



# Oregon

Tina Kotek, Governor

## Department of State Lands

775 Summer Street NE, Suite 100

Salem, OR 97301-1279

(503) 986-5200

FAX (503) 378-4844

[www.oregon.gov/dsl](http://www.oregon.gov/dsl)

## State Land Board

Tina Kotek

Governor

## State Land Board

**October 15, 2024**  
**9:30 am – 12:00 pm**  
**Meeting Agenda**

LaVonne Griffin-Valade

Secretary of State

*Public Wi-Fi login: LandsDSL*

Tobias Read

State Treasurer

*This is a hybrid meeting that can be attended in-person at 775 Summer St. NE, Suite 100, Salem, OR 97301-1279 or online through the Department of State Lands' livestream video: [www.youtube.com/@oregonstatelands](https://www.youtube.com/@oregonstatelands)*

### **State Land Board Awards Presentation**

From 9:30 – 10 a.m., the State Land Board will present the annual Land Board Awards to:

- **Stream Award:** The Dalles Dog River Pipeline Replacement
- **Stream Award:** North Fork Walla Walla River Restoration
- **Partnership Award:** Rangeland Program Partners
- **Catalyst Award:** Chad Hoffman, Lane County Public Works

### **CONSENT ITEMS**

1. Request for approval of the minutes of the August 13, 2024, State Land Board Meeting

### **ACTION ITEMS**

2. Elliott State Research Forest – Appointment of the remaining Board Members  
*Public testimony will be accepted on this item.*

*Continued on the next page*

3. Elliott State Research Forest – Adoption of the proposed Forest Management Plan  
*Public testimony will be accepted on this item.*
4. Adoption of the proposed School Lands Asset Management Plan  
*Public testimony will be accepted on this item.*

### **INFORMATIONAL ITEMS**

5. Geologic Carbon Sequestration Presentation by Department of Geology and Mineral Industries  
*No public testimony will be taken on this item.*
6. Other  
*No public testimony will be taken on this item.*

### **WATCH THE MEETING ONLINE**

Meeting video and audio will be livestreamed, and the recording available after the meeting, on the DSL YouTube Channel: [www.youtube.com/@oregonstatelands](https://www.youtube.com/@oregonstatelands)

### **ATTEND IN-PERSON**

This meeting will be held in a facility that is accessible for persons with disabilities. If you need assistance to participate in this meeting due to a disability, please notify Arin Smith at [arin.n.smith@dsl.oregon.gov](mailto:arin.n.smith@dsl.oregon.gov) at least two working days prior to the meeting.

Visitors are **NOT permitted to bring backpacks, bags, or large purses** into the State Lands building prior to, during, or following Land Board meetings. Purses, medical bags, and diaper bags are permitted, but may be subject to inspection by the Oregon State Police.

### **PROVIDE PUBLIC TESTIMONY**

The State Land Board places great value on information received from the public. The public may provide written or spoken (online or in-person) testimony regarding consent and action agenda items, time permitting and at the discretion of the Chair.

- **Providing Written Testimony:** Testimony received by 10 a.m. on the Monday before the meeting will be provided to the Land Board in advance and posted on the meeting website. Submit your input in writing to: [landboard.testimony@dsl.oregon.gov](mailto:landboard.testimony@dsl.oregon.gov). Testimony received after this deadline may not be provided to the Land Board prior to a vote. Please indicate the agenda item your testimony relates to.
- **Providing Spoken Testimony by Video/Phone or In Person:** Advanced sign-up is required for the public to provide spoken testimony (in-person or by Zoom). The sign-up deadline is 10 a.m. the day before the meeting.  
**Please note:** When the number of people interested in speaking exceeds the time allotted for an agenda item, speakers are randomly selected for testimony slots to ensure all have an equal opportunity to testify. Speakers have the same chance of being randomly selected whether they plan to testify in person or by Zoom. The testimony order will be posted to the State Land Board Meetings webpage the day before the meeting, and everyone who signed up to testify will be notified of the testimony order via email. Be aware there may not be time for everyone who signs up to speak.

### **Additional Testimony Information**

- Testimony on action items is taken during the item's presentation, before the Land Board votes. Please review the meeting agenda and be present and prepared to provide testimony at the appropriate time.
- The Board typically accepts testimony on consent and action items only.
- The standard time limit is three minutes for each individual; the actual time available for testimony during Land Board meetings is at the discretion of the Chair.
- The Board may not be able to accept testimony on items for which a formal comment period has closed, such as a rulemaking comment period. The meeting agenda indicates whether testimony will be accepted on an item.



# Oregon

Tina Kotek, Governor

## Department of State Lands

775 Summer Street NE, Suite 100

Salem, OR 97301-1279

(503) 986-5200

FAX (503) 378-4844

[www.oregon.gov/dsl](http://www.oregon.gov/dsl)

## State Land Board

## M E M O R A N D U M

Tina Kotek

Governor

LaVonne Griffin-Valade

Secretary of State

Date: October 15, 2024

To: Governor Tina Kotek  
Secretary of State LaVonne Griffin-Valade  
State Treasurer Tobias Read

Tobias Read

State Treasurer

From: Vicki L. Walker, Director

Subject: The 20<sup>th</sup> Annual State Land Board Awards

### Overview

Every year, the State Land Board honors exceptional projects and partners for their contributions to protecting and enhancing Oregon's treasured natural resources.

Established in 2004, the State Land Board Awards are an annual celebration of Oregonians working together to help lands, waters, and wetlands thrive. To date, more than 45 awards have been presented, recognizing extraordinary efforts in every region of Oregon.

### Land Board Award Winners

Today, in the 20<sup>th</sup> year of the State Land Board Awards, we are presenting two Stream Awards, a Wetland Award, a Catalyst Award, and a Partnership Award.

#### **STREAM AWARD**

##### **The Dalles Dog River Pipeline Replacement**

This project replaced a 112-year-old wooden pipeline that supplies over 50 percent of The Dalles' annual water supply, and did so with voluntary commitment to ensuring fish passage and aquatic habitat protections despite the challenges of a remote site with no electricity and presence of a historic cabin.

## **STREAM AWARD**

### **North Fork Walla Walla River Restoration**

In a top-priority location for watershed restoration, this project took multiple actions for river health, including increasing river flow, reducing water temperature and turbidity, and expanding access to upstream habitat.

## **CATALYST AWARD**

### **Chad Hoffman, Lane County Public Works**

Chad Hoffman oversees Lane County's Quamash Prairie wetland mitigation site – 165 acres of wet prairie, emergent, and scrub shrub wetland that serves as an outdoor classroom for K-12 students. Hoffman leads both stewardship and education efforts, caring for the land and encouraging students to understand and value natural resources.

## **PARTNERSHIP AWARD**

### **Rangeland Program Partners**

More than a dozen community and agency partners support DSL's stewardship of 620,000 school rangeland acres in central and eastern Oregon. These partners secure funding, collaborate with lessees, administer contracts, and help our rangeland team coordinate large, complex projects:

- Harney Soil and Water Conservation District
- Crook County Soil and Water Conservation District
- Malheur County Weed Control
- Malheur County Soil Water Conservation District
- Lake County Soil Water Conservation District
- Jordan Valley Cooperative Weed Management Area
- Harney Cooperative Weed Management Area
- High Desert Partnership
- Pheasants Forever
- Natural Resource Conservation Service
- Owyhee Watershed Council
- US Fish and Wildlife Service
- Oregon Department Fish and Wildlife
- Sage Con
- Harney County Weed Control



# Oregon

Tina Kotek, Governor

## Department of State Lands

775 Summer Street NE, Suite 100

Salem, OR 97301-1279

(503) 986-5200

FAX (503) 378-4844

[www.oregon.gov/dsl](http://www.oregon.gov/dsl)

## State Land Board

Tina Kotek

Governor

The State Land Board (Land Board or Board) met in regular session on August 13, 2024, at the Sough Slough Visitor's Center, 61907 Seven Devils Rd., Charleston, OR 97420. The meeting audio and video was livestreamed on the DSL YouTube channel.

LaVonne Griffin-Valade

Secretary of State

### Present were:

Tina Kotek

Tobias Read

LaVonne Griffin-Valade

Governor

State Treasurer

Secretary of State

Tobias Read

State Treasurer

### Land Board Assistants

Geoff Huntington

Jessica Ventura

Ryan Mann

Governor's Office

Secretary of State's Office

State Treasurer's Office

### Department Staff

Vicki Walker

Arin Smith

Patricia Fox

Bill Ryan

Jean Straight

Katrina Scotto

Ellie Forness

Ali Ryan Hansen

Ted Bright

Linda Safina-Massey

### Department of Justice

Matt DeVore

Governor Kotek called the meeting to order at 11:00 a.m. The topics discussed and the results of those discussions are listed below. To view the Land Board (Board) meeting in its entirety, please visit our YouTube page: [August 13, 2024, Land Board Meeting](#)

### Consent Items

#### 1. Minutes

Treasurer Read made a motion to approve the minutes for the June 11, 2024, Land Board meeting.

Secretary Griffin-Valade seconded the motion.

The item was approved at 11:01 a.m. without objection.

## **Action Items**

### **2. Request to Initiate Rulemaking for Division 141-142: Designating Rocky Shores Habitat.**

Director Walker gave a brief overview of the item and the Department's recommendation that the State Land Board authorize the Department to initiate permanent rulemaking under OAR 141-142 to formally incorporate the new rocky habitat designations identified in Part III of Oregon's Territorial Sea Plan

Secretary Griffin-Valade made a motion to approve the action item.

Treasurer Read seconded the motion.

The item was approved at 11:05 a.m. without objection.

### **3. Fortuna Cannery Pier Hotel: Filled Lands Sale on the Astoria Waterfront**

Director Walker introduced and gave a summary of the item and the Department's recommendation that the State Land Board authorize the direct sale of 0.57 acres of filled land in Clatsop County to Fortuna Cannery, LLC for the negotiated price of \$315,715.00.

Treasurer Read made a motion to approve the action item.

Secretary Griffin-Valade seconded the motion.

The item was approved at 11:10 a.m. without objection.

### **4. RAMSAR Designation of the South Slough National Estuarine Research Reserve: a "Wetland of International Importance"**

Director Walker invited Patricia Fox, Manager of the South Slough National Estuarine Research Reserve (SSNERR), to the table to assist in presenting the item.

The Department recommends the State Land Board authorize the Reserve to apply to become a Ramsar site, which will earn the Reserve the recognition of being a "Wetland of International Importance."

Secretary Griffin-Valade asked what the acronym RAMSAR stands for. Director Walker stated that it is not an acronym, but the name of an Iranian city.

Treasurer Read asked why there are so few RAMSAR sites in the United States. Ms. Fox stated that she expects more states to apply as the application process is fairly easy.

Treasurer Read made a motion to approve the action item.

Secretary Griffin-Valade seconded the motion.

The item was approved at 11:20 a.m. without objection.

