

BARTLETT Shawna L * ODF

From: Grant Holly <Grant.holly102@gmail.com>
Sent: Wednesday, August 26, 2026 5:42 PM
To: FORESTRY Boardof * ODF
Subject: Speak Up For Your State Forests

[You don't often get email from grant.holly102@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Wednesday 08/26/2026 (8:40 PM)

Dear Chair Kelly and Members of the Board of Forestry,

Good evening! Thank you for supporting the completion of a Habitat Conservation Plan (HCP) for Western Oregon state forests. I'm writing to ask you to continue this work by adopting a new forest management plan for Oregon's state forests. This includes implementing a strong HCP and the Climate Change and Carbon Plan (Climate Plan), adopted by the Board of Forestry in 2021, with proactive measures to address climate change.

The HCP will begin to restore balance to our state forests after decades of clearcuts and over-harvest. The HCP will protect iconic salmon runs, wildlife habitat, recreation, and clean water by limiting or prohibiting timber harvest within established conservation areas. However, the remainder of state forest should not be managed like private industrial forest land with short harvest rotations that maximize revenue.

The new forest management plan must be supported by the best science available, to meet the challenges posed by climate change. This includes increasing protective stream buffers on headwater streams to protect cold clean water for salmon, and implementing the Climate Plan to increase carbon absorption and storage in our state forests. This can be achieved by reducing clearcut timber harvest, protecting existing mature stands of forest, applying ecological forest management practices, and establishing longer rotations between harvest to increase carbon storage.

The HCP and new forest management plan would continue to produce revenue from state forest timber sales to fund the Department of Forestry and county services, but this is an unreliable and unsustainable approach. I support efforts to diversify revenue sources for both the Department of Forestry and local services, to relieve the pressure to over-harvest public forests and provide more stable funding.

Now is the time to stand tall for Oregon's state forests, and for current and future generations, by adopting a strong HCP and a new forest management plan.

Sincerely,

Grant Holly
6012 Woodcock Circle
PennForest III
Roanoke, VA 24018 USA
Big Lick. - Monacan/Tutelo Nations
e: grant.holly102@gmail.com

BARTLETT Shawna L * ODF

From: Elizabeth Hayman <ehayman27@gmail.com>
Sent: Wednesday, August 26, 2026 12:16 PM
To: FORESTRY Boardof * ODF
Subject: Speak Up For Your State Forests

[You don't often get email from ehayman27@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Chair Kelly and Members of the Board of Forestry,

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Sincerely,

Elizabeth Hayman
936 N Pearl St
Tacoma, WA 98406
ehayman27@gmail.com

BARTLETT Shawna L * ODF

From: Judy Stevenson <stejology@gmail.com>
Sent: Monday, August 17, 2026 3:37 PM
To: INFORMATION Forestry * ODF; KC Kacey * ODF; SKINNER Kate J * ODF; BARNARD Josh W * ODF; WILSON Michael * ODF; PEW Brian * ODF; EVERINGHAM Don * ODF; LARSON Dave * ODF; MCCOMB Brenda * ODF; AGPAOA Liz * ODF; CURTISS Heath * ODF; DEUMLING Ben * ODF; JUSTICE Joe * ODF; LOVECHIO Alexi * ODF; FORESTRY Boardof * ODF
Subject: Implement the Updated Oregon Climate Action Commission Natural and Working Lands Goals

You don't often get email from stejology@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Forestry and Board of Forestry,

As an Oregonian who cares deeply about the long-term health of our forests, communities, and climate, I am writing to urge you to take immediate action to achieve the net sequestration and storage goals outlined in the updated [Oregon Climate Action Commission Natural and Working Lands report](#). Oregon's forests are one of our greatest climate assets, and the updated report makes clear that protecting and enhancing their carbon sequestration capacity must be treated as an urgent priority.

Our forests already remove vastly more carbon from the atmosphere than emerging technological carbon capture solutions while also providing clean air, clean water, wildlife habitat, recreation opportunities, and other public benefits. Given the climate crisis and the serious risks identified in ODF's own Climate Change and Carbon Plan, Oregon cannot afford further delays in implementing natural climate solutions at the scale required.

I urge ODF and the Board of Forestry to fully implement existing climate-smart forestry strategies, including those outlined in the Climate Change and Carbon Plan, and to update the plan's goals so they align with the latest recommendations from the Oregon Department of Energy and the Oregon Climate Action Commission.

Research demonstrates that Oregon can continue to support timber production while reducing reliance on clearcutting, extending harvest rotations, and increasing selective harvest practices. Allowing trees to grow longer enables greater carbon sequestration, healthier forests, improved soil and watershed function, and continued timber yields.

Oregon has the opportunity to be a national leader in land-based carbon sequestration. However, the data show a significant decline in net carbon sequestration over the past 25 years, corresponding with reductions in forest biomass. Importantly, the report notes that this decline persists even when biomass burning is excluded, indicating that other forest management practices are contributing to the trend.

While harvested wood products can store carbon and may play a role in climate-smart forestry when sourced responsibly, they also replace living trees that would otherwise continue sequestering carbon for decades. The report emphasizes the importance of protecting existing carbon stocks and advancing truly climate-smart forest management. Clearcutting and short harvest rotations are inconsistent with maximizing Oregon's carbon sequestration potential.

ODF already has plans that move Oregon toward more climate-smart forestry. The next step is implementation. I respectfully ask the Oregon Department of Forestry and the Board of Forestry to immediately implement any necessary actions to achieve the net sequestration and storage goals identified in the updated [Oregon Climate Action Commission report](#) and ensure that Oregon's forests remain a cornerstone of the state's climate strategy.

Thank you for your consideration and for your service to Oregon.

Sincerely,

Judy Stevenson
stejology@gmail.com

BARTLETT Shawna L * ODF

From: Tyler Gilmore <tyler@350pdx.org>
Sent: Friday, August 14, 2026 3:37 PM
To: INFORMATION Forestry * ODF; KC Kacey * ODF; SKINNER Kate J * ODF; BARNARD Josh W * ODF; WILSON Michael * ODF; PEW Brian * ODF; EVERINGHAM Don * ODF; LARSON Dave * ODF; MCCOMB Brenda * ODF; AGPAOA Liz * ODF; CURTISS Heath * ODF; DEUMLING Ben * ODF; JUSTICE Joe * ODF; LOVECHIO Alexi * ODF; FORESTRY Board of * ODF
Subject: ODF Must Adopt OCAC Goals

You don't often get email from tyler@350pdx.org. [Learn why this is important](#)

Hello ODF and BoF,

My name is Tyler Gilmore and I am a healthy forest advocate here in Oregon. Thank you for the important work you do in managing Oregon's state forest lands. It is difficult work that is invaluable for current and future generations.

I am reaching out to you because it is imperative that ODF immediately implement any necessary action to achieve the net sequestration and storage goals outlined in [the updated Oregon Climate Action Commission report](#).

Our forests are our best defender against the climate crisis. For example, a technological carbon capture company already operating in Oregon removes approximately 500 metric tons of CO₂e per year. In comparison, existing trees in developed areas across Oregon currently remove, on average, 1,750,000 metric tons of CO₂e per year, representing a 3,500-fold difference in scale. Additionally, forests provide many other benefits (clean air, clean water, recreation, wildlife habitat, etc.) that cannot be provided elsewhere.

We are in a climate crisis which poses a serious threat (as stated in [ODF's own Climate Change and Carbon Plan](#)) and simply cannot afford to waste any more time in being as aggressive as possible in our implementation of natural climate solutions (NCS). Therefore, I urge ODF to implement any and all plans (like the Climate Change and Carbon Plan) to achieve the net sequestration and storage goals outlined in [the updated Oregon Climate Action Commission report](#).

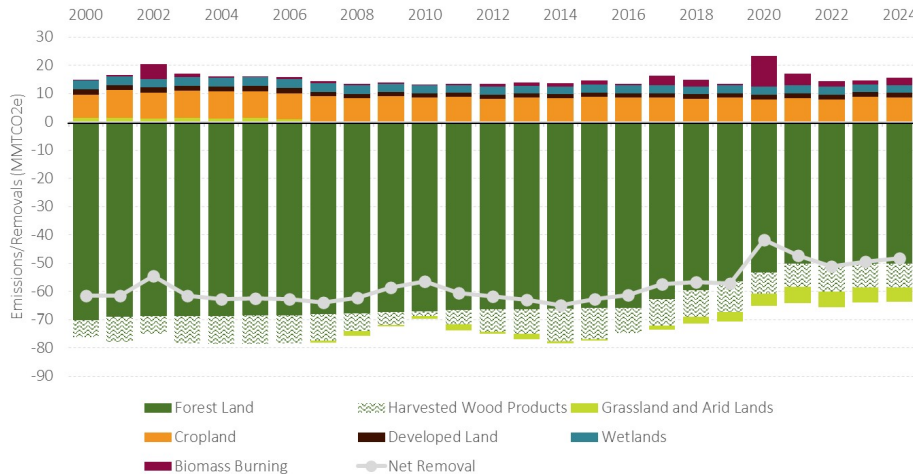
ODF can achieve sufficient "harvest" while avoiding clearcutting and allowing longer rotations ([source one](#), [source two](#)). Trees take decades to reach their peak carbon sequestering potential. If we allow trees to grow longer and harvest more selectively rather than clearcutting, you can yield just as much timber while also allowing trees, forests, soil, and riparian areas to remain healthier.

Oregon can be a national leader in land-based net sequestration. Oregon contributes roughly 5.4 percent of the national average net rate of annual sequestration. Out of the 50 states, Oregon ranks seventh. This, as seen in the report's figure below (more detail available [here](#)), is largely a result of our forests, which can only sequester carbon when they're standing.

However, you can see that net carbon sequestration has significantly decreased just in the past 25 years. This decrease has occurred in lockstep with the decrease in forest biomass. This means, unsurprisingly,

as we cut down more forests, their ability to sequester carbon decreases. This decrease in carbon sequestration of forests cannot be blamed on fires either, as the report states "Without considering biomass burning, Oregon's lands are still experiencing a decline in net sequestration over time."

It is also important to note that (a) while a "harvested wood product" does store the carbon in the wood itself, a "harvested wood product" also negates that previously alive tree's ability to continue sequestering carbon, hampering future sequestration (hence the regular decline seen below), and (b) comes with all of the emissions from the logging machinery, manufacturing, and shipping. So "harvested wood products" are not a sustainable plan for carbon sequestration and storage.



Finally, [it is imperative that we do not leave rural communities behind](#). Communities that depend on timber jobs for their economy must be supported in transitioning away from an extraction-based economy. We must also decouple county funding from the cutting of forests. Counties deserve to have funding *and* healthy forests, not one or the other. ODF can support these aims, plain and simple. It would be a change, but the only constant in life is change. Right now, it's the climate that's changing, and changing ourselves instead sounds a whole lot more sustainable.

Let's be leaders, here in Oregon. We have the potential. History books write about those who carved future realities, whether for good or bad. Let's be thoughtful about which side we land on.

Tyler Gilmore
he/him/his
350PDX Forest Defense Volunteer Team Coordinator

BARTLETT Shawna L * ODF

From: KATHARINE JONES <markjonestrucking@msn.com>
Sent: Friday, August 07, 2026 9:41 AM
To: FORESTRY Boardof * ODF

You don't often get email from markjonestrucking@msn.com. [Learn why this is important](#)

Dear OR Board of Forestry,

I urge you please not accept another Burn Plan for Oregon. Over the last decade, we have watched Oregon timberlands burn to the ground due to this plan. Please save Oregon jobs and Timber!

*Katie Jones
Roseburg, OR*

From: john sweet <jsweet9574@gmail.com>
Sent: Friday, August 07, 2026 9:17 AM
To: FORESTRY Boardof * ODF
Subject: Re: WILD FIRES

You don't often get email from jsweet9574@gmail.com. [Learn why this is important](#)

Subject: Citizen Proposal Update: Self-Powered Automated Wildfire Suppression Infrastructure

Hello,

My name is John Sweet from Dallas, Oregon. I am writing to submit an updated, highly resilient framework for my previous wildfire containment proposal utilizing existing infrastructure (utility poles, cell towers, and lookouts).

To solve the critical challenges of water supply and grid failure during a fire event, the system would utilize **centralized cisterns** and **solar backup power**:

1. **Solar-Battery Infrastructure:** Each pole or lookout tower would feature a localized solar panel and battery backup. If a wildfire knocks down power lines, or if utilities initiate a preventive power shutoff, the heat sensors and automated valves remain 100% operational.
2. **Centralized Cistern Network:** Rather than relying on city water lines, the network would connect to strategically placed, elevated water cisterns. These cisterns can store hauled water or collected rainwater, using gravity and solar-powered booster pumps to feed the 360-degree high-power sprinklers on adjacent poles.
3. **Immediate Targeted Suppression:** When local heat sensors trigger, the system deploys an independent, pressurized curtain of water to smother the spark instantly, isolating the threat without human intervention.

This self-contained design ensures the system works precisely when the grid fails. Thank you for routing this to your engineering, wildfire mitigation, or technology innovation teams.

Sincerely,
John Sweet
Dallas, Oregon

On Fri, Aug 7, 2026 at 9:08 AM john sweet <jsweet9574@gmail.com> wrote:

HELLO MY NAME IS JOHN SWEET I AM A RESIDENT OF DALLAS OREGON WATCHING THE NEWS OF THE DEVISTATING WILD FIRES LATELY HAS BEEN SO DESTURBING I HAVE BEEN IN CONSTANT THOUGHT OVER THE SUBJECT AND I MAY HAVE AN IDEA TO LIMIT OR PERHAPS ELIMINATE WILD FIRES...

IF PERHAPS USING CELL TOWERS,TELEPHONE POLES,FIRE LOOKOUTS ETC,IF YOU DEVELOPE AN

IRRIGATION SYSTEM SIMILER TO A LANDSCAPE IRRIGATION WITH HEAT SENSORS AT THE BASE TRIGGERING LARGE IRRIGATION AT THE TOP OF THE POLES WITH 360 DIRECTIONALITY POWERFUL ENOUGH TO REACH TO THE NEXT POLE WOULD ELIMINATE OR CONTAIN IN A SMALL AREA UNABLE TO ESCAPE WOULD NOT ONLY SAVE PROPERTY BUT POTENTIALLY LIVES.... THANK YOU FOR YOUR CONSIDERATION IF THIS HAS LANDED INTO THE WRONG DEPARTMENT PLEASE FEEL FREE TO PASS IT ALONG TO ANYONE AND EVERYONE IN OR OUT OF STATE

BARTLETT Shawna L * ODF

From: Sean <seanmrl@gmail.com>
Sent: Tuesday, August 11, 2026 1:41 PM
To: FORESTRY Boardof * ODF
Subject: A Regenerative Solution to Oregon's Escalating Wildfire Crisis
Attachments: Biologically Regenerative Forest Management.pdf; Biologically Regenerative Forest Management.docx

You don't often get email from seanmrl@gmail.com. [Learn why this is important](#)

I'm reaching out to share a forest-management approach informed by more than 20 years of experience in regenerative agriculture. As a passionate Oregonian, I'm deeply concerned that despite significant public spending on forest management and fire response, massive wildfires continue to occur every summer—and are becoming larger and more destructive.

This approach focuses on restoring the biological processes that help forests regulate soil fertility, water retention, vegetation, and fuel conditions naturally. Rather than relying primarily on routine thinning, amendments, grazing, or repeated broad-scale treatments, it emphasizes continuous ground cover, native diversity, natural decomposition, minimal disturbance, and targeted intervention where safety or infrastructure requires it.

I believe Oregon needs to evaluate whether its current investments are addressing the underlying causes of declining forest resilience. A biologically regenerative model could provide a practical, lower-cost complement to existing strategies while reducing long-term dependence on repetitive treatments and emergency response.

It's time to take a different approach because the one we have is not working and is having devastating consequences.

I would love the opportunity to speak more with your department about my approach.

I have attached an in depth document that explains my approach vs the current approach and the consequences of one vs the other.

Thank You,

Sean Lee

Biologically Regenerative Forest Management

A Comprehensive Framework for Restoring Forest Function, Improving Resilience, and Reducing Long-Term Management Dependence

Executive Summary

This document presents a biologically regenerative approach to forest management. It is intended for forest owners, land managers, conservation organizations, tribal governments, communities, public agencies, and other professionals responsible for forest stewardship.

The approach treats a forest as a living, interconnected system rather than simply as an accumulation of trees or combustible vegetation. Soil organisms, fungi, living roots, native plants, leaf litter, downed wood, water movement, decomposition, natural succession, and mortality all contribute to forest fertility, moisture retention, regeneration, habitat, and fuel dynamics.

The objective is to restore and protect these natural processes so that the forest becomes increasingly capable of regulating its own biological functions. This includes regulating vegetation growth, decomposition, soil fertility, water availability, and the distribution and moisture of combustible material.

The model emphasizes:

- Continuous living plant cover
- Minimal soil disturbance
- Protection of existing biological capital
- Natural fertility through decomposition and nutrient cycling
- Improved water infiltration and moisture retention
- Native plant diversity
- Natural regeneration and succession
- Retention of appropriate leaf litter and downed wood
- Targeted intervention rather than routine broad-scale treatment
- Monitoring and adaptive management

The core model does not rely on:

- Routine thinning
- Routine soil amendments, fertilizers, or imported compost
- Grazing or livestock
- Repeated mowing or brush clearing
- Removal of all deadwood and leaf litter
- Heavy machinery wherever avoidable
- Uniform vegetation removal
- Unnecessary roads or access routes

This framework does not claim that forests can be made fireproof or maintenance-free. Wildfire remains a natural and potentially severe disturbance, especially under extreme drought, wind, and weather conditions. The objective is to improve ecological function and resilience, reduce avoidable degradation, and limit dependence on repetitive treatments that may address visible fuels while weakening the underlying biological system.

1. Purpose and Scope

The purpose of this framework is to establish a practical, measurable, and biologically based model for forest management.

It is designed to help land stewards:

1. Restore soil and water function.
2. Protect existing ecological assets.
3. Improve native vegetation and natural regeneration.
4. Reduce unnecessary soil and habitat disturbance.
5. Encourage natural decomposition and nutrient cycling.
6. Improve resilience to drought and wildfire.
7. Reduce recurring management dependence.
8. Identify when targeted intervention is necessary.
9. Compare proactive ecological investment with public emergency expenditures.
10. Develop measurable management and monitoring standards.

The framework can be applied to:

- Individual forest properties
- Community forests
- Tribal forests
- Conservation lands
- Municipal and county lands
- State and federal forests
- Watershed restoration projects

- Public-private partnerships
- Cooperative landscape initiatives

It is especially relevant to forests experiencing:

- Declining soil moisture
 - Bare or compacted soil
 - Reduced understory diversity
 - Invasive plant expansion
 - Disrupted fungal or decomposer networks
 - Excessive machinery or treatment disturbance
 - Erosion or rapid runoff
 - Increasing drought stress
 - Continuous, dry, and homogeneous vegetation
 - High exposure around structures, roads, utilities, or public facilities
 - Rising management costs without corresponding gains in resilience
-

2. The Central Concept

A forest is not merely a collection of trees. It is a dynamic biological system in which multiple processes operate together.

A functioning forest may contain:

- Living roots occupying multiple soil layers
- Mycorrhizal fungi
- Bacteria, invertebrates, and other soil organisms
- Native trees, shrubs, grasses, forbs, mosses, and fungi
- Leaf litter and decomposing woody material
- Shaded and insulated soil surfaces
- Uneven canopy and understory structure
- Multiple age classes
- Natural gaps and regeneration areas
- Water infiltration pathways
- Decomposers, pollinators, predators, and herbivores
- Natural mortality and nutrient cycling

These elements influence:

- Soil structure
- Water infiltration
- Evaporation
- Nutrient availability
- Plant competition

- Vegetation density
- Decomposition rates
- Regeneration
- Disease resistance
- Drought response
- Fuel continuity and moisture

The regenerative model seeks to strengthen these relationships rather than repeatedly replacing them with mechanical or chemical intervention.

2.1 Biological regulation of fuel

“Managing the forest’s own fuel” does not mean eliminating fuel. Forests require organic material for:

- Soil development
- Habitat
- Carbon storage
- Moisture retention
- Fungal activity
- Nutrient cycling
- Structural diversity

Biological fuel regulation means encouraging conditions in which vegetation is:

- Diverse
- Unevenly distributed
- Better rooted
- More moisture-retentive
- Less continuous
- More rapidly decomposed
- Less dominated by dry, disturbance-driven growth
- Arranged in varied layers and patterns

A biologically functioning forest may still burn. The goal is not to eliminate wildfire risk, but to improve the forest’s ability to retain moisture, recover from disturbance, and avoid developing unusually continuous and highly degraded fuel conditions.

3. Core Management Principles

3.1 Protect biological capital

Biological capital includes ecological assets that may take decades or centuries to develop:

- Mature trees
- Existing root systems
- Soil horizons
- Leaf litter
- Downed wood
- Snags where they do not present immediate hazards
- Fungal networks
- Native seed banks
- Wetlands, seeps, springs, and natural drainage features
- Established understory communities
- Organic matter
- Decomposer populations

These components should be treated as assets rather than waste or fuel by default.

3.2 Maintain continuous plant and soil cover

Bare soil is vulnerable to:

- Erosion
- Compaction
- Invasive-species establishment
- Rapid drying
- Surface heating
- Loss of organic matter
- Reduced biological activity

The preferred condition is continuous or near-continuous cover provided by native plants, litter, mosses, low vegetation, roots, and appropriately retained woody material.

3.3 Minimize disturbance

Disturbance should be limited in both frequency and intensity.

Preferred practices include:

- Hand work instead of heavy equipment where practical
- Use of existing access routes
- Seasonal operations that avoid wet soils
- Protection of tree-root zones
- Avoidance of unnecessary grading
- Preservation of litter and surface organic matter
- Limited traffic in sensitive areas
- Protection of natural drainage systems

The objective is to ensure that restoration work does not create new compaction, erosion, invasion, or habitat damage.

3.4 Restore water infiltration and retention

Water availability is central to forest resilience. Management should encourage water to:

- Enter the soil
- Move slowly across the landscape
- Remain available to plants and soil organisms
- Recharge deeper soil layers
- Support decomposition and regeneration
- Avoid rapid runoff and erosion

Potential actions include:

- Maintaining plant and litter cover
- Protecting natural drainage features
- Stabilizing erosion-prone areas
- Reducing concentrated runoff
- Restoring compacted areas through low-disturbance methods
- Retaining moisture-holding organic material
- Avoiding unnecessary ditching and channelization

Any berms, swales, ponds, crossings, or drainage structures should be carefully designed for local slope, soil, hydrology, and downstream conditions.

3.5 Encourage native diversity and natural succession

Native plant diversity can improve:

- Soil coverage
- Root distribution
- Seasonal water use
- Habitat quality
- Nutrient cycling
- Resistance to invasive species
- Recovery following drought, fire, or disturbance

Natural regeneration should be preferred where seed sources and site conditions are adequate. Planting may be appropriate when native regeneration is absent, invasive plants have displaced native communities, or severe disturbance has prevented recovery.

3.6 Support decomposition and nutrient cycling

Forest fertility should be generated primarily through:

- Living roots
- Leaf litter
- Decomposing wood
- Fungal networks
- Soil organisms
- Natural mortality
- Diverse plant communities
- Continuous organic inputs

The forest floor should not be routinely stripped, sterilized, or treated as waste material.

3.7 Allow natural mortality and structural variation

Natural mortality contributes to forest development and habitat. Dead trees and woody debris can provide:

- Wildlife habitat
- Soil carbon
- Fungal substrate
- Moisture-holding capacity
- Nutrients
- Structural complexity

However, hazardous trees near structures, roads, utility lines, and frequently used areas require evaluation and, where necessary, removal or stabilization.

3.8 Use targeted intervention

Human intervention should focus on clearly defined needs, including:

- Immediate hazards
- Structures and defensible space
- Utility corridors
- Roads and emergency access
- Invasive plants
- Disease outbreaks
- Erosion and unstable slopes
- Water-quality protection
- Regulatory obligations
- Emergency response

Intervention should be proportional to the risk and designed to preserve surrounding ecological functions.

