



**SUMMARY OF RECOMMENDED AMENDMENTS TO THE DRAFT FINAL OREGON STATE
FORESTS MANAGEMENT PLAN
Submitted by the State Forest Coalition
June 30, 2026**

(Deleted parts have strikethroughs. The new language is bracketed and bold.)

Principle 3 — Revenue: (Page 4)

Recommendation: Delete this principle, or delete “sufficient” and “ensure ODF’s ability.”

Amended Principle 3: The FMP will provide ~~sufficient~~ revenue to ~~ensure ODF’s ability~~ manage, conserve, and invest in the forest in order to provide GPV.

Principle 8—Legal and Regulatory Compliance: (Page 6)

Recommendation: Add the following sentence: **[FMP and its implementation measures shall comply with all plans, policies and performance measures adopted by the Oregon Board of Forestry, key performance measures adopted by the state legislature, and executive orders issued by the governor.]**

New Principle: [Best Available Science] (Page 7)

Recommendation: Add a new principle requiring consistency with the best available science, OAR 629.035.030(1):

[The FMP and all of its implementation measures shall be based upon and consistent with the best available science and include descriptions of the scientific basis for the plan’s goals, strategies and implementation measures.]

New Principle: [Properly functioning aquatic and wildlife habitats:] (Page7))

Recommendation: Add a principle requiring properly functioning aquatic and wildlife habitats.

[The FMP shall include specific goals and strategies requiring management of forest conditions to result in a high probability of maintaining and restoring properly functioning aquatic habitats for salmonids, and other native fish and aquatic life, and protecting, maintaining, and enhancing native wildlife habitats, recognizing that forests are dynamic and that the quantity and quality of habitats for species will change geographically and over time.] OAR 629-035-0030 (30(b)(B)

Strategy: Sustainable Harvest (Page 41)

Recommendations: Amend the Timber Harvest Objective strategy.

Determine a sustainable harvest objective during IP development **[that is consistent with the FMP goals and strategies, HCP, the principles of ecological forest management, the Climate Change and Carbon Plan, and the requirements of OAR 629.035.020-030.]** and ~~complete~~**[C]**omplete this harvest objective with predictable year-to-year timber supply over the life of the IP.

Recommendation: Add a new strategy to establish continuity between the requirements of the current FMP and the new FMP:

New strategy: **[Place a moratorium on harvest of complex layered stands and older forest structure until a minimum of 30% of state forests are in these conditions.]**

Strategy: Silviculture Practices for Stand Management and Development (Page 41)

Recommendations: Add the following strategies:

1. **[Require silvicultural prescriptions in HCAs to be solely for the protection and restoration of suitable habitat for covered species.]**
2. **[Maintain a minimum of 40% of general stewardship areas as dispersal habitat, consistent with the HCP.]**
3. **[Prohibit silvicultural practices in RCAs except as allowed in the HCP.]**
4. **[Reduce reliance on clearcut timber harvest and apply ecological forest management practices.]**

Strategy: Timber Salvage (Page 43)

Recommendation: Amend strategy subpart a. Add a new strategy.

- a. ~~Limit~~ **[Prohibit]** salvage within HCAs and RCAs, **[except for]** ~~to-hazard tree felling~~ **[that is necessary for public safety].**

New strategy: **[Timber salvage shall avoid steep erosion-prone slopes, and retain the largest healthy trees, downed logs and snags for habitat, soil recovery and erosion prevention.]**

Strategy: Transportation Planning (Page 46)

Recommendations: Add a strategy to decommission roads based on steep slopes, likelihood of erosion, slope failure or adverse impacts to sensitive resources. Identify opportunities to consolidate road access. Develop a strategy and priorities to improve

fish passage on existing roads. Decommission roads within HCAs and RCAs and include a schedule and timeline for road decommissioning.

New strategy: [Develop plans and timelines to decommission roads based on steep slopes, likelihood of erosion, slope failure, location within HCA or RCAs or adverse impacts to sensitive resources.]

New strategy: [Identify and prioritize fish passage improvements needed for existing roads.]

Goal: Carbon Sequestration and Storage: (Page 75)

Recommendation: Revise the carbon sequestration and storage goal as follows:

~~“Contribute~~ **[Increase]** carbon sequestration and storage on state forest land ~~and carbon storage in harvested wood products~~ **[by setting sequestration and storage targets and timelines]**.

Strategy: Long-term Carbon Storage: (Page 75)

Recommendations: Amend the carbon storage strategy and add a new sub strategy.