## **Informational Item**

### **5. South Slough National Estuarine Research Reserve Annual Report**

Director Walker and Patricia Fox, Manager of the South Slough, remained at the table to give an overview of the annual report which highlights the accomplishments of the Reserve over the last year.

Treasurer Read asked Ms. Fox what the biggest surprises have been during her first six months as the Manager of SSNERR. Ms. Fox stated that her background in owning a small business has helped her in her new position because there are so many events going on and so much coordination and team work needed.

Secretary Griffin-Valade stated that she is very impressed with the report and the reserve itself and thanked Ms. Fox for her work.

Governor Kotek asked Ms. Fox to elaborate on the invasive green crab problem. Ms. Fox stated that as of now they are just in the process of trying to learn more about them and their life cycle and why they tend to be more abundant in some areas than in others.

Treasurer Read asked what the priorities are for SSNERR over the next year. Ms. Fox stated that they will be focusing on eel grass and increasing its habitat and also continuing work on the WASSON restoration area.

### **6. DSL Strategic Plan Annual Report**

11:42 a.m.

Director Walker introduced Ali Ryan-Hansen, DSL's Communications Director, who presented information on the progress towards meeting the Strategic Plan goals. This included a review of the objectives and explanation of how they are measured.

Treasurer Read asked for clarification as to why the goal of the key performance measure "Percent of South Slough National Estuarine Research Reserve operations funded from non-Common School Fund sources" has a target of 25% rather than 100%. Director Walker asked Jean Straight, Deputy Director of Administration, to join her at the table to assist in answering the Treasurer's question.

Ms. Straight stated that the goal is for it to be 100%, but the 25% target is in line with other grant programs that are matched at 25% federally.

Governor Kotek asked what the agency's most active social media account is and the response was that it is Instagram.

## 7. Other

Director Walker gave a quick update on the Abandoned and Derelict Vessel Program and the most recent vessel to be removed being the El Conquistador in Empire.

Finally, Director Walker gave an overview of what Geologic Carbon Sequestration is and why it is important and a possible revenue source for the Common School Fund.

A more in-depth presentation on Geologic Carbon Sequestration will be presented at the October Land Board meeting.

The meeting was adjourned at 12:26 p.m.

---

Tina Koteck, Governor

---

Vicki L. Walker, Director



# Oregon

Tina Kotek, Governor

## Department of State Lands

775 Summer Street NE, Suite 100

Salem, OR 97301-1279

(503) 986-5200

FAX (503) 378-4844

[www.oregon.gov/dsl](http://www.oregon.gov/dsl)

## State Land Board

## State Land Board

### Regular Meeting

October 15, 2024

### Agenda Item 2

Tina Kotek

Governor

LaVonne Griffin-Valade

Secretary of State

Tobias Read

State Treasurer

### **SUBJECT**

Elliott State Research Forest Board of Directors appointments

### **ISSUE**

Whether the State Land Board should appoint the candidates presented by the Department as the remaining three voting members of the Elliott State Research Forest Board of Directors.

### **AUTHORITY**

- Oregon Constitution, Article VIII, Section 5, specifies the State Land Board is responsible for managing lands placed under their jurisdiction by law.
- ORS 273.045; authorizing the Department of State Lands to exercise the administrative functions of the State Land Board.
- ORS 530.450 to ORS 530.520; authority for management of the Elliott State Forest.

### **BACKGROUND**

At its April 9, 2024, meeting, the State Land Board adopted a formal oversight structure of the Elliott State Research Forest (ESRF) to ensure public transparency, accountability, and oversight in the administration of the program. This oversight structure included the creation of a new ESRF Board of Directors (ESRF Board) and related roles and responsibilities (see Appendix B).

The ESRF Board may consist of seven or nine voting members, to be appointed by the Land Board, as well as one non-voting member designated by the lead research entity for the Elliott (to be determined). At its June 11, 2024, meeting, the Land Board appointed six initial members and stated the intention to appoint three additional members at its October 2024 meeting.

The oversight structure for the research forest commits the Land Board to strive to appoint members reflecting a full complement of relevant experience or expertise in subjects related to the mission, management policies, and operations of the Elliott State Research Forest as well as a demonstrated interest in the success of the program.

The DSL Director has provided a list of three candidates for Land Board consideration (Appendix A). This candidate list was developed based on the recruitment process below with an intention to achieve a full complement of relevant and experience that is not otherwise represented by the Land Board's initial six appointments. This includes individuals associated with forest operations, forest products, research, and Tribes.

### **PUBLIC OUTREACH**

From April through May 2024 the Department accepted letters of interest from the public to serve on the Elliott State Research Forest Board. The announcement was featured on the Department's website, as well as distributed through mailing lists, a news release, and social media posts. The Department also conducted direct outreach to and through the Elliott State Research Forest Advisory Group members, Tribal staff, Land Board offices, and other partners. Direct outreach was renewed, following the June appointment of the first six voting members of the Board, to fill the remaining three seats.

### **RECOMMENDATION**

The Department recommends the State Land Board appoint the remaining three voting members of the ESRF Board of Directors from the Department's candidate list (Appendix A).

### **APPENDIX**

- A. ESRF Board: Current Members and Proposed Candidates for New Appointments
- B. Elliott State Research Forest: Oversight Structure

**APPENDIX A**

**Elliott State Research Forest Board Appointments:  
DSL-Proposed Candidates**

<b>Name</b>	<b>Location</b>	<b>Board Seat</b>	<b>Term</b>	<b>Appointed by the State Land Board</b>
<b>Keith Tymchuck</b>	Reedsport	1	3 years	June 11, 2024
<b>Bob Sallinger</b>	Portland	2	3 years	June 11, 2024
<b>Mike Kennedy</b>	Siletz	3	3 years	June 11, 2024
<b>Melissa Cribbins</b>	Coos Bay	4	2 years	June 11, 2024
<b>Peter Hayes</b>	Portland	5	2 years	June 11, 2024
<b>Haley Lutz</b>	Coos Bay	6	1 year	June 11, 2024
<b>Payton Smith</b>	Coos Bay	7	1 year	<i>Proposed on October 15, 2024</i>
<b>Mike Wilson</b>	Dallas	8	1 year	<i>Proposed on October 15, 2024</i>
<b>Jennifer Allen</b>	Portland	9	2 years	<i>Proposed on October 15, 2024</i>

## **Proposed Candidates Bios: October 15, 2024**

### **PAYTON SMITH**

Born and raised in North Bend, Payton Smith spent much of her youth growing up on the Elliott. After graduating from college at the University of Oregon, she worked for Roseburg Forest Products in Springfield before moving home to Coos Bay. Payton serves as the Director of Communications and Government Affairs for Southport Lumber. Her job connects her with South Coast community and economic vitality efforts in many ways. She also on the South Coast. She also serves on the board of directors for the Judith Ann Mogan Foundation as well as the Boys and Girls Club of Southwestern Oregon.

### **MICHAEL WILSON**

Michael Wilson served as the Natural Resource Department Director for the Grand Ronde Tribe (now retired), where he managed forestry and Indigenous stewardship approaches and programs on the Tribe's forestlands. He has also served on many state and federal committees and planning efforts where he has engaged in forest policy and tribal representation. Currently he serves as a board member of the Oregon Agricultural Trust and Board Chair of the Polk Soil and Water Conservation District. Mike is a Grand Ronde Tribal member and brings valuable knowledge and experience of tribal forest operations and management. He continues to work on several projects that promote tribal rights and representation. Mike worked and recreated around the Elliott early in his career and worked as part of representation of Grand Ronde Tribal interests in the original Elliott advisory committee. Mike holds an MBA from George Fox University and Business/Environmental Studies from Linfield College.

### **JENNIFER ALLEN**

Jennifer Allen recently retired from Portland State University, where she was the Portland Professor of Environment and Natural Resources in the Mark O. Hatfield School of Government; she previously served as director of PSU's Institute for Sustainable Solutions. Jennifer served on the prospective board for the Elliott State Research Forest and chaired the Science Advisory Panel associated with earlier ESRF development efforts. She has also served as a commissioner and chair on the Oregon State Parks Commission as well as on the boards of a number of nonprofits. Jennifer offers knowledge and experience related to governance, research, and organizational development that would be of value to the ESRF board. Jennifer holds a Ph.D. in Environmental Science and Public Policy from George Mason University, a Master of Environmental Management from Yale School of Forestry and Environmental Studies, and a BA in American Studies from Yale University.

## **Currently Appointed Board Member Bios**

### **MELISSA CRIBBINS**

Melissa Cribbins is a small business owner and an attorney. A former Coos County Commissioner, Melissa is currently a member of the Environmental Protection Agency's Local Government Advisory Council and is past Chair of the National Association of Counties' Energy, Environment and Land Use Committee. Prior to her election in 2012, she worked for the Coquille Indian Tribe as in-house counsel for six years. She is a member of the Oregon State Bar, the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians Bar, and the Washington State Bar, and she also serves as a tribal judge. She has served on multiple boards and committees, including the Elliott State Research Forest Advisory Committee, the Board of Directors for the Association of Oregon Counties, and the Board of Directors for Energy Trust of Oregon. Melissa is a graduate of Portland State University and Gonzaga University.

### **PETER HAYES**

Peter Hayes and his family own and care for Hyla Woods in the northern Oregon Coast Range where they experiment with what is needed to grow forests that are ecologically complex and resilient, economically sufficient, and culturally helpful. Building on 170 years of family work in forestry and sawmilling, Peter's public involvements include past service on the Oregon Board of Forestry, co-founding and leadership of the Build Local Alliance, and coordination of the NW Innovative Forestry Summit.

### **HALEY LUTZ**

Haley Lutz is an Oregon coast native, born in North Bend. She is the Executive Director of the Coos Watershed Association (CoosWA), a locally organized, non-regulatory organization that has been leading innovative science, restoration, monitoring, and education programs with the Coos watershed community since 1994. CoosWA has a deep interest in the Elliott and related partnerships. Haley holds a Master of Studies in Environmental and Natural Resource Law from Lewis and Clark Law School. Before coming to CoosWA, she worked for the Oregon Department of Fish and Wildlife, interned with NOAA Fisheries working on the Oregon Coast Coho Recovery Plan, and led a watershed council on the North Coast. In her spare time, she enjoys fishing, bow hunting, swimming, exploring the outdoors, and trying to keep up with her wild toddler.

### **MIKE KENNEDY**

Mike Kennedy recently retired as the Natural Resources Director for the Confederated Tribes of Siletz Indians, where he was responsible for operation of the Tribal Forestry, Aquatics, Wildlife, Hunting & Fishing, Realty and Environmental Protection programs. Prior to that role, he served as the Tribe's Forester and Presales Forester and spent 8 seasons as a Forestry Technician on

the Ochoco National Forest. All told, he has dedicated his career to forest management for 44 years and continues to remain engaged in these issues while living in Siletz, Oregon. Mike holds a Bachelor of Science degree in Forest Management from the State University of New York College of Environmental Science and Forestry. In addition to serving on the Elliott State Research Forest Board, he has served on the Siuslaw National Forest Resource Advisory Committee, the BLM Western Oregon Resource Advisory Committee, the Oregon Department of Forestry State Forests Advisory Committee, and the Oregon State University McDonald-Dunn Research Forest Stakeholder Advisory Committee.