4. Practices Excluded From the Core Model

4.1 Routine thinning

This framework does not treat mechanical tree removal as the default method for forest health or fuel management.

Natural competition, succession, mortality, canopy variation, and biological processes are allowed to shape forest structure wherever safety and ecological conditions permit.

Tree removal may still be necessary for:

- Hazard trees
- Structure protection
- Utility corridors
- Emergency access
- Disease management
- Invasive tree control
- Specific restoration objectives supported by site assessment

4.2 Routine amendments

The model does not assume that compost, fertilizer, microbial products, or imported soil amendments are necessary.

Fertility is expected to develop through:

- Living roots
- Decomposition
- Soil organisms
- Mycorrhizal relationships
- Retention of organic matter
- Natural nutrient cycling
- Diverse plant communities

External amendments may be considered only when a documented site-specific problem cannot reasonably be addressed through biological recovery.

4.3 Grazing and livestock

Grazing is not part of the core management system.

Vegetation regulation is instead pursued through:

- Native plant diversity
- Natural succession
- Continuous ground cover
- Moisture management
- Decomposition

- Root competition
- Targeted invasive-species control

This avoids the need for fencing, stock water, livestock handling, and associated risks such as soil compaction, streambank damage, weed spread, and loss of protective ground cover.

4.4 Repeated broad-scale treatment

Automatic mowing, thinning, clearing, or burning schedules are not used as a substitute for monitoring.

A treatment should be repeated only when evidence shows that a specific ecological, safety, infrastructure, or regulatory problem has returned.

5. Problems Addressed by the Regenerative Model

5.1 Soil degradation

Heavy machinery, scraping, grading, and repeated disturbance can:

- Compact soil
- Reduce infiltration
- Damage roots
- Disrupt fungal networks
- Increase erosion
- Reduce organic matter
- Impede natural regeneration

The regenerative response is to protect soil horizons, reduce traffic, maintain cover, and allow biological recovery.

5.2 Declining water retention

Exposed or compacted soil can shed water rapidly while remaining dry during the growing season. Restoring litter, roots, ground cover, and soil structure can improve infiltration and reduce evaporation.

5.3 Invasive-species expansion

Disturbed ground often provides favorable conditions for invasive species. Targeted removal must therefore be followed by native recovery or natural regeneration monitoring.

5.4 The treatment-maintenance cycle

Repeated treatment can create a cycle:

1. Vegetation is removed.
2. Soil and microclimate are disturbed.
3. Regrowth or invasive plants appear.
4. Soil moisture declines.
5. Additional treatment is prescribed.
6. Maintenance costs increase.

The regenerative alternative is to identify and address the underlying biological or hydrological conditions that generate recurring problems.

5.5 Increasing wildfire exposure

Wildfire risk can be influenced by:

- Drought
- Wind
- Topography
- Ignition sources
- Fuel moisture
- Vegetation continuity
- Structure vulnerability
- Emergency access
- Regional fire conditions

Regenerative management may improve resilience by supporting:

- Higher soil moisture
- More diverse vegetation
- Less continuous plant cover
- Stronger root systems
- Better decomposition
- Improved recovery after disturbance
- Reduced erosion
- More stable biological processes

It cannot eliminate extreme fire behavior or replace structural fire protection.

6. Site Establishment Plan for a 10-Acre Forest

The following plan provides a general implementation sequence. It should be adapted to local climate, soils, slope, forest type, fire regime, infrastructure, ownership objectives, and legal requirements.

Phase 1: Assessment and design

Purpose: Understand the site before intervening.

Activities may include:

- Mapping slopes, drainage, wetlands, roads, structures, utilities, and sensitive areas
- Documenting tree, shrub, understory, and invasive species
- Assessing soil cover, compaction, erosion, and drainage
- Recording canopy structure and regeneration
- Identifying hazardous trees
- Mapping areas of high fire exposure
- Documenting wildlife habitat and deadwood
- Establishing baseline monitoring locations
- Developing a site-specific management map

The assessment should distinguish between:

- Areas requiring active intervention
- Areas requiring protection
- Areas suitable for natural recovery
- Areas where safety work is mandatory
- Areas where intervention could create more harm than benefit

Phase 2: Immediate protection

Purpose: Prevent further loss of ecological function.

Actions may include:

- Restricting vehicle access on vulnerable soils
- Protecting streams, wetlands, seeps, and springs
- Marking root-protection zones
- Preventing unnecessary removal of litter and downed wood
- Controlling concentrated runoff
- Protecting natural regeneration
- Establishing safe access around structures and utilities
- Addressing immediate hazards

Phase 3: Targeted invasive-species and hazard control

Purpose: Address problems that natural succession is unlikely to correct on its own.

Actions may include:

- Hand removal of invasive plants
- Carefully timed cutting or treatment of invasive woody species
- Follow-up monitoring

- Disposal or stabilization of hazardous material where required
- Limited hazard-tree removal near structures, roads, and utilities
- Stabilization of disturbed areas
- Protection of adjacent native vegetation

Phase 4: Restore ground cover and water function

Purpose: Rebuild soil protection and moisture retention.

Actions may include:

- Encouraging native ground cover
- Protecting leaf litter and decomposing wood
- Reducing bare soil
- Stabilizing erosion-prone areas
- Protecting or reconnecting natural water pathways
- Reducing concentrated runoff
- Restricting access during wet conditions
- Allowing roots and soil organisms to rebuild structure

External amendments are not assumed to be necessary.

Phase 5: Support natural regeneration and succession

Purpose: Allow the forest to rebuild diversity and structural complexity.

Management should encourage:

- Multiple age classes
- Native understory development
- Natural gap formation
- Uneven vegetation patterns
- Diverse root systems
- Decomposition and nutrient cycling
- Retention of safe deadwood and litter

Planting should be limited to documented restoration needs.

Phase 6: Monitoring and adaptive management

Purpose: Determine whether the forest is becoming more self-regulating.

Monitoring should be conducted annually during establishment and at longer intervals once conditions stabilize.

Additional action may be required if monitoring shows:

- Increasing invasive species
- Expanding bare soil
- Worsening erosion

- Failed regeneration
 - Disease spread
 - Damaging water movement
 - New hazard conditions
 - Unusually continuous or dry vegetation
 - Unintended effects from previous interventions
-

7. Cost Framework for a 10-Acre Forest

The cost of establishment depends on terrain, access, invasive-species pressure, existing infrastructure, ecological condition, and safety requirements.

A general planning range for initial establishment is:

\$3,000–\$15,000 for 10 acres

This estimate assumes that the project excludes routine thinning, amendments, grazing infrastructure, and broad-scale mechanical treatment.

Cost category	Typical activities
Ecological assessment and design	Mapping, site evaluation, planning, and professional review
Invasive-species control	Targeted manual or limited treatment
Hazard and infrastructure safety	Work near buildings, roads, utilities, and access routes
Soil and water protection	Erosion control, access restriction, and runoff management
Native vegetation support	Natural regeneration and limited planting where necessary
Monitoring	Baseline measurements, photographs, surveys, and follow-up
Contingency	Unanticipated hazards, difficult terrain, or regulatory requirements

A complex site may exceed this range if it contains extensive invasive plants, steep terrain, severe erosion, multiple structures, damaged roads, or substantial hazard trees.

Expected cost pattern

The initial investment is primarily a capital investment in ecological function and resilience. As major problems are addressed, recurring costs may decline. However, the forest will still require:

- Monitoring
- Invasive-species control
- Infrastructure maintenance
- Hazard assessment
- Emergency response
- Adaptive management

The goal is not zero maintenance. The goal is to reduce unnecessary, repetitive, and ecologically disruptive maintenance.

8. Comparison With Public Forest and Fire Budgets

The comparison is not simply between private and public land. It is between two different categories of expenditure:

1. **Proactive investment in ecological function and asset resilience**
2. **Reactive spending on risk mitigation, emergency response, suppression, and recovery**

8.1 Proactive ecological investment

A regenerative forest project may invest in:

- Site assessment
- Soil and water restoration
- Native vegetation recovery
- Natural regeneration
- Targeted invasive-species control
- Hazard reduction
- Infrastructure protection
- Monitoring
- Adaptive management

8.2 Public forest and fire-management expenditures

Public agencies must fund:

- Wildfire prevention
- Preparedness

- Detection
- Emergency response
- Fire suppression
- Evacuation
- Infrastructure protection
- Forest restoration
- Disaster recovery
- Interagency coordination
- Personnel, equipment, aircraft, contracts, and communications

Public budgets operate across large landscapes and populations. Suppression costs vary widely based on terrain, weather, fire behavior, duration, access, structures threatened, and resources assigned. A single fire may generate costs ranging from thousands of dollars per acre to substantially more in complex incidents.

Proactive regenerative management	Public risk and emergency management
Focuses on ecological function and resilience	Focuses on public safety, readiness, response, and recovery
Often begins with a defined site or management unit	Operates across large landscapes and jurisdictions
Initial establishment may be approximately \$3,000–\$15,000 for 10 acres	Budgets commonly reach millions or billions across agencies
Seeks to reduce future treatment dependence	Must maintain readiness for uncertain, high-consequence events
Builds soil, water, vegetation, and biological capital	Funds prevention, suppression, emergency operations, and restoration
Costs are largely planned and preventive	Costs may escalate rapidly during emergencies
Benefits include ecological, asset, and resilience gains	Benefits include community safety and protection of public resources

8.3 Public-private and landscape relationships

Forest conditions do not stop at property boundaries. Management on one area can affect:

- Neighboring landowners

- Public lands
- Watersheds
- Roads
- Utilities
- Firefighter safety
- Wildlife movement
- Downstream communities

Ecological stewardship across all ownership types can therefore complement public emergency systems. It cannot eliminate the need for fire departments, emergency agencies, or public suppression capacity.

9. Conventional Practices That May Create Additional Costs or Damage

The following practices may be appropriate in specific situations but can become costly or ecologically damaging when applied broadly, repeatedly, or without site-specific assessment:

- Excessive clearing
- Broad-scale thinning
- Repeated fuel treatments
- Removal of all deadwood and leaf litter
- Heavy mechanical equipment use
- Soil scraping and grading
- Broadcast herbicide application
- Repeated mowing or brush cutting
- Uniform vegetation removal
- Excessive prescribed burning
- Prescribed fire without adequate monitoring
- Construction of unnecessary roads
- Overuse of imported amendments
- Fertilizer-driven vegetation growth
- Inappropriate livestock grazing
- Standardized prescriptions applied to different forest types
- Short-term projects without long-term monitoring
- Treating all vegetation as equally hazardous fuel
- Failure to protect recovery processes
- Emergency-driven management
- Prioritizing visual cleanliness over ecological function

These practices can produce a **treatment-maintenance cycle** in which disturbance causes regrowth, erosion, invasion, drying, or soil decline, leading to additional treatment and expense.

The regenerative response is to:

1. Identify the underlying cause.
 2. Protect remaining biological capital.
 3. Restore soil, water, and plant function.
 4. Use targeted intervention only where necessary.
 5. Monitor the outcome.
 6. Repeat treatment only when evidence demonstrates a need.
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10. Measurement and Evaluation

A regenerative management program must be measurable. The assumption that natural processes are functioning should be tested through field observations and consistent monitoring.

10.1 Soil indicators

Potential indicators include:

- Percentage of ground covered by living vegetation, litter, or woody debris
- Evidence of soil compaction
- Infiltration rate
- Soil surface temperature
- Visible erosion
- Soil organic matter
- Root density and distribution
- Presence and activity of soil organisms
- Fungal and decomposition indicators
- Soil moisture at consistent locations and depths

10.2 Vegetation indicators

Potential indicators include:

- Native plant diversity
- Invasive plant abundance
- Bare-soil percentage
- Regeneration density
- Seasonal vegetation moisture
- Canopy and understory variation

- Structural diversity
- Plant mortality and recovery
- Distribution and continuity of vegetation

10.3 Water indicators

Potential indicators include:

- Runoff concentration
- Infiltration and ponding behavior
- Erosion and sediment movement
- Soil-moisture persistence
- Condition of seeps, springs, streams, and wetlands
- Seasonal water availability
- Recovery after heavy rainfall or drought

10.4 Fire-resilience indicators

No single measurement predicts wildfire behavior. Evaluation should consider:

- Continuity of dry vegetation
- Structure exposure
- Defensible-space condition
- Emergency access
- Wind exposure
- Slope and topography
- Vegetation diversity
- Fuel moisture
- Hazard trees
- Seasonal changes
- Recovery following disturbance

10.5 Economic indicators

Potential economic measures include:

- Initial establishment cost
- Annual maintenance cost
- Cost per acre
- Invasive-species control costs
- Infrastructure and hazard-management costs
- Machinery use
- Treatment frequency
- Avoided erosion or restoration costs

- Time required for monitoring
 - Changes in ecological and asset condition
-

11. Risks, Limitations, and Safeguards

11.1 Wildfire cannot be eliminated

Extreme drought, wind, topography, ignition sources, and regional conditions can produce severe fire even in a biologically healthy forest.

11.2 The model does not replace structural protection

Structures require appropriate measures such as:

- Defensible space where required
- Roof and gutter maintenance
- Ember-resistant vents
- Safe access and egress
- Address visibility
- Utility and propane safety
- Building-code compliance

11.3 Hazards must not be ignored

Hazardous trees, unstable slopes, blocked roads, invasive plants, diseased vegetation, and utility conflicts require prompt action when they pose credible risk.

11.4 Biological recovery takes time

Soil development, native plant recovery, decomposition, and succession may take years. A one-year establishment period can initiate the system, but it cannot guarantee complete ecological recovery within one year.

11.5 Natural processes require oversight

Natural succession may produce undesirable outcomes in some locations. Monitoring is necessary to detect invasive expansion, failed regeneration, disease, erosion, or unacceptable safety conditions.

11.6 Professional and regulatory review may be required

Projects involving wetlands, streams, steep slopes, roads, utilities, prescribed fire, hazardous trees, herbicides, or public safety should be reviewed by appropriately qualified professionals and comply with applicable laws and regulations.

12. Implementation Standards

A project following this framework should document:

1. Existing site conditions
2. Management objectives
3. Areas designated for protection
4. Areas requiring intervention
5. Safety and regulatory requirements
6. Methods selected and the reasons for selection
7. Equipment and access restrictions
8. Any external materials or inputs
9. Baseline ecological measurements
10. Monitoring frequency
11. Trigger points for additional action
12. Annual costs and labor requirements
13. Unintended effects
14. Corrective or adaptive actions

Every proposed intervention should answer four questions:

1. What specific problem does this action address?
2. Why is the action necessary?
3. What ecological functions could it disrupt?
4. How will success or failure be measured?

A useful decision standard is:

Use the least disruptive intervention that adequately addresses a clearly defined ecological, safety, infrastructure, regulatory, or emergency need.

13. Expected Outcomes

When properly designed and adapted to local conditions, the approach seeks to produce:

- More continuous soil cover
- Improved infiltration and moisture retention
- Reduced erosion
- Greater native plant diversity

- More active decomposition
- Stronger and more extensive root systems
- Improved habitat quality
- Increased natural regeneration
- Reduced soil compaction
- Less reliance on imported inputs
- Fewer recurring broad-scale treatments
- Better protection of biological capital
- Improved landscape resilience
- More targeted use of management funds
- Lower dependence on routine mechanical intervention

The intended result is not a forest requiring no stewardship. It is a forest requiring **less unnecessary intervention** because its biological processes are functioning more effectively.

14. Conclusion

Biologically regenerative forest management represents a shift from treating forests primarily as fuel inventories to managing them as living, self-organizing systems.

Forest resilience depends on more than removing visible vegetation. It depends on:

- Functioning soils
- Living roots
- Fungal networks
- Native plant diversity
- Decomposition
- Water retention
- Natural succession
- Structural complexity
- Protection of accumulated biological capital

For a 10-acre forest, initial establishment may require approximately **\$3,000–\$15,000**, depending on site complexity, terrain, invasive species, infrastructure, access, and safety needs. This investment is directed primarily toward assessment, targeted control, soil and water protection, natural regeneration, and monitoring rather than routine thinning, amendments, or grazing infrastructure.

Public fire agencies and emergency systems remain essential. Wildfire cannot be eliminated, and public response capacity cannot be replaced by land stewardship. However, improving ecological function across forests of every ownership type can

complement public prevention and emergency response by reducing avoidable degradation and improving resilience across the broader landscape.

The central management principle is therefore:

Protect biological capital, restore natural processes, minimize disturbance, intervene only when necessary, and measure the results over time.

Through this approach, forests can be managed in a way that supports ecological health, public safety, long-term resilience, and more efficient use of management resources.

Biologically Regenerative Forest Management

A Comprehensive Framework for Restoring Forest Function, Improving Resilience, and Reducing Long-Term Management Dependence

Executive Summary

This document presents a biologically regenerative approach to forest management. It is intended for forest owners, land managers, conservation organizations, tribal governments, communities, public agencies, and other professionals responsible for forest stewardship.

The approach treats a forest as a living, interconnected system rather than simply as an accumulation of trees or combustible vegetation. Soil organisms, fungi, living roots, native plants, leaf litter, downed wood, water movement, decomposition, natural succession, and mortality all contribute to forest fertility, moisture retention, regeneration, habitat, and fuel dynamics.

The objective is to restore and protect these natural processes so that the forest becomes increasingly capable of regulating its own biological functions. This includes regulating vegetation growth, decomposition, soil fertility, water availability, and the distribution and moisture of combustible material.

The model emphasizes:

- Continuous living plant cover
- Minimal soil disturbance
- Protection of existing biological capital
- Natural fertility through decomposition and nutrient cycling
- Improved water infiltration and moisture retention
- Native plant diversity
- Natural regeneration and succession
- Retention of appropriate leaf litter and downed wood
- Targeted intervention rather than routine broad-scale treatment
- Monitoring and adaptive management

The core model does not rely on:

- Routine thinning
- Routine soil amendments, fertilizers, or imported compost
- Grazing or livestock
- Repeated mowing or brush clearing
- Removal of all deadwood and leaf litter
- Heavy machinery wherever avoidable
- Uniform vegetation removal
- Unnecessary roads or access routes

This framework does not claim that forests can be made fireproof or maintenance-free. Wildfire remains a natural and potentially severe disturbance, especially under extreme drought, wind, and weather conditions. The objective is to improve ecological function and resilience, reduce avoidable degradation, and limit dependence on repetitive treatments that may address visible fuels while weakening the underlying biological system.

1. Purpose and Scope

The purpose of this framework is to establish a practical, measurable, and biologically based model for forest management.

It is designed to help land stewards:

1. Restore soil and water function.
2. Protect existing ecological assets.
3. Improve native vegetation and natural regeneration.
4. Reduce unnecessary soil and habitat disturbance.
5. Encourage natural decomposition and nutrient cycling.
6. Improve resilience to drought and wildfire.
7. Reduce recurring management dependence.
8. Identify when targeted intervention is necessary.
9. Compare proactive ecological investment with public emergency expenditures.
10. Develop measurable management and monitoring standards.

The framework can be applied to:

- Individual forest properties
- Community forests
- Tribal forests
- Conservation lands
- Municipal and county lands
- State and federal forests
- Watershed restoration projects

- Public-private partnerships
- Cooperative landscape initiatives

It is especially relevant to forests experiencing:

- Declining soil moisture
 - Bare or compacted soil
 - Reduced understory diversity
 - Invasive plant expansion
 - Disrupted fungal or decomposer networks
 - Excessive machinery or treatment disturbance
 - Erosion or rapid runoff
 - Increasing drought stress
 - Continuous, dry, and homogeneous vegetation
 - High exposure around structures, roads, utilities, or public facilities
 - Rising management costs without corresponding gains in resilience
-

2. The Central Concept

A forest is not merely a collection of trees. It is a dynamic biological system in which multiple processes operate together.

A functioning forest may contain:

- Living roots occupying multiple soil layers
- Mycorrhizal fungi
- Bacteria, invertebrates, and other soil organisms
- Native trees, shrubs, grasses, forbs, mosses, and fungi
- Leaf litter and decomposing woody material
- Shaded and insulated soil surfaces
- Uneven canopy and understory structure
- Multiple age classes
- Natural gaps and regeneration areas
- Water infiltration pathways
- Decomposers, pollinators, predators, and herbivores
- Natural mortality and nutrient cycling

These elements influence:

- Soil structure
- Water infiltration
- Evaporation
- Nutrient availability
- Plant competition

- Vegetation density
- Decomposition rates
- Regeneration
- Disease resistance
- Drought response
- Fuel continuity and moisture

The regenerative model seeks to strengthen these relationships rather than repeatedly replacing them with mechanical or chemical intervention.

2.1 Biological regulation of fuel

“Managing the forest’s own fuel” does not mean eliminating fuel. Forests require organic material for:

- Soil development
- Habitat
- Carbon storage
- Moisture retention
- Fungal activity
- Nutrient cycling
- Structural diversity

Biological fuel regulation means encouraging conditions in which vegetation is:

- Diverse
- Unevenly distributed
- Better rooted
- More moisture-retentive
- Less continuous
- More rapidly decomposed
- Less dominated by dry, disturbance-driven growth
- Arranged in varied layers and patterns

A biologically functioning forest may still burn. The goal is not to eliminate wildfire risk, but to improve the forest’s ability to retain moisture, recover from disturbance, and avoid developing unusually continuous and highly degraded fuel conditions.

3. Core Management Principles

3.1 Protect biological capital

Biological capital includes ecological assets that may take decades or centuries to develop:

- Mature trees
- Existing root systems
- Soil horizons
- Leaf litter
- Downed wood
- Snags where they do not present immediate hazards
- Fungal networks
- Native seed banks
- Wetlands, seeps, springs, and natural drainage features
- Established understory communities
- Organic matter
- Decomposer populations

These components should be treated as assets rather than waste or fuel by default.

3.2 Maintain continuous plant and soil cover

Bare soil is vulnerable to:

- Erosion
- Compaction
- Invasive-species establishment
- Rapid drying
- Surface heating
- Loss of organic matter
- Reduced biological activity

The preferred condition is continuous or near-continuous cover provided by native plants, litter, mosses, low vegetation, roots, and appropriately retained woody material.

3.3 Minimize disturbance

Disturbance should be limited in both frequency and intensity.

Preferred practices include:

- Hand work instead of heavy equipment where practical
- Use of existing access routes
- Seasonal operations that avoid wet soils
- Protection of tree-root zones
- Avoidance of unnecessary grading
- Preservation of litter and surface organic matter
- Limited traffic in sensitive areas
- Protection of natural drainage systems

The objective is to ensure that restoration work does not create new compaction, erosion, invasion, or habitat damage.

3.4 Restore water infiltration and retention

Water availability is central to forest resilience. Management should encourage water to:

- Enter the soil
- Move slowly across the landscape
- Remain available to plants and soil organisms
- Recharge deeper soil layers
- Support decomposition and regeneration
- Avoid rapid runoff and erosion

Potential actions include:

- Maintaining plant and litter cover
- Protecting natural drainage features
- Stabilizing erosion-prone areas
- Reducing concentrated runoff
- Restoring compacted areas through low-disturbance methods
- Retaining moisture-holding organic material
- Avoiding unnecessary ditching and channelization

Any berms, swales, ponds, crossings, or drainage structures should be carefully designed for local slope, soil, hydrology, and downstream conditions.

3.5 Encourage native diversity and natural succession

Native plant diversity can improve:

- Soil coverage
- Root distribution
- Seasonal water use
- Habitat quality
- Nutrient cycling
- Resistance to invasive species
- Recovery following drought, fire, or disturbance

Natural regeneration should be preferred where seed sources and site conditions are adequate. Planting may be appropriate when native regeneration is absent, invasive plants have displaced native communities, or severe disturbance has prevented recovery.

3.6 Support decomposition and nutrient cycling

Forest fertility should be generated primarily through:

- Living roots
- Leaf litter
- Decomposing wood
- Fungal networks
- Soil organisms
- Natural mortality
- Diverse plant communities
- Continuous organic inputs

The forest floor should not be routinely stripped, sterilized, or treated as waste material.

