



extensive monitoring program that ODF once had is now much diminished, and ODF has returned to reporting on activities rather than on performance measures, presumably due to lower staffing.

Given that ODF faces financial challenges in part because of high staffing costs, we think it unwise that an expansive monitoring program should be the premise of a new plan.

As we have reminded you at earlier Board meetings, ODF is now cutting at record levels and with high timber prices, and yet they continue to project financial hardship. Formal direction from the state forester has prioritized high-value clearcuts over forest operations that represent an investment in the forest. Earlier this year, the state forester approved redesignating 6,000 acres of the Clatsop State Forest in order to ensure high harvest levels can be maintained, despite concerns from staff biologists.

As we have stated in the past, we do not see the current Forest Management Plan as a problem. The fundamental problem is that ODF's costs continue to rise rapidly, and despite record revenue they feel pressure to change the plan to weaken conservation commitments.

To solve this problem, we believe ODF should seek to reduce costs, advocate for more revenues or a different way of sharing existing revenues, and set a path for a Forest Land Transfer program that can incrementally disconnect special areas on the state forests from the revenue-generation pressure.

We are eager to work with you on these solutions, but we cannot today support further work on the alternative FMP, given its lack of clarity, apparent increase of discretion to the ODF managers, and lack of increased conservation. Thank you for your time.