plan (OAR 629-035-0105(b)), and Elliott State Forest Management Plan (OAR 629-035-0105(c)). The lands currently subject to these management plans will be managed under a single forest management plan to be adopted. This change is needed to align the management of these forest lands with a Habitat Conservation Plan.

CHANGES TO RULE:

~~629-035-0105 Adopted Forest Management Plan Documents (1) The following forest management plan documents have been adopted and incorporated by reference into this division:¶ (a) Northwest Oregon State Forests Management Plan, Revised Plan, April 2010;¶ (b) Southwest Oregon State Forest Management Plan, Revised Plan, April 2010; and¶ (c) Elliott State Forest Management Plan, November 2011, effective January 1, 2012.¶ (2) The forest management plan documents which have been incorporated by reference into this division are maintained by the State Forester at the Oregon Department of Forestry's headquarters in Salem, Oregon.~~

~~Statutory/Other Authority: ORS 526.016(4), 526.041~~

~~Statutes/Other Implemented: ORS 530.050~~

ADOPT: 629-035-0106

RULE SUMMARY: The Western Oregon State Forests Management Plan describes the management of forest lands managed by the Oregon Department of Forestry west of the Cascades consistent with the requirements found in OAR 629-035-0030.

CHANGES TO RULE:

629-035-0106 Adopted Forest Management Plan Documents (1) The Western Oregon State Forests Management Plan has been adopted and incorporated by reference into this division.¶ (2) The State Forester's existing implementation and annual operations plans will govern management of the planning area until:¶ (a) the issuance of Incidental Take Permits under section 10 of the federal Endangered Species Act by the U.S. Fish and Wildlife Service and National Marine Fisheries Service; and¶ (b) new implementation and annual operations plans are approved by the State Forester to implement the Western Oregon State Forests Management Plan.¶

[ED. NOTE: Documents incorporated by reference are available from the agency.]

Statutory/Other Authority: ORS 526.016(4), ORS 530.050

Statutes/Other Implemented: ORS 526.016(1), ORS 526.041(1), ORS 526.041(3), ORS 530.050



Board of Forestry Public Meeting

The July 2026 final draft of the Western Oregon State Forests
Management Plan can be found at the following link:

<https://www.oregon.gov/odf/board/Documents/fmp-hcp/western-oregon-state-forests-management-plan-final-draft.pdf>

Summary of Public Comments

The Department received approximately 2,400 comments prior to the deadline. Almost all comments were emailed, and approximately 98% of the comments were emails submitted as part of advocacy campaigns. The list (in no particular order) of campaigns and number of comments received from each is:

- 220 emails - Sierra Club campaign
- 13 - Bird Alliance of Oregon campaign
- 1159 - Wild Salmon Center campaign
- 388 - Cascadia Wildlands campaign
- 370 - Oregon Wild campaign
- 197 - Oregon Natural Resources Industries campaign
- 17 - advocating for a Tillamook County parcel to be added as an HCA¹

The remaining comments were from individuals or organizations, or had been modified substantially from the source advocacy campaign. All comments are summarized below, with the campaign emails summarized individually and the overall/individual comments summarized after those. The conservation-focused campaigns came from organizations in the State Forests Coalition, and have similar talking points, so rather than repeating, those are summarized under Common Conservation-Based Comments.

Email Campaign Summaries

Common Conservation-Based Comments

- Add an explicit requirement that all actions, goals, strategies, monitoring, and adaptive management in the FMP be based on the best science available, as required by existing law.
- Directly incorporate applicable laws, Board of Forestry policies, plans, and key performance measures into the FMP and require compliance.
- Delete or amend Principle 3 so that management is not funded solely by timber harvest revenue and logging is not prioritized over other statutory public values.

¹ These comments are out-of-scope for the FMP rulemaking and are not included in the summary; however, they have been noted by the Division as part of Implementation and Operations planning.

