

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 January 7, 2026
Premature Rulemaking for the Western Oregon State Forests FMP

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](#). Below I argue that the [Notice of Proposed Rulemaking to Adopt Western Oregon State Forests Management Plan \(FMP\)](#) is premature, because the FMP is incomplete.

At the [Board meeting on September 6, 2023](#), ODF presented a [Forest Management Plan \(FMP\), Adaptive Management Plan \(AMP\), and Performance Measures \(PMs\) Update](#). The update included ten draft FMP PMs:

- Adaptive Capacity of Forests
- Aquatic Habitat
- Carbon Storage
- Community Engagement and Public Support
- Division Finances
- Economic Opportunities
- Financial Support for Counties
- Harvest and Inventory
- Recreation, Education, and Interpretation Opportunities
- Terrestrial Habitat

The draft PMs included many metrics for several of the PMs, but did not include targets. The associated [presentation for the Board meeting](#) stated (slide #40), “Targets for Performance Measures anticipated to be set in spring 2024 by the Board.” This did not occur.

At the [Board meeting on November 18, 2025](#), ODF presented [Western Oregon State Forests Draft Forest Management Plan Scenarios](#). The scenarios presented included five draft FMP PMs with targets:

- Harvest Volume
- Revenue from Harvests
- Carbon Storage and Sequestration
- Distribution of Management by Stand Age Class
- Habitat for Covered Species

No explanation was provided for why the new set of PMs differed from the earlier set. In a subsequent private email exchange, State Forests Division Chief Mike Wilson said that the new PMs do not replace the earlier draft. However, there has been no public update on ODF's plan to close on a set of FMP PMs and targets with the Board. In any case, the Board did not make a decision at the November 18, 2025 meeting. The [meeting summary](#) states: "The board of forestry did not feel they were given enough information to make a decision on the draft Forest Management Plan at this time."

In the [Western Oregon State Forests Management Plan Information Meeting - January 2026](#) presentation, there is no mention of the AMP, PMs, or FMP scenarios at all. Neither does the FMP draft included in the [Notice of Proposed Rulemaking to Adopt Western Oregon State Forests Management Plan \(FMP\)](#) link to the [draft AMP](#), [draft PMs](#), or ODF proposed [FMP Scenarios](#). It takes a very close observer of ODF and the Board to know that these things exist.

I would argue that without a complete and approved set of FMP PMs with targets, the FMP is not a plan at all. It is simply another layer of [vision document](#). Depending on how ODF and the Board define, prioritize, and balance a complete set of PMs with targets, implementation of the FMP can have profoundly different outcomes. If the public is to have the opportunity for any meaningful input on the direction ODF takes in the management of Western Oregon State Forests, PMs with targets are an essential component of the FMP. I urge the Board and ODF to postpone or extend the FMP comment period and rulemaking process until PMs with targets are included in the public comment process.

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

Respectfully,

Scott Killops

350PDX Forest Defense Team Member

Speak Up For Your State Forests

From Tony Romero <tony.romero@patagonia.com>
via us.advocacymessaging.org

Date Mon 12/8/2025 4:12 PM

To FORESTRY Boardof * ODF <boardof.forestry@odf.oregon.gov>

[You don't often get email from tony.romero@patagonia.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Chair Kelly and Members of the Board of Forestry,

Thank you for supporting the completion of a Habitat Conservation Plan (HCP) for Western Oregon state forests. I'm writing to ask you to continue this work by adopting a new forest management plan for Oregon's state forests. This includes implementing a strong HCP and the Climate Change and Carbon Plan (Climate Plan), adopted by the Board of Forestry in 2021, with proactive measures to address climate change.

The HCP will begin to restore balance to our state forests after decades of clearcuts and over-harvest. The HCP will protect iconic salmon runs, wildlife habitat, recreation, and clean water by limiting or prohibiting timber harvest within established conservation areas. However, the remainder of state forest should not be managed like private industrial forest land with short harvest rotations that maximize revenue.

The new forest management plan must be supported by the best science available, to meet the challenges posed by climate change. This includes increasing protective stream buffers on headwater streams to protect cold clean water for salmon, and implementing the Climate Plan to increase carbon absorption and storage in our state forests. This can be achieved by reducing clearcut timber harvest, protecting existing mature stands of forest, applying ecological forest management practices, and establishing longer rotations between harvest to increase carbon storage.

The HCP and new forest management plan would continue to produce revenue from state forest timber sales to fund the Department of Forestry and county services, but this is an unreliable and unsustainable approach. I support efforts to diversify revenue sources for both the Department of Forestry and local services, to relieve the pressure to over-harvest public forests and provide more stable funding.

Now is the time to stand tall for Oregon's state forests, and for current and future generations, by adopting a strong HCP and a new forest management plan.