3.7 Allow natural mortality and structural variation

Natural mortality contributes to forest development and habitat. Dead trees and woody debris can provide:

- Wildlife habitat
- Soil carbon
- Fungal substrate
- Moisture-holding capacity
- Nutrients
- Structural complexity

However, hazardous trees near structures, roads, utility lines, and frequently used areas require evaluation and, where necessary, removal or stabilization.

3.8 Use targeted intervention

Human intervention should focus on clearly defined needs, including:

- Immediate hazards
- Structures and defensible space
- Utility corridors
- Roads and emergency access
- Invasive plants
- Disease outbreaks
- Erosion and unstable slopes
- Water-quality protection
- Regulatory obligations
- Emergency response

Intervention should be proportional to the risk and designed to preserve surrounding ecological functions.

4. Practices Excluded From the Core Model

4.1 Routine thinning

This framework does not treat mechanical tree removal as the default method for forest health or fuel management.

Natural competition, succession, mortality, canopy variation, and biological processes are allowed to shape forest structure wherever safety and ecological conditions permit.

Tree removal may still be necessary for:

- Hazard trees
- Structure protection
- Utility corridors
- Emergency access
- Disease management
- Invasive tree control
- Specific restoration objectives supported by site assessment

4.2 Routine amendments

The model does not assume that compost, fertilizer, microbial products, or imported soil amendments are necessary.

Fertility is expected to develop through:

- Living roots
- Decomposition
- Soil organisms
- Mycorrhizal relationships
- Retention of organic matter
- Natural nutrient cycling
- Diverse plant communities

External amendments may be considered only when a documented site-specific problem cannot reasonably be addressed through biological recovery.

4.3 Grazing and livestock

Grazing is not part of the core management system.

Vegetation regulation is instead pursued through:

- Native plant diversity
- Natural succession
- Continuous ground cover
- Moisture management
- Decomposition

- Root competition
- Targeted invasive-species control

This avoids the need for fencing, stock water, livestock handling, and associated risks such as soil compaction, streambank damage, weed spread, and loss of protective ground cover.

4.4 Repeated broad-scale treatment

Automatic mowing, thinning, clearing, or burning schedules are not used as a substitute for monitoring.

A treatment should be repeated only when evidence shows that a specific ecological, safety, infrastructure, or regulatory problem has returned.

5. Problems Addressed by the Regenerative Model

5.1 Soil degradation

Heavy machinery, scraping, grading, and repeated disturbance can:

- Compact soil
- Reduce infiltration
- Damage roots
- Disrupt fungal networks
- Increase erosion
- Reduce organic matter
- Impede natural regeneration

The regenerative response is to protect soil horizons, reduce traffic, maintain cover, and allow biological recovery.

5.2 Declining water retention

Exposed or compacted soil can shed water rapidly while remaining dry during the growing season. Restoring litter, roots, ground cover, and soil structure can improve infiltration and reduce evaporation.

5.3 Invasive-species expansion

Disturbed ground often provides favorable conditions for invasive species. Targeted removal must therefore be followed by native recovery or natural regeneration monitoring.

5.4 The treatment-maintenance cycle

Repeated treatment can create a cycle:

1. Vegetation is removed.
2. Soil and microclimate are disturbed.
3. Regrowth or invasive plants appear.
4. Soil moisture declines.
5. Additional treatment is prescribed.
6. Maintenance costs increase.

The regenerative alternative is to identify and address the underlying biological or hydrological conditions that generate recurring problems.

5.5 Increasing wildfire exposure

Wildfire risk can be influenced by:

- Drought
- Wind
- Topography
- Ignition sources
- Fuel moisture
- Vegetation continuity
- Structure vulnerability
- Emergency access
- Regional fire conditions

Regenerative management may improve resilience by supporting:

- Higher soil moisture
- More diverse vegetation
- Less continuous plant cover
- Stronger root systems
- Better decomposition
- Improved recovery after disturbance
- Reduced erosion
- More stable biological processes

It cannot eliminate extreme fire behavior or replace structural fire protection.

6. Site Establishment Plan for a 10-Acre Forest

The following plan provides a general implementation sequence. It should be adapted to local climate, soils, slope, forest type, fire regime, infrastructure, ownership objectives, and legal requirements.

Phase 1: Assessment and design

Purpose: Understand the site before intervening.

Activities may include:

- Mapping slopes, drainage, wetlands, roads, structures, utilities, and sensitive areas
- Documenting tree, shrub, understory, and invasive species
- Assessing soil cover, compaction, erosion, and drainage
- Recording canopy structure and regeneration
- Identifying hazardous trees
- Mapping areas of high fire exposure
- Documenting wildlife habitat and deadwood
- Establishing baseline monitoring locations
- Developing a site-specific management map

The assessment should distinguish between:

- Areas requiring active intervention
- Areas requiring protection
- Areas suitable for natural recovery
- Areas where safety work is mandatory
- Areas where intervention could create more harm than benefit

Phase 2: Immediate protection

Purpose: Prevent further loss of ecological function.

Actions may include:

- Restricting vehicle access on vulnerable soils
- Protecting streams, wetlands, seeps, and springs
- Marking root-protection zones
- Preventing unnecessary removal of litter and downed wood
- Controlling concentrated runoff
- Protecting natural regeneration
- Establishing safe access around structures and utilities
- Addressing immediate hazards

Phase 3: Targeted invasive-species and hazard control

Purpose: Address problems that natural succession is unlikely to correct on its own.

Actions may include:

- Hand removal of invasive plants
- Carefully timed cutting or treatment of invasive woody species
- Follow-up monitoring

- Disposal or stabilization of hazardous material where required
- Limited hazard-tree removal near structures, roads, and utilities
- Stabilization of disturbed areas
- Protection of adjacent native vegetation

Phase 4: Restore ground cover and water function

Purpose: Rebuild soil protection and moisture retention.

Actions may include:

- Encouraging native ground cover
- Protecting leaf litter and decomposing wood
- Reducing bare soil
- Stabilizing erosion-prone areas
- Protecting or reconnecting natural water pathways
- Reducing concentrated runoff
- Restricting access during wet conditions
- Allowing roots and soil organisms to rebuild structure

External amendments are not assumed to be necessary.

Phase 5: Support natural regeneration and succession

Purpose: Allow the forest to rebuild diversity and structural complexity.

Management should encourage:

- Multiple age classes
- Native understory development
- Natural gap formation
- Uneven vegetation patterns
- Diverse root systems
- Decomposition and nutrient cycling
- Retention of safe deadwood and litter

Planting should be limited to documented restoration needs.

Phase 6: Monitoring and adaptive management

Purpose: Determine whether the forest is becoming more self-regulating.

Monitoring should be conducted annually during establishment and at longer intervals once conditions stabilize.

Additional action may be required if monitoring shows:

- Increasing invasive species
- Expanding bare soil
- Worsening erosion

- Failed regeneration
 - Disease spread
 - Damaging water movement
 - New hazard conditions
 - Unusually continuous or dry vegetation
 - Unintended effects from previous interventions
-

7. Cost Framework for a 10-Acre Forest

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\$3,000–\$15,000 for 10 acres

This estimate assumes that the project excludes routine thinning, amendments, grazing infrastructure, and broad-scale mechanical treatment.

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- Public lands
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- Evidence of soil compaction
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- Soil surface temperature
- Visible erosion
- Soil organic matter
- Root density and distribution
- Presence and activity of soil organisms
- Fungal and decomposition indicators
- Soil moisture at consistent locations and depths

10.2 Vegetation indicators

Potential indicators include:

- Native plant diversity

- Invasive plant abundance
- Bare-soil percentage
- Regeneration density
- Seasonal vegetation moisture
- Canopy and understory variation
- Structural diversity
- Plant mortality and recovery
- Distribution and continuity of vegetation

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Potential indicators include:

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- Infiltration and ponding behavior
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- Seasonal water availability
- Recovery after heavy rainfall or drought

10.4 Fire-resilience indicators

No single measurement predicts wildfire behavior. Evaluation should consider:

- Continuity of dry vegetation
- Structure exposure
- Defensible-space condition
- Emergency access
- Wind exposure
- Slope and topography
- Vegetation diversity
- Fuel moisture
- Hazard trees
- Seasonal changes
- Recovery following disturbance

10.5 Economic indicators

Potential economic measures include:

- Initial establishment cost
- Annual maintenance cost
- Cost per acre

- Invasive-species control costs
 - Infrastructure and hazard-management costs
 - Machinery use
 - Treatment frequency
 - Avoided erosion or restoration costs
 - Time required for monitoring
 - Changes in ecological and asset condition
-

11. Risks, Limitations, and Safeguards

11.1 Wildfire cannot be eliminated

Extreme drought, wind, topography, ignition sources, and regional conditions can produce severe fire even in a biologically healthy forest.

11.2 The model does not replace structural protection

Structures require appropriate measures such as:

- Defensible space where required
- Roof and gutter maintenance
- Ember-resistant vents
- Safe access and egress
- Address visibility
- Utility and propane safety
- Building-code compliance

11.3 Hazards must not be ignored

Hazardous trees, unstable slopes, blocked roads, invasive plants, diseased vegetation, and utility conflicts require prompt action when they pose credible risk.

11.4 Biological recovery takes time

Soil development, native plant recovery, decomposition, and succession may take years. A one-year establishment period can initiate the system, but it cannot guarantee complete ecological recovery within one year.

11.5 Natural processes require oversight

Natural succession may produce undesirable outcomes in some locations. Monitoring is necessary to detect invasive expansion, failed regeneration, disease, erosion, or unacceptable safety conditions.

11.6 Professional and regulatory review may be required

Projects involving wetlands, streams, steep slopes, roads, utilities, prescribed fire, hazardous trees, herbicides, or public safety should be reviewed by appropriately qualified professionals and comply with applicable laws and regulations.

12. Implementation Standards

A project following this framework should document:

1. Existing site conditions
2. Management objectives
3. Areas designated for protection
4. Areas requiring intervention
5. Safety and regulatory requirements
6. Methods selected and the reasons for selection
7. Equipment and access restrictions
8. Any external materials or inputs
9. Baseline ecological measurements
10. Monitoring frequency
11. Trigger points for additional action
12. Annual costs and labor requirements
13. Unintended effects
14. Corrective or adaptive actions

Every proposed intervention should answer four questions:

1. What specific problem does this action address?
2. Why is the action necessary?
3. What ecological functions could it disrupt?
4. How will success or failure be measured?

A useful decision standard is:

Use the least disruptive intervention that adequately addresses a clearly defined ecological, safety, infrastructure, regulatory, or emergency need.

13. Expected Outcomes

When properly designed and adapted to local conditions, the approach seeks to produce:

- More continuous soil cover
- Improved infiltration and moisture retention

- Reduced erosion
- Greater native plant diversity
- More active decomposition
- Stronger and more extensive root systems
- Improved habitat quality
- Increased natural regeneration
- Reduced soil compaction
- Less reliance on imported inputs
- Fewer recurring broad-scale treatments
- Better protection of biological capital
- Improved landscape resilience
- More targeted use of management funds
- Lower dependence on routine mechanical intervention

The intended result is not a forest requiring no stewardship. It is a forest requiring **less unnecessary intervention** because its biological processes are functioning more effectively.

14. Conclusion

Biologically regenerative forest management represents a shift from treating forests primarily as fuel inventories to managing them as living, self-organizing systems.

Forest resilience depends on more than removing visible vegetation. It depends on:

- Functioning soils
- Living roots
- Fungal networks
- Native plant diversity
- Decomposition
- Water retention
- Natural succession
- Structural complexity
- Protection of accumulated biological capital

For a 10-acre forest, initial establishment may require approximately **\$3,000–\$15,000**, depending on site complexity, terrain, invasive species, infrastructure, access, and safety needs. This investment is directed primarily toward assessment, targeted control, soil and water protection, natural regeneration, and monitoring rather than routine thinning, amendments, or grazing infrastructure.

Public fire agencies and emergency systems remain essential. Wildfire cannot be eliminated, and public response capacity cannot be replaced by land stewardship.

However, improving ecological function across forests of every ownership type can complement public prevention and emergency response by reducing avoidable degradation and improving resilience across the broader landscape.

The central management principle is therefore:

Protect biological capital, restore natural processes, minimize disturbance, intervene only when necessary, and measure the results over time.

Through this approach, forests can be managed in a way that supports ecological health, public safety, long-term resilience, and more efficient use of management resources.

BARTLETT Shawna L * ODF

From: Michael Lang <mlang@wildsalmoncenter.org>
Sent: Tuesday, September 08, 2026 3:55 PM
To: MCCOMB Brenda * ODF; JUSTICE Joe * ODF; LOVECHIO Alexi * ODF; AGPAOA Liz * ODF; CURTISS Heath * ODF; DEUMLING Ben * ODF; Kasey.KC@odf.oregon.gov; FORESTRY Boardof * ODF
Subject: Wild Salmon Center's Comments to the Board of Forestry
Attachments: WSC Comments to the Board of Forestry 9.26.pdf

Dear Vice Chair McComb, Members of the Board and State Forester KC,

Attached are Wild Salmon Center's comments on the draft FMP Performance Measures under consideration by the Board. Please include these comments in the record. Thank you.

Best,

Michael



Michael Lang | Sr. Policy Manager
Cell: 503-890-3012 | Main: 503-222-1804
Mailing Address: PO Box 10026, Portland, OR 97296
wildsalmoncenter.org




To: Oregon Board of Forestry
From: Michael Lang, Senior Policy Manager, Wild Salmon Center
Date: September 9, 2026
Re: FMP Performance Measure Recommendations

Dear Vice Chair McComb, Board of Forestry members and State Forester KC:

Please consider these comments and recommendations from the Wild Salmon Center (WSC) regarding the draft Performance Measures for the new Western Oregon State Forests Management Plan (FMP).

WSC is a nonprofit organization that is dedicated to the conservation and sustainable use of wild salmon ecosystems across the Pacific Rim. We identify science-based solutions to sustain wild salmon populations and the communities that depend on them.

On July 22, the Board of Forestry voted to approve a new Forest Management Plan (FMP) contingent on three conditions, including the adoption of performance measure targets and trends. The 2010 FMP, updated in 2012, is in effect until these conditions are met.

The Board included performance measure "targets and trends" in the motion to approve the new FMP to improve accountability, after considering the lack of specific strategies in the FMP and lack of compliance with requirements of the 2010 Forest Management Plan. These requirements include a target requiring 30-50% of the forest to be in complex layered structure or older forest structure.

In the Performance Progress Report in the Board packet for the September 9 meeting, complex layered forest stands are reported to be only 12% of forest structure, far below the minimum target of 30% and 16 years after the adoption of the FMP in 2010.

The ODF staff's response is that these structure-based management targets are not "time bound," therefore the ODF is not required to show meaningful progress toward achieving them. We respectfully disagree. Nevertheless, this underscores the importance of developing performance measures that are specific, measurable, achievable, relevant and **time-bound** (SMART).

Recommendations

As the Board considers a new set of performance measures, including targets and trends, WSC recommends including the following elements:

- **Follow the SMART model for developing performance measures and targets.** Performance measures and targets must be specific, measurable, achievable, relevant and time-bound.
- **Establish timelines, milestones and trend analysis for achieving targets.** Timelines with specific measurable milestones will assist the Board in tracking progress toward meeting goals and provide the data and analysis necessary for the Board and staff to adjust management practices to meet targets.
- **Ensure the FMP is fulfilling legal requirements.** Performance measures should provide information necessary to determine whether the FMP goals and strategies are meeting legal requirements for Greatest Permanent Value ([OAR 629.0020](#)) and Management of State Forest Land ([OAR 629.0030](#)). This includes ensuring a high probability of protecting and restoring aquatic habitats and native wildlife habitats. The Board members and staff have acknowledged that the FMP lacks specific strategies to ensure compliance with legal requirements and the performance measures will help fill this gap.
- **Ensure compliance with the Habitat Conservation Plan (HCP).** Include HCP compliance and effectiveness monitoring and evaluation in the performance measures.
- **Take into account the impacts of climate change.** Establish credible assumptions of the effects of climate change and build these into performance measure targets.
- **Set timebound targets for forest stand structure.** Require 30-50% of forest stands to be in complex layered or older forest structure across the forest, prior to additional harvest of complex layered stands.
- **Ensure the restoration of aquatic and riparian resources:** Set habitat and stream temperature targets and monitor progress toward attaining the targets. Do not assume that “effects of silvicultural activities are minimized by RCA strategies.”¹ This assumption is inconsistent with the best available science.² RCAs may reduce, but not minimize

¹ Staff Report, Work Session for Performance Measures for Western Oregon State Forests Management September 9, 2026, Attachment, Page 1.

² [Perry, Timothy D.; Jones, Julia A. 2017. Summer streamflow deficits from regenerating Douglas-fir forest in the Pacific Northwest, USA. *Ecohydrology*. 10\(2\): 1-13.](#)

[Duarte, et al 2023 Adjacent and downstream effects of forest harvest on the distribution and abundance of larval headwater stream amphibians in the Oregon Coast Range. *Forest Ecology and Management*, Volume 545, 1 October 2023, 121289](#)

[Sean M. Naman, Kara J. Pitman, Dylan S. Cunningham, Anna Potapova, Shawn M. Chartrand, Matthew R. Sloat, Jonathan W. Moore \(2024\) *Forestry impacts on stream flows and temperatures: A quantitative synthesis of paired catchment studies across the Pacific salmon range. *Ecological Solutions and Evidence*, Volume5, Issue2 April/June 2024 e12328*](#)

[Seguga C., Bladon K., Hatten J., Jones J., Hale C., Ice G. \(2020\) Long-term effects of forest harvesting on summer low flow deficits in the Coast Range of Oregon *Journal of Hydrology*, Volume 585 \(Article 124749\)](#)

effects. Establish targets and timelines for aquatic habitat restoration projects that meet or exceed HCP mitigation requirements.

- **Set targets to increase carbon sequestration & storage:** Set targets, timelines and milestones to increase carbon sequestration and storage in the forest. Develop specific strategies to meet targets.
- **Diversify and stabilize division finances and support for counties:** Develop strategies to diversify and stabilize revenue to achieve Greatest Permanent Value. This may include legislative proposals.
- **Ensure sufficient habitat for wildlife:** Set targets, timelines and trends for covered species to ensure compliance with stay-ahead requirements in the HCP.
- **Ensure compliance with road and transportation requirements in the HCP and the Coho settlement:** Adopt performance measures to evaluate implementation of the HCP requirements and the terms of the Coho settlement that address road design, maintenance and vacating.

Thank you for considering these comments and recommendations.

BARTLETT Shawna L * ODF

From: Carol Valentine <cvalentinemusic@gmail.com>
Sent: Tuesday, September 08, 2026 3:19 PM
To: FORESTRY Boardof * ODF
Cc: Oregon Conservation Committee; team Oregon SC Forest
Subject: OR Sierra Club comment for 9/9/26 BOF meeting
Attachments: OR Sierra Club Comment to BOF 9_9_26.pdf

Dear Board members,

Please see the attached comment from the Sierra Club Oregon Chapter regarding agenda items #5 and #9.

Also, in case you're not aware, the BOFemail address in the agenda contains a typo.

Thank you,

Carol Valentine

Carol Valentine (she/her)
Forest Team Coordinator
Oregon Chapter Sierra Club
cvalentinemusic@gmail.com



Even a wounded world is feeding us. Even a wounded world holds us, giving us moments of wonder and joy. I choose joy over despair. Not because I have my head in the sand, but because joy is what the earth gives me daily and I must return the gift.
— Robin Wall Kimmerer



SIERRA CLUB

OREGON CHAPTER

To: Oregon Board of Forestry (Board) and Department of Forestry (ODF)
From: Sierra Club Oregon Chapter
Subject: Public Comment for the Board of Forestry Meeting on September 9, 2026

September 8, 2026

Dear members of the Board and State Forester KC,

On July 22, the Board of Forestry voted to approve a new Forest Management Plan (FMP), contingent on three conditions that include the adoption of performance measure targets and trends. Until these conditions are met, the 2010 FMP, updated in 2012, is still in effect.

The Sierra Club Oregon Chapter appreciates the opportunity to comment on items concerning management of Oregon's state forests. Our comments will focus on the current Key Performance Measure 10 and the new FMP Performance Measures.

Key Performance Measure 10, State Forests North Coast Habitat– Complex forest structure as a percentage of the State Forests landscape

In its motion to approve the new FMP, the Board voted to include the adoption of “targets and trends” due to a lack of specific strategies in the FMP as well as past noncompliance with requirements of the 2010 Forest Management Plan. This noncompliance includes the target laid out in Key Performance Measure 10, requiring 30-50% of the forest to be in complex layered structure or older forest structure.

The Sierra Club Oregon Chapter endorses the comment submitted by Scott Killops on behalf of 350PDX, which focuses on KPM 10.

In our comment, we will dive more deeply into ODF's lack of progress in achieving the complex layered structure required by KPM 10. Because ODF's Stand Level Inventory (SLI) system is not designed to report on year-to-year differences, we took the liberty of analyzing data reported for KPM 10 back to 2012, which was the earliest reported data we could find. Therefore, the reporting window we are looking at reflects a period of 14 years. Our analysis of these data concluded that the average growth per year of complex forest structure represented as a percentage of the overall landscape was actually a net decrease of -0.066% per year.

Negative growth should be completely unacceptable, especially when considering Governor Kotek's Executive Order 25-26, which directs state agencies to "take urgent action to promote the resilience of our communities and natural and working lands and waters." If we look at only more recent data—for example, data provided in this year's Annual Performance Progress Report—the average growth rate is better, but still completely unacceptable. Considering only the data included in ODF's Performance Progress Report provides us with a more recent snapshot of the last 5 years. Looking at this snapshot, the average growth rate was calculated to be 0.2125% per year. While this rate is at least positive, maintaining it would have ODF taking 84.33 years to reach the MINIMUM of 30% complex layered stands. Meeting the upper end of the goal, 50%, would take 178.45 years using current growth metrics.

Current figures provided by ODF show that complex forest structure currently makes up only 12.08% of the landscape, which shows ODF short of its *minimum* goal of 30% by 17.92%. Given the large percentage of growth required and the less than satisfactory growth trends reflected in the data, we can conclude that serious changes to ODF's management strategies are necessary. In addition, this growth rate likely fails to consider the detrimental impacts of any increased harvest under a departure from Even Flow that could be implemented in the future.

Considering the currently unacceptable growth rates for complex layered forest, we propose that the ODF adopt a new strategy for increasing such forest structure. Current strategy depends on the development of complex layered forest from stands that are currently immature and less diverse, however this approach is clearly lacking in efficiency and effectiveness. We recommend that ODF instead implement a moratorium on clearcutting *existing* complex layered forest, with the restriction on cutting trees 80 years and older in order to achieve KPM 10. Not only would this accelerate the achievement of stated structure and climate goals, it would also competently address the governor's executive order.

FMP Performance Measures

As ODF and the Board of Forestry move forward on developing Performance Measures under the FMP, we urge you to establish **all** Performance Measures and targets according to the SMART model, meaning they are Specific, Measurable, Achievable, Relevant and Time-bound. We ask that Performance Measures include timelines, milestones and trend analysis for achieving targets. This is necessary for the Board to accurately track progress toward meeting established goals, and will provide the data

and analysis necessary for the Board and staff to adjust management practices so targets can be met.

Specifically, FMP Performance Measures should include:

- Information necessary for determining whether FMP goals and strategies are meeting legal requirements for Greatest Permanent Value ([OAR 629.0020](#)) and Management of State Forest Land ([OAR 629.0030](#)). This information helps ensure that Performance Measures add specific strategies for compliance that BOF members and ODF have already acknowledged are lacking within the FMP.
- Targets, timelines and milestones for increasing carbon sequestration and storage on state forest lands, with specific strategies for meeting those targets.
- Targets, timelines and trends for covered species, to ensure compliance with stay-ahead requirements in the HCP. HCP compliance and effectiveness monitoring/evaluation should also be included.
- Targets for habitat and stream temperature, with monitoring of progress toward attaining the targets, without assuming that HCP Riparian Conservation Areas “minimize” the effects of silvicultural practices, since RCAs may reduce, but not minimize effects. Include targets and timelines for aquatic habitat restoration projects that meet or exceed HCP mitigation requirements.