Implement management activities that improve long-term carbon storage in the forest ~~and in harvested wood products.~~

a. Consider **[Increase]** carbon sequestration **[and storage]** as part of IP development. This can be done through modeling changes in carbon pools, both in the forest and in harvested wood products, as part of forest activity planning; restoring underproductive timber stands; and passively managing forests with high carbon storage potential in HCAs and RCAs. **[Increase rotation ages, decrease reliance on clearcutting, retain complex layered and older forest stands, and use biochar to return carbon to forest soils.]**

c. **New strategy: [Establish time-bound carbon sequestration and storage targets and monitor progress toward reaching these targets.]**

Strategy: Carbon Monitoring and Markets (Page 75)

Recommendation: Amend Strategy b. to include a timeline for developing and implementing a carbon offset market program.

b. Where compatible with other forest resource goals, participate in carbon offset markets to diversify revenue streams. Share revenues derived from ODF participation in carbon offset markets or other carbon finance products with county partners

pursuant to ORS 530.110, as described in the Timber Management section. **[Develop a timeline for implementing a carbon market program.]**

Strategy: Aquatic and Riparian Habitat Improvements (Page 84)

Recommendation: Add a new strategy that ensures consistency with the best available science and OAR 629-035-0030 3. (b)(B).¹

g. New strategy: [Require forest management activities to contribute to a high probability of maintaining and restoring properly functioning aquatic habitats for salmonids, and other native fish and aquatic life, and protecting, maintaining, and enhancing native wildlife habitats, based on the best available science.]

Strategy: Headwater Processes (Page 85)

Recommendations: The Strategy for Headwater Processes is lacking in specific, measurable, timebound actions to maintain and enhance headwater processes and, therefore, is inconsistent with OAR 629.035.030.

- a. ~~Support the long-term addition of~~ **[Require IPs to include specific, measurable, timebound actions to increase]** woody debris, coarse and fine sediment, nutrients, and other organic materials to aquatic and riparian ecosystems over time.
- a. ~~Minimize direct~~ **[Prohibit adverse]** impacts from forest management activities.
- c. **[Base decisions on the best available science and]** Acquire greater scientific understanding of rare and endemic species occurrences and habitat use in headwater streams.

Strategy: Water Quality Standards (Page 88)

Recommendation: Amend strategy b. to include road decommissioning as an option.

- b. Improve road and trail system drainage to avoid transporting fine sediments and contaminants from roads and trails to streams. **[Decommission roads where sedimentation or contamination cannot be avoided.]**

¹ OAR 629-035-0030 3. (b)(B) Manage forest conditions to result in a **high probability of maintaining and restoring properly functioning aquatic habitats for salmonids, and other native fish and aquatic life, and protecting, maintaining, and enhancing native wildlife habitats**, recognizing that forests are dynamic and that the quantity and quality of habitats for species will change geographically and over time.

Recommendation: Add the following strategy to ensure that water quality standards are met.

e. **[Evaluate forest management activities and their impacts on stream flows, temperatures and sedimentation, based on the best available science. Modify silviculture practices as necessary to improve water quality.]**

Strategy: Drinking Water: (Page 89)

Recommendation: Add the following strategies to ensure the protection of drinking water sources.

New strategy: [Protect and enhance drinking water sources by phasing out pesticide and herbicide use in drinking watersheds and identifying alternatives. Set timelines for the reduction and elimination of their use.]

New Strategy: [Protect and enhance drinking water by phasing out clearcut timber harvest within drinking watersheds, based on the best available science.]

Goal: Wildlife (Page 94)

Recommendation: Add the following language to the Wildlife goal:

Maintain, protect, and enhance functional and resilient landscapes that provide the variety and quality of habitat types and features necessary for long-term persistence of all native wildlife species-**[and contribute to the recovery of species listed as threatened or endangered under the state and federal ESAs or listed as species of concern including relevant Strategy Species identified in ODFW's State Wildlife Action Plan.]**

Strategy: Habitat Complexity (Page 95)

Recommendation: Amend Strategy subpart c. to say:

Protect, maintain, and enhance legacy structures, including **[mature and]** old-growth trees, **[trees exhibiting habitat characteristics for species dependent on older forests, buffers for old-growth trees]**, retained green trees, snags, and downed wood. Allow exceptions for hazard tree removal for public safety.

Recommendation: Amend Strategy subpart d. ODF should protect all complex layered stands until a minimum of 30% of the forest is in this structure. Update wildlife strategy language to include a commitment to monitoring for complexity in Western Oregon state forests inside and outside of HCAs.

- d. **[Protect all complex layered stands until a minimum of 30% of the forest is in this condition. Maintain a minimum of 30% of forest stands in this condition while continuing to p]**Promote vertical canopy layering where habitat restoration or enhancement are primary concerns.