### **BOB SALLINGER**

Bob Sallinger has more than 30 years of experience working on conservation issues across the State of Oregon including three decades of service to the Audubon Society of Portland. He has focused primarily on conservation of avian species. His expertise spans urban, rural, and wild landscapes. Bob takes a multi-dimensional approach to conservation that includes policy, law, advocacy, science, and public engagement. He has been directly involved in achieving collaborative solutions to some of Oregon's most challenging natural resource issues including long-term participation on the Harney Basin Wetlands Initiative, Private Forest Accord and Elliott State Research Forest. Bob's involvement with the Elliott stretches back more than a decade, and he was part of the Elliott State Research Forest Advisory Committee that met for more than three years to develop the Elliott State Research Forest proposal. He currently serves as board president of Humane Voters Oregon, and on the boards of the Portland Utility Board, the Intertwine Alliance, the Urban Flood Safety and Water Quality District. He previously worked as an adjunct professor of law at Lewis and Clark Law School and as an elected director at East Multnomah Soil and Water Conservation District. Bob has a BA in Biology from Reed College and a JD from Lewis and Clark Law School with a Certificate in Environmental and Natural Resources Law. Bob lives in NE Portland with his wife Elisabeth Neely, three children and assorted goats, chickens, dogs, and homing pigeons.

### **KEITH TYMCHUK**

Keith Tymchuk is a lifelong resident of Reedsport. A graduate of the University of Oregon and Oregon State University, he has been an educator for 42 years, the last 40 at Reedsport High School teaching Government, History, Psychology and English. He served six terms as Reedsport's mayor, has been a Port of Umpqua Commissioner for 28 years and serves as the Regional Solutions Convener for Douglas, Coos, and Curry Counties. He is currently the President of the Board of Directors for Central Lincoln PUD. Keith also has been involved in projects as diverse as Wave Energy, Community Forests, and the Oregon Coast Trail. Keith served on the Elliott State Research Forest Advisory Committee since its inception in 2019. He is an avid reader and enjoys hunting, fly fishing and golfing in his free time.

## **Elliott State Research Forest Oversight Structure**

For the purpose of safeguarding public oversight, accountability and transparency in the administration of the Elliott State Research Forest (ESRF), the State Land Board on April 9, 2024 approved the following structure for an ESRF Board of Directors (ESRF Board) to guide management of the ESRF by the Department of State Lands (DSL).

The ESRF Board will function in an advisory capacity to DSL based on existing statutory authorities, delegated responsibilities and direction from DSL and the State Land Board. This document is divided into three primary sections:

1. State Land Board roles and duties related to the ESRF, ESRF Board membership and appointment;
2. DSL responsibilities; and
3. ESRF Board duties and responsibilities.

Future changes to this Oversight Structure will follow this process:

- Revisions relevant to Section 1 (ESRF Mission, Management Policies, and State Land Board responsibilities) may be made based on State Land Board review and approval.
- Revisions relevant to Sections 2 and 3 (DSL and ESRF Board responsibilities) may be made based on mutual agreement between DSL and the ESRF Board.
  - If such mutual agreement exists, DSL will notify the State Land Board of the changes at its next scheduled meeting, and State Land Board approval need not occur provided that the changes agreed upon by DSL and ESRF Board are consistent with State Land Board direction.
  - If DSL and the ESRF Board do not reach mutual agreement over a proposed change, either entity may seek State Land Board guidance and resolution.

### **Section 1: State Land Board Roles**

#### **A. ESRF Mission**

The State Land Board's mission for the Elliott State Research Forest is the creation of an enduring, publicly owned, world-class research forest that:

(1) Advances and supports forest health, climate resilience, carbon sequestration, biodiversity conservation, recovery of imperiled species, water quality and quantity, recreational opportunities and local economies as well as scientific research that improves knowledge related to forest management's role in achieving these qualities.

(2) Is managed to promote collaboration, partnerships, inclusive public processes and equity, consistent with:

- (A) The management policies in Subsection B below;
- (B) An applicable habitat conservation plan approved pursuant to the federal Endangered Species Act of 1973 (P.L. 93-205, 16 U.S.C. 1531 to 1544); and
- (C) A forest management plan approved by the State Land Board.

## **B. ESRF Management Policies**

The State Land Board's management policies for the ESRF are to:

- (1) Further the mission described in subsection (A) of this section.
- (2) Support scientific inquiry.
- (3) Allow public access for recreational and educational purposes that is compatible with scientific and conservation purposes, and the mission and management policies described in this section.
- (4) Advance long-term, operational-scale research on issues including forest management practices, ecosystem function, biodiversity, habitat conservation, water quality and quantity, carbon sequestration, rural livelihoods and the resilience of forests to the impacts of climate change.
- (5) Support rural economies through active forest management, timber harvest and other forest products, recreation, research, habitat restoration and related jobs.
- (6) Improve the ecological health of the forest through conservation and restoration measures relevant to habitat, biodiversity, carbon and climate resilience outcomes;
- (7) Promote opportunities at all education levels to interact with the forest and advance public understanding of the ecological, economic and social benefits of healthy forest ecosystems.
- (8) Seek active partnerships with Tribal governments to:
  - (A) Research and demonstrate traditional and contemporary Tribal cultural practices and ecological knowledge related to forest management.
  - (B) Provide opportunities for Tribal governments and Tribal members to harvest traditional forest products and engage in traditional Tribal cultural practices related to the forest.

(C) Consult on potential impacts on natural, cultural and traditional resources in the forest.

(9) Maintain a financially self-sufficient forest management entity and structure capable of operating and overseeing the forest and necessary infrastructure.

(10) Prioritize collaborative partnerships that recognize both the local and statewide values the forest provides.

(11) Maintain a high level of public accountability and transparency in forest management decisions and operations.

### **C. ESRF Guidance and Decision Responsibilities**

Consistent with the ESRF's mission and management policies, the State Land Board will provide the following to DSL and the ESRF Board:

(1) Policy guidance.

(2) Feedback on DSL's biennial programmatic reports.

(3) Approval or denial of:

(A) A forest management plan, and any amendments thereof.

(B) Any amendments to the habitat conservation plan, prior to submittal to federal or state regulatory agencies.

(C) Any expansion of lands in the forest, or exchange of lands in the forest or timber on the lands.

### **D. ESRF Board Membership and Appointment Process**

The State Land Board will appoint voting members to the ESRF Board. The ESRF Board shall consist of seven or nine voting members and a person designated by the lead research entity for the ESRF, who shall be a nonvoting member.

(1) The State Land Board shall:

(A) Appoint the voting members for terms of four years and for not more than two consecutive terms, except as set forth below in subsection 5.

- (B) Fill any vacancy among the voting members by appointing a voting member to serve the remainder of the unexpired term.
  - (C) Consult with, and consider input from, the primary ESRF research partner and the existing ESRF Board when determining whom to appoint to the ESRF Board.
  - (D) Endeavor to appoint members who have a full complement of relevant experience or expertise in subjects related to the mission and management policies and operations of the research forest, and demonstrated interest in the success of the mission and management policies of the forest as a research forest.
- (2) ESRF Board Members are not entitled to compensation but may receive reimbursement by DSL of their actual and necessary travel and other expenses incurred in the performance of their official duties, to the extent allowed by applicable law.
- (3) On or before June 1, 2024, the DSL Director will develop a list of candidates for appointment as the first voting members of the ESRF Board.
- (4) The State Land Board intends to appoint the first voting members of the ESRF Board from a list of candidates at its June 2024 meeting.
- (5) Notwithstanding section 1(a) above:
- (A) Of the voting members first appointed by the State Land Board:
    - (i) Three shall serve for a term ending one year after the date of the appointment.
    - (ii) Two shall serve for a term ending two years after the date of the appointment.
    - (iii) Two shall serve for a term ending three years after the date of the appointment.
    - (iv) If there are nine members, three shall serve for a term ending two years after the date of the appointment, and three shall serve for a term ending three years after the date of the appointment.
  - (B) A voting member serving a term described in this subsection, or serving the remainder of an unexpired term resulting from vacancy referred to in Subsection 1(B), may be appointed to serve two additional consecutive terms.

## **Section 2: DSL Responsibilities**

- (1) DSL shall advance ESRF management in a manner consistent with the mission and management policies of Section 1 above, including in compliance with an approved habitat conservation plan, forest management plan, or other plans or direction referenced in Section 3(2)(A)-(N) below.
- (2) DSL will safeguard public transparency, accountability and participation in decision-making related to the ESRF by ensuring the ESRF Board complies with Oregon Public Meetings Laws, ORS 192.610 to 192.705 and by advancing the following:
- (A) Provide opportunities for public comment at each ESRF Board meeting.
  - (B) Provide ESRF Board members with copies of written public comments before the ESRF Board acts.
  - (C) Provide the public with written materials as well as a public review and comment opportunity on items listed in Section 3(2)(A)-(N). For any proposed biennial operations plans, forest management plan or related amendments, or amendments to the habitat conservation plan, at least 45 days will exist for public comment before the ESRF Board votes on any recommendations related to such plans.
  - (D) Conduct at least five meetings of the ESRF Board per year for which public participation is facilitated.
- (3) DSL will adopt the recommendations of the ESRF Board to the fullest extent possible, especially if offered with full consensus of the ESRF Board, unless DSL determines the ESRF Board recommendation is inconsistent with state law, inconsistent with State Land Board or DSL policy, or other reasons exist for making a different decision. DSL will respond to ESRF Board Recommendations within 30 days. If DSL does not adopt the advice or recommendations of the ESRF Board, DSL will articulate its reasons to the ESRF Board in writing concurrent with the Department's decision.

### **Section 3: ESRF Board Duties & Responsibilities**

- (1) The ESRF Board shall advise the DSL Director and ESRF Forest Manager, and advance recommendations if it has them, on the following:
- (A) Evaluation, or contract for evaluation, of whether management of the forest (operational planning, implementation, monitoring and reporting) is being effectively integrated with a lead research entity or entities.

(B) Evaluation of whether the mission and management policies for the Elliott State Research Forest are being effectively implemented.

(C) The operational and fiscal integrity of the ESRF.

(D) The hiring of an ESRF forest manager as well as delegation of responsibilities to this position.

(E) The scope of biennial operations plans.

(F) The advancement and/or implementation of operations and research programs, whether prospective (based on proposed programs) or retrospective (based on ongoing or past implementation of programs).

(2) After considering public comments received in response to the Department's circulation of materials related to items below, as well as any further input the ESRF Board solicits, the ESRF Board shall advise the ESRF Forest Manager and/or DSL Director with recommendations on:

(A) Department budgets for the ESRF, including related to its Agency Request Budget.