Thank you for considering these comments and recommendations.

Sincerely,

Carol Valentine
Forest Team Coordinator
Sierra Club Oregon Chapter

BARTLETT Shawna L * ODF

From: Scott Killops <scott.killops@gmail.com>
Sent: Tuesday, September 08, 2026 6:09 AM
To: FORESTRY Boardof * ODF
Cc: Scott Killops; KC Kacey * ODF; FERRARI Chandra Alene * GOV
Subject: Public Comment for BOF Meeting 9/9/2026 - Climate Smart Forestry Award
Attachments: 20260909-bof-public-comment-csfa-scott-killops.pdf

Hi Board of Forestry,

Attached is a public comment for the Board of Forestry meeting coming up next week on 9/9/2026. My comment regards the Climate Smart Forestry Award, which seems to have gone missing. Details are in the attached PDF.

Thanks,
Scott Killops
350PDX Forest Defense Team Member

To: Oregon Board of Forestry (Board) and Department of Forestry (ODF)
From: Scott Killops
Subject: Public Comment for the Board of Forestry Meeting on September 9, 2026
Whatever happened to the Climate Smart Forestry Award?
Date: September 8, 2026

Vice-chair McComb, Members of the Board, and State Forester KC,

Thank you for your service and for the opportunity to provide a public comment for the [Board of Forestry meeting on September 9, 2026](#). My comment regards ODF's annual [Climate Smart Forestry Award](#).

The [Board Work Plan for 2026-2027](#) contains only one topic related to climate leadership, the "Climate-Smart Forestry Awards". However, since its inaugural award in 2024, the Climate Smart Forestry Award seems to have gone missing.

The [Climate Smart Award presentation](#) at the Board's March 8, 2023, meeting indicated that the award was intended to be annual (slide #5). The "Procedures and Responsibilities" section of the [Climate Smart Forestry Award: Nomination Form](#) says that nominations will be accepted October – December and the Board will present the Climate Smart Forestry Award at its September meeting. This has not happened for two years in a row.

Having only one [climate leadership](#) topic in the [Board Work Plan](#) and then not doing it is not a great way to demonstrate climate leadership. Of course, the Board Work Plan should contain more than one climate leadership topic. I submitted a [public comment in March](#) suggesting additional climate leadership topics the Board may wish to consider.

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

Respectfully,
Scott Killops
350PDX Forest Defense Team Member

BARTLETT Shawna L * ODF

From: Scott Killops <scott.killops@gmail.com>
Sent: Sunday, September 06, 2026 9:56 PM
To: FORESTRY Boardof * ODF
Cc: Scott Killops; KC Kacey * ODF; FERRARI Chandra Alene * GOV; OCAC Odoe * ODOE
Subject: Public Comment for BOF Meeting 9/9/2026 - OCAC NWLF Report for 2026
Attachments: 20260909-bof-public-comment-nwlf-scott-killops.pdf

Hi Board of Forestry,
Attached is a public comment for the Board of Forestry meeting coming up next week on 9/9/2026. My comment regards the Oregon Climate Action Commission's [Draft Natural & Working Lands Fund Annual Report for 2026](#). ODF administers \$3,250,000 of this fund allocated across three projects and provides updates on these projects in the report. I feel that one of these projects is making very little progress and warrants a deeper review by ODF staff. Details are contained in the attached PDF.

Thanks,
Scott Killops
350PDX Forest Defense Team Member

To: Oregon Board of Forestry (Board) and Department of Forestry (ODF)
From: Scott Killops
Subject: Public Comment for the Board of Forestry Meeting on September 9, 2026
OCAC Natural & Working Lands Fund Annual Report for 2026
Date: September 6, 2026

Vice-chair McComb, Members of the Board, and State Forester KC,

Thank you for your service and for the opportunity to provide a public comment for the [Board of Forestry Meeting held on September 9, 2026](#). My comment regards the [Oregon Climate Action Commission's \(OCAC\) draft Natural & Working Lands Fund Annual Report September 2026 \(NWLF Report\)](#). The draft report was presented at the [OCAC meeting on August 14, 2026](#). OCAC will vote to accept the report at their [September meeting](#). ODF administers a \$3,250,000 allocation within the NWLF in a fund named the Forestry Natural Climate Solutions Fund (FNCSF). As a fund agency, ODF provides a progress update in the annual NWLF Report.

[HB3409 \(2023\)](#), sections 53-67, established a state policy for natural climate solutions and created the Natural & Working Lands Fund (NWLF). OCAC allocates NWLF funds to four sub-funds including the FNCSF administered by ODF. The first tranche of FNCSF funding, \$3,250,000, was allocated in April 2024.

ODF has defined three projects for use of FNCSF funds. These are described in the [Natural Working Lands Fund Proposal](#) (pages 17-22):

- Advance implementation of Climate-Smart Forestry
- Incentivize Climate-Smart Forestry Implementation in partnership with Tribal and Environmental Justice Communities
- Establishment of climate-ready seed orchards

The [NWLF Report Appendix A: Investment Area Descriptions](#) provides project descriptions and updates for 2026. ODF project updates appear on pages 40-51. ODF made solid progress on the first and third projects in 2026. Progress on the second project continues to lag. ODF should conduct a thorough review of the second project to determine why it is progressing so slowly. Also, the project update for the first project in the NWLF Report is vague and does not provide an adequate accounting for FNCSF funds expended. This project update should be improved before the final NWLF Report is approved. Additional comments on the NWLF Report appear below.

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

Respectfully,

Scott Killops

350PDX Forest Defense Team Member

Comments Regarding the [NWLF Report Appendix A: Investment Area Descriptions](#)

Pages 40-43, ODF | P9: Advance Implementation of Climate-Smart Forestry

This project appears to have made substantial progress in 2026. In particular, the [Tualatin Soil and Water Conservation District](#) has recently posted their [Climate-Informed Forestry](#) web page and published their guide [Climate-Informed Forestry: Strategies for Washington County, Oregon](#). However, the ODF update for project P9 included in the NWLF Report lacks detail and does not adequately provide an accounting of expenditures.

The [OCAC August 14 Meeting Presentation](#) includes an NWLF Annual Update. ODF updates appear on slides 23-26. Slides 24-25 identify four Soil and Water Conservation Districts (SWCD) and Watershed Councils (WC) that ODF is working with on project P9:

- Tualatin SWCD, Climate-Informed Strategies Guide
- Benton SWCD, Carbon Decision Tools for Small Landowners
- Grant SWCD, Postfire (2024) Reforestation Seedlings
- Klamath Watershed Partners, South-Central Oregon Seed Orchard

The NWLF Report does not identify any of these partners/grantees and only describes these projects in vague terms. The ODF update for project P9 should identify all of the partners ODF is funding and provide more detail on the goals, plans, timelines, and progress of each of these sub-projects. In particular, the ODF update should explain how much money is allocated to each of these sub-projects.

“2026 Budgeting and Spending Plan Update”: This section indicates that \$875,059 was issued in FY2026 and that \$624,941 will be issued in FY2027. There is no breakdown showing who is receiving funds, how much they are receiving, and for what purpose. This is inadequate. OCAC should require a more detailed accounting from ODF before approving the NWLF Report.

“Needs and Opportunities (2026)”: ODF is not even mentioned in the [Natural Climate Solutions Guide](#) published in January 2025 by the [Oregon Association of Conservation Districts \(OACD\)](#). Given ODF’s strategy of working with/through SWCDs and WCs, it seems that ODF should reach out to OACD to collaborate on promoting NCS and the guide. Also, this year’s [Committee for Family Forestlands \(CFF\) Annual Report](#) contains this comment:

Climate Smart Forestry. The Board Vision refers to climate smart forestry; the CFF would like to engage the Board on what that looks like for SFOs, and to track ODF’s Climate Change and Carbon Plan generally. Many SFOs want to become involved in such an important program as this and want to learn more. We suggest setting up a mutually convenient meeting to discuss this and any other topics of mutual interest.

It seems that in the more than two years since the FNCSF was funded, ODF has not presented an overview of this project to the CFF. This is a glaring omission which ODF should make it a priority to rectify. Finally, the ODF web site does not discuss Natural Climate Solutions or the FNCSF at all. ODF should endeavor to use their web site as an information portal to expand their outreach.

“Measurable Outcomes for Reporting”: ODF has reported only one measurable outcome for this project in three years. This is inadequate. If the “Metrics for Tracking Outcomes” in Table A26 are not the right

metrics for this project, ODF should define alternate metrics that can be used to track progress on this project.

Pages 44-46, ODF | P10: Climate-Smart Forestry Implementation in Partnership with Tribal and Environmental Justice Communities

The project update for P10 is three pages of text that make it sound like work is happening, but no specific accomplishments are reported. ODF should conduct a detailed project review of P10 to figure out why this project is moving so slowly.

“2026 Update”: The P10 update states:

The department is in the process of establishing agreements with the nine federally recognized Tribes as they identify NCS projects and those that build climate resilience. It is anticipated that these agreements will be largely in place near the end of calendar year 2026 and work will begin shortly after.

This vague language does not indicate a plan. The P10 update indicates that FNCSF funds will flow to the Tribes through ODF’s [Urban and Community Forestry \(UCF\) Program](#), but the UCF web site makes no mention of the FNCSF and neither does ODF’s [2025 Government-to-Government Report on Tribal Relations](#). This project was allocated \$1,000,000 in April 2024. None of this money is flowing to its intended recipients. ODF should find out why not.

“Measurable Outcomes for Reporting”: “None to report” for three years in a row.

Pages 47-51, ODF | P11: Establishment of Climate-Ready Seed Orchards

This project appears to be on track and I commend the project team for the progress that they are making.

“2026 Implementation Update”: This section provides a good example of the level of detail that I think ODF should provide in the NWLF Report for project P9 (see above).

BARTLETT Shawna L * ODF

From: Scott Killops <scott.killops@gmail.com>
Sent: Friday, September 04, 2026 2:15 PM
To: FORESTRY Boardof * ODF
Cc: Scott Killops; KC Kacey * ODF; FERRARI Chandra Alene * GOV
Subject: Public Comment for BOF Meeting 9/9/2026 - ODF APPR for 2026
Attachments: 20260909-bof-public-comment-appr-scott-killops.pdf

Hi Board of Forestry,

Attached is a public comment for the Board of Forestry meeting coming up next week on 9/9/2026. My comment regards agenda item 5, [Annual Performance Progress Report 2026](#). My comment is contained in the attached PDF.

Thanks,
Scott Killops
350PDX Forest Defense Team Member

To: Oregon Board of Forestry (Board) and Department of Forestry (ODF)
From: Scott Killops
Subject: Public Comment for the Board of Forestry Meeting on September 9, 2026
Annual Performance Progress Report 2026
Date: September 4, 2026

Vice-chair McComb, Members of the Board, and State Forester KC,

Thank you for your service and for the opportunity to provide a public comment for the [Board of Forestry Meeting to be held September 9, 2026](#). My comment regards the [Annual Performance Progress Report \(APPR\) 2026](#) agenda item.

First, thank you for making this year's APPR update a regular agenda item vs. a Consent Agenda item as it was for the last three years. I appreciate the opportunity to provide a public comment on the APPR. My comment pertains to Key Performance Measure (KPM) #10, State Forests North Coast Habitat – Complex forest structure as a percentage of the State Forests landscape. The target range for KPM #10 is 30-50%.

It appears that ODF has not made a serious effort to achieve KPM #10's target for at least a decade. KPM #10 has been stuck between 10-12% since 2018. APPRs for years 2016-2025 are posted on the Legislative Fiscal Office's [Key Performance Measures](#) web site. I have collected ODF's updates for KPM #10 for reporting years 2016-2026; these appear below. All of these reports repeat the same boilerplate explanation under "Factors Affecting Results":

Factors Affecting Results

Complex forest structure develops very slowly, and it is anticipated to take decades to achieve the range of 30 to 50% complex structure now described in the forest management plans. ODF's Stand Level Inventory (SLI) system is not designed to report on year-to-year differences but rather reflect our updated understanding of the landscape.

It's obvious that it takes decades to establish new complex forest structure. But it's also obvious that ODF could achieve KPM #10's target more rapidly if they simply stop clear-cutting existing complex forest stands. ODF has not done this. ODF should declare a moratorium on the "regeneration harvest" of existing complex layered stands until the 30% target is reached.

Also, ODF's Stand Level Inventory (SLI) system is not the only data available to ODF to include in the APPR. ODF Annual Operation Plans (AOPs) and Pre-Operation Reports include data on the structure and age of stands targeted for regeneration harvest. The APPR should include a roll-up of the number of acres of complex forest stands subject to regeneration harvest along with a justification for why this is acceptable given that KPM #10 has been so far

below target for so long. This would provide an additional data point on the “year-to-year difference”. Ultimately, the APPR should include a cumulative running total of the complex forest stands that have been subject to regeneration harvest since KPM #10 was adopted.

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

Respectfully,

Scott Killops

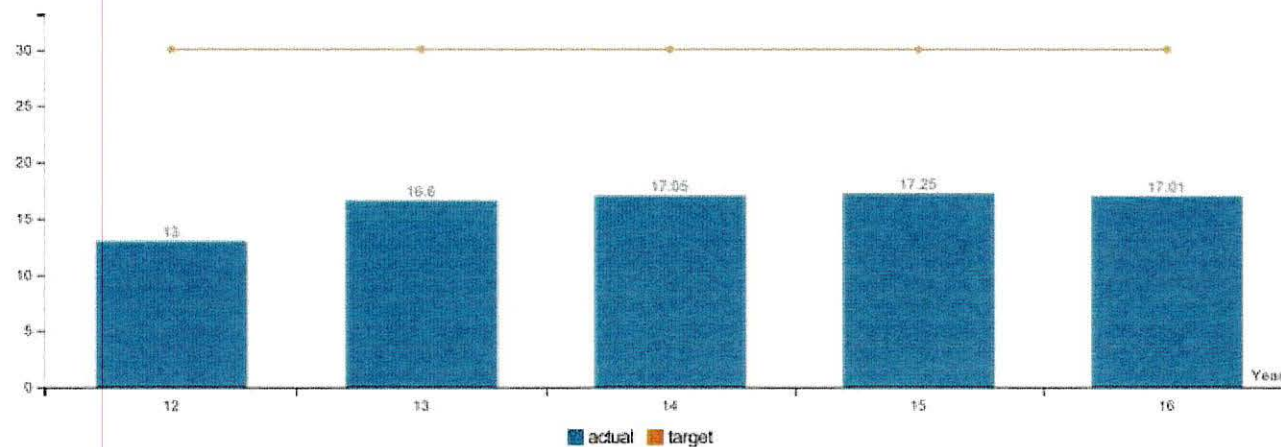
350PDX Forest Defense Team Member

Oregon Department of Forestry (ODF) Key Performance Measure #10 (KPM #10) for Reporting Years 2016-2026

Compiled from ODF Annual Performance Progress Reports (APPRs) posted on the Legislative Fiscal Office [Key Performance Measures](#) web site by Scott Killops, 350PDX Forest Defense Team member, on 8/30/2026.

Reporting Year 2016

KPM #10	STATE FORESTS NORTH COAST HABITAT - Complex forest structure as a percent of the State Forests landscape.
	Data Collection Period: Jul 01 - Jun 30



Metric	2012	2013	2014	2015	2016
Complex structure as a percent of the State Forests landscape					
Actual	13%	16.60%	17.05%	17.25%	17.01%
Target	30%	30%	30%	30%	30%

How Are We Doing

The FY 2015 data show that 30.1% of Astoria district, 18.1% of Forest Grove district, and 9.4% of Tillamook district are in complex forest structure.

Factors Affecting Results

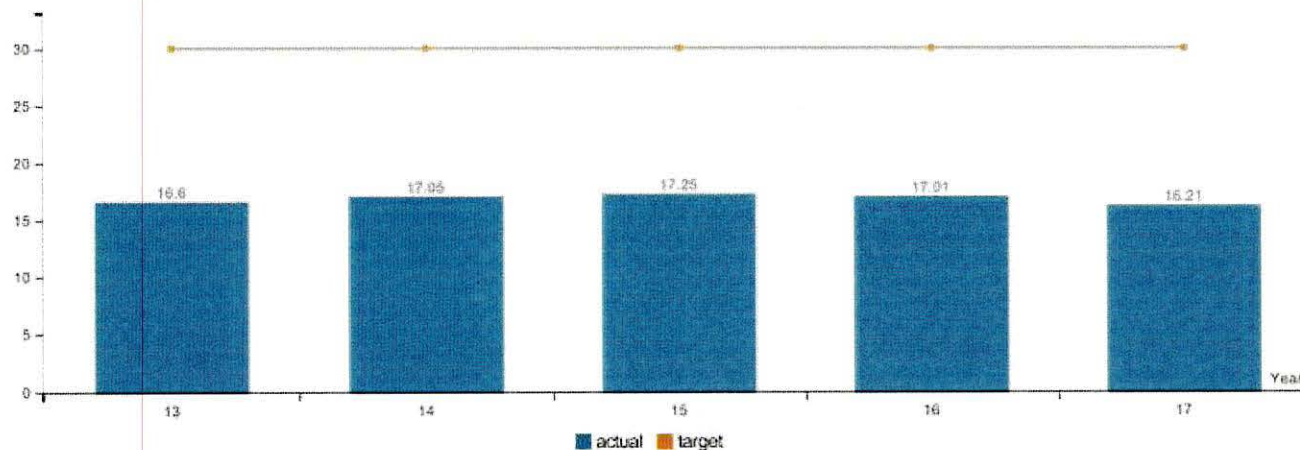
Complex forest structure develops very slowly and it is anticipated to take decades to achieve the range of 30 to 50% complex structure now described in the forest management plans. ODF's Stand Level Inventory system is not designed to report on year-to-year difference but rather indicate longer term trends. The apparent year-to-year trends in complex structure are likely the result of changes in methodology as well as the active management practices designed to enhance the development of complex forest structure while efficiently harvesting timber.

Reporting Year 2017

KPM #10 STATE FORESTS NORTH COAST HABITAT - Complex forest structure as a percent of the State Forests landscape.

Data Collection Period: Jul01 - Jun 30

* Upward Trend = positive result



Report Year	2013	2014	2015	2016	2017
Complex structure as a percent of the State Forests landscape					
Actual	16.60%	17.05%	17.25%	17.01%	16.21%
Target	30%	30%	30%	30%	30%

How Are We Doing

The FY 2016 data show that 27.0% of Astoria district, 16.1% of Forest Grove district, and 10.3% of Tillamook district are in complex forest structure.

Factors Affecting Results

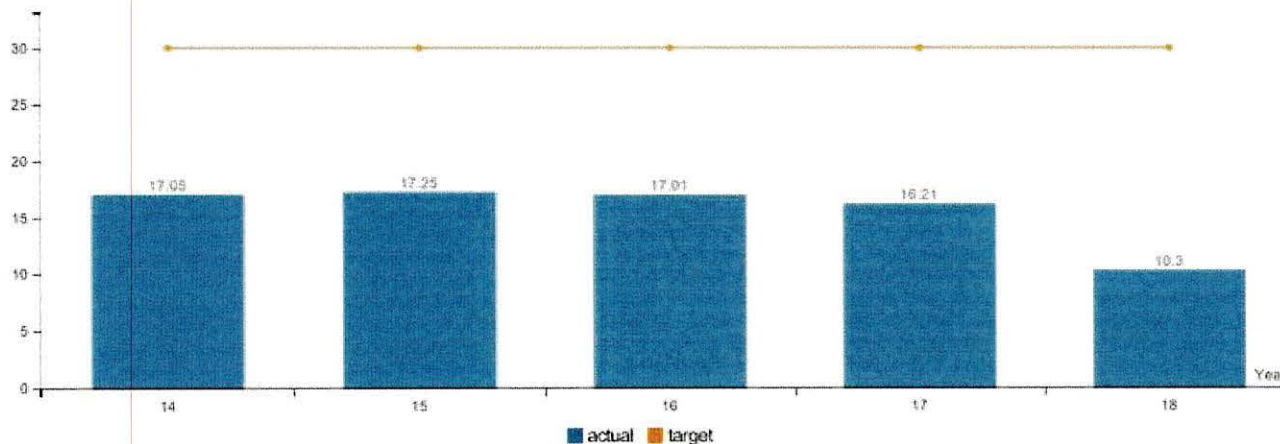
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Reporting Year 2018

KPM #10 STATE FORESTS NORTH COAST HABITAT - Complex forest structure as a percent of the State Forests landscape.

Data Collection Period: Jul 01 - Jun 30

* Upward Trend = positive result



Report Year	2014	2015	2016	2017	2018
Complex structure as a percent of the State Forests landscape					
Actual	17.05%	17.25%	17.01%	16.21%	10.30%
Target	30%	30%	30%	30%	30%

How Are We Doing

The FY 2017 data show that 14.4% of Astoria district, 10.3% of Forest Grove district, and 8.0% of Tillamook district are in complex forest structure.

Factors Affecting Results

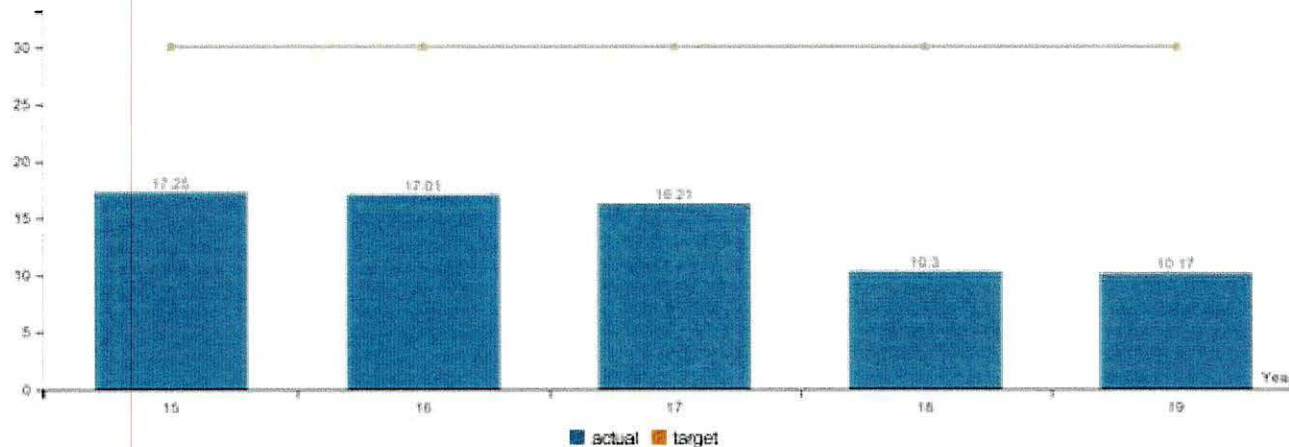
Complex forest structure develops very slowly and it is anticipated to take decades to achieve the range of 30 to 50% complex structure now described in the forest management plans. ODF's Stand Level Inventory (SLI) system is not designed to report on year-to-year difference but rather indicate longer term trends.

The year-to-year changes in complex structure are the result of updates to SLI data as well as active management designed to enhance the development of complex forest structure over time. Following an external expert review ODF adopted a new growth model in 2018 to improve consistency of inventory estimates. The new growth model provides improved estimates of stand growth and development; however, further refinements are needed to accurately estimate complex forest structure. As a result the estimates may change as the refinements are implemented and new information becomes available.

Reporting Year 2019

KPM #10 STATE FORESTS NORTH COAST HABITAT - Complex forest structure as a percent of the State Forests landscape.
Data Collection Period: Jul 01 - Jun 30

* Upward Trend = positive result



Report Year	2015	2016	2017	2018	2019
Complex structure as a percent of the State Forests landscape					
Actual	17.25%	17.01%	16.21%	10.30%	10.17%
Target	30%	30%	30%	30%	30%

How Are We Doing

The FY 2018 data show that 15.2% of Astoria district, 9.2% of Forest Grove district, and 7.9% of Tillamook district are in complex forest structure.

