From: Scott Killops <scott.killops@gmail.com>
Sent: Monday, October 26, 2026 6:53 PM
To: FORESTRY Boardof * ODF <boardofforestry@odf.oregon.gov>
Cc: Scott Killops <scott.killops@gmail.com>; KC Kacey * ODF <Kacey.KC@odf.oregon.gov>; FERRARI Chandra Alene * GOV <Chandra.Alene.Ferrari@oregon.gov>
Subject: Public Comment for BOF Retreat 10/26/2026 - ODF Strategic Plan

Hi Board of Forestry,

Attached is a public comment for the Board of Forestry Retreat scheduled for October 26-28. This comment is in regard to the Board's and State Forester KC's discussion of ODF strategic planning that occurred during the Vision for Oregon's Forests overview this afternoon. Details are contained in the attached PDF file.

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 Retreat on October 26-28, 2026
ODF Strategic Plan

Date: October 26, 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 Retreat on October 26-28*. My comment regards the discussion of strategic planning that the Board and State Forester KC engaged in during the *Vision for Oregon's Forests* overview this afternoon.

I was encouraged by the discussion of a plan to create an ODF strategic plan, but I was surprised that no one mentioned that this is not just good management practice, it is also one of Governor Tina Kotek's *Oregon Agency Expectations*. Under *Strategic Planning (due COB June 1, 2026)* the Department of Administrative Services (DAS) has provided an *Agency Strategic Plan Outline*, *Review Criteria for Agency Strategic Plans*, a set of *Strategic Planning Resources*, and Procurement Documents for Hiring a Strategic Planning Vendor.

Regarding the Board's brief discussion of other examples of strategic plans, the *Forestry Program for Oregon – 2011 Edition* is still available on the ODF *About the Board of Forestry* web page. All current Oregon agency strategic plans are linked on the *Oregon Transparency – Strategic Planning* web page. The *DAS Strategic Plan 2024-2027* is a good example. The *Strategic Planning at DAS* web page also provides good examples of quarterly progress reports.

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 <scott.killops@gmail.com>
Sent: Wednesday, October 28, 2026 6:45 PM
To: FORESTRY Boardof * ODF <boardofforestry@odf.oregon.gov>
Cc: Scott Killops <scott.killops@gmail.com>; KC Kacey * ODF <Kacey.KC@odf.oregon.gov>; FERRARI Chandra Alene * GOV <Chandra.Alene.Ferrari@oregon.gov>
Subject: Public Comment for BOF Retreat 10/26-28/2026 - KPMs and APPR in BWP

Hi Board of Forestry,

Attached is a public comment for the Board of Forestry Retreat held on October 26-28. This comment addresses the Key Performance Measures (KPMs) and Annual Performance Progress Report (APPR) line items the Board of Forestry Work Plan (BWP) Details are contained in the attached PDF file.

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 Retreat on October 26-28, 2026
Board of Forestry Work Plan for 2027-28: Key Performance Measures and Annual Performance Progress Report

Date: October 28, 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 Retreat on October 26-28*. My comment regards the Key Performance Measures (KPMs) and Annual Performance Progress Report (APPR) line items in the *Board of Forestry Work Plan for 2027-28 (Board Work Plan)*.

The "Annual Performance Progress Report provided to the Board before submittal to LFO and CFO" line item is listed for the Board's September meeting each year as "C – Info". The Key explains that "C - Info = Consent - Informational Briefing, No Decision Made & No Agenda Time". I would like to point out that when items are placed on the Board's Consent Agenda, not only does the Board not discuss them, but the Board does not accept public testimony regarding them. Regarding the APPR, *each year since 2020* at least 38% of ODF's KPMs were reported as missing their target by at least 15%. Given this, I believe that the Board's annual review of the ODF APPR should be a regular agenda item in which ODF explains the corrective actions they are taking for KPMs "in the red". This would also allow the Board and the public the opportunity to comment on the adequacy of these corrective actions.

The "Recommendations for modification of the KPM's presented to the Board for review and input" line item is listed for the Board's October 2027 meeting as "Discuss". The Key explains that "Discuss = Deliberate Towards Decision at Later Date". There is no decision point indicated for this line item. I would like to remind the Board that *changes to KPMs must be submitted to the Legislative Fiscal Office (LFO) by April 30, 2028*.

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 Meeting on February 4-5, 2026
Key Performance Measures

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

From: Scott Killops

Subject: Public Comment for the Board of Forestry Meeting on February 4-5, 2026
Key Performance Measures

Date: February 1, 2026

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

Thank you for your service and for the opportunity to provide a public comment for the *Board of Forestry Retreat to be held February 4-5, 2026*. My comment regards the Key Performance Measures (KPMs) agenda item.