(B) Biennial operations reports.

(C) Biennial operations plans.

(D) Proposed research plans or programs.

(E) Recreation plans.

(F) Education plans.

(G) A forest management plan.

(H) Any sale of carbon credits or entry into easements or other encumbrances of lands in the forest.

(I) Any expansion or exchange of lands in the forest.

(J) Any amendments to a habitat conservation plan related to the forest

(K) Any proposed amendments to the Elliott State Research Forest Proposal.

(L) Any other submission to federal or state agencies that relates to revising or clarifying ESRF management or policy direction.

(M) Any proposed receipt of funds, including bequests, or funding requests made to the federal government, private sector, state agencies or the Legislative Assembly not otherwise covered in subsection 2(A), including any request for issuance of revenue bonds, certificates of participation financing, or state-funded debt service.

(N) Any other plans or decisions DSL intends to make of significance to advancement of or compliance with the ESRF's mission and management policies.

(3) In advancing oversight, advice or recommendations, the ESRF Board shall review DSL proposals, plans, reports or other information submitted to it (by DSL, the public or otherwise) relevant to the subject matter in subsections (1) and (2) above. While DSL and the State Land Board have responsibility for decisions on plans, amendments, or other decision areas referenced in subsection (1) and (2), the ESRF Board's review and any advice or recommendations related to those subsections will focus on and strive to ensure consistency with the direction and intent of the applicable Forest Management Plan, Habitat Conservation Plan, research direction, or overall mission and management policies of the ESRF.

(4) The ESRF Board shall also:

(A) Review DSL's biennial or other programmatic reports to the State Land Board on the ESRF and may provide recommendations to the State Land Board on the DSL reports.

(B) Promote transparency around decisions concerning the forest, including forums to provide public input in association with ESRF Board meetings or separately.

(5) The ESRF Board may also:

(A) Form advisory bodies or subcommittees as the Board deems necessary and appropriate.

(B) Request that DSL pursue funding of ESRF operations and/or research through state-issued bonds, certificates of participation or similar instruments as well as other opportunities identified by the ESRF Board.



# Oregon

Tina Kotek, Governor

## Department of State Lands

775 Summer Street NE, Suite 100

Salem, OR 97301-1279

(503) 986-5200

FAX (503) 378-4844

[www.oregon.gov/dsl](http://www.oregon.gov/dsl)

## State Land Board

## State Land Board

**Regular Meeting  
October 15, 2024  
Agenda Item 3**

Tina Kotek

Governor

LaVonne Griffin-Valade

Secretary of State

Tobias Read

State Treasurer

### **SUBJECT**

Forest Management Plan for the Elliott State Research Forest

### **ISSUE**

Whether the State Land Board should approve adoption of the proposed Forest Management Plan for the Elliott State Research Forest as submitted by the Department of State Lands.

### **AUTHORITY**

- Oregon Constitution, Article VIII, Sections 2 and 5; pertaining to the Common School Fund and land management responsibilities of the State Land Board.
- ORS 273.171; relating to the duties and authority of the Director.
- ORS 530.450 – 530.520; relating to management of the Elliott State Forest.
- ORS 273.245; relating to State Land Board adoption of asset management plans.

### **BACKGROUND**

The Elliott State Research Forest (ESRF) is located on the southern Oregon Coast in Coos and Douglas Counties across approximately 83,000 acres of contiguous state public lands administered by the Department of State Lands. These lands comprise the vast majority of the Elliott State Forest boundary, established as Oregon's first state forest in the 1930s. Surrounded by federal, private, and other state lands, this landscape was originally stewarded by the Hanis and Quich people, whose descendants continue to value and remain connected to these lands today as members

of several federally recognized Western Oregon Tribes. A summary of “key moments in Elliott State Forest history” is on the [Department’s website](#).

At its December 2023 meeting, the Land Board affirmed its commitment to the Elliott State Research Forest’s creation consistent with foundational collaborative agreements advanced by the Department’s ESRF Advisory Committee and supported by the Land Board, the Legislature, Tribes and others. Throughout 2024 the Land Board advanced direction to establish the research forest based on a [workplan of six key actions](#).

The Land Board’s adoption of a Forest Management Plan is one of the remaining actions needed to transition the Elliott to a research forest of unique statewide, national, and international relevance.

### **THE FOREST MANAGEMENT PLAN**

The proposed Forest Management Plan represents the overarching management direction for the Elliott State Research Forest. Incorporating commitments from, and administered consistent with, the proposed Habitat Conservation Plan (HCP)<sup>1</sup>, the Forest Management Plan is intentionally much broader. Budgeting for operations must account for advancement of both plans.

The Forest Management Plan is based on foundational guidance provided by the original ESRF Advisory Committee (including three Tribes and other diverse interests), the 2021 Oregon State University (OSU) Research Proposal, as well as consultation and engagement with the Land Board, Tribes, community members, partners, and other government entities. It also advances policy direction from the Legislature.<sup>2</sup>

The Department’s proposed Forest Management Plan stems from OSU’s plan, delivered to the Department in December 2023. Due to [OSU’s President deciding not to hold a Board of Trustees vote](#) on OSU management of the research forest, OSU’s management plan was not presented to the Land Board for consideration. However, the Department recognized the significant good work, information, and underlying engagement in the OSU management plan, and upon the Land Board directing DSL to manage the forest, the Department decided to use it as the starting place for developing the Department’s plan. Conversations have continued with OSU as to whether it wishes to serve as the lead research partner.

Key areas of revision in the Department’s proposed plan include:

---

<sup>1</sup> The Habitat Conservation Plan focuses on the narrower context of the Endangered Species Act and related commitments, providing regulatory coverage within which the Forest Management Plan can operate.

<sup>2</sup> The Oregon Legislature advanced policy direction through [SB 1546 \(2022\)](#), which passed with strong bipartisan majorities. While the statute was nullified for procedural reasons based on events of late 2023, the policy direction remains relevant.

- **Recognition that the Department is not itself a research entity.** The proposed plan advances a forest research framework and a process for adopting research projects. It also assumes the continued need for a lead research partner while recognizing other research partnership models exist. An independent Science Advisory Committee is part of the governance structure to ensure researchers and scientists are working with the lead research partner, the ESRF Board of Directors, and the Department in advancing the plan framework to a comprehensive research plan and adopted projects.
- **Increased management and research flexibility.** The underlying geographic allocations for management and research (i.e., subwatersheds), research principles, and unifying research question and sub-themes have been retained. The research design in the 2021 OSU Research Proposal, commonly referred to as the Triad / spare and share approach, is not precluded but neither is it required to be at the same scale or advanced in the same way. Revisions make room for valuable long-term research not rigidly tied to the Triad research design. This includes more flexibility in approaches to ecological forestry and intensive forest management.
- **Enhanced focus on carbon and biodiversity management objectives:**
  - i. Integration of 10,000+ additional acres into the Conservation Research Watershed (CRW) to further advance carbon sequestration and related biodiversity objectives on the research forest.
  - ii. Longer rotations in support of carbon sequestration and enhanced wood product values, while still allowing flexibility for shorter rotations for purposes of a research plan or financial viability.
  - iii. Clear direction supporting enrollment of the research forest in a voluntary carbon market project that secures carbon sequestration objectives in a manner consistent with research and additional to what would otherwise occur in the absence of the Forest Management Plan. This would be precedent setting for state public lands in the Western United States.

In response to feedback from the public and government entities following the release of the draft plan in June 2024, the current proposed plan includes revisions made to:

- Clarify the CRW management, including the nature of restoration thinnings;
- Expand upon desired integration of Indigenous management and research with inclusion of a project-based opportunity for partnership;
- Revise the habitat restoration and monitoring sections to include HCP updates, ongoing work with OSU related to the collection of baseline data, and a next step restoration strategy and monitoring work with state and local partners;
- Update the science and history related to wildfire and human fire use; and

- Clarify the pathway to incorporation of the plan as an Oregon Administrative Rule in order to address public accountability and legal appeal options.

Additional revisions are in the Community Engagement Report (Appendix B).

The Department will manage the Elliott to sustain its diverse values, address fundamental research questions regarding working forests in the context of climate change, and achieve the outcomes envisioned by the ESRF Advisory Committee process, the public, other government entities and stakeholders. The Forest Management Plan will provide decision-makers, Department staff, researchers, contractors, practitioners, and partners with foundational direction and practical guidance to implement the Elliott's integrated research and management approach.

### **ONGOING AND FUTURE CONSIDERATIONS**

This is the first iteration, or Forest Management Plan 1.0, for the research forest. Additional work is needed for a holistic plan to be fully implemented. Space in the proposed plan is held for:

- Resolution of questions and conversations related to the research partner model and related research plan refinement.
- Ongoing conversations with Western Oregon Tribes to integrate Indigenous interests in ESRF management, governance, and research. This is an important conversation, with connections to potential partnership, equity, and other important outcomes. While the proposed plan reflects intention, it also respects the time frame Tribes want for this conversation.
- Community-informed development of a more detailed recreation strategy, education strategy, and habitat restoration and monitoring strategy that connects existing related programs and people with the Elliott.

The Forest Management Plan will be updated and revised based on these ongoing efforts. The plan proposes a 1-year review and update to the Land Board related to those efforts, and a 5-year review consistent with Oregon administrative law, assuming the plan is incorporated as a rule. Any amendments would require Land Board approval following Department and Elliott State Research Forest Board review and recommendations.

### **COMMUNITY ENGAGEMENT AND GOVERNMENT CONSULTATION**

Feedback on the draft Forest Management Plan was gathered from the public, partners, government entities (including Tribes), and the ESRF Board.

- Community engagement began in the summer of 2024, with a public comment period open from June 12 – August 4, 2024. The Department hosted four in-person (Salem and Coos Bay) and virtual listening sessions. Over 400 public

comments were received during this period, and a summary of key themes and comments can be found in the Community Engagement Report (Appendix B).

- The Forest Management Plan was also vetted and shaped through consultations and conversations at various levels of government, including Tribes, state and federal agencies, and local governments. A summary of key themes can be found in the Government Engagement Report (Appendix C).
- Further, the Department advanced the proposed plan in consultation with the ESRF Board through presentations, discussion, and opportunities for public comment at Board meetings, as well as advice from the Board on proposed responses to public comments and government input.

Finally, the Forest Management Plan builds on many years of underlying process and vetting of the research forest concept. This includes over 5 years of advisory committee meetings open to the public, public review process for the Habitat Conservation Plan, and the 2023 OSU Forest Management Plan development process which included committee and partner coordination, public listening sessions, and multiple public comment periods.

### **RECOMMENDATION**

The Department recommends adoption of the initial Forest Management Plan for the Elliott State Research Forest.