Factors Affecting Results

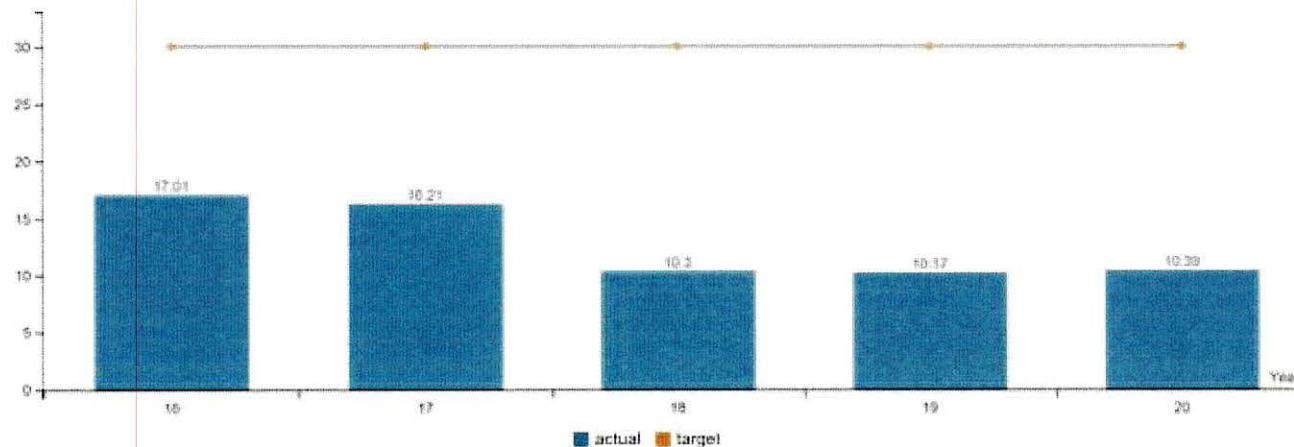
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The year-to-year changes in complex structure are the result of updates to SLI data as well as active management designed to enhance the development of complex forest structure over time. Following an external expert review, ODF adopted a new growth model in 2018 to improve consistency of inventory estimates. The new growth model provides improved estimates of stand growth and development; however, further refinements are needed to accurately estimate complex forest structure. As a result the estimates may change as the refinements are implemented and new information becomes available.

Reporting Year 2020

KPM #10 STATE FORESTS NORTH COAST HABITAT - Complex forest structure as a percent of the State Forests landscape.
Data Collection Period: Jul 01 - Jun 30

* Upward Trend = positive result



Report Year	2016	2017	2018	2019	2020
Complex structure as a percent of the State Forests landscape					
Actual	17.01%	16.21%	10.30%	10.17%	10.39%
Target	30%	30%	30%	30%	30%

How Are We Doing

The FY 2019 data show that 16.1% of Astoria district, 9.0% of Forest Grove district, and 8.0% of Tillamook district are in complex forest structure.

Factors Affecting Results

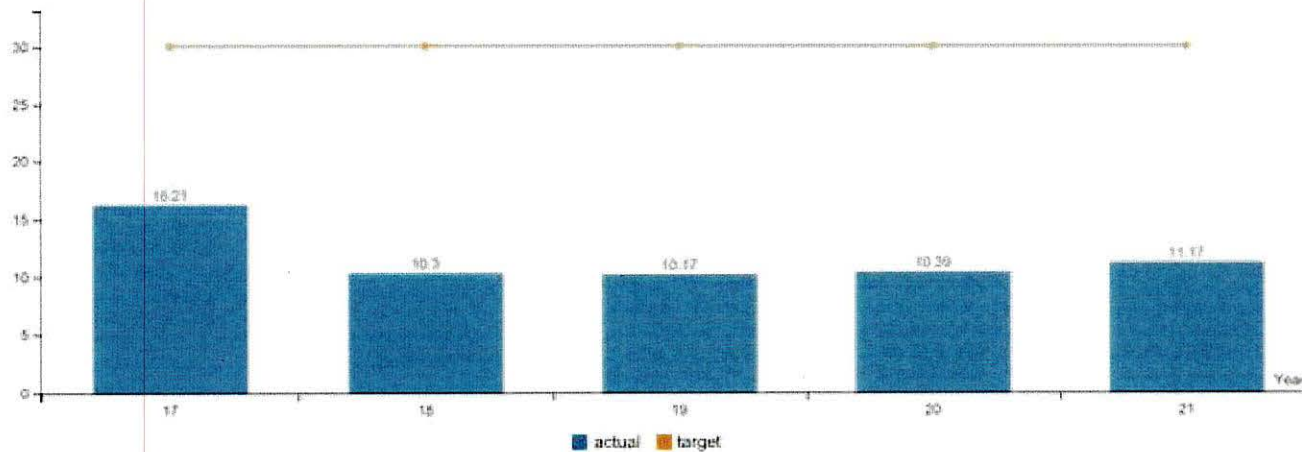
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The year-to-year changes in complex structure are the result of updates to SLI data as well as active management designed to enhance the development of complex forest structure over time. Following an external expert review, ODF adopted a new growth model in 2018 to improve consistency of inventory estimates. The new growth model provides improved estimates of stand growth and development; however, further refinements are needed to accurately estimate complex forest structure. As a result the estimates may change as the refinements are implemented and new information becomes available.

Reporting Year 2021

KPM #10 STATE FORESTS NORTH COAST HABITAT - Complex forest structure as a percent of the State Forests landscape.
Data Collection Period: Jul 01 - Jun 30

* Upward Trend = positive result



Report Year	2017	2018	2019	2020	2021
Complex structure as a percent of the State Forests landscape					
Actual	16.21%	10.30%	10.17%	10.39%	11.17%
Target	30%	30%	30%	30%	30%

How Are We Doing

The amount of complex structure on State Forests demonstrates a steady or slightly increasing trend since 2018. The decrease from 2017 to 2018 was largely a result of a change in how the amount of complex structure is estimated. When considered by District, the fiscal year 2020 data show that 17.2% of Astoria district, 10.3% of Forest Grove district, and 8.3% of Tillamook district are in complex forest structure.

Factors Affecting Results

Complex forest structure develops very slowly, and it is anticipated to take decades to achieve the range of 30 to 50% complex structure now described in the forest management plans. ODF's Stand Level Inventory (SLI) system is not designed to report on year-to-year difference but rather indicate longer term trends.

The year-to-year changes in complex structure are the result of updates to SLI data as well as active management designed to enhance the development of complex forest structure over time. Following an external expert review, ODF adopted a new growth model in 2018 to improve consistency of inventory estimates. The new growth model provides improved estimates of stand growth and development; however, further refinements are needed to accurately estimate complex forest structure. As a result the estimates may change as the refinements are implemented and new information becomes available.

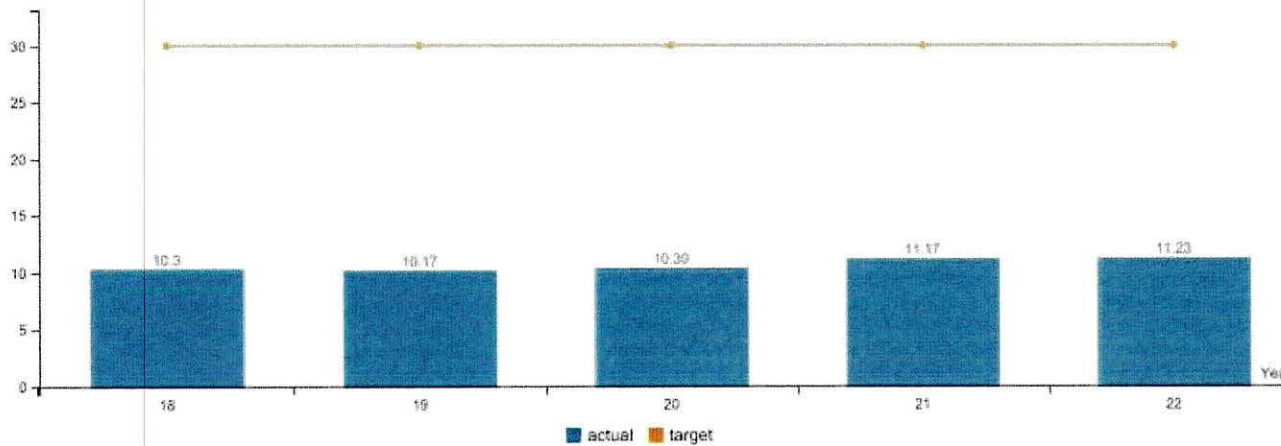
Reporting Year 2022

KPM #10

STATE FORESTS NORTH COAST HABITAT - Complex forest structure as a percent of the State Forests landscape.

Data Collection Period: Jul 01 - Jun 30

* Upward Trend = positive result



Report Year	2018	2019	2020	2021	2022
Complex structure as a percent of the State Forests landscape					
Actual	10.30%	10.17%	10.39%	11.17%	11.23%
Target	30%	30%	30%	30%	30%

How Are We Doing

The amount of complex structure on State Forests demonstrates a steady or slightly increasing trend since 2018. The decrease from 2017 to 2018 was largely a result of a change in how the amount of complex structure is estimated. When considered by District, the fiscal year 2021 data show that 16.74% of Astoria district, 10.96% of Forest Grove district, and 8.35% of Tillamook district are in complex forest structure.

Factors Affecting Results

Complex forest structure develops very slowly, and it is anticipated to take decades to achieve the range of 30 to 50% complex structure now described in the forest management plans. ODF's Stand Level Inventory (SLI) system is not designed to report on year-to-year difference but rather reflect our updated understanding of the landscape.

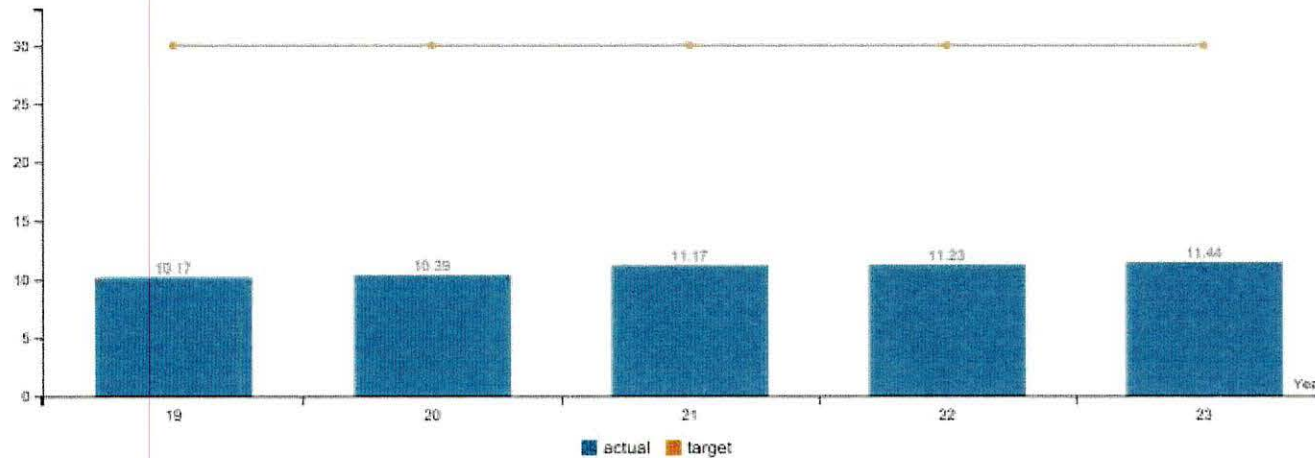
The year-to-year changes in complex structure are the result of updates to SLI data as well as active management designed to enhance the development of complex forest structure over time. Following an external expert review, ODF adopted a new growth model in 2018 to improve consistency of inventory estimates. The new growth model provides improved estimates of stand growth and development; however, further refinements are needed to accurately estimate complex forest structure. As a result the estimates may change as the refinements are implemented and new information becomes available.

Reporting Year 2023

KPM #10 STATE FORESTS NORTH COAST HABITAT - Complex forest structure as a percent of the State Forests landscape.

Data Collection Period: Jul 01 - Jun 30

* Upward Trend = positive result



Report Year	2019	2020	2021	2022	2023
Complex structure as a percent of the State Forests landscape					
Actual	10.17%	10.39%	11.17%	11.23%	11.44%
Target	30%	30%	30%	30%	30%

How Are We Doing

The amount of complex structure on State Forests demonstrates a steady or slightly increasing trend since 2018. The decrease from 2017 to 2018 was largely a result of a change in how the amount of complex structure is estimated. When considered by District, the fiscal year 2022 data show that 17.00% of Astoria district, 10.12% of Forest Grove district, and 9.00% of Tillamook district are in complex forest structure.

Factors Affecting Results

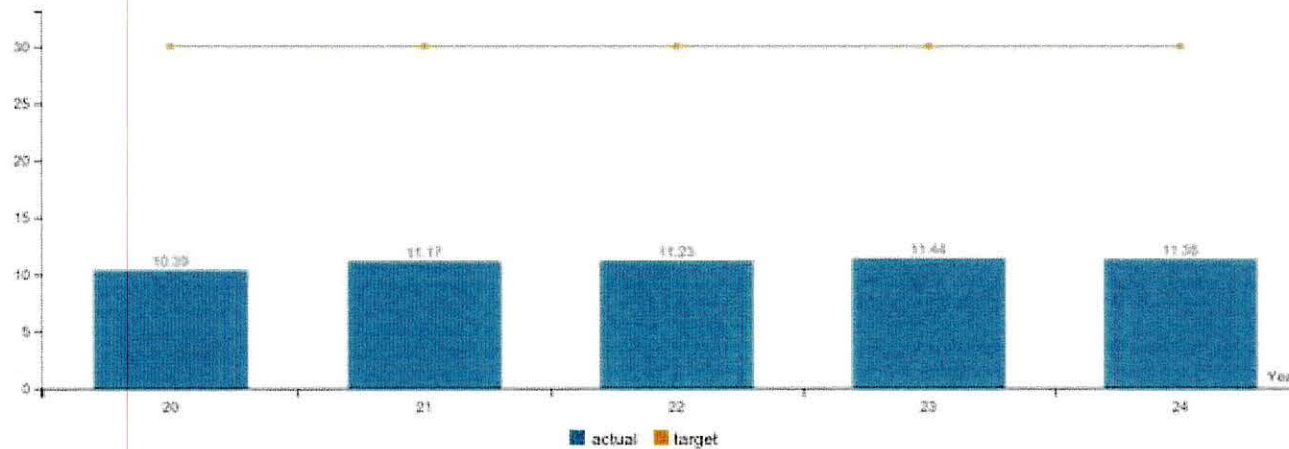
Complex forest structure develops very slowly, and it is anticipated to take decades to achieve the range of 30 to 50% complex structure now described in the forest management plans. ODF's Stand Level Inventory (SLI) system is not designed to report on year-to-year difference but rather reflect our updated understanding of the landscape.

The year-to-year changes in complex structure are the result of updates to SLI data as well as active management designed to enhance the development of complex forest structure over time.

Reporting Year 2024

KPM #10 STATE FORESTS NORTH COAST HABITAT - Complex forest structure as a percent of the State Forests landscape.
Data Collection Period: Jul 01 - Jun 30

* Upward Trend = positive result



Report Year	2020	2021	2022	2023	2024
Complex structure as a percent of the State Forests landscape					
Actual	10.39%	11.17%	11.23%	11.44%	11.38%
Target	30%	30%	30%	30%	30%

How Are We Doing

The amount of complex structure on State Forests demonstrates a steady or slightly increasing trend since 2018. The decrease from 2017 to 2018 was largely a result of a change in how the amount of complex structure is estimated. When considered by District, the fiscal year 2023 data show that 16.99% of Astoria district, 10.06% of Forest Grove district, and 8.92% of Tillamook district are in complex forest structure.

Factors Affecting Results

Complex forest structure develops very slowly, and it is anticipated to take decades to achieve the range of 30 to 50% complex structure now described in the forest management plans. ODF's Stand Level Inventory (SLI) system is not designed to report on year-to-year differences but rather reflect our updated understanding of the landscape.

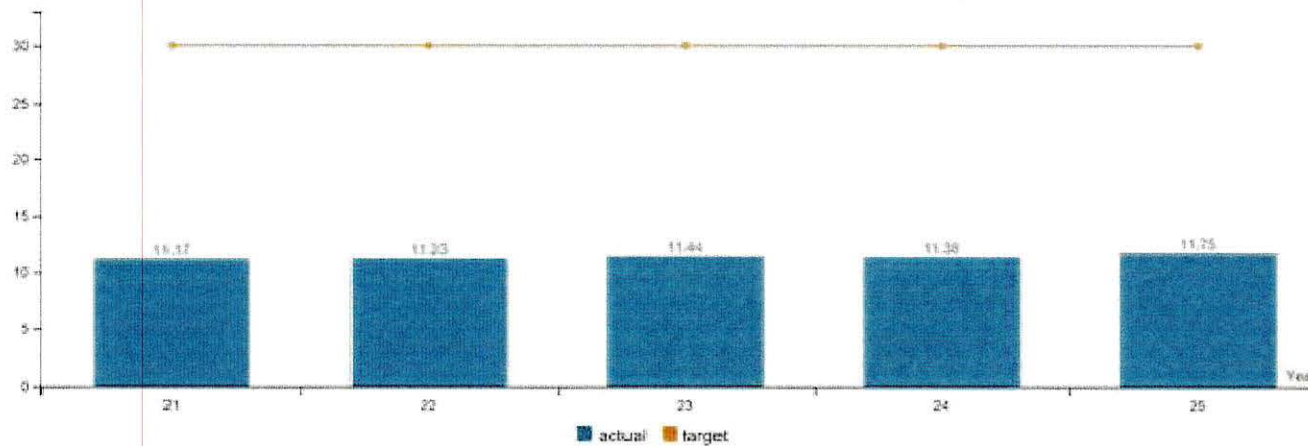
The year-to-year changes in complex structure are the result of updates to SLI data as well as active management designed to enhance the development of complex forest structure over time.

Reporting Year 2025

KPM #10 STATE FORESTS NORTH COAST HABITAT - Complex forest structure as a percent of the State Forests landscape.

Data Collection Period: Jul 01 - Jun 30

* Upward Trend = positive result



Report Year	2021	2022	2023	2024	2025
Complex structure as a percent of the State Forests landscape					
Actual	11.17%	11.23%	11.44%	11.38%	11.25%
Target	30%	30%	30%	30%	30%

How Are We Doing

The amount of complex structure on State Forests demonstrates a steady or slightly increasing trend since 2018. The decrease from 2017 to 2018 was largely a result of a change in how the amount of complex structure is estimated. When considered by District, the fiscal year 2024 data show that 17.64% of Astoria district, 10.77% of Forest Grove district, and 8.99% of Tillamook district are in complex forest structure.

Factors Affecting Results

Complex forest structure develops very slowly, and it is anticipated to take decades to achieve the range of 30 to 50% complex structure now described in the forest management plans. ODF's Stand Level Inventory (SLI) system is not designed to report on year-to-year differences but rather reflect our updated understanding of the landscape.

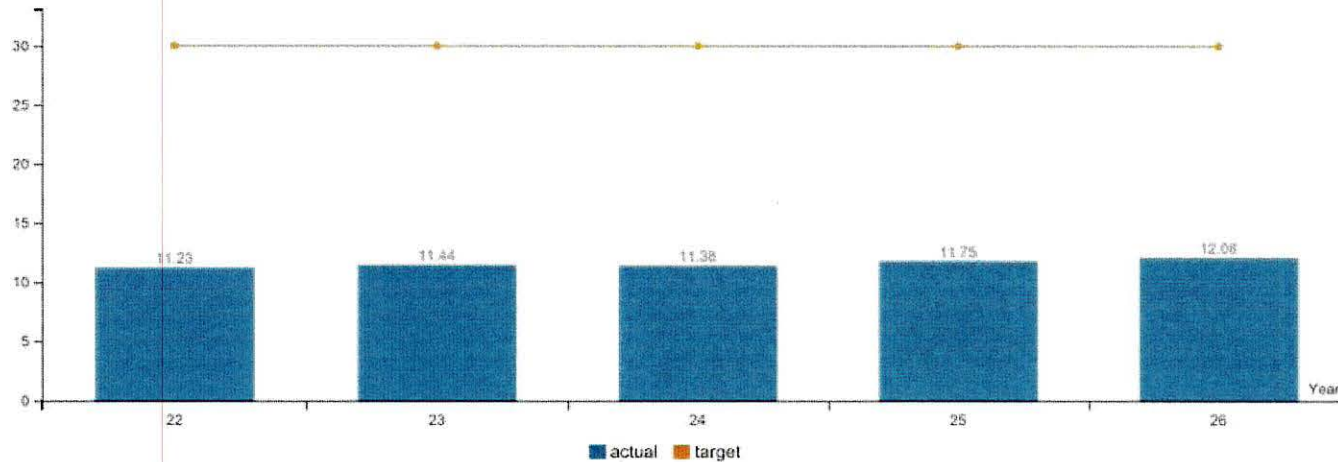
The year-to-year changes in complex structure are the result of updates to SLI data as well as active management designed to enhance the development of complex forest structure over time.

Reporting Year 2026

KPM #10 STATE FORESTS NORTH COAST HABITAT - Complex forest structure as a percent of the State Forests landscape.

Data Collection Period: Jul 01 - Jun 30

* Upward Trend = positive result



Report Year	2022	2023	2024	2025	2026
Complex structure as a percent of the State Forests landscape					
Actual	11.23%	11.44%	11.38%	11.75%	12.08%
Target	30%	30%	30%	30%	30%

How Are We Doing

The amount of complex structure on State Forests demonstrates a steady or slightly increasing trend since 2018. The decrease from 2017 to 2018 was largely a result of a change in how the amount of complex structure is estimated. When considered by District, the fiscal year 2025 data show that 17.87% of Astoria district, 11.03% of Forest Grove district, and 9.40% of Tillamook district are in complex forest structure.

Factors Affecting Results

Complex forest structure develops very slowly, and it is anticipated to take decades to achieve the range of 30 to 50% complex structure now described in the forest management plans. ODF's Stand Level Inventory (SLI) system is not designed to report on year-to-year differences but rather reflect our updated understanding of the landscape.

The year-to-year changes in complex structure are the result of updates to SLI data as well as active management designed to enhance the development of complex forest structure over time.

BARTLETT Shawna L * ODF

From: Scott Killops <scott.killops@gmail.com>
Sent: Friday, September 04, 2026 10:04 AM
To: FORESTRY Boardof * ODF
Cc: Scott Killops; KC Kacey * ODF; FERRARI Chandra Alene * GOV
Subject: Public Comment for BOF Meeting 9/9/2026 - Board Governance Subcommittee
Attachments: 20260909-bof-public-comment-bgs-scott-killops.pdf

Hi Board of Forestry,

Attached is a public comment for the Board of Forestry meeting coming up next week on 9/9/2026. My comment regards agenda item 6, [Board Governance Subcommittee - Discussion of Board self-evaluation](#). I suggest that the Board's self-evaluation process should include an annual review of progress on the [Board Work Plan](#).

Thanks,
Scott Killops
350PDX Forest Defense Team Member

To: Oregon Board of Forestry (Board) and Department of Forestry (ODF)
From: Scott Killops
Subject: Public Comment for the Board of Forestry Meeting on September 9, 2026
Board Governance Subcommittee – Suggestion for Board Self-Evaluation
Date: September 4, 2026

Vice-chair McComb, Members of the Board, and State Forester KC,

Thank you for your service and for the opportunity to provide a public comment for the [Board of Forestry meeting on September 9, 2026](#). My comment regards the [Board Governance Subcommittee](#) agenda item pertaining to the Board's self-evaluation process.

I support the [Board Governance Subcommittee's recommendation](#) to eliminate the Board's self-evaluation as a formal reporting requirement. But I would like to suggest that the Board's self-evaluation process going forward should include an annual review of the [Board Work Plan](#).

