



To: Chair Kelly, Members of the Oregon Board of Forestry  
Cc: State Forester Mukumoto, State Forest Division Chief Michael Wilson  
From: State Forest Coalition Groups  
Date: 11/19/2024  
Re: State Forest Annual Report, Climate Plan and Draft Forest Management Plan Scenarios

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Dear Chair Kelly and Members of the Board of Forestry:

On the behalf of the State Forest Coalition member groups, we thank you for managing state forests for the greatest permanent value for all Oregonians and for the opportunity to comment on the Forest Management Plan scenarios.

We encourage the Board of Forestry (Board) to continue to move forward with finalizing the Habitat Conservation Plan for Western Oregon State Forests (HCP), as the best means of complying with the mandatory requirements of the federal Endangered Species Act (ESA). We also support the Board in fully implementing the Climate Change and Carbon Plan (Climate Plan), approved in 2021. The draft Forest Management Plan and its implementation options must include meaningful and measurable progress toward realizing the goals and objectives of the Climate Plan.

### **CFTLC Report for FY 2024**

The Oregon Department of Forestry (ODF) recently issued its Council of Forest Trust Land Counties [Report](#) for Fiscal Year 2024. This is the first report issued since the ODF began implementing the HCP, pending final approval by federal agencies and issuance of Incidental Take Permits in 2026.

The report found that:

- Revenue to the counties from the ODF exceeded the five and ten year averages at \$67,418,781. (Page 3)

- Revenue to Clatsop County exceeded the five and ten year averages at nearly \$26 million. (Page 3)
- Timber harvest was below the five-year average but higher than the previous two years. FY 2024 harvest was 209 million board feet. (Page 2)
- The ODF met or exceeded its projected timber sale and revenue projections for 2024.
- Harvest and revenue are projected to continue at these levels through FY 2027. (These reports do not project beyond three years)

These results demonstrate that the HCP is not currently reducing harvest revenue and likely won't in the next several years according to ODF projections and modeling. It also reinforces that the ODF's short-term projections are accurate. However, reductions in harvest levels and revenue will eventually occur, requiring a restructure of the revenue model for state forests. Our groups support working with the ODF, counties and taxing districts to change the current system of revenue distribution and diversify revenue sources for the ODF and for counties receiving state forest timber revenue.

### **Implementation of the Climate Change and Carbon Plan**

Our coalition continues to be concerned by ODF's failure to meaningfully translate the Climate Plan into management actions on state forests. The Climate Plan<sup>1</sup> directs the ODF to implement the following:

- Incorporate climate change into the Forest Management Planning (FMP) and Implementation Planning (IP) process.
- Implement silvicultural pathways and harvest rotations that increase carbon storage in the forest while maintaining wood fiber flow to the forest products industry.
- Identify areas particularly susceptible to the deleterious effects of climate change and work to conserve them. This includes climate-sensitive habitats, areas of high conservation value, and areas of cultural significance that may become threatened by climate change. This should be done with input from tribal and community-based organizations.
- Restore areas impacted by insect pests and diseases to productive forests through removal of susceptible species and use of site appropriate species.
- **Identify areas that have high carbon storage potential**, especially for those that can provide benefits for threatened and endangered species habitat, water quality, and educational and recreation opportunities for Oregonians. Establish priorities for these areas that include long-term carbon storage.
- **Internal Carbon Pricing Process.** The Department, and specifically the State Forests Division, should work toward setting an internal carbon price for the lands and forests that it manages. Having this information incorporated into future forest management planning and decisions will allow the State Forests Division to implement carbon-smart forestry on the Board of Forestry and Common School Fund forestlands throughout the state.

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<sup>1</sup> Oregon Department of Forestry Climate Change and Carbon Plan, Pages 32-33

We urge the Board to direct the ODF to ensure these measures are included in the FMP and to develop clear performance measures to evaluate their success.

### **Forest Management Plan Timber Harvest Model Scenarios**

The Climate Plan requires incorporation of climate-smart forestry, including mitigation and adaptation measures listed above, into the FMP and IP development processes. The proposed harvest modeling scenarios must include constraints that are consistent with the Climate Plan and its implementation measures.

Coalition members have reviewed the proposed harvest modeling scenarios and offer the following recommendations:

- Eliminate “Run C”, which would average 205 million board feet annually for the first 30 years of the HCP. This is very unlikely to be a realistic target and would be inconsistent with the Climate Plan.
- Constrain the models to prioritize carbon storage in the forest to facilitate a carbon pricing process.
- Prioritize longer logging rotations to increase carbon storage.
- Constrain the modeling to retain all existing stands over 90 years old to maximize carbon storage in the forest.
- Consider eliminating Scenario 4, which would maximize net present value at a 4% discount rate. Optimizing economics may be inconsistent with the Climate Plan and inconsistent with managing state forest for the greatest permanent value.

Thank you for considering these comments.

Sincerely,

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