

The League of Women Voters of Oregon, established in 1920, is a 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.

Dec. 23, 2025

To: ODF.SFComments@odf.oregon.gov,

[Oregon Climate Action Commission \(OCAC\), Chair MacDonald](#)

Re: Changes Needed in Draft Western State Forest Management Plan – **Comments**

The League of Women Voters of Oregon (LWVOR) submits the following comments on the Final Draft of Oregon Department of Forestry (ODF)'s **Western Oregon State Forests Management Plan** (FMP), which will provide the management direction for all Board of Forestry Lands for ten years. There are 640,000 acres of state forest lands in Oregon, which include Board of Forestry owned lands (BOFL), the Common School Forest Lands (CSFL) and ODF state forest land west of the crest of the Cascade Range. These lands are just 3% of all Oregon forest land. The plan supersedes and replaces the 2010 Northwest Oregon State Forests Management Plan, the 2011 Elliott State Forest Management Plan, and the 2010 Southwest Oregon State Forest Management Plan.

We base our comments on the national LWV positions on natural resource management: “The League of Women Voters of the United States believes that natural resources should be managed as interrelated parts of life-supporting ecosystems. Resources should be conserved and protected to assure their future availability.” In addition, our positions on climate state: “The League supports climate goals and policies that are consistent with the best-available climate science to ensure a stable climate system for future generations.” Furthermore, the Oregon League believes that “a full accounting of all costs, including cumulative ecological impacts of timber harvests and other forest uses must be considered in forest activity decisions.” This includes planning for future climate impacts for forest resilience and for carbon sequestration and storage so that future generations can meet their own needs [based on Oregon Revised Statute 184.421].

We offer these comments after reviewing the final draft of [the September 2025 Western Oregon State Forests Management Plan](#), as well as the December [2025 Land-Based Net Carbon Inventory](#) produced by the Oregon Dept of Energy (ODOE) and the Oregon Climate Action Commission (OCAC), and [OCAC's 2025 Natural & Working Lands Fund Annual Report](#) presented in September.

BACKGROUND

All three of these documents refer to the enormous role our forests play in reducing CO₂e from the atmosphere by sequestering and storing carbon, especially in mature and old growth trees. Page 6 of the recent [Inventory report](#) states: “Oregon's forests remained a net carbon sink in 2024, removing 58.2 million metric tons of CO₂ equivalent (MMTCO₂e) from the atmosphere annually.” However, the state's forest carbon sequestration capacity has declined from 104.5 MMTCO₂e in 1990, to 58.2 MMTCO₂e over the past 34 years, a nearly 38% decline. This decline in carbon storage in forests happened in spite of the fact that timber harvests were significantly reduced due to the 1994 [Northwest Forest Plan](#), which slashed federal logging by about 90%, and while private harvests' overall volumes plummeted from peak levels (around 8 billion board feet in the mid-80s) to under 4 billion by 2017. Recent severe wildfires have also reduced forestland. Therefore, it is more important than ever that our small patches of state forest lands be protected by ecologically sustainable management to ensure social, economic, and environmental benefits as required by law.

Since the state forests are only 3% of all Oregon forest land, **it is imperative that they continue to be carbon sinks**. If they are over-harvested, these forests will no longer be sustainable for future timber harvest, nor be able to reduce the speed and severity of global warming, nor support the various habitats that endangered species require, nor provide other ecological services which are all part of ODF's charter to provide the Greatest Permanent Value to all Oregonians over time.

The FMP is a high-level document listing 12 management principles, which serve as management guidance for the Habitat Conservation Plan (HCP). Active management is integrated across the landscape guided by resource management “emphasis areas.” The plan has mapped out designated areas for General Stewardship, which means areas approved for logging to raise revenue, and High Value Conservation Areas (HCSs) which include both HCAs which are protected forested areas of different age classes in support terrestrial species and Riparian Conservation Areas (RCAs) that protect fish and other aquatic species.