The [About the Board of Forestry](#) web page lists seven Board Work Plans for 2022-2024. As far as I know, the Board never reviewed any of these plans for progress/results/next steps. I don't think the Board created a Board Work Plan for 2025. A [Board Work Plan for 2026-2027](#) was presented at the [Board retreat in February](#). This [Board Work Plan](#) (on page 8) called for its own adoption at the March 2026 Board meeting, but that did not happen. (I submitted a [public comment arguing that this Board Work Plan is deficient in climate leadership topics](#).)

I believe that ODF should review the progress and results of all of their plans. Long duration plans should be reviewed on at least an annual basis. Short duration plans should be reviewed upon their completion. These reviews reinforce a culture of accountability and organizational learning. The Board can role model this behavior by reviewing the Board Work Plan each year. The annual Board retreat in October would probably be a good time to do this.

Personally, I would still like to see ODF provide an implementation review of the Board's [Climate Change and Forest Carbon Work Plan 2022-2024](#). I believe this review would provide useful input to ODF's update of its [Climate Change and Carbon Plan](#) which is supposed to happen during the coming biennium.

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

Respectfully,
Scott Killops
350PDX Forest Defense Team Member

BARTLETT Shawna L * ODF

From: Rhonda Piasecki <coyotevibe@yahoo.com>
Sent: Monday, September 07, 2026 1:16 PM
To: FORESTRY Boardof * ODF
Cc: Governor Kotek * GOV
Subject: Brownsmead

For years our Oregon forests have suffered the impacts from tree farming operations. Spraying poisons, whether by backpack or aircraft regardless of "borders", near the homes and water supplies of residents is carried out thoughtlessly and apparently with no willingness to do more thorough investigations of the health impacts on people, wildlife, and aquatic organisms, as well as trying better to let a complete ecosystem be restored after the total destruction of it is done for what is actually a trivial financial gain. It is outrageous and is disrespectful to the people of Oregon, and the ecological systems and resources that sustain us now and for future generations.

This week the UN reported that the world will breach the 1.5 Celsius limit. This is the threshold which will cause worldwide devastation, mass migration and die off. There is still time to do something about this. We can start here in Oregon by stopping clear cutting and spraying of our forests.

The Board of Forestry has the power to change the way it is managing our forests right now to more sustainable forestry which will actually create more jobs. Our state and in fact, the whole world depends on this. Our forests in Oregon absorb more carbon than the Amazon rainforest. By clear cutting them, you are releasing this carbon into the atmosphere creating climate change. I'm encouraging you to follow the science now to make these changes before it's too late.

Please stop clear cutting and spraying our watersheds, for us, for you, for our children and our children's children.

BARTLETT Shawna L * ODF

From: Julia Smith <jsmith@wildsalmoncenter.org>
Sent: Tuesday, September 08, 2026 12:18 PM
To: FORESTRY Boardof * ODF
Subject: Speak Up For Your State Forests

[You don't often get email from jsmith@wildsalmoncenter.org. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Chair Kelly and Members of the Board of Forestry,

Thank you for supporting the completion of a Habitat Conservation Plan (HCP) for Western Oregon state forests. I'm writing to ask you to continue this work by adopting a new forest management plan for Oregon's state forests. This includes implementing a strong HCP and the Climate Change and Carbon Plan (Climate Plan), adopted by the Board of Forestry in 2021, with proactive measures to address climate change.

The HCP will begin to restore balance to our state forests after decades of clearcuts and over-harvest. The HCP will protect iconic salmon runs, wildlife habitat, recreation, and clean water by limiting or prohibiting timber harvest within established conservation areas. However, the remainder of state forest should not be managed like private industrial forest land with short harvest rotations that maximize revenue.

The new forest management plan must be supported by the best science available, to meet the challenges posed by climate change. This includes increasing protective stream buffers on headwater streams to protect cold clean water for salmon, and implementing the Climate Plan to increase carbon absorption and storage in our state forests. This can be achieved by reducing clearcut timber harvest, protecting existing mature stands of forest, applying ecological forest management practices, and establishing longer rotations between harvest to increase carbon storage.

The HCP and new forest management plan would continue to produce revenue from state forest timber sales to fund the Department of Forestry and county services, but this is an unreliable and unsustainable approach. I support efforts to diversify revenue sources for both the Department of Forestry and local services, to relieve the pressure to over-harvest public forests and provide more stable funding.

Now is the time to stand tall for Oregon's state forests, and for current and future generations, by adopting a strong HCP and a new forest management plan.

Sincerely,

Julia Smith
4225 SE 9th Ave
Portland, OR 97202
jsmith@wildsalmoncenter.org

BARTLETT Shawna L * ODF

From: Jennifer Hamaker <jenhamaker1@gmail.com>
Sent: Monday, September 07, 2026 3:44 PM
To: DEUMLING Ben * ODF; SFCOMMENTS ODF * ODF; MCCOMB Brenda * ODF; heath.curtis@odf.oregon.gov; AGPAOA Liz * ODF; FORESTRY Boardof * ODF; LOVECHIO Alexi * ODF
Subject: The Circumstances Have Changed — Please Change Course Before Federal Approval of the Western Oregon HCP

Members of the Oregon Board of Forestry,

Several weeks ago, I wrote to the Board asking that you reconsider the Western Oregon State Forests Habitat Conservation Plan before federal approval and implementation.

I asked you to examine whether the assumptions supporting a 70-year commitment remained sound in light of changing federal policy, evolving science, wildfire, forest conditions, declining forest infrastructure, economic impacts, and the actual results of decades of Northern Spotted Owl conservation policy.

I ended that letter with a simple request:

“Please judge this policy not by its intentions, but by its results.”

Since then, something significant has happened.

On September 4, 2026, the U.S. Fish and Wildlife Service submitted a new proposed rule, “Critical Habitat Designation for Northern Spotted Owl,” RIN 1018-BJ06, for federal regulatory review.

In other words, the federal government itself is now reconsidering a major component of the Northern Spotted Owl conservation framework while Oregon is preparing to enter a long-term federal Habitat Conservation Plan built substantially around conservation of that same species.

This is precisely why I asked the Board to review the HCP before federal approval.

We do not yet know what the new federal critical-habitat proposal will contain. We do not know how many acres may be excluded or how federal policy regarding Northern Spotted Owl habitat may ultimately change.

But that uncertainty is not an argument for Oregon to proceed. It is an argument for Oregon to stop and reassess.

The Board now has information before it that did not exist when it approved the HCP in March 2024.

The federal regulatory landscape is changing.

Our understanding of the causes of Northern Spotted Owl decline has changed.

The U.S. Fish and Wildlife Service recognizes the enormous threat posed by invasive barred owls. Despite decades of extensive habitat protection, Northern Spotted Owl populations have continued to decline. And catastrophic wildfire has demonstrated repeatedly that acreage designated as habitat on a map is not necessarily habitat protected on the ground.

We should be willing to ask whether the strategy itself needs to change.

This is not an argument against the Northern Spotted Owl.

It is an argument for conservation that actually works.

It is an argument for forests resilient enough to remain forests, habitat capable of remaining habitat, rural communities capable of surviving alongside our public lands, and a forest-products infrastructure capable of performing the active management and restoration those lands require.

There is an enormous difference between protecting acres and protecting outcomes.

Oregon should not commit approximately 640,000 acres of western state forests to a long-term HCP while the federal government is actively reconsidering one of the central regulatory structures surrounding the very species driving much of that conservation strategy.

And Oregon certainly should not do so simply because we have already traveled so far down this road.

Past investment in a policy is not a reason to continue it when the facts underlying that policy are changing.

The federal incidental take permits have not yet been issued. The new Forest Management Plan has not yet become effective.

There is still time.

But there will not always be.

I am therefore asking the Board more directly than I did before:

Change course before it is too late.

Do not allow the federal incidental take permits to finalize without first determining what the pending federal Northern Spotted Owl critical-habitat revision means for Oregon's HCP.

Ask the U.S. Fish and Wildlife Service to brief this Board.

Require ODF to identify every material HCP assumption that could be affected by the changing federal regulatory framework.

Reexamine whether a 70-year commitment remains prudent.

And most importantly, ask whether the plan before you will actually produce the outcomes Oregonians were promised.

This Board has an extraordinary opportunity.

Changing course when circumstances change is not failure.

It is stewardship.

Management is what we do. Stewardship is the responsibility to ask whether what we are doing is working — and to have the courage to change when it is not.

The Northern Spotted Owl deserves a conservation strategy that works.

Our forests deserve a management strategy that keeps them healthy and resilient.

Our rural communities deserve economic opportunity.

Our counties deserve sustainable revenues.

And future generations deserve something more meaningful than millions of acres designated as protected habitat.

They deserve healthy forests.

Please do not allow Oregon to cross the threshold into a 70-year federal commitment while the federal government itself is reconsidering the assumptions surrounding Northern Spotted Owl habitat.

You still have the opportunity to change course.

Please use it before it is too late.

Respectfully,

Jen Hamaker
President
Oregon Natural Resource Industries (ONRI)

Federal Critical Habitat Regulatory Review

[View Rule](#)
[reginfo.gov](#)



Federal
Government
Agrees to
Reevaluate
Northern
Spotted Owl
"Critical
Habitat" After
Supreme
Court Ruling |
American
Forest
Resource
Council
[amforest.org](#)



**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**AMERICAN FOREST RESOURCE
COUNCIL**, 700 N.E. Multnomah Street, Suite
320, Portland, OR 97232; **ASSOCIATION OF
O&C COUNTIES**, 16289 Hwy. 101 South, Suite
A, Brookings, OR 97415; **DOUGLAS COUNTY,
OREGON**, 1036 S.E. Douglas Avenue, Roseburg,
OR 97470; **LEWIS COUNTY, WASHINGTON**,
345 W. Main Street, Chehalis, WA 98532;
SISKIYOU COUNTY, CALIFORNIA, P.O.
Box 750, 1312 Fairlane Road, Yreka, CA 96097;
and **SKAMANIA COUNTY, WASHINGTON**,
240 NW Vancouver Avenue, Stevenson, WA
98648,

Plaintiffs,

v.

**UNITED STATES FISH AND WILDLIFE
SERVICE**, 1849 C Street NW, Washington, DC
20240; **DOUG BURGUM**, *in his official capacity
as U.S. Secretary of the Interior*, 1849 C Street
NW, Washington, D.C. 20240,

Defendants.

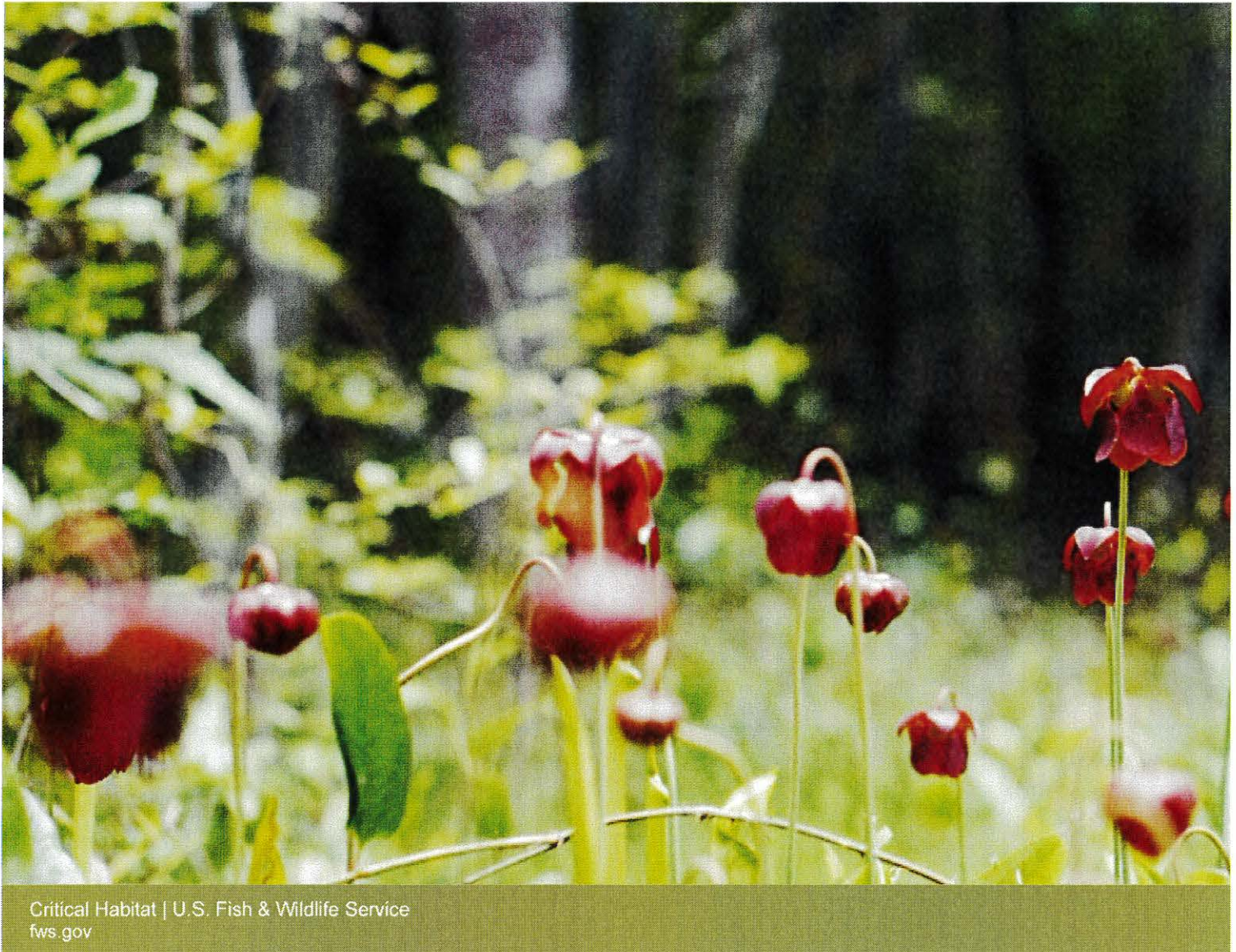
Civil Case No. ____

**COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF**

INTRODUCTION

1. This case is about an agency ignoring the law, readily available scientific and economic data, and a binding settlement agreement to advance flawed policy preferences over sound species protection, causing devastating harm to rural, timber-dependent communities in the Pacific Northwest. Plaintiffs American Forest Resource Council, the Association of O&C Counties, Douglas County, Lewis County, Siskiyou County, and Skamania County (collectively, “Plaintiffs”) challenge the U.S. Fish and Wildlife Service’s (“Service”) latest designation of critical habitat for the Northern Spotted Owl (“Owl”), Endangered and Threatened Wildlife and

FWS explanation of critical habitat and what designation actually does



AFRC Critical Habitat Challenge

AFRC Joins
County
Coalition in
Challenging
Federal
Overreach in
Northern
Spotted Owl
Critical
Habitat
Designation |
American
Forest



Sent from my treehouse made of renewable and sustainable wood.

BARTLETT Shawna L * ODF

From: oregon-gov-web-services@egov.com
Sent: Monday, September 07, 2026 3:35 PM
To: FORESTRY Boardof * ODF
Subject: Habitat Conservation Plan
Attachments: formsubmission.csv

Name	Jen Hamaker
Email	jenhamaker1@gmail.com
Subject	Habitat Conservation Plan
Comments	Chair Kelly and Members of the Oregon Board of Forestry, Several weeks ago, I wrote to the Board asking that you reconsider the Western Oregon State Forests Habitat Conservation Plan before federal approval and implementation. I asked you to examine whether the assumptions supporting a 70-year commitment remained sound in light of changing federal policy, evolving science, wildfire, forest conditions, declining forest infrastructure, economic impacts, and the actual results of decades of Northern Spotted Owl conservation policy. I ended that letter with a simple request: "Please judge this policy not by its intentions, but by its results." Since then, something significant has happened. On September 4, 2026, the U.S. Fish and Wildlife Service submitted a new proposed rule, "Critical Habitat Designation for Northern Spotted Owl," RIN 1018-BJ06, for federal regulatory review. In other words, the federal government itself is now reconsidering a major component of the Northern Spotted Owl conservation framework while Oregon is preparing to enter a long-term federal Habitat Conservation Plan built substantially around conservation of that same species. This is precisely why I asked the Board to review the HCP before federal approval. We do not yet know what the new federal critical-habitat proposal will contain. We do not know how many acres may be excluded or how federal policy regarding Northern Spotted Owl habitat may ultimately change. But that uncertainty is not an argument for Oregon to proceed. It is an argument for Oregon to stop and reassess. The Board now has information before it that did not exist when it approved the HCP in March 2024. The federal regulatory landscape is changing. Our understanding of the causes of Northern Spotted Owl decline has changed. The U.S. Fish and Wildlife Service recognizes the enormous threat posed by invasive barred owls. Despite decades of extensive habitat protection, Northern Spotted Owl populations have continued to decline. And catastrophic wildfire has demonstrated repeatedly that acreage designated as habitat on a map is not necessarily habitat protected on the ground. We should be willing to ask whether the strategy itself needs to change. This is not an argument against the Northern Spotted Owl. It is an argument for conservation that actually works. It is an argument for forests resilient enough to remain forests, habitat capable of remaining habitat, rural communities capable of surviving alongside our public lands, and a forest-products infrastructure capable of

performing the active management and restoration those lands require. There is an enormous difference between protecting acres and protecting outcomes. Oregon should not commit approximately 640,000 acres of western state forests to a long-term HCP while the federal government is actively reconsidering one of the central regulatory structures surrounding the very species driving much of that conservation strategy. And Oregon certainly should not do so simply because we have already traveled so far down this road. Past investment in a policy is not a reason to continue it when the facts underlying that policy are changing. The federal incidental take permits have not yet been issued. The new Forest Management Plan has not yet become effective. There is still time. But there will not always be. I am therefore asking the Board more directly than I did before: Change course before it is too late. Do not allow the federal incidental take permits to finalize without first determining what the pending federal Northern Spotted Owl critical-habitat revision means for Oregon's HCP. Ask the U.S. Fish and Wildlife Service to brief this Board. Require ODF to identify every material HCP assumption that could be affected by the changing federal regulatory framework. Reexamine whether a 70-year commitment remains prudent. And most importantly, ask whether the plan before you will actually produce the outcomes Oregonians were promised. This Board has an extraordinary opportunity. Changing course when circumstances change is not failure. It is stewardship. Management is what we do. Stewardship is the responsibility to ask whether what we are doing is working — and to have the courage to change when it is not. The Northern Spotted Owl deserves a conservation strategy that works. Our forests deserve a management strategy that keeps them healthy and resilient. Our rural communities deserve economic opportunity. Our counties deserve sustainable revenues. And future generations deserve something more meaningful than millions of acres designated as protected habitat. They deserve healthy forests. Please do not allow Oregon to cross the threshold into a 70-year federal commitment while the federal government itself is reconsidering the assumptions surrounding Northern Spotted Owl habitat. You still have the opportunity to change course. Please use it before it is too late. Respectfully,
Jen Hamaker President Oregon Natural Resource Industries (ONRI)

Submission Date: 09/07/2026 05:35 PM CST

Submission ID: 1788820514590-0.48204406262130806

Record ID: 24714

From: Denise Moore <denisemoore07@gmail.com>
Sent: Monday, September 07, 2026 9:52 AM
To: FORESTRY Boardof * ODF
Subject: Request to Prevent Herbicide Spraying Near Our Homes and Water Sources

Dear Oregon Department of Forestry,

I am writing to formally express our serious concern about the proposed use of herbicides near our home and neighboring residences in connection with the Davis Ridge timber operation.

During a conversation in 2024/2025, the previous ODF forester told us that it was being considered that no herbicide spraying would be needed in this area. That statement was important to us because our homes, domestic water sources, wildlife habitat, and nearby waterways could all be affected by herbicide drift, runoff, and contaminated sediment.

We have since requested a face-to-face meeting with the current forester to discuss these concerns. To date, the current forester, Tony Rudolphi, has not responded to that request. Given the potential consequences for our health, drinking water, animals, amphibians, pollinators, and surrounding ecosystem, the absence of a response is unacceptable. Residents who may be directly affected deserve meaningful communication before any herbicide decision is made.

We are asking ODF to:

1. Arrange a face-to-face meeting with affected residents before approving or conducting any herbicide application.
2. Provide the proposed application locations, dates, methods, quantities, and the names and safety information for every product and additive that may be used.
3. Explain what protections would be provided for homes, wells, groundwater, streams, wetlands, wildlife, pets, and neighboring properties.
4. Provide the scientific and site-specific basis for determining that spraying would not contaminate our water or reach our property through drift, runoff, erosion, or groundwater movement.
5. Give serious consideration to the earlier statement, from previous forester Will, that spraying might not be necessary and commit to nonchemical vegetation-management methods near our homes and water sources.
6. Refrain from spraying until residents have received complete information, had an opportunity to meet with ODF representatives, and received written responses to their concerns.

This is not a minor matter to those of us who live here. Once an herbicide is released into the environment, exposure or contamination cannot simply be undone. ODF has a responsibility to proceed cautiously, transparently, and with respect for the people whose homes and water supplies are immediately adjacent to state-managed land.

Please treat this letter as a formal request for a prompt written response and an in-person meeting. We ask that ODF provide proposed meeting dates and confirm that no spraying will occur while these concerns remain unresolved.

Sincerely,

Denise and Ryan Moore

Adjacent property owner, Davis Ridge area

BARTLETT Shawna L * ODF

From: Becca Nielsen <beccanielsen@earthlink.net>
Sent: Friday, September 04, 2026 2:53 PM
To: FORESTRY Boardof * ODF
Subject: comments for BOF Sept 9 meeting - re: request to cancel Davis Ridge spraying

You don't often get email from beccanielsen@earthlink.net. [Learn why this is important](#)

It's been a tough summer for those of us living next to Davis Ridge. Despite promises of being a good neighbor and limiting logging times, we were rocketed out of bed for months at 5 am. The valley was filled with smoke and noise of multiple chainsaws for hours and days on end. It's been hell as our backyard has been destroyed and we have been subjected to the never ending whine of chainsaws and crash of trees from March to August.

Now we have received a notice that ODF is going to spray herbicides/pesticides in less than 2 weeks. From day one, our first meeting with Brad, our designated "representative", we said we do not want these chemicals in our ground and water. This includes backpack spraying. The chemicals go into the ground and all of the logging is on a hill. Water pours down the hill during the winter rains and into the backyards of the adjacent properties. In my case, it runs under the road in a culvert and floods my fields and goes into Davis Creek which goes into Blind Slough and eventually ends up in the Columbia River with all the salmon. All living creatures, domestic, wild and marine, are affected by this. **We do not want any spraying. The neighbors of Davis Ridge have requested ODF CANCEL THE SCHEDULED SPRAYING (for Sept 14) and meet with us but our request as been ignored.**

The forest will do fine without the forever chemicals. Other communities have opted out on this and we want to as well. I do not spray chemicals in your backyard and you should not have the right to do so in mine contaminating my property and putting my health at risk.

Rebecca Nielsen, Astoria, Oregon

BARTLETT Shawna L * ODF

From: Katrina Nielsen <4katrina.nielsen@gmail.com>
Sent: Saturday, September 05, 2026 10:02 AM
To: FORESTRY Boardof * ODF
Subject: Proposed Herbicide Spraying on Davis Ridge

You don't often get email from 4katrina.nielsen@gmail.com. [Learn why this is important](#)

To: Oregon Board of Forestry

Re: Proposed Spraying in Clatsop Country

The clear cutting on Davis Ridge was already a bad situation for neighbors, wildlife and the water shed. I fear that we will see multiple landslides in this area when seasonal rains arrive. Now we face further unstable weather with a super El Niño headed towards our coast.

And layered on all of that the ODF plans to spray herbicides and pesticides on these vulnerable slopes. We wholeheartedly reject this plan. Heavy fall rains will send these chemical directly into local streams that empty into the Columbia River. The water shed, the wildlife and the Great River of the West should not be subject to this poison.

The value of our land and livability is so much more than a timber harvest. We say NO to the plan to spray Davis Ridge.