Summary of Public Comment

- Stop all clearcutting of complex, layered stands on North Coast state forests until at least 30% of forest acreage achieves mature/complex conditions, consistent with current rules and policies.
- Create watershed management and restoration plans for impaired watersheds to restore water quality suitable for salmon and aquatic species within 10 years, supporting safe community drinking water.
- Add strategies to implement ODF's Climate Change and Carbon Plan and meet directives in Executive Order 25-26; shift to longer rotations and reduce reliance on large-scale clearcutting.
- Recognize the HCP as necessary to prevent local extinction of 17 imperiled species, but add FMP-specific strategies to drive meaningful recovery (not just compliance).

Sierra Club

- Build climate resilience by using longer harvest rotations, reducing or eliminating large scale clearcutting, phasing out routine pesticide use, and identifying and managing areas with high carbon storage potential.
- Strictly avoid stream degradation.

Bird Alliance of Oregon

- Prioritize climate mitigation through longer rotations, reduced reliance on large-scale clearcutting, and a carbon market program.

Wild Salmon Center

- Past management has over emphasized industrial scale clearcutting and revenue, undermining legal mandates to protect habitat and preserve older forest structures.
- Focus on climate resilience by shifting to longer rotations, reducing or eliminating large scale clearcutting, phasing down routine pesticide use, and establishing a carbon market program.

Cascadia Wildlands

- The draft Forest Management Plan is an opportunity to restore balance to state forests by focusing on ecological forest management, restoring damaged ecosystems, improving water quality, and aiding the recovery of at-risk species pushed to the brink of extinction by decades of industrial forest practices.

Oregon Wild

- Management is out of balance: too little mature/complex forest remains, despite legal expectations, and past practices have emphasized industrial clearcutting over public values.
- The draft lacks explicit commitments to best science and accountability.
- Climate mitigation: Shift to longer rotations, reduce or eliminate large scale clearcutting, and establish a carbon market program to support climate resilience.

Oregon Natural Resources Industries

- Adopt the FMP as drafted, without additional restrictions. The Habitat Conservation Plan (HCP) already sets aside more than half of state forestlands for conservation, and Oregon should proceed to secure the benefits and protections the HCP provides.
- The FMP/HCP framework offers a comprehensive conservation strategy; adding new restrictions would be unnecessary.
- Decades of research indicate that unmanaged forests can increase wildfire risk, while reduced management harms rural economies; responsible, science based management should continue.
- Implement the plan's management strategies to ensure shared forest resources receive the protections and benefits envisioned.
- Stay the course: Move forward and adopt the FMP without additional constraints.

Summary of All Comments by Theme

Governance and Process

- The substantial rewrite of the FMP late in the process limits meaningful public input.
- New goals and strategies were introduced without adequate vetting or opportunity for stakeholder review.
- The tight timeline before the Board of Forestry vote creates uncertainty and undermines public engagement.
- The final FMP must be implementable, financially sustainable, economically viable, and clear enough to avoid future reinterpretation or added constraints.

Summary of Public Comment

- The FMP presents an incomplete, biased, and misleading assessment of the social, economic, and environmental impacts of industrial timber production. It overstates benefits while omitting well-documented harms.
- Performance measures should be adopted at the same time as the Plan.
- The FMP lacks meaningful metrics and measurable outcomes. Without them Implementation Plans and Annual Operating Plans will lack consistency and there will be too much discretion at the district level.
- Remove or amend Principle 3 because this requires all state-forest management activities to be funded solely by timber harvest revenue, which unlawfully prioritizes logging over other public values.
- All applicable statutes, policies, plans, and performance measures already adopted by the Board of Forestry or the legislature should be formally included in the FMP.
- The FMP should explicitly require science-based management (using best available science) and measurable standards.
- Develop alternative revenue sources that do not depend on high-intensity logging.
- The FMP reflects sound science and should proceed.
- The science-based strategies in the draft FMP provide necessary protections across shared forest resources.
- “Stay the course” and adopt the plan as drafted, without imposing any additional restrictions.
- The FMP should explicitly require compliance with all Board-adopted policies (including the Climate Change and Carbon Plan), legislative key performance measures, and Governor’s executive orders.