### **APPENDICES**

- A. Forest Management Plan
- B. Community Engagement Report (includes public comments received)
- C. Government Engagement Report

## Forest Management Plan for the Elliott State Research Forest

The Oregon Department of State Lands' proposed Forest Management Plan for the Elliott State Research Forest demonstrates how forestland will be managed to sustain its diverse values, address fundamental research questions regarding working forests in the context of climate change, and achieve the specific ecosystem goods and service outcomes envisioned for it within the foundational guidance provided by the original ESRF Advisory Committee, the Oregon State University Research Proposal, and the Land Board. This direction has evolved and been refined over time based on efforts to address input from the ESRF Board, Tribes, community members, partners, and other government entities.



### Download the Forest Management Plan

In addition to the plan itself, there are a variety of appendices supporting the work. These appendices include summaries of community engagement activities and public comments, government consultation, supporting documents for research methodologies and more.

- [Forest Management Plan \(PDF\)](#)
- [Appendices \(PDF\)](#)

[See this folder to download individual chapters of the Forest Management Plan.](#) Chapters include:

1. Background, Setting, Overarching Direction
2. Governance, Organization, and Revenue to Support the ESRF
3. Partnership and Management for Multiple Values: Research, Conservation, Education, and Recreation
4. Research Forest Design
5. Research Planning and Implementation
6. Silviculture, Harvest Systems, and Operations Planning
7. Aquatic and Riparian Systems
8. Climate Change, Adaptive Silviculture, and Forest Carbon
9. Species Conservation
10. Monitoring
11. Adaptive Research Strategy and Implementation
12. Disturbance, Forest Health and Resilience

# **DRAFT**

# **ELLIOTT STATE RESEARCH FOREST**

# **FOREST MANAGEMENT PLAN**

# **COMMUNITY ENGAGEMENT REPORT**

## **PREPARED FOR:**

Oregon Department of State Lands  
Contact: Brett Brownscombe  
[Brett.Brownscombe@dsl.oregon.gov](mailto:Brett.Brownscombe@dsl.oregon.gov)

## **PREPARED BY:**

ICF  
Contact: Stefanie Lyster  
[Stefanie.Lyster@icf.com](mailto:Stefanie.Lyster@icf.com)

**October 2024**

# Contents

Contents.....	i
Introduction .....	1
Project Overview .....	1
Guiding Principles.....	1
Project Purpose.....	1
Objectives .....	2
Project Location .....	3
Community Engagement Efforts .....	6
Comment Submission.....	6
Summary of Comments on the Forest Management Plan .....	7
Overview of Commenters.....	7
Unique Letters .....	7
Summary of Comments Received.....	8
General Support for the Proposed Plan .....	8
General Opposition for the Proposed Plan .....	8
Background, Setting, Overarching Direction.....	8
Governance .....	9
Partnership and Management.....	9
Research Forest Design .....	10
Research, Planning, and Implementation .....	11
Aquatic and Riparian Systems.....	11
Climate Change, Adaptive Silviculture, and Forest Carbon .....	13
Silviculture, Harvest Systems, and Operations Planning .....	13
Species Conservation .....	13
Monitoring.....	14
Adaptive Research Strategy and Implementation .....	15
Disturbance, Forest Health, and Resilience .....	15
Anti-Timber Industry .....	16
Preservation of Old Growth Forests.....	16
Enforceability .....	16
Anti-Experimental Harvesting .....	16

Scenic Resources.....	17
Plan Budget/Funding.....	17
Community Involvement.....	17
Recreation .....	18
Taxes/Common School Fund .....	18
Water Quality .....	18
Other.....	18
Consideration of Comments in the FMP .....	18
References.....	19
Attachment A.1 – Comments by Topic Area and Current Proposed Responses .....	20
Table A-1. General Support for the Proposed Plan .....	1
Table A-2. General Opposition for the Proposed Plan.....	4
Table A-3. Background, Setting, Overarching Direction .....	5
Table A-4. Governance .....	13
Table A-5. Partnership and Management.....	15
Table A-6. Research Forest Design.....	21
Table A-7. Research, Planning, and Implementation .....	27
Table A-8. Aquatic and Riparian Systems.....	40
Table A-9. Climate Change, Adaptive Silviculture, and Forest Carbon .....	51
Table A-10. Silviculture, Harvest Systems, and Operations Planning.....	65
Table A-11. Species Conservation .....	68
Table A-12. Monitoring.....	79
Table A-13. Adaptive Research, Strategy, and Implementation.....	84
Table A-14. Disturbance, Forest Health, and Resilience .....	87
Table A-15. Anti-Timber Industry .....	96
Table A-16. Preservation of Old Growth Forests .....	98
Table A-17. Enforceability .....	102
Table A-18. Anti-Experimental Harvesting.....	103
Table A-19. Scenic Resources.....	103
Table A-20. Plan Budget/Funding.....	104
Table A-21. Community Involvement .....	112
Table A-22. Recreation.....	115
Table A-23. Taxes/Common School Fund.....	117
Table A-24. Water Quality .....	119

# Introduction

This document is the Community Engagement and Outreach Report (Report) for the Oregon Department of State Lands (DSL) Elliott State Research Forest (ESRF) Forest Management Plan (FMP). The proposed plan is the ways in which the ESRF is to become an enduring, publicly owned, world-class research forest that advances and supports all aspects of forestry, including forest health, climate resilience, carbon sequestration, biodiversity, recovery of imperiled species, timber and other forest products, water quality and quantity, recreational opportunities and local economies. The plan includes a menu of management, research, and treatment options to better understand forest ecology, as well as maintaining educational opportunities and public access for recreation and traditional cultural uses of the forest.

This Report provides an overview of the FMP and describes specific engagement and outreach efforts undertaken during the public review and comment period. It also summarizes comments received on the FMP.

## Project Overview

The FMP is an implementing document for the goals set out in the ESRF Habitat Conservation Plan (HCP). This section describes the project, including the purpose, guiding principles, and project objectives.

## Guiding Principles

To articulate a vision for how the ESRF will be managed, the DSL Advisory Committee approved a set of guiding principles to help form the foundation for research, management, education, and recreation on the ESRF. These Guiding Principles are carried forward in this DSL FMP from the OSU College of Forestry FMP submitted to DSL in December 2023 given their connection to and underlying role in shaping the ESRF since the Land Board began the collaborative process for the research forest's creation.

The guidelines of the project include the following categories:

1. Forest Governance
2. Recreation
3. Tribal Nation Traditional Uses
4. Educational Partnerships
5. Local and Regional Economies
6. Conservation

## Project Purpose

The purpose of the FMP is to provide decision-makers, management-related staff, researchers, administrators, contractors, practitioners, and partners with foundational direction and practical guidance relevant to implementing the ESRF's integrated research management approach in conjunction with relevant policies and plans. This FMP also provides interested stakeholders, additional partners and the public with details on the ESRF and how it is to be managed.

In the overall planning process for the ESRF, the FMP fits between the broader strategic planning embodied in the original ESRF *Research Proposal* (OSU College of Forestry 2021) and the more detailed and focused *Biennial Operational Plans* where site-specific research and management activities will be described using the direction and tools presented in this FMP.

This FMP assumes and incorporates the commitments in the DSL Habitat Conservation Plan for the ESRF. HCP compliance provides a base-level (floor not the ceiling) of conservation commitments, covered management activities as well as constraints. Because the HCP is an Endangered Species Act planning and compliance-driven document, this FMP intentionally addresses broader values, commitments and interests in the ESRF, forest management, and research.

## Objectives

In addition, this FMP intentionally addresses forest management in the context of growing pressures related to climate change and disturbance. The FMP connects to the State's Climate Change and Carbon Plan and related policies advanced by the State's Board of Forestry, including through increased carbon sequestration on the forest, related demonstrations and research on climate-adapted forestry, carbon and forest-management dynamics, wildfire and disturbance dynamics, and integration with a voluntary project for the sale of carbon credits.

Intentional integration of a research forest, timber production, an HCP, and a carbon project across one, large contiguous publicly owned landscape is not only atypical of plans for managed forests, it may be unprecedented. In addition, unlike typical plans for managed forests, these activities will occur in the context of scientific research relevant not just to current western science, but the future shape of that science as informed by Indigenous Knowledge and other ways of knowing. As a research forest, scientific knowledge and Indigenous Knowledge can be complementary knowledge generation processes, and both are central to intended management and research on the ESRF in the context of multiple ecological and social values and global change. This FMP is a first step in reflecting and promoting a synergistic multiple systems view for adaptive implementation of research relevant to the ESRF becoming a leader in advancing the braiding of multiple ways of knowing in an inclusive and respectful way, understanding that this objective rests upon a divided history, unproven path, and will take time to understand critical links between those knowledge systems, activities and ecological and social conditions.

These differences and others make this FMP novel in several ways. The braiding of western science and Indigenous science embraces multiple ways of knowing that guide planning and practices on the forest. For example, large tracts of the ESRF will be managed using a range of thinning and variable retention harvesting treatments to increase forest complexity and diversity through ecocultural restoration that improves resilience under climate change. Designing and implementing such treatments is considerably more complicated than for even-aged plantation forestry. A well-designed and inclusive research platform is an essential component of the implementation stage for this FMP. Compared to a traditional forest plan with one dominant objective and knowledge system, this plan for the ESRF reflects the additional complexity of planning for a public landscape that truly integrates multiple objectives for the land and its people within a core research mission.

## Project Location

The main area of the ESRF is a contiguous 18-mile by 16-mile tract of forestland in the Oregon Coast Range, located between the towns of Coos Bay and North Bend to the southwest and Reedsport to the northwest. The ESRF also includes East Hakki Ridge, a 788-acre parcel on the northern side of the forest which is located in the Lower Umpqua Watershed. East Hakki Ridge is separated from the main ESRF forestland tract by Oregon Board of Forestry lands and is not contiguous with the rest of the forest. The ESRF lies just south of the Umpqua River and extends within 6 miles of the Pacific Ocean to the west. On the east the forest extends 21 miles inland to the Coast Range crest with a high point (Elk Peak) of 2,100'. The ESRF is located in Coos and Douglas Counties in the south Oregon Coast region, defined as the geographic area in the southern one-third of the Oregon Coast Range physiographic province (Franklin and Dyrness 1988).

The area adjacent to the ESRF includes a combination of private, state, and federal ownership/management. Approximately 9,000 acres of ODF-managed state lands exist both within and directly adjacent to the ESRF's boundary. These lands present potential opportunities for future partnership and integrated management approaches related to forest product and timber production, habitat, Indigenous interests, local government and other values.

