



DATE: November 25, 2025

TO: Co-Chairs Senator Kate Lieber and Representative Tawna Sanchez and members of the Joint Ways and Means Committee, and Co-Chairs Senator Neron Misslin and Representative Emerson Levy, and members of the Joint Committee on Ways and Means Subcommittee on Natural Resources.

FROM: Bird Alliance of Oregon, Oregon Wild, Trout Unlimited, Wild Salmon Center

RE: **Private Forest Accord Funding at Oregon Department of Forestry (ODF) and Oregon Department of Fish and Wildlife (ODFW)**

Dear Legislators:

On behalf of the undersigned organizations that represent conservation signatories to the Private Forest Accord, we appreciate your consideration of these comments regarding the proposed budget reductions to core Private Forest Accord programs and staff at Oregon Department of Forestry (ODF) and Oregon Department of Fish and Wildlife (ODFW).

In this challenging budget climate, we appreciate your work to navigate these difficult decisions. Oregon's natural resource agencies provide core services to the people of Oregon by protecting clean air, safe drinking water, healthy forests, and resilient landscapes. The changes to Oregon law under the Private Forest Accord represent a significant step forward to better protect ESA-listed salmon and native wildlife, and to improve water quality, while at the same time providing more regulatory certainty for the timber industry.

The following represent our shared priorities to preserve funding for core Private Forest Accord (PFA) Programs that are critical to ensuring that the state is able to secure a federally approved Habitat Conservation Plan (HCP) by December 31, 2027. If an HCP is not finalized and approved by 2027, all of the PFA changes roll back to the previous Oregon Forest Practices Act (OFPA) standards. To ensure that the state is on track for federal approval, investing in these programs and staffing needs will be critical.

#### **1. Proposed Cuts to Private Forest Accord Adaptive Management Program at ODF**

The Oregon Department of Forestry's (ODF) proposes significant cuts to the Private Forest Accord Adaptive Management Program. In total, these cuts would equal the \$3.1M (GF) appropriated to the program for the 2025-2027 budget. This funding directly supports effectiveness monitoring work that is a linchpin of the agreement. It is the mechanism through which the state, as well as both federal agencies (U.S. Fish and Wildlife Service and NOAA) will determine whether the rule changes under the PFA are meeting the biological goals and objectives of the proposed Habitat Conservation Plan (HCP). Without this mechanism in place, it will be difficult to secure a federally approved HCP. If all \$3.1M is cut, this program will have a shortfall of funding to begin work on two effectiveness monitoring projects that the Board of Forestry recently approved in September 2025.<sup>1</sup>

**Our organizations are significantly concerned about the following proposed cuts to the Adaptive Management Program at ODF (total \$3.1M GF):**

- PFA Adaptive Management Program (\$871k GF), no FTE (#1 priority)
- PFA Adaptive Management Program at \$1.3M GF, no FTE (#3 priority)
- PFA Adaptive Management Program at \$924k GF, no FTE (#4 priority)

## **2. Proposed Cuts to Private Forest Accord Program FTE at ODFW**

The proposed cuts to FTE at ODFW will reduce critical PFA program positions that will limit the Department's ability to effectively implement key programs.

**Our organizations are significantly concerned about the following proposed cuts to the following ODFW FTEs:**

- PFA GIS Analyst at \$146,750 GF, 1 FTE eliminated: Eliminating this position would reduce the state's ability to effectively assess determinations of fish presence and fish habitat, which is vital to implementation of the PFA rules. Many of the standards are tied to the stream type based on fish presence. (#15 priority)
- Habitat Division Administrator at \$76,763 GF, 1 FTE eliminated: Eliminating this position would limit ODFW's ability to effectively administer the PFA Grant Program. (#18 priority)
- PFA Beaver Management at \$123,202 GF, 1 FTE eliminated: Eliminating this position would undermine the state's ability to meet the new beaver requirements under the PFA. (#16 priority)
- Habitat Regional Operations at \$158,291 GF, 1 FTE eliminated: Eliminating this position based in southeastern Oregon would limit ODFW's ability to review landowner surveys related to fish presence and streamflow in the region. (#17 priority)

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<sup>1</sup> <https://www.oregon.gov/odf/board/bof/20250903-bof-item-5.pdf>. In September, the Board of Forestry approved \$5.5M for the effectiveness monitoring projects. The proposed \$3.1M budget cut would leave this program \$2.4M short to complete the approved projects.

### **3. Proposed Cuts to PFA Grant Program at ODFW**

ODFW proposes as its third priority for cuts to reduce funding for the PFA Grant Program by \$250,000 (GF). This program provides dedicated funding for stream habitat restoration and other mitigation projects and is an essential component of the PFA HCP. This program is the mitigation program for the HCP, and further reducing funding for this program will make ensuring a federally approvable HCP more difficult. This program requires funding from both the state and the timber industry, and has already provided funding to more than 40 restoration projects statewide. In 2024, the PFA Grant Program awarded \$10.3M and leveraged an additional \$7.7M in matching funds.

**Our organizations are significantly concerned about the following proposed cuts at ODFW:**

- PFA Grant Program at \$250k GF, no FTE (#3 priority)

### **4. Proposed Cuts to SFISH Grant Program for Small Forest Landowners at ODF**

ODF proposes as its fifth priority for cuts to reduce the SFISH grant program for small forestland owners by \$75,000 (GF). In the 2025-2027 biennium, the SFISH program received \$2M (GF), which was an 80% shortfall in funding from the \$10M needed. Funding for this program provides critical support to small forestland owners to improve fish passage under new PFA requirements.

**Our organizations are significantly concerned about the following proposed cuts at ODF:**

- SFISH Program at \$75k GF, no FTE (#5 priority)

We appreciate your consideration of these comments and urge you to keep these programs intact. We look forward to working with you as the state grapples with these difficult budget decisions.

Sincerely,

Joe Liebezeit

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