Sincerely,

Tony Romero
10310 SE Mill Ct

Portland, OR 97216

tony.romero@patagonia.com

Name	Date Received
Alex Tucker	January 2, 2026
Alicia Kuehn	January 4, 2026
Allan Shiver	January 2, 2026
Amber Freeman	January 2, 2026
Amelia Lamar	January 2, 2026
Amy Lafferty	January 4, 2026
Andrew Steelhammer	January 3, 2026
Anna Clabaugh	January 3, 2026
Barbara Wright	January 2, 2026
Bernadetter Preszler	January 2, 2026
Bryan Moore	January 3, 2026
Carol Chan	January 4, 2026
Carol Koch	January 2, 2026
Christine McKenney	January 4, 2026
CJ Hennserson	January 3, 2026
coleen walter	January 3, 2026
Cynthia Hicks	January 3, 2026
D Helpter	January 4, 2026
Damon Miller	January 3, 2026
David Edwards	January 4, 2026
David Sammons	January 2, 2026
Debbie Newhouse	January 4, 2026
Dion Rodgers	January 3, 2026
Dolores Perez	January 3, 2026
Dyami Wold	January 4, 2026
Elizabeth Edinger	January 3, 2026
Elizabeth Fox	March 19, 2026
Elizabeth Spillman	December 8, 2025
Em Chase	January 2, 2026
Eric Ulrich	January 4, 2026
Gabriel Menard-Oxman	January 3, 2026
Gabriel Menard-Oxman	January 3, 2026
Gail Sabbadini	January 4, 2026
Gene Blackcurn	January 4, 2026
Gina Croft	January 4, 2026
Holly Coleman	January 2, 2026
Jackie Dalke	January 2, 2026
Janee Morely	January 3, 2026
Jeff Omgebrand	January 2, 2026
Jennifer Powers	January 13, 2026
Jenny Chism	December 25, 2025
Jeremy Kerr	January 2, 2026

Jeremy Kerr	January 2, 2026
Jessica Sheil	January 2, 2026
Joan Torok	January 2, 2026
John Robinson	January 4, 2026
Jonathan Greenwood	December 25, 2025
Joseph Hayden	January 3, 2026
Judith Underwood	January 3, 2026
Julie Buchenau	January 2, 2026
Justin Terry	January 2, 2026
Karisa Smith	January 2, 2026
Kath Oneil	January 3, 2026
Katherine Gallagher	January 2, 2026
Kathleen Roche	January 2, 2026
Kathleen Rutecki	January 4, 2026
Kathryn Cleland-Sipfle	January 3, 2026
Kelley Lanspa	December 29, 2025
Kelly Tanguay	January 3, 2026
Ken Molz	January 3, 2026
Kenneth Ball	January 4, 2026
Kim Craig	January 2, 2026
Kim Hartley-Arambula	January 4, 2026
Kimberly Rinkes	January 3, 2026
Kristofer Kloehn	January 5, 2026
L DeMille	January 3, 2026
Laura Wilkeson	January 3, 2026
Laurel McAfee	January 2, 2026
Laurel Serdehely	January 3, 2026
Liam McGovern	January 2, 2026
Linda Lee	January 4, 2026
Linda Moredock	January 2, 2026
Lora Mesiner	January 2, 2026
Lora Mesiner	January 2, 2026
Lorraine Patterson	January 4, 2026
Lynn Sharp	January 3, 2026
Maggie Jones	January 2, 2026
Maggie Jones	January 2, 2026
Marie Wakefield	January 8, 2026
Mark Hurchinson	January 5, 2026
Mary Jo Mann	January 28, 2026
Matt Kat	January 4, 2026
Mellisa Kelley	January 3, 2026
Michelle Deaderick	January 2, 2026
Netha Lester	January 3, 2026
Phil Zulfer	January 2, 2026

Phil Zulfer	January 2, 2026
Rex Verley	January 2, 2026
Rhonda Rennels	January 3, 2026
Roxanne Magnuson	December 25, 2025
Sandra Elliott	January 4, 2026
Sarah Weichold	January 3, 2026
Shana Witham	January 3, 2026
Shanoon Merill	January 3, 2026
Shariah Dixon	January 2, 2026
Shelley Hart	January 2, 2026
Stacy James	January 3, 2026
Steve Munson	January 4, 2026
Steven Dalcin	January 2, 2026
Steven Sirianni	January 3, 2026
Steven Trotter	March 19, 2026
Susan Hartford	January 2, 2026
Susan Mill	January 2, 2026
sydney Jordan	January 2, 2026
Tammara Peyron	January 3, 2026
Ted Kelley	January 4, 2026
Timothy Loftus	January 2, 2026
Tony Romero	December 8, 2025
Tora Benochea	January 3, 2026