



The League of Women Voters of Oregon is a 100-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

May 4, 2020

To: Liz F. Dent, State Forest Division Chief, Oregon Department of Forestry
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Re: 2020 Western Oregon State Forest Management Plan (FMP) – **Comments**

The League of Women Voters of Oregon supports the 19 statewide land use goals and policies that promote both conservation and development of land as a natural resource. In addition, we believe that one of government's most important roles is protecting the public's health and safety.

The Forestry Management Plan supports the following LCDC land use goals:

Goal 4 **Forest Lands**

Goal 5 **Natural Resources, Scenic and Historic Areas, and Open Spaces**

Goal 6 **Air, Water and Land Resources Quality**

Goal 7 **Areas Subject to Natural Hazards**

Goal 8 **Recreational Needs**

Goal 9 **Economic Development**

The goals and strategies of the FMP are to achieve a balance among multiple forest resources with the purpose of achieving the greatest permanent value (GPV) to the citizens of the state through a system of integrated management. The LWVOR has reviewed the draft plan recently submitted to the Board of Forestry on April 22nd. We appreciate the opportunity to submit our comments and hope they will be helpful.

General Comment: The Oregon Department of Forestry's ecological approach, adaptive management, modeling, data monitoring and structured decision-making process are great ideas and well presented. The legal mandate and planning levels sections are useful. The intro section is very thorough and provides good background on forestry, but it could be tightened up. 71 pages is a bit too long. The individual resources sections starting on page 21 are far too detailed and unnecessary, such as the current activities, details in the stream, forest pest and disease sections, where a bulleted list would do with a few sentences of main concerns for each. The Economic Resources section on timber is good, especially the graphics on forest types and stands. A clear definition of "stand" is needed up front, however, since if diversity of the species of trees are desired, (as is the trend for wildlife protection), how are the boundaries of a mixed stand defined?

The history of forestry planning section at the end is good to know and is helpful to the general public. We have five other more specific comments.

- 1) At the start of **Chapter 2 -Vision and Guiding Principles** (p. 72), there should be a reference to conforming with the **Land Conservation and Development Commission's** goals mentioned above. <https://www.oregon.gov/lcd/OP/Pages/Goals.aspx>

"Local comprehensive plans must be consistent with the Statewide Planning Goals. Plans are reviewed for such consistency by the state's Land Conservation and Development Commission (LCDC). When

LCDC officially approves a local government's plan, the plan is said to be acknowledged. It then becomes the controlling document for land use in the area covered by that plan.

“Oregon's planning laws apply not only to local governments but also to special districts and state agencies. The laws strongly emphasize coordination -- keeping plans and programs consistent with each other, with the goals, as statutes are updated, and with acknowledged local plans.”

Mentioning the Goals listed above would put the plan in context with the overall land use planning goals for the state, plus Goal 1 Citizen Involvement, which would show that the plans the Forest Management Plan (FMP) and the Habitat Conservation Plan (HCP) are not developed in isolation by the department.

- 2) Forestry Board Member Brenda McComb at the March 4 Board meeting, mentioned being sure that there are criteria about how to prioritize and analyze the competing goals for resources in the modeling spelled out ahead of time in the FMP. We concur. What administrative rules are needed to develop the criteria, especially in regard to climate change? What will drive decision-making?
- 3) We have a number of questions related to implementing the proposed plan. Will you evaluate a plan for a particular part of the state forest based on perhaps the rarity of the ecological niche available for a threatened species, for example, over recreation or timber harvest or a variety of tree species types or maintaining a corridor between parcels? How is the size of the parcels determined? Is there an ordered sequence or weighting of the resource factors or is it based on meeting as many resource goals as possible based on the properties of the forest parcel in question? Currently the plan does not clarify the decision-making process that leads to the Implementation Plan. We know this is extremely complex, but understanding a basic overview of how the models are developed would help answer some of these questions. Page 155 discusses that many models were developed for each district and a “model linkages document” was developed. Is there a link to it with a broad overview for the layman?