Sincerely,

Katrina A Nielsen

Portland, OR & Astoria, OR

BARTLETT Shawna L * ODF

From: Christopher Farrar <tochrisfarrar@gmail.com>
Sent: Tuesday, September 08, 2026 1:05 PM
To: FORESTRY Boardof * ODF
Cc: odf@public.govdelivery.com; WILSON Michael * ODF; PALAZZOTTO Nick * ODF; KC Kacey * ODF; HUNTINGTON Geoff * GOV
Subject: Public Comment: agenda item #3 -- Davis Ridge Harvest, herbicide protest

You don't often get email from tochrisfarrar@gmail.com. [Learn why this is important](#)

Comments re: Davis Ridge Harvest, Astoria District

8Sep2026

Thank you for accepting my comments offered regarding the Davis Ridge Harvest in the Astoria District and a few general comments regarding SOP (standard operating procedures).

I am a resident of Clatsop County and live on 28 ac of forested land adjacent to State Forest land.

In order to balance ODF operations to accommodate conflicting goals, values, and levels of direct impact borne by individuals, ODF must adhere to the principle of GPV (Greatest Permanent Value) and this may require adjustments to SOPs. In fact, adjustments to SOPs should be made frequently and willingly, especially when legitimate concerns are raised by any party directly impacted. Such adjustments to harvest plans based on public concerns raised through public comments should be given a high level of importance, response, and effectively addressed by ODF personnel at a District level. But when concerns are inadequately addressed at a local level, then ODF staff at a higher level and if necessary, the BOF should direct upper-level ODF staff to follow through.

It is fair to say that considerable controversy exists over two common practices in forest management and timber harvesting: clear cutting and use of chemical herbicides.

Forest harvesting on Davis Ridge in Clatsop County is currently being carried out. The plan includes both clear cutting and the use of chemical herbicides post-harvest. Davis Ridge is in the Brownsmead area and occupied private properties border the harvest area. Most of these properties have been homesites for decades and some for generations. The residents of this area are on individual domestic water supplies, some have spring-fed fish ponds, organic gardens, and they encourage the presence of native wildlife, both vertebrates and invertebrates. The residents chose to live in a more natural space than urban life affords; they seek tranquility and opportunities to commune with nature. ODF is the steward of the adjacent forested public land. I ask you [ODF] to be considerate neighbors and be respectful of your neighbors that place higher value on resources that state forests have that are destroyed by clear cutting as a means of timber harvesting. ODF you have clear cut, or will do so in the near future, the forests so many residents of the Davis Ridge area value as intact forests. Is not this loss enough? Must you add insult to injury by following a removal of the forest with spraying toxic chemical herbicides over the land now laid barren?

I am a resident of Clatsop County with friends and acquaintances living around Davis Ridge. I am outraged by the lack of compassion shown by a state agency, held by law to manage our state forests for GPV, that plans to go forward with the SOP of chemical herbicide spraying after clear cutting the forest (the equivalent of kicking your neighbors in the teeth when they are down).

The argument is often made that herbicides must be used to allow the establishment and rapid growth of seedling trees planted to promote reforestation. But what do the data really show – a quicker way to a stand of uniform aged trees mostly of one, two, or at most three species – certainly that is NOT reFORESTation because it won't be a forest – it will be a tree farm, in addition, there are no data that support that the standard of GPV will have been met under this plan.

You've started carrying out step one (forest removal), please skip step two (herbicide application) so that a real forest can grow back and provide habitat for aquatic and land-dwelling organisms that do not thrive where poisons are applied.

Strike at least a small bit of balance in the spirit of GPV for your neighboring land owners and residents – forgo the double whammy – change your SOP and don't apply herbicides in the Davis Ridge harvest area.

Sincerely,

Christopher Farrar

A concerned citizen, tax-payer, and wildlife defender

Astoria, Oregon

C L I M A T E W R I T E R S

86070 Cougar Lane
Eugene, OR 97402

Dear Members of the Oregon
Board of Forestry,

Thank you so much for your new management
plan that includes commitments to increase carbon
storage in state-managed forests west of the
Cascades. You're helping future generations!

Sincerely yours,

Kate Gessert

Terin Russell


Max Gessert

92.26

C L I M A T E W R I T E R S

DEAR DR. BOARD OF FORESTRY -

CONGRATULATIONS ON ADOPTING A NEW MANAGEMENT
PLAN THAT COMMITTS TO INCREASING CARBON STORAGE
TO COMBAT CLIMATE DISRUPTION. NOW PLEASE MAKE SURE
ITS FOLLOWED UPON.

SINCERELY —

Julie Roseman

Kate Jessert

Kevin Russell

Heidi Clinton

Max Jessert

From: [Greg](#)
To: [FORESTRY Board of * ODF](#)
Subject: Comment on the CCCP within the FMP
Date: Tuesday, September 08, 2026 7:25:20 PM

To: Board of Forestry and Department of Forestry
From: Greg Jacob
Date: September 8, 2026

As a member of SFAC and the Oregon Chapter of the Sierra Club, I support a Forest Management Plan (FMP) that advances a Climate Change and Carbon Plan (CCCP). There are many other concerns, such as increasing complex forest habitat and protecting healthy waterways for salmon and communities, but I will limit my remarks to forest and climate.

Surprisingly, the CCCP is not mentioned in the FMP. It should! We are facing a climate emergency worldwide. The CCCP directs ODF to lead by example and demonstrate climate-smart forest management on state forests to achieve "Greatest Permanent Value." Furthermore, the Governor's executive order 25-26 specifically calls on the ODF by setting aside an additional 10% of state forests for carbon sequestration. The moist forests of the Oregon Coast Range are among the most productive forests in the world and can accumulate vast quantities of carbon. The FMP must adapt to climate change, and it should identify areas that have high carbon storage potential, especially for those that can provide benefits for threatened and endangered species, water quality, and educational and recreation opportunities for Oregonians.

From: [Kyle McElroy](#)
To: [FORESTRY Board of * ODF](#)
Subject: NO SPRAY ON DAVIS RIDGE
Date: Thursday, September 10, 2026 12:37:55 AM

You don't often get email from kylemcelroy14@gmail.com. [Learn why this is important](#)

The use of glyphosates is extremely irresponsible and they should never be sprayed on public lands, particularly on a hill where they can run off and enter wetlands, sloughs, rivers, and adjacent private property.

You must cancel the upcoming scheduled spray and meet with community members before making a choice that will create a risk for their health and the health of the ecosystem. Community members have been intentional and outspoken that they do not want the hill sprayed, even prior to the clearcutting.

It is extremely disheartening and disappointing that even while we all endure disastrous forest fires year after year, the result of decades of forest mismanagement, that ODF still continues to disregard the will of the people and community members.

Forests are not a product. They are absolutely essential to the systems that sustain life on this planet. This entire project is about financial motives, not forest management. The clear cutting alone is already likely to have damaging consequences to local waterways and species like salmon. Do not further this destruction by spraying poison on to the earth.

From: [Joan Cummings](#)
To: [FORESTRY Board of * ODF](#); [KC Kacey * ODF](#)
Subject: Please stop contaminating forests
Date: Thursday, September 10, 2026 9:58:20 AM

You don't often get email from joancummings61@gmail.com. [Learn why this is important](#)

I strongly oppose the use of herbicides and pesticides on public Forest lands including those that have been destroyed by clear-cutting like Davis Ridge near Astoria.

PLEASE do not approve the application of any type of herbicides or pesticides. They are not selective in their targets but instead kill all and, bonus kill: they contaminate water and humans.

Please stop these unnatural, unhealthy practices.

Thank you,

Joan Cummings
Voter, Portland, Oregon

From: [Avi Goldshmidt](#)
To: [FORESTRY Boardof * ODF](#); [KC Kacey * ODF](#)
Cc: [PALAZZOTTO Nick * ODF](#); [HUNTINGTON Geoff * GOV](#)
Subject: Stop the Spray of Davis Ridge!
Date: Thursday, September 10, 2026 6:56:52 PM

You don't often get email from avi.goldshmidt@gmail.com. [Learn why this is important](#)

Dear members of the Board of Forestry and State Forester KC,

I am a resident of Astoria, OR. During this week's board meeting, I heard testimony from Rebecca Nielsen regarding her experience as a resident adjacent to ODF's ongoing clearcut operation of Davis Ridge in Brownsmead. You'll recall that Rebecca objected to the spraying of herbicides on the property near her land and near the bodies of water that she and other living beings depend on. I was moved by her testimony and as a fellow resident of Astoria can empathize with her dissatisfaction with the use of chemicals near her land.

As decision-makers of public forestland, you have the authority to remedy Rebecca's situation. I have two requests. First, and most urgently: Please contact our local ODF office in Astoria to cancel the spray at Davis Ridge. The operation is scheduled to happen early next week and the district operations manager seems to have denied a request for a meeting with the residents nearby the operation. I see a great opportunity for you as a board overseeing our public forests to come in and help our local ODF office better represent the interest of the public here in Astoria, particularly the neighbors of this operation, who are asking for no chemicals to be introduced to or near their property.

Secondly, I urge the Board and State Forester to rethink the use herbicides on state forestland in general. There are numerous peer reviewed studies that indicate harm to the quality of waterways, as well as to living beings within and around them. As Rebecca says in her testimony, "your choice is: do we live with a few extra alders growing on the hill or do we expose the neighbors in this area with carcinogenic chemicals?" As representatives of the public interest, I would hope the choice there is obvious.

Respectfully,
Avi Goldshmidt
Astoria, OR

From: [Julia Smith](#)
To: [FORESTRY Board of * ODF](#)
Subject: My comment supporting the HCP
Date: Thursday, September 24, 2026 10:02:06 AM

[You don't often get email from jsmith@wildsalmoncenter.org. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Interim Chair Deumling and Members of the Board of Forestry,

Thank you for supporting the completion of a Habitat Conservation Plan (HCP) for Western Oregon state forests. I'm writing to ask you to continue this work by implementing a new forest management plan for Oregon's state forests that ensures the restoration of aquatic habitat for salmon, habitat for native wildlife species and bold steps to increase carbon sequestration and storage.

The HCP will begin to restore balance to our state forests after decades of clearcuts and over-harvest. The HCP will help protect iconic salmon runs, wildlife habitat, recreation, and clean water by limiting or prohibiting timber harvest within established conservation areas. However, the remainder of state forests should not be managed like private industrial forest land with short harvest rotations that maximize timber harvest and revenue at the expense of clean water and fish and wildlife habitat.

The new forest management plan must be supported by the best science available to meet the challenges posed by climate change. This includes increasing protective stream buffers on headwater streams to protect cold clean water for salmon, and increasing carbon absorption and storage in our state forests. This can be achieved by reducing clearcut timber harvest, protecting existing mature stands of forest, applying ecological forest management practices, and establishing longer rotations between harvest to increase carbon storage in the forest.

The HCP and new forest management plan will continue to produce revenue from state forest timber sales to fund the Department of Forestry and county services, but this is an unreliable and unsustainable approach. I support efforts to diversify revenue sources for both the Department of Forestry and local services, to relieve the pressure to over-harvest public forests and to provide more stable funding.

Now is the time to stand tall for Oregon's state forests, and for current and future generations, by implementing a new forest management plan that restores salmon runs, improves habitat for imperiled wildlife species and increases carbon storage.

Sincerely,

Julia Smith
4225 SE 9th Ave
Portland, OR 97202
jsmith@wildsalmoncenter.org

From: [Stacey Detwiler](#)
To: [FORESTRY Board of * ODF](#)
Subject: BOF Public Comments
Date: Wednesday, September 09, 2026 9:56:17 AM
Attachments: noname,
9.9.26 Final Letter - PFA Funding in 2027-2029 State Budget.pdf
9 9 26 Written Comments BOF.pdf

Hi Shauna,

Please see the attached written comments for the BOF meeting today.

Thanks,
Stacey

Attachment:

1. Joint letter in support of PFA funding from conservation and timber
2. WSC written comments for BOF meeting

--



Stacey Detwiler | Oregon Policy Director
Direct line: 971-255-5583 (does not receive texts)
Mailing Address: PO Box 10026, Portland, OR 97296
wildsalmoncenter.org

Bird Alliance of Oregon • Oregon Forest Industries Council • Oregon Small Woodlands Association • Oregon Wild • Weyerhaeuser • Wild Salmon Center

September 4, 2026

RE: Full Funding for Private Forest Accord Programs to Support Federal Approval of Habitat Conservation Plan

Dear Governor Kotek:

The undersigned organizations represent Authors of the Private Forest Accord (PFA). We write to express our strong support for fully funding the programs that implement this historic agreement. Failing to fund key programs will continue to delay and negatively impact Oregon's application for a Habitat Conservation Plan (HCP), risking final federal approval.

In this challenging budget climate, we appreciate your work to navigate these difficult decisions. We respectfully request full funding at Oregon Department of Forestry (ODF) for the Adaptive Management Program (\$6M per biennium) and the Small Forestland Investment in Stream Habitat (SFISH) Program (\$10M per biennium). At the Oregon Department of Fish and Wildlife (ODFW), we respectfully request full funding of the PFA Grant Program (\$20M per biennium). These three programs provide critical support for mandatory elements of a federally approvable HCP.

- **ODF SFISH Program (\$10M needed per biennium):** The ODF SFISH Program provides dedicated grant funding to small forestland owners to replace or upgrade culverts and stream crossings. In combination with the PFA Grant Program at ODFW, the SFISH program supports ecological uplift to the covered species under the proposed HCP and for mitigation as needed.
 - Funding in 2025-2027: The SFISH Program received \$2M GF and also included \$5.7M in funding carried forward from the 23-25 biennium for a total of \$7.7M.
- **ODF Adaptive Management Program (\$6M needed per biennium):** Monitoring and reporting are required elements of approvable HCPs and must allow for assessment of compliance, project impacts, and verifying progress towards meeting biological goals and objectives. This includes effectiveness monitoring, which falls under the responsibility of the Adaptive Management Program (AMP). In September 2025, the Board of Forestry approved the first [research agenda](#) that includes a baseline assessment of road-stream connectivity and sediment modeling of forest roads as well as a detailed literature review of steep slope processes in eastern Oregon. In parallel with the HCP process, the AMP is developing the effectiveness monitoring strategy for the HCP. Failing to fund this program means that there will be limited funding for research and implementation of the effectiveness monitoring strategy, making federal approval of the HCP significantly more challenging.

- Funding in 2025-2027: The Adaptive Management Program received \$3.1M in the 25-27 biennium in combination with \$1.4M in carry forward funds housed at the Institute for Natural Resources for a total of \$4.5M GF.
- **ODFW PFA Grant Program (\$20M needed per biennium)**: The PFA authorizing legislation under SB 1501 in 2022 commits \$10M from the state and \$2.5M from industry annually for this fund until federal approval of an HCP, after which the industry contribution increases to \$5M annually. Avoidance, minimization, and mitigation measures are required components of an HCP and the PFA Grant program was designed to provide critical funding to support ecological uplift to the covered species under this HCP and for mitigation as needed. The PFA Grant program has been continuously funded since 2022. In April 2025, the Fish & Wildlife Commission approved \$10.3M to 23 projects that leveraged an additional \$7.7M in matching funds.
 - Funding in 2025-2027: The PFA Grant Program received \$10M in GF to be continuously appropriated.

If approved, this 50-year plan will provide more regulatory certainty for forest landowners, while at the same time providing increased protections for threatened salmon and amphibians. However, if the state fails to get federal approval for the PFA Habitat Conservation Plan (HCP) by December 31, 2027, all of the changes under the PFA roll back.

Thank you for your consideration of these comments, and we look forward to working with you in the development of the 2027-2029 state budget.

Sincerely,

Joe Liebezeit
Statewide Conservation Director
Bird Alliance of Oregon

Seth Barnes
Director of Forestry Policy
Oregon Forest Industries Council

Steve Pedery
Conservation Director
Oregon Wild

Mike Cafferata
Executive Director
Oregon Small Woodlands Association

Stacey Detwiler
Oregon Policy Director
Wild Salmon Center

Betsy Earls
Government Affairs Manager
Weyerhaeuser

Vice-Chair Brenda McComb
Oregon Board of Forestry

September 9, 2026

RE: Public Comments on ODF Agency Request Budget (ARB) Funding for Private Forest Accord Programs - SFISH Grant Program and Adaptive Management Program

Vice-Chair McComb, Board Members, and State Forester KC:

Thank you for the opportunity to provide public comments into the record. The Wild Salmon Center is a nonprofit organization based in Oregon that works to protect and restore healthy forests and abundant clean water to support thriving wild salmon populations in the state and across the Pacific Rim. The Wild Salmon Center is one of the Private Forest Accord Authors as part of the conservation coalition and has engaged in this process from the beginning in 2020.

First, we'd like to thank Board Members McComb, Justice, and Agpoa for their dedicated service on the Board of Forestry. Serving on this board requires commitment to accountability, a willingness to have hard conversations, and a shared goal of tackling the challenges of forest management in Oregon.

Second, we are significantly concerned about the lack of funding for two critical programs at ODF that are essential to a federally approvable Private Forest Accord (PFA) Habitat Conservation Plan (HCP).

Summary of Current ARB Funding vs. 25-27 Legislatively Approved Budget

	25-27 Legislatively Approved Budget	27-29 Agency Request Budget (as of Sept 2026)
SFISH Grant Program - ODF Total need = \$10M / biennium	\$2M GF (new funding) and \$5.7M in funding carried forward from the 23-25 biennium for a total of \$7.7M.	Not currently funded in ARB
Adaptive Management Program - ODF Total need = \$6M / biennium	\$3.1M (new funding) and \$1.4M in carry forward funds housed at the Institute for Natural Resources for a total of \$4.5M.	Not currently funded in ARB
PFA Grant Program - ODFW Total need = \$20M / biennium	PFA Grant Program received \$10M in GF to be continuously appropriated.	Not currently funded in ARB

As described in the table above, the following programs provide critical monitoring and mitigation that is required in a federally approvable HCP. These programs are described in more detail below:

Small Forestland Owner Investment in Stream Habitat (SFISH) Grant Program at

ODF: This program provides dedicated grant funding to small forestland owners to replace or upgrade culverts and stream crossings. To date, \$5M has been obligated to 16 projects and 14 of those are on track for completion in November 2026. These projects will improve 50 miles of stream habitat. There are at least 45 projects in the queue awaiting additional funding. The commitment and need for this program is \$10M / biennium, and it received \$7.7M in combined new and carry forward funding in the 25-27 budget. This program is not currently funded in ODF's ARB.

Adaptive Management Program at ODF: This program includes the Adaptive Management Program Committee (AMPC) and the Independent Research and Science Team (IRST) that develop and implement research and effectiveness monitoring as required in an HCP.

Monitoring and reporting are required elements of approvable HCPs to assess compliance, project impacts, and verify progress towards meeting biological goals and objectives. In September 2025, the Board approved the first research agenda, including a baseline assessment of road-stream connectivity and sediment modeling of forest roads as well as a detailed literature review of steep slope processes in eastern Oregon. The commitment and need for this program is \$6M / biennium, and it received \$4.5M in combined new and carry forward funding in the 25-27 budget. This program is not currently funded in ODF's ARB.

Private Forest Accord (PFA) Grant Program at ODFW: The authorizing legislation from 2022 (SB 1501) for the PFA committed \$10M from the state and \$2.5M from the timber industry annually to support habitat restoration projects. Following federal approval of the PFA HCP, the industry commitment increases to \$5M/year. This grant program was designed to support ecological uplift of covered species and for mitigation as needed. Like the SFISH and AMP Programs, this program has been continuously funded since 2022. As of April 2025, the Fish & Wildlife Commission approved \$10.3M to 23 projects that leveraged an additional \$7.7M in matching funds through this program. The commitment and need for this program is \$20M / biennium, and it received \$10M in new funding in the 25-27 budget as well as language stating that the program shall be "continuously appropriated.". This program is not currently funded in ODFW's ARB.

We recognize that this is a very challenging budget environment, and there is a long road ahead as the Governor's Recommended Budget is developed in December and the legislature ultimately approves the budget by June 2027. However, failing to fund these programs will continue to delay and negatively impact Oregon's application for an approved PFA HCP. It also increases the risk of the PFA rules rolling back if the state isn't able to get federal approval by December 31, 2027.

Thank you for your consideration of these comments.

Sincerely,

Stacey Detwiler
Oregon Policy Director
Wild Salmon Center

From: [Scott Killops](#)
To: [FORESTRY Boardof * ODF](#)
Cc: [Scott Killops](#); [KC Kacey * ODF](#); [FERRARI Chandra Alene * GOV](#)
Subject: Public Comment for BOF Meeting 9/9/2026 - Is the Board's work mostly for show?
Date: Thursday, September 10, 2026 10:36:07 PM
Attachments: [20260909-bof-public-comment-board-scott-killops.pdf](#)

Hi Board of Forestry,

Attached is a public comment for the Board of Forestry meeting that was held yesterday on 9/9/2026. My comment regards a comment made by Board member Heath Curtiss during the meeting in which he said that the Board's work is mostly for show. I disagree. Details are in the attached PDF.

Thanks,
Scott Killops
350PDX Forest Defense Team Member

To: Oregon Board of Forestry (Board) and Department of Forestry (ODF)

From: Scott Killops

Subject: Public Comment for the Board of Forestry Meeting on September 9, 2026
Is the Board's work mostly for show?

Date: September 10, 2026

Acting Chair Deumling, Members of the Board, and State Forester KC,

Thank you for your service and for the opportunity to provide a public comment for the [Board of Forestry meeting held on September 9, 2026](#). My comment regards a comment made by Board member Heath Curtiss during the Board meeting (in the [video recording of the meeting](#) the comment occurs at 1:37:30-1:38:00):

A quick comment if I may. It's kind of symptomatic or one of the weird things about Oregon governance that many of the public processes are just for show. That is to say, this Board's work, mostly for show. The Legislature doesn't actually set KPMs; evidently it's Legislative Fiscal that sets KPMs and the agency negotiates with them and one can't help but kind of shake the uneasy feeling of the deep state in all of this.

I feel like I can't let this comment pass without a response.

First, timing is everything. I think it was incredibly insensitive to say that the Board's work is mostly for show on the same day and in the same meeting where Board members Agpaoa, Justice, and McComb were stepping down after years of service. And on the eve of the Senate confirmation of new Board members Grimm, Hereford, and Kovalik. I don't believe that any of these folk view their public service as mostly for show.

Second, this comment devalues the participation of the public. If the Board's work is mostly for show, then what is the point of public testimony? We may as well not waste our time.

Third, this comment was made at the end of a short agenda item discussing ODF's [Annual Performance Progress Report for 2026](#) which included a short discussion of the [Key Performance Measure \(KPM\) changes that ODF proposed](#) at the [Board retreat on February 4](#). I don't think that the [Legislative Fiscal Office \(LFO\)](#) was a nefarious deep state player here. I think ODF and the Board mismanaged this process:

- ODF either started the KPM change process too late or waited too long to present their proposal to the Board. LFO instructions are spelled out on their web site: [Legislative Process for Proposed Changes to KPMs](#), [KPM Budget Instruction Timeline](#). These instruction state clearly that changes to KPMs must be submitted by April 30 of even numbered years. ODF waited until February to bring their proposed KPM changes to the Board. This did not allow sufficient time to incorporate Board input and conduct another round of review and approval before the April deadline. ODF should have initiated this discussion with the Board no later than fall 2025.
- ODF did a poor job of explaining the KPM change process and timeline to the Board at the retreat in February. I pointed this out in a [public comment](#) that I submitted ahead of the Board

retreat. I don't think that most Board members came away from the retreat understanding that the deadline to submit KPM changes was April 30 or that the next opportunity to make changes would be in April 2028.

- The discussion at the Board retreat concluded without recording decisions, clearly articulating next steps with timelines, or assigning action items. No meeting summary was posted.
- This was the first time that the APPR was presented to the Board as a regular agenda item in four years. For the past three years the APPR was presented as a Consent Agenda item and approved without comment. Board members could have raised concerns regarding KPMs during this period.
- ODF now plans to revisit proposed KPM changes at the Board retreat in October. I applaud this move. But I will point out that ODF still does not have an approved strategic plan despite this being an expectation of the Governor. I argued in my [public comment in February](#) that KPMs should reflect the SMART goals in the agency's strategic plan. I also argued in a [second public comment](#) that the [February retreat agenda](#) should include a discussion of ODF's plan to create a strategic plan. Since that didn't happen and has not happened since, I recommend that the Board include a plan for a strategic plan discussion in the agenda for the October retreat.
- Neither the Legislature nor the LFO "sets KPMs". [ORS 291.110\(2\)](#) requires the agency to do this. LFO administers the process, but that hardly rises to the level of the deep state.