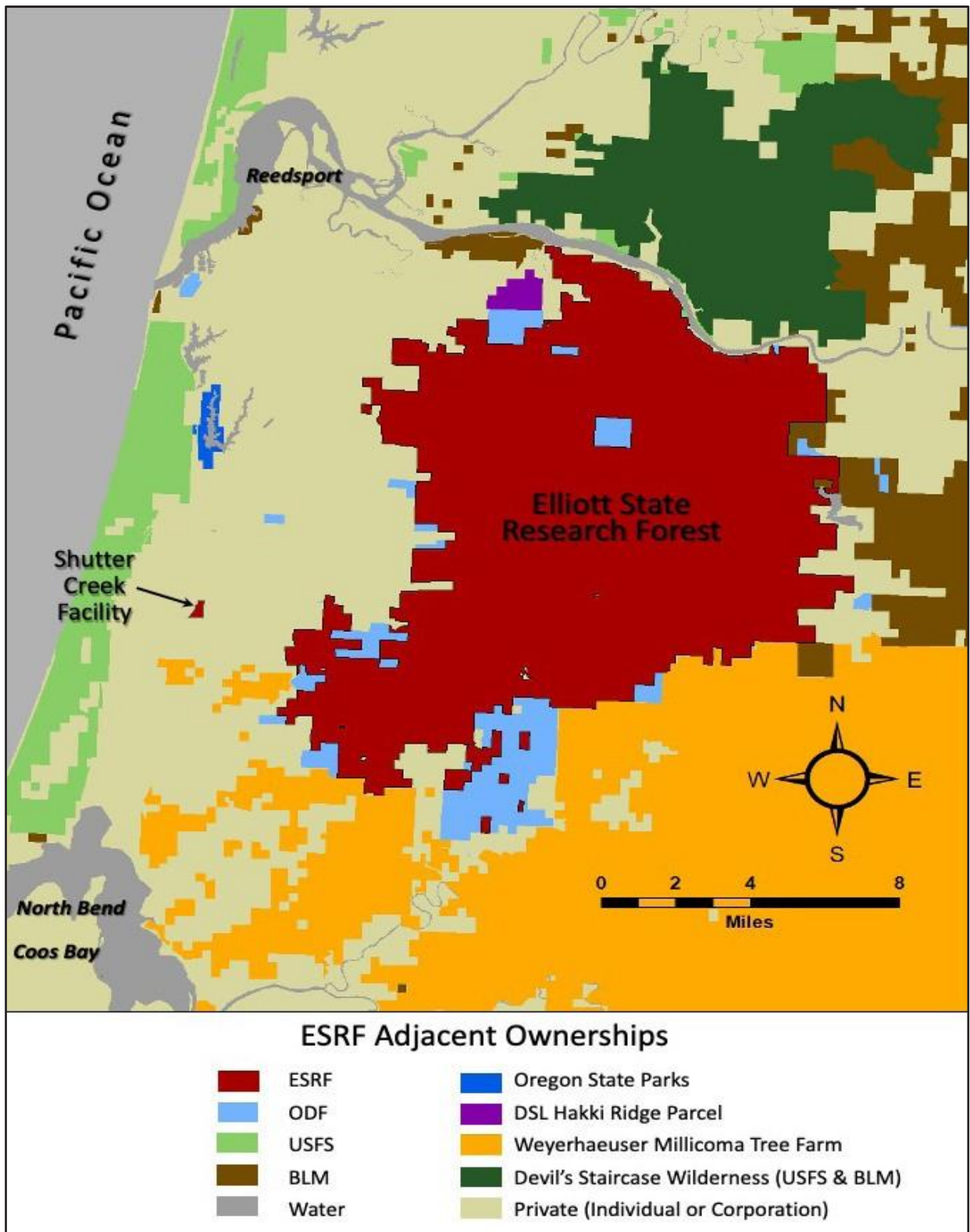


Figure 1. The Elliott State Research Forest and surrounding land ownership. The Shutter Creek Facility is currently being explored as a base of operations for the ESRF.

There is a road network throughout the Elliott State Research Forest that consists of 550 miles of roads, over 300 of which are located along ridgetops. About 175 miles of road are on side slopes, with the remainder along valley bottoms and varying in proximity to streams. Roads are classified as *primary* or *secondary*, and then by their geomorphic position on the landscape – *ridgetop*, *side slope*, *valley*, *streamside* – with roads near streams and on steep slopes of higher concern from a conservation perspective (Biosystems et al. 2003).

# Community Engagement Efforts

Public transparency, accountability and engagement are central to the ESRF's planning, mission and management. Related to this, the ESRF Oversight Structure adopted by the State Land Board in 2024 includes a variety of relevant provisions, requirements and structures. This includes:

- A public Board of Directors subject to Oregon's Public Meetings laws and related transparency requirements;
- Roles and responsibilities of the State Land Board, DSL, and the ESRF Board in advancing public oversight and engagement; and
- Process requirements for public engagement as part of ESRF Board meetings and in underlying DSL work prior to the ESRF Board making recommendations or decisions being made by DSL or the Land Board.

The ESRF Board and DSL will add further detail to its public engagement processes consistent with direction in the Oversight Structure. DSL will also maintain a robust online presence for the ESRF, including a data portal with real-time and archived data for use by researchers, managers, partners, and the public. Educational partnerships and plans will be developed to create opportunities for learners from K-12 programs, colleges and universities, Tribal Nations, informal education participants, and visitors to the research forest (see Chapter 3 of the FMP: Managing a Research Forest for Multiple Values).

DSL conducted a public review period for the FMP from June 12, 2024, through August 4, 2024. During this time, the agency held four public meetings to share information, answer questions, and receive public comments on the Draft FMP.

The meetings were held on:

- Monday July 15, 2024, in Salem at DSL office (hybrid)
- Tuesday, July 16, 2024 in Coos Bay at the public library (in-person only)
- Thursday, July 18, 2024 (virtual)
- Thursday, July 18, 2024 (virtual)

Recordings of the meetings and copies of the meeting presentation are available on the DSL website at <https://www.oregon.gov/dsl/Pages/Elliott.aspx>.

DSL also prepared a 3-page overview document on the Draft FMP that describes how the draft plan was developed, key considerations, and what is still to come. The document, along with the draft FMP, was posted and remains available at the project website noted above.

## Comment Submission

DSL provided several ways for comments to be submitted on the Draft FMP during the comment period of June 12, 2024, through August 4, 2024. Comments could be submitted by email to [elliottproject.dsl@oregon.gov](mailto:elliottproject.dsl@oregon.gov) until the close of the comment period. Comments could also be shared verbally at one of the four public meetings held in July 2024.

# Summary of Comments on the Forest Management Plan

This section presents the comments submitted on the FMP. It outlines comments by themes. Attachment A.1 of this Report includes comments and responses in tables by the comment themes.

## Overview of Commenters

DSL received comments in the form of letters and email. Over 450 comment letters were submitted. DSL received approximately 30 unique letters and identified approximately 250 discrete comments from those letters. Unique letters are letters containing individual unique comments submitted by a single commentor or multiple commenters. Unique commenters are listed below by category.

DSL also received three different form letters. Form letters are those letters that are similar in content and provided by multiple commenters. Over 400 people submitted form letters.

## Unique Letters

### *State Agencies*

- Oregon Department of Fish & Wildlife

### *Non-Profit Organizations*

- Cascadia Wildlands, Bird Conservation Oregon, Wild Salmon Center, Oregon League of Conservation Voters, The Larch Company, Great Old Broads for Wilderness, Coast Range Forest Watch, Center for Biological Diversity, Salem Audubon Society, Bird Alliance of Oregon, Lane County Audubon Society, Audubon Society of Corvallis, Audubon Society of Lincoln City, Umpqua Valley Audubon Society, Cape Arago Audubon Society, Kalmiopsis Audubon Society
- Coos Watershed Association
- Wild Salmon Center
- Sierra Club, Oregon Chapter

### *Individuals (unique comments)*

- |                                |                     |
|--------------------------------|---------------------|
| • Lisa Brenner and Tom Stibolt | • Gail Sabbadini    |
| • Skye Decker                  | • Barb Shamet       |
| • Carla Grant                  | • Caroline Skinner  |
| • Jon Haynes                   | • David Stone       |
| • Linda Hartling               | • Rob Taylor        |
| • Michael Heumann              | • Kent Tresidder    |
| • Carolyn Hinds                | • Carol Valentine   |
| • Albert LePage                | • Valerie Vashon    |
| • Maude Levesque               | • William Wagner    |
| • Linda Parmer                 | • Beverlie Woodsong |
| • Ken Rawles                   | • Bob Zybach        |
| • Jill Riebesehl               |                     |

## Summary of Comments Received

The following sections summarize comments received; comments are presented by resource section and topic within the ESRF FMP. DLS reviewed all comments received during the comment period [June 12 – August 4, 2024 in detail to inform themselves and the project team about issues of concern related to the project, both in general and about specific items for consideration regarding the FMP's scope. Comments relevant to the FMP will be considered in the next iteration of the document.

Attachment A.1 contains a more detailed comment summary arranged by commenter and by category of comments. Comments are categorized by resource topics to assist DSL in review of comments relevant to specific topics or resource areas.

## General Support for the Proposed Plan

A vast majority of commenters expressed support for the plan. General comments of support included mentions of allocating all 10,000 acres to the CDMA and support for revitalizing the forest and ecosystems. Some commenters mentioned the readability and more concise nature of this iteration of the document compared to previous versions.

## General Opposition for the Proposed Plan

Two commenters outright disapproved of the FMP in its entirety.

Despite most commenters leaning towards supporting the plan, they included some hesitation, and many stipulations and proposals for edits in order to ensure the right balance of research, management, conservation, restoration, and other priorities were going to be prioritized in the FMP.

## Background, Setting, Overarching Direction

Several commenters included summaries of the proposed actions that will take place within the Elliott State Research Forest, overviews of lawsuits and other environmental actions in relation to the Elliott State Forest.

Several commenters highlighted the historical and ecological importance of the Elliott State Forest on crucial habitats for protected and endangered species, and as an asset for sequestering carbon. These commenters urged DSL to prioritize conservation comments regarding the FMP. One commenter highlighted the purpose of the ESRF FMP and the opportunity it presents for conservation efforts.

Some commenters described the history of management of the Elliott State Forest and pointed out reduced timber sales coinciding with environmental political movements and argued that DSL should oppose the use of Senate Bill 1546 to convert Elliott State Forest to a research forest and away from economic and communal values.

One commenter specifically recommended that with the departure of OSU from the ESRF management team, the phrase “key unifying question” be removed, as there are several important questions that will be researched at the ESRF.

One commenter expressed appreciation for the updated FMP language that addresses the shortcomings of the Triad research model, which was the basis for the OSU Research Forest Proposal. This same commenter urges DSL and the Elliott Board to conduct an extensive problem analysis how the research forest will address economic, environmental, and cultural values.

Two commenters argued that the plan is likely to fail on both economic and scientific fronts, and instead pose a risk of increased costs to local communities with decreased job availability, increased risk of wildfire, and no scientific information of value to the public. These commenters also argued that the FMP and Triad modeling relies on untested modeling and assumptions without field testing. These commenters claimed that the misrepresentation of the conditions within the Elliott State Forest within the FMP serve as additional evidence that the plan will not achieve its intended purpose.

One commenter challenges the ecological basis of conservation data that has been used to establish the ESRF as critical habitat for several endangered and threatened species. This same commenter asks for clarification of the phrase “restoration treatment” and argues that restoration would essentially require a clear-cutting of the forest as it exists today. This commenter also disagreed with the use of the term “seral stage”, and claims it is not a sound aspect of forestry science.