Another board member hoped that there would be pros and cons for various concrete options with their associated economic impacts. Perhaps this idea can be included in the Implementation Plan or the Operations Plans. A list of priorities in order of importance that will guide planning decisions should be included.

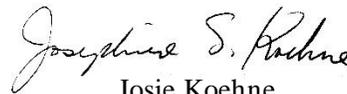
- 4) Climate change is mentioned briefly as Principle 11 in Chapter 2. Pages 4, 55, 56, 62, and 64 of the Intro, the Management Perspective of Chapter 2 mention issues that climate change presents for specific resources in forest management planning. Climate mitigation is also scattered among the ‘Strategies’ and ‘Measurable Outcomes’ sections of the various resource topics in Chapter 3, and as one of the goals under Carbon on page 113. We would suggest that the various ideas for mitigation of the negative impacts of increased temperature and other factors (changes to soils, water, ocean, etc.) be consolidated into one additional “Climate” section and listed together with a bulleted list of possible solutions for mitigation for each resource. Are there plans for a net increase of trees planted along streams over a period of time, or other projects that will help mitigate the effects of a warmer climate? How will increases in Swiss Needle Cast (SNC) and bark beetle infestations be handled other than by planting new or better adaptive species, for example? The goals and measurable outcomes (minimize, maximize or maintain) seem so broadly defined that they seem to be not particularly useful. Has a baseline for each resource been established from which to measure a percentage of increase or decrease over a specified timeframe? That would be a better measurable outcome.
- 5) We believe the following questions should be addressed in the Plan. If funding becomes available, will more trees be planted (and which kinds) to sequester more carbon? Can school class projects and neighborhood and grassroots organizations be asked to help with this work? Can independent university research groups and other organizations be asked to research and make recommendations on other ways to harvest timber on state forest lands with less negative impacts on carbon

sequestration, temperature, wildlife, soil and water resources, such as finding alternatives to clear-cutting and experimenting with selective harvesting? Are there other new practices that could be economically viable for timber operators? The Operators of the Year Awards are a great way to inspire best practices, but it would be nice to know if there are other new ideas outside the timber industry that can be found and experimented with. Can new economic models be found for the harvesting and marketing of timber?

Thank you for considering our comments. We look forward to responses to our questions and appreciate the considerable work that has been done. Having a viable, long term Western Oregon Forest Management Plan is in the best interest of Oregonians.



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LWVOR President



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Please also consider the following suggestion for **Appendix B: Species of Concern**.

The table starts on page 157 and a reader must page to page 168 to find the key for an explanation of the symbols used, which is less than optimal and is difficult to read.

(Note: the key lists SC = State-sensitive – Critical but the symbols used in the chart is SSC and they should match.)

Suggestion: put the key at the top of page 157 directly under the Appendix title and displayed as follows.

Regulatory Status

F = Federal	S = State
FT = Federal Threatened	ST = State Threatened
FE = Federal Endangered	SE = State Endangered
FC = Federal Candidate for Endangered Species Act (ESA) Listing a = Distinct Population Segment north of the Siuslaw River	SSC = State Sensitive – Critical (near extinction)
FSCO = Federal Species of Concern	SSV = State Species - Vulnerable
FPA = Site Protection under Federal Protection Act/Area?	(Q: Is there a SPA? Are there any STATE sites that the state has delegated for specie protection?)

Geographic Symbols

2016 Oregon Conservation Strategy Ecoregions	State Forest Districts
CR = Coast Range	AST = Astoria
WC = Western Cascades	TL = Tillamook
KM = Klamath Mountains	FG = Forest Grove
WV = Willamette Valley	NC = North Cascade
	WO = West Oregon
	WL = Western Lane (including Coos and SW Units)

X = Species known or presumed to be present

SP = Species range overlap limited to one or few individual scattered parcels