I choose to not believe that Board's work is mostly for show. I vote with my time by spending many hours reviewing ODF and Board plans, reports, and presentations and preparing public testimony.

For the record, I like and respect Board member Heath Curtiss and appreciate his active engagement in Board discussions. I especially appreciate his work on the Private Forest Accord (PFA). I don't think he actually believes that the Board's work is mostly for show. If he did, I think he would find some more important or productive ways to use his time. I think he was just venting frustration with some of these bulky, poorly understood, sometimes poorly executed processes. Which I get. I have experienced a fair amount of frustration in the three and a half years that I have been following the work of the Board and ODF. But I think we all have to work together to understand these processes and to make them work better or to change them.

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

Respectfully,

Scott Killops

350PDX Forest Defense Team Member

From: [Scott Killops](#)
To: [FORESTRY Boardof * ODF](#)
Cc: [KC Kacey * ODF](#); [FERRARI Chandra Alene * GOV](#); [OCAC Odoe * ODOE](#); [Scott Killops](#)
Subject: Public Comment for BOF Meeting 9/9/2026 - Carbon Measures in FMP PMs
Date: Tuesday, September 22, 2026 6:50:15 AM
Attachments: [20260909-bof-public-comment-css-scott-killops.pdf](#)

Hi Board of Forestry,

Attached is a public comment for the [Board of Forestry meeting that was held on 9/9/2026](#). This comment regards the carbon sequestration and storage measures that were included in the presentation of [Western Oregon State Forests Management Plan Performance Measures](#). Details are contained in the attached PDF.

Thanks,
Scott Killops
350PDX Forest Defense Team Member

To: Oregon Board of Forestry (Board) and Department of Forestry (ODF)

From: Scott Killops

Subject: Public Comment for the Board of Forestry Meeting on September 9, 2026
Carbon Sequestration and Storage Measures in FMP PMs

Date: September 22, 2026

Acting Chair Deumling, Members of the Board, and State Forester KC,

Thank you for your service and for the opportunity to provide a public comment for the [Board of Forestry meeting held on September 9, 2026](#). My comment regards the Board's discussion of Carbon Sequestration and Storage measures presented as part of the [Western Oregon State Forests Management Plan \(FMP\) Performance Measures \(PMs\)](#) agenda item. The Board's discussion occurs at 5:34:40 – 5:52:55 in the [video recording of the meeting](#). The FMP PM presentation is posted [here](#).

I am in favor of ODF adopting both carbon sequestration and storage measures for the FMP. ODF has demonstrated the ability to model and estimate both in the past. For carbon storage, I favor a target of an increasing trend. For carbon sequestration, I suggest that ODF work with the [Oregon Climate Action Commission \(OCAC\)](#) to calculate a target based on [OCAC's recently approved Natural and Working Lands Net Carbon Sequestration Goals](#).

This is not the first time that ODF has proposed to the Board a carbon storage measure for the state forests. ODF proposed a carbon storage measure at the [Board meeting on November 3, 2021](#) and included the following graphs ([from the Board packet, pages 190-194](#)):

Figure 2: Trends in average carbon stored in live trees (DBH > 2.5cm) in forestland within the Oregon Coast Range region estimated by LEMMA subdivided by ownership and State Forest district. Y-axis scale is the same in the two graphs, with metric and US measurement units displayed.

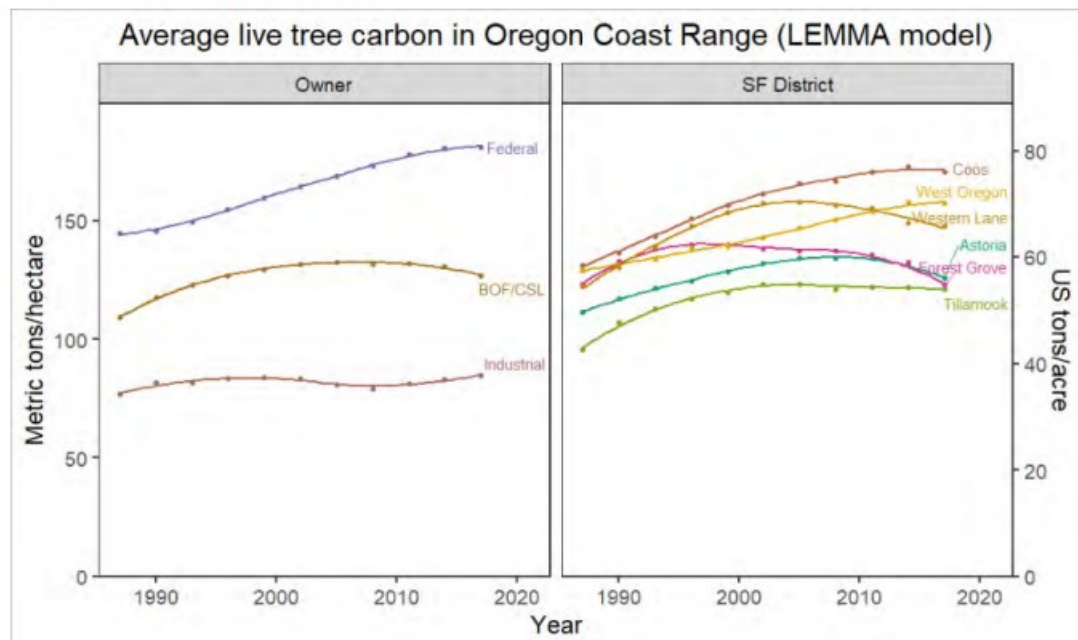
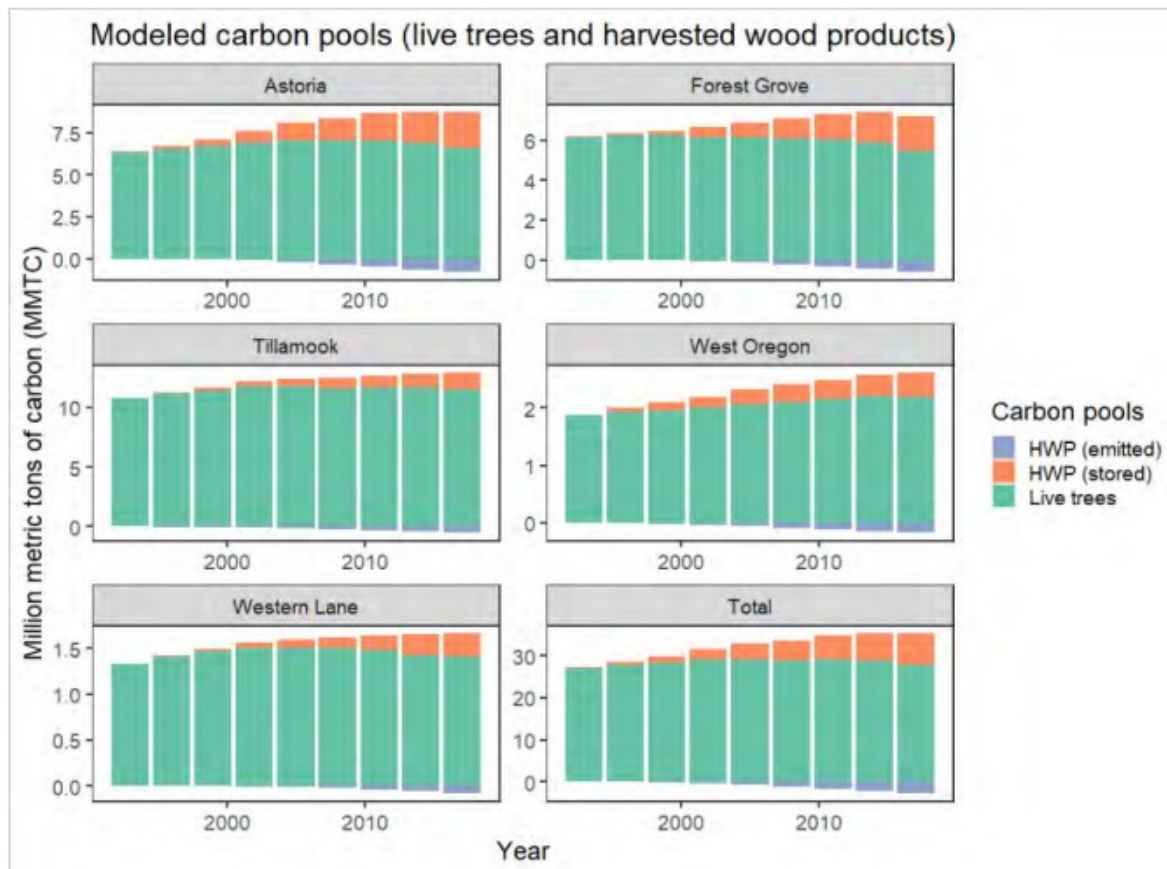


Figure 3. Trends in carbon pools stored in live trees and harvested wood products (HWP) from State Forests within the Oregon Coast Range region. Results are shown from every third year, but pools are cumulative. Note different scales on the y-axes for each District.



It appears that the Board did not make a decision on this proposal. I have not seen these measures reported since. State Forests Division Chief Mike Wilson did provide a commentary on these graphs at the [Board meeting on June 8, 2022](#) (see the [Board handouts, pages 1-3](#)). But obviously ODF can produce carbon storage trends. I like these graphs and am in favor of adopting them. I think a simple target of increasing trends would be adequate for now. I like the per-district graphs above and would favor including these in district Implementation Plans and Annual Operation Plans in order to promote carbon-aware implementation and operations planning.

ODF also provided modeled trends for carbon storage and sequestration in the [Draft Forest Management Plan Performance Measures](#) presented at the [November 18, 2025 Board meeting](#). That presentation included these graphs:

Figure A6: Modeled carbon storage in aboveground live trees over 150 years.

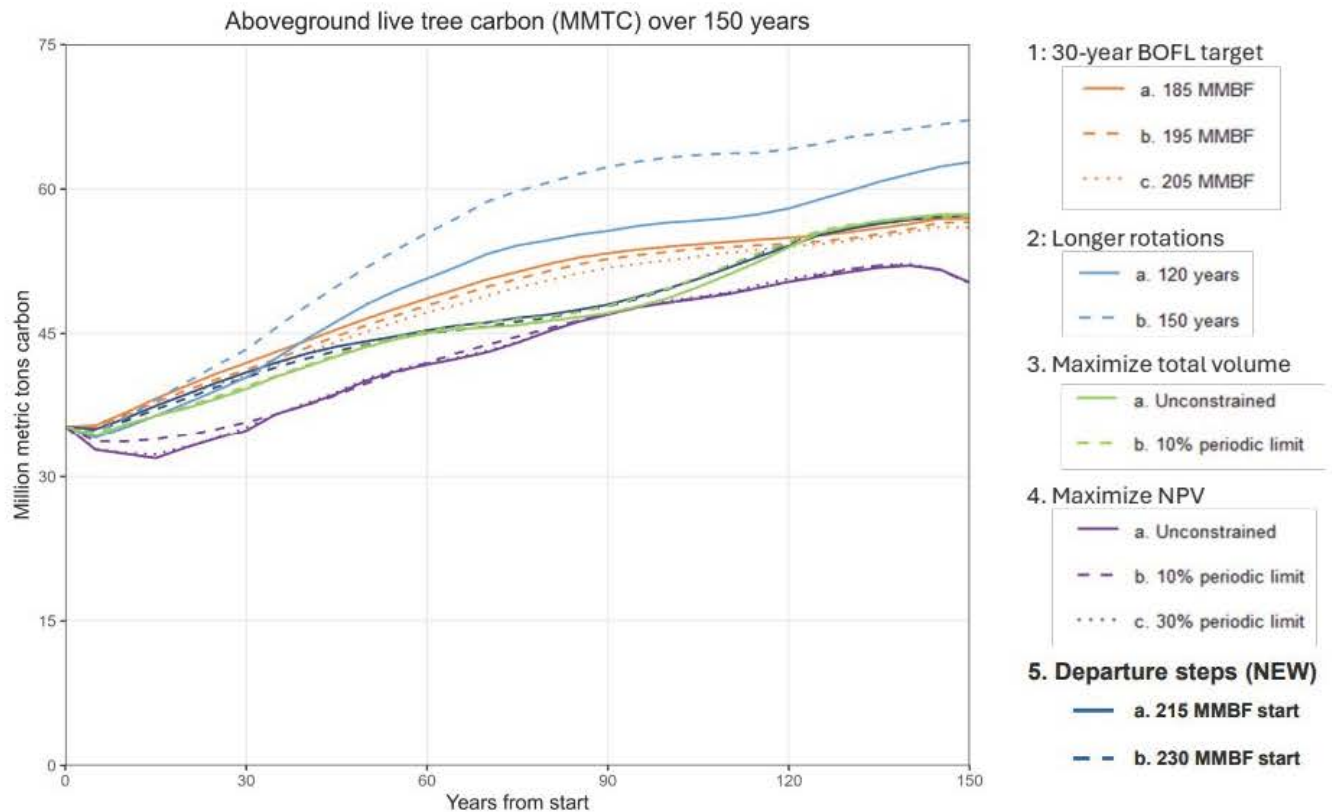
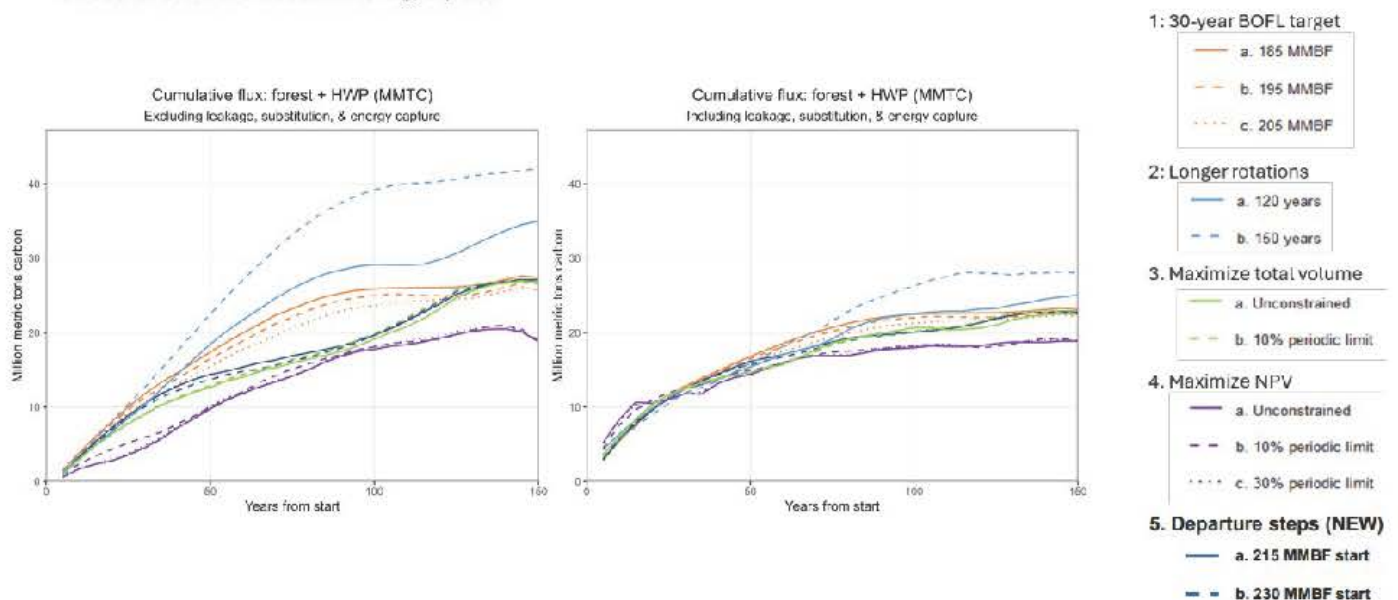


Figure A7: Different assumptions affect modeled carbon sequestration (flux).

Carbon pools include forest (live trees aboveground & belowground) and harvested wood products (HWP) (in use, landfill, & decomposition) over 150 years. Left graph shows results without additional assumptions. Right graph shows same results with half credit for forest carbon due to leakage, double credit to HWP in use due to substitution, and half the emissions from HWP excluded with energy capture.



In the case of carbon sequestration, I think that ODF should work with the [OCAC Natural and Working Lands Advisory Committee](#) to calculate a target based on OCAC's recently approved [Natural and Working Lands Net Carbon Sequestration Goals](#). ODF's [Climate Change and Carbon Plan \(CCCP\)](#) states that "The Department will lead by example and demonstrate climate-smart forest management on State Forests to achieve adaptation, mitigation, and the achievement of forest resource goals. This concept will be incorporated into the State Forests Management Plans (FMPs)," (page 23). Also that OCAC "has been directed to develop goals related to climate change and natural and working lands. These goals should be used to guide the Department as it works to implement programs aimed at reducing greenhouse-gas emissions and carbon sequestration projects," (page 31). So it makes sense for ODF to work with OCAC to calculate an appropriate state forest contribution to meeting the OCAC Natural and Working Lands Net Carbon Sequestration Goals.

Finally, it has been several years since the Board has received an update on ODF's [Forest Carbon Accounting](#) program. With a relatively new State Forester and three new Board members, I feel that an update would be useful. This update should include the status of ODF's Enhanced Forest Inventory (EFI) system, an assessment of any impact or risk to the [USFS Forest Inventory Analysis \(FIA\)](#) program due to the ongoing USFS reorganization, and details of ODF's plan to collaborate with OCAC on biennial updates to the [Land-Based Net Carbon Inventory](#) report.

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

Respectfully,

Scott Killops

350PDX Forest Defense Team Member

Attachment

Public Comment for the Board of Forestry Retreat on February 4-5, 2026
Request for an ODF Forest Carbon Accounting Update to the Board

References

Oregon Department of Forestry (ODF) References

[ODF Climate Change Web Page](#)

[ODF Climate Change and Carbon Plan \(2021\)](#)

[ODF Forest Carbon Accounting Web Page](#)

[Oregon Forest Ecosystem Carbon Inventory \(2019\)](#)

[Oregon Forest Ecosystem Carbon Inventory – 2021 Monitoring Coda \(Presentation, 2024\)](#)

[Oregon Harvested Wood Products Carbon Inventory 1906 – 2018 \(2022\)](#)

Oregon Climate Action Commission (OCAC) References

[Oregon Climate Action Commission](#)

[Natural and Working Lands Advisory Committee](#)

[Oregon Establishes Natural and Working Lands Net Carbon Sequestration Goals – Blog post August 4, 2026](#)

[Goal Setting for Natural and Working Lands Report – July 14, 2026](#)

[Land-Based Net Carbon Inventory Report – December 31, 2025](#)

[Forest Carbon Accounting Project](#)

[Forest Carbon Accounting Project Report – November 2018](#)

Board of Forestry (BOF) Meeting Presentations Related to Forest Carbon Accounting

BOF Meeting on 2026-09-09

Western Oregon State Forests Management Plan Performance Measures

[Text](#), [Presentation](#)

BOF Meeting on 2026-03-04

Performance Measures for Western Oregon State Forests

[Text](#), [Presentation](#)

BOF Meeting on 2025-11-18

Draft Forest Management Plan Performance Measures – Includes modeled carbon storage and sequestration for five FMP scenarios

[Western Oregon State Forests Draft Forest Management Plan Scenarios](#)

BOF Meeting on 2023-03-08

Sightline Institute: Long Rotational Forestry Discussion

[Long Timber Harvest Rotations – Methodology, Results, and Policy Considerations \(text\)](#)

[Long Timber Harvest Rotations – Methodology, Results, and Policy Considerations \(presentation\)](#)

BOF Meeting on 2022-09-07

State Forests Carbon and Inventory – Includes Enhanced Forest Inventory (EFI) Update

[Meeting Packet \(pages 137-150\)](#)

BOF Meeting on 2022-06-08

Mike Wilson Comments on Carbon Trends in Oregon State Forests – [Meeting Handouts \(pages 1-3\)](#)

Pacific Coast Forest Carbon: Estimating Regional Carbon Stocks and Flux – [Meeting Handouts \(pages 89-130\)](#)

BOF Meeting on 2021-11-03

State Forests Performance Measures Update – Includes Draft Carbon Storage Measure

[Board Packet \(FMP PMs on pages 188-199, Carbon Storage on pages 190-194\)](#)

[Meeting Presentations \(FMP PMs on pages 97-110, Carbon Storage on pages 102-106\)](#)

BOF Meeting on 2021-03-03

Oregon Global Warming Commission Natural and Working Lands Emissions Reduction and Sequestration
Goal Setting Update

[Meeting Agenda \(pages 124-125\)](#)

[Meeting Handouts \(pages 227-236\)](#)

BOF Meeting on 2020-11-04

Oregon Forest Accounting Framework

[Meeting Agenda \(pages 148-151\)](#)

[Meeting Handouts \(pages 64-183\)](#)

U.S. Forest Service Research & Development

[Forest Inventory and Analysis \(FIA\)](#)

[Tree Volume, Biomass, and Carbon Models - National Scale Volume and Biomass Estimators \(NSVB\)](#)

Oregon Legislative Reference

[HB3409 \(2023\) – Sections 53 - 67, State Policy for Natural Climate Solutions](#)

To: Oregon Board of Forestry (Board) and Department of Forestry (ODF)
From: Scott Killops
Subject: Public Comment for the Board of Forestry Retreat on February 4-5, 2026
Request for an ODF Forest Carbon Accounting Update to the Board
Date: February 3, 2026

Chair Kelly, Members of the Board, and ODF Staff,

Thank you for your service and for the opportunity to provide a public comment for the [Board of Forestry Retreat on February 4-5, 2026](#). My comment is a request for ODF to present an update on its [Forest Carbon Accounting](#) program to the Board at an upcoming Board meeting in 2026.

The [Performance Measures \(PMs\) for the Western Oregon State Forests Draft Forest Management Plan \(FMP\) Scenarios presented to the Board on November 18, 2025](#), include carbon storage in aboveground live trees and total carbon sequestration in forests and harvested wood products (flux). These carbon storage and sequestration PMs can only be monitored if ODF maintains a capacity for and commitment to forest carbon accounting. It is not clear that ODF has this capacity and commitment.

ODF published an [Oregon Forest Ecosystem Carbon Report \(FECR\)](#) in 2019. The [Climate Change and Carbon Plan \(CCCP\)](#) approved by the Board in November 2021 states that ODF will “continue to produce the Oregon Forest Ecosystem Carbon Inventory Report on a biennial basis” (page 40, but it’s worth reviewing the entirety of the section “Past, Present, and Future Carbon Research” on pages 38-40). However, ODF has failed to produce a single updated FECR since the original. A Forest Carbon Accounting program update should examine the reasons for this failure and what will be done to correct them so that the Board and the public can have confidence that the carbon storage and sequestration PMs for the FMP will be monitored and reported going forward.

Also, ODF produces an annual [Stand Level Inventory \(SLI\)](#) report for Oregon state forests. The SLI does not even include the word carbon. I see no reason why a carbon storage inventory should not be a part of the annual SLI report. A Forest Carbon Accounting program update should examine the barriers so that the ODF executive team can consider steps to remove them.

Finally, as part of implementing [HB3409 \(2023\)](#), the [Oregon Climate Action Commission \(OCAC\)](#) recently published a [Land-based Net Carbon Inventory \(LCI\) | 2025](#). OCAC plans to update the LCI every two years. The LCI section “Roadmap for Inventory Improvement” (pages 36-38) and LCI [Appendix D – Datasets Reviewed for Inventory](#) list several areas for improvement in ODF datasets to improve the quality and completeness of the LCI going forward. A Forest Carbon Accounting program update should articulate ODF’s plans to support the preparation and improvement of future LCIs

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

Respectfully,
Scott Killops
350PDX Forest Defense Team Member