Relationship between HCP and FMP

- Adoption of the FMP should only occur once the HCP is fully approved.
- Implementing rule changes before HCP approval could force ODF to restart the entire planning process if the HCP is later disapproved.
- The Plan must include, within itself, the listed species strategies necessary for ESA compliance.

Summary of Public Comment

- Because the HCP reserves a large portion of state forests for conservation, the state should move forward to secure the benefits and regulatory certainty the HCP offers.
- Restrictions in addition to those in the HCP are unwarranted
- They argue that responsible forest management should continue and that new limitations would hinder effective stewardship.

Timber Harvest

- The revised draft heavily emphasizes ecological forestry and climate resilience but provides little specificity on expected timber production.
- Lack of clarity creates uncertainty for counties, taxing districts, and industry partners who depend on predictable harvest levels required under the “Greatest Permanent Value” (GPV) mandate.
- Declare and maintain predictable, dependable harvest levels.
- Recognize the importance of the forest sector workforce, including its role in firefighting and road maintenance.
- Lowering harvest levels will:
 - Reduce ODF revenue and operating budgets.
 - Diminish ODF’s ability to maintain fire suppression capacity.
 - Limit ODF’s ability to maintain forest roads and support private landowners needing services.
 - Minimize special areas designations, species and landform survey requirements, and seasonal logging restrictions. Similar requirements under the Northwest Forest Plan significantly complicated management, increased costs, and reduced sale volumes and bid competitiveness.
- Require ground truthing of stands proposed for harvest to verify actual tree age, rather than relying on imputed or model based classifications.

Carbon and Climate Change

- Support for carbon monitoring but opposition to inclusion of carbon market participation in the FMP
- Carbon markets are a major policy change requiring a separate Board process, county consultation, economic analysis, and public review.
- Carbon credits could displace timber harvest volumes, reducing county revenue, timber supply, and forest-sector employment.

Summary of Public Comment

- Carbon revenues will not replace the broader economic benefits of active management (logging, milling, reforestation, restoration).
- Logging releases most of a tree's stored carbon; only a small portion remains long-term in durable wood products.
- Timber harvest is described as Oregon's single largest source of greenhouse-gas emissions (~35 million metric tons CO₂e per year).
- Logging reduces future sequestration by removing growing trees.
- Greenhouse-gas emissions impose large societal costs, including:
 - climate-related deaths
 - billions of dollars in economic damages (heat waves, wildfire, GDP losses)
- Strengthen Climate and Carbon Strategies by identifying high carbon storage areas, including a strategy for longer harvest rotations, and including a strategy for reducing dependence on large scale clearcutting.

Community Well-being

- ODF ignores known social harms associated with timber-dependent communities. Higher levels of logging results in:
 - higher unemployment
 - lower incomes
 - higher poverty
 - worse health outcomes
 - higher arrest rates
 - weaker community institutions

Economic Impacts

- Industrial logging tends to weaken—rather than strengthen—local economies. Long-term data shows:
 - declining jobs per million board feet
 - industry-wide wage stagnation or decline
 - elimination of ~10,000 jobs despite timber harvest recovery after the Great Recession
- Conservation and restoration-based management often produces stronger long-term economic outcomes through recreation, amenity migration, and more diverse local economies.
- Limiting management activities would have negative economic consequences for rural communities that rely on forestry.

Water Resources

- Industrial logging can:
 - significantly reduce summer streamflows, especially as climate change intensifies
 - increase water temperatures and harmful algal bloom risks
 - increase future water costs for households and communities
- The Plan should include measurable strategies for restoring Section 303(d) listed impaired waters.
- Avoid stream degradation and develop restoration plans to bring impaired watersheds back to salmon-healthy conditions within 10 years.
- Identify all domestic water sources—regardless of registration status—during planning, and create site-specific watershed protection plans.