The FMP does not change the current business model requirement that 98% of state timber sales must finance its own activities on state forest lands, with 63.75% of revenues to be distributed to local counties and taxing districts and the remaining 36.25% of revenue to pay for the management of state forest lands. **These rules are legislative decisions, which we believe could and should be altered if we wish to manage state forests for the greatest permanent value (GPV).**

Although the FMP lists great principles with admirable goals, it appears the FMP prioritizes revenue goals over ecosystem services in Chapter 4.1.1 by outlining what will be prioritized when the ODF budget is limited:

“Funding levels for plan implementation vary with cyclical economic trends. FMP implementation is primarily funded through timber harvest revenues. There may be periods where revenues limit funding. Annual budget instructions for developing fiscal budgets reflect the Forest Development Fund (FDF) balance and the projected FDF balance. The highest level of implementation and investment occurs when the FDF balance exceeds 12 months of operating expenses, and the balance is forecast to be relatively steady or increasing. The lowest level occurs when the FDF balance is less than 6 months of operating expenses, and the balance is forecast to decrease.”

Since federal funding has been cut severely with H.R. 1 tax changes, and since state income revenues tied to it will also be severely cut for years to come unless the legislature makes major changes, Oregon will have little money for agency budgets. This means most likely that the projected decreased revenue will mean that what little funding there is will go to maintaining “core business and to meet legal obligations” with no new investments. Habitat improvements will not happen and ODF will be more dependent than ever on timber harvests. **We think this section needs to be modified so that habitat is assured in the HCAs and RCAs even in years of reduced budget funding.**

In many areas of the General Stewardship area timber can be cut to raise revenue; the maps in Section 2.12 show areas of “regeneration harvest” or areas designated for clearcuts. **We would like to see this kind of clearcut harvesting method be kept to a bare minimum on state forestlands, and that partial and selective cuts or variable density harvesting and patch cuts be the general rule for harvesting timber.** [Scientific research has shown](#) that plantation clearcuts tend to increase wildfire severity, and extreme heat from these fires can harm soils thereby reducing productivity, while often decreasing stream flow and quality within the watershed, which is counterproductive to other management goals.

We would also like to point out several omissions in the FMP. Section 3.1 talks about tree stand age classes with 45% of state forest lands in the 50 to 79 years old range. Approximately 87% of state forest land stands are less than 80 years old with a very small percentage of mature and old growth trees. **The FMP should state explicitly that it will manage to increase the percentages of the mature and old growth age classes by limiting their harvest within the planning areas, and should be managed for longer periods between harvest rotations (60-80 years) as is recommended in the Carbon and Climate Change Plan (CCCP).** There is no discussion of a strategy for longer rotations in general

stewardship areas to increase carbon storage. There is no mention of the goal and strategies to increase the proportion of mature and old growth when discussing age classes on page 44. Although Section 3.1.3 mentions that “compared to even-aged stands, forests with uneven-aged stands often support a greater number of species and are more resistant to windfall and insect outbreaks”, there is no mention of a **strategy to replant with mixed species and different aged seedstock or of assisted migration planting after a clear cut, which are climate smart practices that the CCCP embraces**. And there is no discussion of **planting close to slash in heat-stressed areas to preserve and increase moisture when doing regeneration planting after harvest, as is recommended by climate-smart forestry practices**.

In fact, the 3.2.1 **Timber Management** section is especially thin on both goal content and strategic direction, whereas the wildlife goal is complete and includes strategies to attain those goals. **The water and timber strategies are incomplete and should include soil recommendations**, which when soils are healthy, can sequester as much carbon in below-ground biomass as above-ground biomass (see the [Inventory pg.4](#)).

In conclusion, **we wish to see more emphasis in the FMP on managing state forest land to increase ecological services and meet climate goals and less emphasis on economic considerations**.

Thank you for this opportunity to write comments on this Final Draft of the FMP and we hope you will include these suggestions for improvement.



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