Context

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

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

KPMs Should Reflect the Agency's Vision and Strategic Plan

KPMs should reflect the agency's vision and strategic plan. The current Board/ODF *Vision for Oregon's Forests (Vision)* contains five priorities:

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

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

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

Comments on Specific KPMs

Climate Leadership

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

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

KPM #10: State Forests North Coast Habitat

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

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

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

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

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

Addressing the Wildfire Crisis and Resilient Communities

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

Reviewing Annual Performance Progress Reports (APPRs)

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

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

Respectfully,
Scott Killops
350PDX Forest Defense Team Member

From: Scott Killops <scott.killops@gmail.com>
Sent: Thursday, October 22, 2026 5:30 AM
To: FORESTRY Boardof * ODF <boardofforestry@odf.oregon.gov>
Cc: Scott Killops <scott.killops@gmail.com>; KC Kacey * ODF <Kacey.KC@odf.oregon.gov>; FERRARI Chandra Alene * GOV <Chandra.Alene.Ferrari@oregon.gov>
Subject: Public Comment for BOF Retreat 10/26/2026 - Climate Leadership Omissions in BWP

Hi Board of Forestry,

Attached is a public comment for the Board of Forestry Retreat scheduled for October 26-28. This comment addresses climate leadership omissions in the Board of Forestry Work Plan being presented by ODF on October 28. Details are contained in the attached PDF file.

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 Retreat on October 26-28, 2026
Climate Leadership Omissions in the Board Work Plan for 2027-28

Date: October 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 Retreat on October 26-28*. My comment regards the omission of climate leadership topics in the *Board of Forestry Work Plan for 2027-28 (Board Work Plan)*.

The Board/ODF *Vision for Oregon's Forests (Vision)* includes the priority "Climate Leadership" with the goal "The Board and Department will build capacity for climate-smart leadership." However, the *Board Work Plan* contains only one topic related to climate leadership, the "Climate-Smart Forestry Awards". This is inadequate to realize the Board/ODF's climate leadership goal. I believe that the *Board Work Plan* should include at least these additional topics:

- Annual implementation updates for the *ODF 2026-2029 Executive Order 25-26 Climate Resilience Work Plan*.
- Annual implementation updates for the *ODF Climate Change and Carbon Plan*.
- Annual implementation updates for the *Forestry Natural Climate Solutions Fund (FNCSF)*.
- At least one update on the ODF *Forest Carbon Accounting* program.
- ODF's 5-year revision of the ODF *Climate Change and Carbon Plan (CCCP)*

Governor Kotek's *EO 25-26* requires each of Oregon's natural resource agencies to "develop (or incorporate into an existing planning process) a biennial plan that includes targets and metrics appropriate to the agency's intersection with this Order". Also to "immediately begin developing implementation timelines and pathways to comply with this Order", i.e., to create an implementation work plan. ODF is presenting its initial *ODF 2026-2029 Executive Order 25-26 Climate Resilience Work Plan* at this Board Retreat. The *Board Work Plan* should include an annual implementation update for the EO 25-26 work plan in order to track progress and to address any implementation issues that arise.

The ODF *Climate Change and Carbon Plan (CCCP)* was approved by the Board on November 3, 2021. Since then there have been only two implementation updates to the Board. Both were vague and one indicated that some goals are now unachievable (see slide #46 in *20241017-bof-meeting-materials.pdf* and slides #7-8 in *20250108-bof-record-item-14.pdf*). ODF should present an annual CCCP implementation update to the Board that includes the status for each of the eight CCCP goals and fourteen CCCP supporting actions.

ODF is collaborating with the *Oregon Climate Action Commission (OCAC)* on implementation of *HB3409 (2023) Sections 53-67, State Policy for Natural Climate Solutions*. This includes implementation and allocation of the Natural & Working Lands Fund (NWLF) and the Forestry Natural Climate Solutions Fund (FNCSF). OCAC produces a *Natural & Working Lands Fund Annual Report* each September with ODF

input regarding the FNCSF. The Board should solicit an ODF update at the September or October Board meetings to review ODF's progress and results in administering the FNCSF.

Forest Carbon Accounting is foundational to ODF's climate leadership goal. However, ODF has not produced an update to the *Oregon Forest Ecosystem Carbon Inventory: 2001-2016 (FECR)* since its initial release in 2019. The Board should solicit an ODF update on the *Forest Carbon Accounting* program in order to examine barriers to producing FECR updates.

The ODF *Climate Change and Carbon Plan (CCCP)* was approved by the Board on November 3, 2021. The "Revision Timeline" section of the *CCCP* (page 19) states, "It is important that this plan be revisited and updated every five years to ensure that the research and monitoring portions are consistent with current science and climate impacts and projections as well as being able to capture the work that is accomplished." This implies that ODF will revise the *CCCP* during the 2-year scope of the *Board Work Plan*. The *Board Work Plan* should therefore include a review of the *CCCP* revision.

Finally, the *Board Work Plan* does include a line item for the annual Climate-Smart Forestry Awards (CSFA). However, the CSFA has gone missing since its inaugural award in 2024. The ODF *Climate Change web page* is still soliciting nominations for 2025. The Board should ask ODF what happened to this award.

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 Meeting on January 7, 2026
Request for an ODF Forest Carbon Accounting Update to the Board

Public Comment for the Board of Forestry Meeting on September 9, 2026
OCAC Natural & Working Lands Fund Annual Report for 2026

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

From: Scott Killops

Subject: Public Comment for the Board of Forestry Meeting on January 7, 2026
Request for an ODF Forest Carbon Accounting Update to the Board

Date: January 21, 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 Meeting held on January 7, 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

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).