Forest Health and Resilience

- Prioritize Active management to improve forest resistance and resilience.
- Use rapid post-disturbance restoration following wildfire, insects, disease, or blowdown.
- Allow salvage harvest where appropriate and promptly reforest disturbed areas to restore productivity and carbon sequestration.
- Develop strategies to lengthen harvest rotations, reduce or eliminate large-scale clearcutting, and phase out routine pesticide use.

Environmental Outcomes

- The FMP lacks a clear, determinate method for evaluating whether strategies meet the biological diversity requirement.
- The Plan provides no measurable metric or decision rule for biological-diversity outcomes on General Stewardship lands (those outside HCAs), whereas the 2010 FMP has structure targets.
- Increase mature and complex forest structure by including specific strategies to increase complex, layered mature forests and setting-aside mature stands adjacent to Habitat Conservation Areas (HCAs).
- State Forests currently contain very low levels of older trees (only 5% over age 100), and have never approached 30% complex forest structure.
- Phase out pesticide use. Existing pesticide language is insufficient as compliance with labels will not prevent environmental or human-health harm, because

pesticides can be mobile in soil, volatilize in heat, and drift can occur even when applied according to label.

- Include specific FMP strategies, measurable actions, and performance measures, beyond the HCP, to promote recovery of all imperiled wildlife and fish species.
- Implement ecological forest management across the whole landscape, not just in HCAs and RCAs.
- Shift away from practices that prioritize timber revenue over ecological integrity.
- Develop an FMP that reflects the urgency of the climate and biodiversity crises.
- Halt clearcutting of older, complex forests until at least 30% of state forests reach this condition, as current rules require.
- Reducing active forest management leads to more severe wildfires, whereas managed forests help mitigate fire danger.
- Protect all existing legacy, mature (80+ years), and old-growth stands—with adequate buffers—both inside and outside HCAs.

Chapter-Specific Comments and Recommendations

Chapter 1

- Add a new Guiding Principle requiring all goals, strategies, and implementation measures to be based on the best available science.
- Delete Guiding Principle 3, or change from “sufficient” to “ensure ODF’s ability.”
- Add to Guiding Principle 8, language requiring compliance with all plans, policies and performance measures adopted by the Board of Forestry, legislative Key Performance Measures, and executive orders.
- Add a guiding principle requiring the FMP to contain specific goals and strategies that would result in a high probability of maintaining and restoring properly functioning aquatic systems and native wildlife habitats.

Chapter 2

- The new “Management of Landscape Conditions” section duplicates concepts already covered by the Habitat Conservation Plan (HCP).
- The newly introduced “Management of Stands” framework adds unnecessary granularity and introduces unclear “emphasis areas” at the stand level, which have not been previously vetted.

Chapter 3

- The wildfire section oversimplifies wildfire causes by implying suppression activities have driven catastrophic fires; Hampton asserts this mischaracterizes ODF-managed lands, which are actively managed.
- They recommend restoring recognition of timber's importance to Oregon's economy.
- The new "Timber Sale Design" strategy should avoid tailoring sales to market conditions; instead, ODF should maintain predictable volume.
- The plan should define "shared stewardship" in the cultural/historic resources section.
- Economic benefits of timber should be highlighted if recreation economics are included.
- They strongly oppose participation in carbon markets if it would reduce timber harvest acreage or economic returns.
- Slash management changes should avoid additional requirements that ignore market realities.
- Table 3-2 – Climate Resilience and Adaptation Needs Major Clarification
 - The table lists broad climate-resilience actions without specifying where they apply or how they relate to the FMP's management emphasis areas, which could expand restrictions beyond intended zones (e.g., General Stewardship Areas).
 - Add a column identifying the primary management context for each option (e.g., HCAs, RCAs, reforestation).
 - Clarify Table 3-2 is illustrative only, not a source of new constraints.
 - Ensure actions align with the FMP, HCP, and ODF's working-forest responsibilities.
- Timber sale design strategy should require purchaser and operator expertise. This will reduce costs and increase bid competitiveness. They can provide input on:
 - Market conditions
 - Logging feasibility, access constraints, equipment limits