## Governance

Three commenters expressed various concerns over the governance of the ESRF.

Several commenters applauded the efforts of the state to decouple the ESF from the Common School Fund, which they say encouraged unsustainable logging levels. They stated that their support for the ESRF is contingent upon it achieving protections for mature and old growth stands, streams, and imperiled species.

Another commenter noted that with DSL now assuming oversight of the ESRF, the governance structure of the ESRF should be done democratically by any leadership and advisory committee members chosen by elected officials, not DSL.

The other commenter noted that the delay of the HCP, the withdrawal of OSU from management responsibilities, and overall sunseting of responsibilities of SB 1546 leaves the status of ESRF name unsettled. This commenter questions whether the name will be reverted to the Elliott State Forest.

## Partnership and Management

One commenter expressed concern over creating the Climate and Biodiversity Management Area within the forest’s boundaries.

One commenter underlined the importance of maintaining robust protections for the CMA because of its importance for long-term ecological research and educational purposes.

One commenter expressed concern with the withdrawal of OSU from management responsibility, and demonstrated appreciation that much of the work in the FMP seems to be relying on the previous work done by the OSU School of Forestry. This commenter recommends appointing some professional foresters to the Board of Directors of the ESRF.

Alternatively, one commenter appreciated the departure of OSU’s School of Forestry and urges that DSL and the Elliott Board refrain from engaging OSU in any management or research decisions, due to their long history of timber industry funding and bias.

Another commenter expressed concern about the proposal to include a lead research entity which would incur exorbitant costs. This commenter recommends that DSL staff, Elliott Board, and associated committees should be able to establish research priorities and contract directly with qualified institutions and consultants. This commenter also recommended editing Figure 3.1 to make it clear that the Elliott Board plays a key oversight role and is not on par with stakeholder groups.

One commenter suggested further inclusion of local practitioners within the work of the Implementation and Adaptive Management Committee. Two other commenters similarly recommended that Indigenous community members should have more input in the development of a research plan, to effectively integrate traditional ecological knowledge and modern conservation biology.

One commenter made several comments regarding more effective partnership and management. They recommend that Section 1.1.2 Guiding Principles which includes engagement with ODFW should also be applicable to Recreation, Educational Partnerships, and Conservation categories of this section. They also recommend more discussion on the process and criteria for approving of a proposed project if any conflicts with the compatibility criteria exist. Lastly, they recommend more context on how consultations with state agencies will happen, and how any alternatives for proposed action will be handled.

Two commenters criticized the lack of economic analysis within the FMP, and argues that the FMP's restrictive harvest limit of 17 mmbf per year will prevent the forest from retaining economic viability.

## Research Forest Design

There were many comments on the design of the research forest.

One commenter emphasized the need for non-partisan, independent scientists with no conflicts of interest, and peer-reviewed research.

One commenter criticized the lack of specific design standards and geographic extent for in-stream habitat enhancement and recommended better design standards to make restoration work effective.

One commenter had extensive comments about the design of the research forest:

- They emphasized the opportunity for DSL to manage the forest for maximum productivity, beyond minimal legal thresholds for ESA-listed coho salmon
- They highlighted the need to prioritize science-driven restoration projects, such as fish passage improvement, large woody debris placement (with clear guidelines based on established practices), and road upgrades, which they note have been stalled for over 7 years
- They requested further clarification on the study design, including specific project objectives and effectiveness monitoring
- They criticized the vague description of the scale of research in the FMP, suggesting the use of best available science for designing structures and accounting for net export of wood
- They noted the need for better connection between study design and the impact of wood jam structures on habitat complexity, stream temperatures, and nutrient releases
- They emphasized the importance of using data-driven stakeholder restoration planning to streamline site selection for the FMP
- Highlighted concerns about the expansion of the road network and the need for a thorough inventory and prioritization of road decommissioning and upgrades

Similarly, another commenter noted that in Section 4.2.1 the section titled Streams, Designations, and Treatments has a statement discussing the incompatibility of increasing road densities and conservation goals stated.

One commenter asked for the consideration of the Bird Alliance of Oregon's request to conserve the full 10,000 acres for habitat protection. Similarly, other commenters requested that the full 10,000 acres be placed in the Climate and Biodiversity management area.

Two commenters critiqued the use of the Triad Research design because of claims it lacks practical value, and is not an appropriate tool because of complexity, long timeframe, and use in real-world forest management.

Three commenters specifically mentioned the "Giesy Plan Option" and encouraged DSL to consider this alternative as a viable starting point for replacing the draft FMP.

## Research, Planning, and Implementation

Multiple commenters expressed support for the Climate and Biodiversity Management Areas in the Elliott State Forest and emphasized the importance of climate-smart forestry and carbon sequestration. There were some commenters who expressed concern about potential reduction in protections for the 33,000 acre Conservation Management Area, and they urged the expansion of protected acreage and the allocation of all 10,000 acres to the CDMA.

Multiple commenters mentioned how research proposals should be approved by independent panels and should test various traditional logging methods, stream buffering techniques, removal and placement of woody debris in streams, prescribed burning, and different tree planting strategies. Commenters also suggested that impact studies should assess the effects of infrastructure and natural events on different land parcels and streams.

Commenters highlighted how the Conservation Research Watershed (CRW) is crucial for long-term ecological functions, and that the draft Forest Management Plan (FMP) lacks context for proposed restoration treatments. They state that the FMP needs clear thresholds and monitoring plans for research phases and sufficient information on the timescale and specifics of riparian thinning in Phase One. Further, they state that there should be no reduction in protections for the 33,000-acre CRW, a foundational piece of the Elliott vision.

Commenters expressed concerns in relation to the Triad Research Design, which is intended to last 100 years with significant start-up costs. Additional concerns included the impractical timeframe due to natural disasters, scale mismatch as the triad concept is tested on small watersheds rather than large landscapes, and doubts about the practical utility of the research findings for forest management and policy. Commenters mentioned peer reviews, particularly by Jerry Franklin, that highlight these issues.

Commenters requested that reserve areas within the ESRF must be off-limits to all timber harvesting immediately and in perpetuity. Allowing "treatments" within conservation reserve areas violates the premise of a "reserve," and there is no confidence that such treatments would be limited to a "light-touch" approach.

## Aquatic and Riparian Systems

Several commenters emphasized the importance of rivers and streams to salmon populations. Commenters outlined how the Upper West Fork Millicoma and Upper Haynes Inlet Tributaries are crucial for coho salmon on the Oregon Coast, and how managing ESRF land is vital for the health and productivity of the Coos coho population.

Several commenters noted specifically how the FMP should reduce the expansive (550-mile) road network within the boundaries of the forest, especially eliminating roads that impact fish bearing streams (approximately 30 miles), as this can improve habitats for species like the Coast Coho salmon.

Commenters expressed concern over the proposed research to conduct selective thinning within riparian buffers, and urged DSL to not conduct this experiment unless sufficient funding has been secured to support it in the long-term.

Several commenters noted how the FMP lacks a clear restoration strategy. Commenters recommended that the strategy should include ways to address polluted, temperature-impaired (worsened by climate change), or otherwise altered streams from the root cause of the issue. Strategies for restoration must account for cumulative impacts to habitat abundance, quality, connectivity, and diversity on a watershed or other relevant scale to affected species. One commenter specifies that any in-stream restoration that involves large wood structure placement should only involve native and locally derived wood, be able to provide rearing refuge for species of native fish, and create off-channel habitat.

One commenter identified that there remain gaps in how the FMP will protect Ns and Np streams, which had been deferred from the HCP analysis. Commenters urged the FMP to prioritize amphibian protection, especially in Np and Ns streams, and secure funding for long-term research.

Commenters noted that future management should consider and monitor the impacts on past restoration efforts, and cited recent analysis that confirms the high-quality habitat of the ESRF and outlines actions for protection and restoration. Another commenter mentioned the importance of encouraging beaver recolonization and dam building within the ESRF, and encouraged the use of the Beaver Restoration Assessment Tool for site selection.

The Oregon Department of Fish and Wildlife had several specific comments relating to aquatic and riparian systems:

1. Section 1.4.6 Stream Classification – does not accurately describe the roles of ODFW and ODF about implementing Forest Practices rules regarding streams
2. Section 4.2.1 Watershed Designations, Treatment Allocations, Management and Research Direction –recommend identifying thresholds whereby change of acreages within designations/allocations triggers the need for additional consultation with the federal Services.
3. Section 7.2.3 – recommends considering the value of ephemeral streams and providing some RCA protections in harvest areas
4. Section 7.4.1 – recommends that DSL coordinate with ODFW and other partners on assessment of significance in regard to treatments of RCAs and persistence of salmonoids
5. Section 6.1.5 – advises that animal control actions can introduce bias
6. Section 7.4.1 (Study Design) – recommends guidance be included in the Draft FMP that can be used by decision-makers to better evaluate short-term impacts versus long term benefits or trade-off analyses associated with restoration treatments in RCAs (i.e., thinning treatments versus thermal protection of streams)
7. Section 7.4.1 (Study Implementation) –highly supports restoration treatments in RCAs which create a patchwork or mosaic pattern of conifer/hardwood habitats
8. Section 10.1.2 – unclear on the frequency and regularity of independent population basin surveying for coho salmon will occur, requesting clarification
9. Resolve placeholders (e.g., “\*\*\*” acres) currently found throughout the FMP so potential impacts can be resolved, and informed feedback can be given

## Climate Change, Adaptive Silviculture, and Forest Carbon

A majority of comments relating to climate change were encouraging the FMP for the ESRF to make any carbon credits tied to the protection of forest habitat above legally obligated protections. Furthermore, commenters urged that any carbon credits used for income must be tied to real and measurable benefits to the forest ecosystem, and desired clarity on what additional protections will be sought out to achieve carbon sequestration and carbon credits. One commenter noted how protecting the forest is the easiest and most economical way to decrease atmospheric CO<sub>2</sub> production.

Two commenters expressed specific concern that protection in one area (for ex, the CDMA) will mean greater harvest/extraction in another – and emphasized how if harvest targets are not altered, then any carbon credits from the project are not truly additive.

One commenter provided thorough comments expressing distrust for the use of carbon credits as an alternative income stream to timber sales, and claimed that there is not sufficient evidence that there will be a dependable market for carbon credits for the life of the FMP. Part of these comments included concerns from OSU's Dean Deluca in an August 2022 memorandum. This commenter claimed that the FMP's focus on climate change and carbon sequestration lacks scientific basis and practical relevance. Particularly with relation to research at the ESRF, this commenter argued that the coastal nature of the ESRF will make any research gathered there not relevant to other forested areas that are not coastal.