Summary of Public Comment

- Road costs and contractor risk
- Revise the Timber Harvest Objective strategy to include a requirement that harvest is done consistent with FMP goals and strategies, the HCP, the principles of ecological forest management, the Climate Change and Carbon Plan, the GPV and Planning rules.
- Add a strategy that places a moratorium on harvest of complex stands and older forest structure until a minimum of 30% of state forests are in these conditions.
- Add silvicultural strategies that:
 - Require silvicultural prescriptions in HCAs to be solely for the protection and restoration of suitable habitat for covered species.
 - Maintain a minimum of 40% of general stewardship areas as dispersal habitat, consistent with the HCP.
 - Prohibit silvicultural practices in RCAs except as allowed in the HCP.
 - Reduce reliance on clearcut timber harvest and apply ecological forest management practices.
- Change the Timber Salvage strategy to prohibit salvage logging in HCAs and RCAs except for public safety concerns.
- Add a strategy to prohibit salvage on steep erosion-prone slopes, and retain legacy habitat components.
- Add a strategy to decommission roads based on steep slopes, likelihood of erosion, slope failure or adverse impacts to sensitive resources and identify opportunities to consolidate road access.
- Develop a strategy and priorities to improve fish passage on existing roads.
- Decommission roads within HCAs and RCAs and include a schedule and timeline for road decommissioning.
- Revise the Carbon sequestration goal to increase rather than contribute to carbon sequestration.
- Amend the carbon storage strategy to require increasing carbon sequestration and storage during IP development.
- Add a strategy to establish time-bound carbon sequestration targets and monitor progress.

Summary of Public Comment

- Amend the carbon market goal to require a timeline for implementing a carbon market program.
- Add a new strategy to require forest management activities contribute to a high probability of maintaining and restoring properly functioning aquatic habitats.
- Amend the headwater process strategy to:
 - Require IPs to include specific, measurable, timebound actions to increase woody debris, sediments, and nutrients to aquatic ecosystems.
 - Prohibit adverse impacts from forest management.
 - Base decisions on the best available science.
- Amend the water quality standards strategy to include road decommissioning.
- Add a strategy to evaluate forest management activities and their impacts on stream flows, temperatures and sedimentation.
- Add a strategy to phase out pesticide use in drinking watersheds.
- Add a strategy to phase out clear cut harvest in drinking watersheds.
- Amend the wildlife goal to include species recovery.
- Amend the habitat complexity strategy to:
 - include mature trees, trees with characteristics associated with older trees, and buffers for old-growth trees (subpart c).
 - require protection of all complex layered stands until 30% of the forest is in this condition (subpart d).

Chapter 4

- New language suggesting diversification of funding due to “poor timber markets” is problematic; ODF has historically maintained consistent harvests through fluctuations and should continue doing so.
- Proposed change moving Operations Plan approval from District Foresters to the State Forests Division Chief lacks justification and may reduce efficiency and local responsiveness.

Board of Forestry Findings – Western Oregon State Forests Management Plan

Rules related to the management of State Forest Lands are found in Chapter 629, Division 35 (OAR 629-035-0000 through 629-035-0110).

Findings

1. The Board of Forestry finds that the Western Oregon State Forests Management Plan was developed consistent with Oregon Administrative Rule Chapter 629, Division 35, and contains all elements required by Forest Management Planning rule (OAR 629-035-0030).
2. The Board of Forestry finds that the State Forester has implemented a public involvement effort that fulfilled the goals for public involvement that are described in OAR 629-035-0080.
3. The Board of Forestry finds that the State Forester has involved the counties in the development of this FMP and has met the obligations to consult with the Forest Trust Land Advisory Committee as described in OAR 629-035-0090.

Board of Forestry Intent Statement on Adopting the Western Oregon State Forests Management Plan.

Purposes of the Board of Forestry Intent Statement:

1. To provide a historic context for the Board of Forestry (BOF) decision about the Western Oregon State Forests Management Plan (FMP).
2. To provide the public, media, interest groups and the counties with an understanding about the intent and expectations of the Board as they adopt this FMP.
3. To provide future policy makers with information that will help them understand the rationale and intent of the current BOF in adopting the FMP.
4. To express a set of expectations about what benefits this FMP will achieve over time and BOF expectations about the processes that will be utilized by the Oregon Department of Forestry (ODF).

The Oregon Board of Forestry Intends that:

1. In adopting this FMP, the Board is defining a pathway that will provide a full range of economic, social, and ecological values. In this context, the Board retains options for future Boards of Forestry and for the citizens of Oregon.
2. Ecosystem function and resilience are important components of achieving "healthy, productive and sustainable forest ecosystems that produce a full range of social, economic and ecological benefits".
 - a. A full range of social, economic and ecological benefits include:
 - i. Sustainable and predictable timber and revenues for the benefit of the local governments and schools;
 - ii. Properly functioning aquatic habitats for salmonids, and other native fish and aquatic life;
 - iii. Habitats for native wildlife;
 - iv. Productive soil, and clean air and water;
 - v. Protection against floods and erosion; and
 - vi. Recreation
3. The integrated forest management approach, as described in the FMP, is a pathway to achieve resilient forests that continue to produce greatest permanent value across the landscape and over time.
4. The adopted FMP, in conjunction with the regulatory certainty provided by the anticipated Western Oregon State Forests HCP, will better enable ODF to produce social, economic and conservation outcomes over the long term, compared to continuing to manage under the uncertainties associated with take avoidance.

5. Timber harvests will be conducted across a range of forest conditions and forest age classes.
6. The adopted FMP will provide social values that include family wage jobs and benefits, diverse recreational opportunities, cultural resource protection and access for tribal members.
7. Monitoring is an adaptive management tool to maintain achieving Greatest Permanent Value (GPV) on BOF lands as defined by the State Forest Management Policy and Planning Administrative Rules. ODF will continue to make adjustments in its FMP implementation based on monitoring results and at the appropriate operational or policy level, depending on significance and scope.
8. ODF will continue to have public involvement and participation opportunities and provide information to the public as the FMP is implemented.
9. ODF will collaborate with other agencies as appropriate to conduct the necessary level of monitoring, analysis, and research to validate key assumptions and to address key monitoring questions.
10. State forests will contribute to ecological goals at the landscape level without assuming responsibility for mitigation of the effects of management on other ownerships.
11. The adopted FMP will allow management of state forests in a cost efficient, effective, and sustainable manner, to provide revenues for re-investment into those forests for continued production of social, economic, and environmental benefits to Oregonians over the 70-year expected duration of the FMP.
12. In recognition of revenue fluctuations due to market forces and fixed costs that are outside of agency control, ODF will continue to follow forest management investment-level guidance set forth in Table 4-1, and to pursue alternative funding streams to cover expenses.
13. During FMP implementation, ODF will estimate – through modeling – above and below ground carbon pools on state forestlands and in harvested wood products, as well as monitor and report forest carbon sequestration and storage over the life of the FMP implementation.
14. ODF will explore available compensatory mechanisms, such as carbon dioxide emission offset credits, that provide direct financial benefit to the state, counties, and local taxing districts for increases in carbon storage that are consistent with other objectives of FMP implementation, including the sustainable and predictable supply of timber over time.
15. The Board and ODF will finalize performance measures for ODF's reporting on a schedule developed by the Board during FMP implementation.

16. Consistent with OAR 629-035-0020, which requires a ten-year review of an FMP " ... in light of current social, economic, scientific, and silvicultural considerations .. .", the Board may make appropriate adjustments in the policy direction for BOF lands within the planning areas. At the completion of the initial ten-year implementation period, and every ten years thereafter, ODF will compile a ten-year Implementation and Monitoring Report for dissemination to the BOF and the public to summarize the management activities that have occurred over the period, the results of monitoring and research efforts during that time, and any proposed changes to the FMP strategies to better meet the goals, if any.