## Silviculture, Harvest Systems, and Operations Planning

One commenter noted that with DSL assuming complete oversight of the ESRF, two guiding principles should be established in the FMP: 1) current land allocations within the ESRF should be replaced with broad protections contingent upon the research needs determined by the problem analysis, and 2). The extractive logging-based research should be replaced with a research plan focused primarily on restoration, forest carbon, climate change, wildfire resilience, wildlife habitat, tribal values, and recreation.

Another commenter acknowledges the flexibility strategically built into the FMP, but recommended that DSL include more details that will clarify how the ESRF is to be managed and more closely aligns with the HCP.

Another commenter expressed concern about the cumulative impact of timber harvests within the ESRF on recreation, soil health, climate change, and lumber demand.

## Species Conservation

Commenters that focus on species conservation focused on specific mentions of Northern Spotted Owls, Marbled Murrelets, Coho Salmon, Martens, Beavers. One commenter encouraged the FMP to include more avian surveys. Another commenter encouraged the inclusion of sensitive, Oregon Conservation Strategy, and game species to the FMP to be protected as well.

Some commenters expressed concern over the impact of the barred owl and other predators like crows and ravens.

One commenter stated that the model used for coastal marten habitat is based on an old growth habitat and recommends a different source that will be more accurate. Commenters asked for the FMP to include how management will affect all strategy species and habitats. One commenter

criticized the FMP for protecting the Northern Spotted Owl but planning to remove the barred owls, even though the latter is supposedly a better ecological fit for the habitat. Another commenter encouraged DSL to protect any newly discovered Northern Spotted Owl nests, despite having no legal requirement to do so.

Several commenters expressed concerns about rolling back protections in the CMA, and encouraged that the FMP maintain robust protections.

Several commenters noted how logging in marbled murrelet habitat was removed from the HCP, but is still mentioned in the FMP and advised removing from the FMP.

Several commenters mentioned how protecting beavers and their habitat should be a key conservation action, and made recommendations for beaver management, in particular the American Beaver Activity Survey Protocol for the PNW.

A commenter from ODFW expressed concerns that there are many assumptions being made in the Draft FMP for species in which there are serious data gaps which inhibit accurate evaluation of treatment and restoration actions (for example, birds, amphibians, reptiles, and bats). The commenter expressed a desire for more clarity about the flexibility for harvest treatments in the RCA, and whether monitoring for species will occur when harvest is shifted to protected areas.

One commenter expressed a concern over the time frame of the FMP, and encouraged annual and decadal planning timeframes be chosen instead for more practical and measurable outcomes.

## Monitoring

Several commenters encouraged wildlife surveys at various intervals throughout the FMP, and urged more clarity on the frequency in which monitoring will take place. Commenters stated that a minimum goal of one year of pre and post implementation data is insufficient and advocated for long term monitoring to account for natural variability and external factors. This commenter recommended using multiple metrics, tools and fields of expertise.

Commenters encouraged monitoring research activities for compliance with conservation goals in the ESRF at regular intervals.

Several commenters noted the lack of clarity in monitoring techniques for in-stream habitat enhancement, particularly in regards to being able to document benefits to coho salmon populations. One commenter noted that experiments on riparian habitat thinning may also provide an opportunity to improve watershed health and coho productivity and gave detailed recommendations of monitoring actions.

One commenter recommended that water temperature be monitored downstream of any monitoring actions, in the event that proposed actions increase water temperature.

Commenters asked for monitoring plans to be developed alongside restoration strategies, and metrics should be derived from restoration objectives to measure project outcomes and inform adaptive management.

Recommendation to install traps with escape devices to avoid incidental mortality of non-target species.

## Adaptive Research Strategy and Implementation

Commenters urged for more clarity, information, and assurances that public review and engagement will occur when decision triggers are reached in the FMP.

One commenter urged the FMP to include a detailed analysis of sub watersheds and partial watersheds in the FMP that would allow readers to understand the current conditions accurately, and noted that this had been requested previously and acknowledged by OSU, but was overlooked due to the pandemic.

One commenter urged the inclusion of an appendix that would detail the differences between intensive, extensive, and reserve treatments for clarity, and recommended framing language to be included.

One commenter appreciated DSL including a research question around the implementation of large woody debris stream enhancement projects and recommended expanding the research question to continue to home in on that well established restoration technique.

One commenter urged the FMP to have a research development approach as its basis, and that the ESRF should not establish timber harvest goals and objectives until the dynamic nature of the coastal forest systems is more fully understood.

## Disturbance, Forest Health, and Resilience

Many commenters expressed concern that leaving the ESRF mostly unmanaged will increase the risk of devastating wildfire within the bounds of the forest that spread to nearby communities due to dead trees and downed woody debris that create excess fuels for wildfires. One commenter expressed concern that some of the management practices intended to enable greater biodiversity could in fact lead to excess woody debris and cause additional fire risk. One commenter noted that previous successful management of the forest had led to 80 years without a major fire, and expressed concern and suspicion over the recent tree ring study cited within "Appendix J". Another commenter pointed specifically to the recent Shelly Fire in Northern California as an example of how important strong forest management is to preventing wildfires.

Other commenters expressed concern that previous protections for the CRW and commitments to restoration harvest practices have been repealed, and claims that these new methods involving reduced retention of stands will be contrary to the objective of the CRW. Included in these comments are the following requests that

1. Treatment and restoration methods be chosen on a stand-by-stand basis, and do not enforce a one-size fits all approach to avoid intensive harvesting practices;
2. All restoration work in the Conservation Reserve area must be completed within 30 years, with no possibility for extension;
3. The overall 50% forestry retention rates stated in previous Elliott documents should be restored;
4. The permissive use of herbicides be removed from the FMP;
5. Restoration harvests remain minimal and focused on creating older, more complex and biodiverse forests; and
6. The analysis to establish research priorities and topics be established first before timber harvests are set in stone.

Many commenters urged for the FMP to prioritize conservation biology in accordance with ecological management rather than sustainable forest management methods of the recent past, and prioritize disturbance and wildlife monitoring, fire management, and meaningful research on a landscape scale.

One commenter claimed that disruption of the current plantations through harvesting and replanting is the only way to restore the forest to its previous status of creating habitat for wildlife, as the plantations were designed to maximize tree growth and inhibit predators or competition for the stands.

## Anti-Timber Industry

Commenters expressed concern that the FMP has been overtaken by timber demands, instead of focusing on preservation and conservation.

## Preservation of Old Growth Forests

Many commenters expressed concern for mature and older growth forests within the ESRF, and want to ensure that the FMP provides adequate protection and management measures for these stands resources that absorb greenhouse gases, provide valuable habitat for wildlife, enhance air/water quality, provide shade, prevent soil erosion, and protect the watersheds.

Several commenters noted how the ESRF represents a unique opportunity to balance ecological preservation and sustainable forestry and research. Commenters urged DSL to ensure that any restoration actions are for the purpose of enhancing old growth trees around it, and do not use herbicides that will affect the ecosystem at large.

One commenter noted particularly on the part of the FMP that assures trees older than 1868 will be preserved and encouraged DSL to be overly cautious, and have any necessary roads circumnavigate any trees that may be on the cusp of that cut-off. Another commenter urged DSL not to cut down any trees above 65 years old to avoid potential litigation concerns. Several commenters urged that no more roads should be built, and that the FMP should focus on growth of trees over harvesting.

Two commenters voiced support for restoration activities that create a balance of young and mature trees within the forest ecosystem.

One commenter stated that there is an absence of old-growth within the ESRF, and claims that the FMP does not acknowledge this.

## Enforceability

Commenters raised concerns about the enforceability of the plan, and encouraged the FMP to clearly discuss the ways that the public can legally hold the FMP and ESRF accountable to its goals and intentions.

## Anti-Experimental Harvesting

Several commenters demonstrated opposition to experimental harvesting within the ESRF, particularly within Marbled Murrelet habitat and recommended that any reference to experimental harvesting in MAMU habitat be removed.

## Scenic Resources

Commenters expressed concern over impact to scenic resources as a result of the FMP, and recommended that further iterations of the FMP include a clear list of resources and viewsheds, and include strategies for protecting them.

## Plan Budget/Funding

Commenters expressed concern that the budget proposed by DSL is not realistic and may lead to pressures to increase harvest levels if the budget depends on timber sales. Other commenters urged DSL to start with a lower budget and gradually increase as sustainable forestry allows them to, and move away from the timber-based funding mechanism (“working forests research model”). Commenters stressed how raising the money to decouple the Elliott from the Common School Fund is a significant effort on taxpayers and should be conservatively and carefully budgeted to ensure that conservation goals are met.

One commenter expressed concern that there was not more information regarding the economic value of the timber within the ESRF that could be available for the FMP.

Commenters asked for additional information on the long-term and self-sustaining funding plan for the FMP to ensure that research outlooks are viable and reasonable, and so timber harvests do not become an anticipated and pressured source of income for the ESRF. One commenter highlighted this concern especially in regards to providing a clear timeline and structure for coho salmon conservation and in-stream habitat enhancements.

One commenter noticed a discrepancy and requested clarification regarding whether research proposals for the ESRF should secure funding before being formally approved or not.

Several commenters mentioned concerns over the use of carbon credits and carbon sequestration used for an income stream for the ESRF and FMP.

One commenter criticized the plan for its mention of startup costs and capital investments required for ESRF functions, but did not provide a total annual cost figure

## Community Involvement

Commenters urged for greater transparency in how the public can hold the FMP and biennial operations plans accountable to the stated goals within planning documents.

Other commenters urged the ESRF to be transparent of all proposed, ongoing, and concluded projects to encourage credibility and accountability.

One commenter expressed concern that there has not been a serious enough effort to incorporate public input, and input that has been received is biased towards environmental over economic and local concerns. Commenters expressed concern that public participation and comments have been ignored in the past.

Commenters asked for greater clarity on the timeline and when additional opportunities for public input and feedback will be solicited, and clarity on how/if any feedback will be accounted for in upcoming iterations of the FMP.

Commenters also recommended for what industries commenters for the FMP are coming from.

## Recreation

Three commenters expressed concern over recreation accessibility within the Elliott State Research Forest. One commenter advocated for the plan to mention any available areas for ATV usage within the forest, and suggested a loop trail that includes staging areas and campsites, as are seen at the Oregon Dunes NRA. Another commenter thought that the FMP overlooked the historical and cultural significance of the 550 miles of roads and trails within the ESRF.

## Taxes/Common School Fund

Three commenters expressed concerns related to the decoupling of the ESRF from the Common School Fund and expressed concerns about the ESRF causing increased taxes in the future.

Five commenters expressed gratitude for the decoupling from the Common School Fund in the pursuit of conservation and research goals.

## Water Quality

There were several that emphasized the importance of activities in the ESRF to enhance and protect water quality, and for the FMP to address any currently affected streams and watersheds through restoration actions.

One commenter also requested that all water temperature monitoring be done at 15-minute intervals instead of hour intervals to align with methodologies used by DEQ. This commenter also recommended consulting with practitioners in stream hydrology to improve the methodologies used for tracking water quality in the FMP.

## Other

Some additional comments that do not fall into the previous categories include personal anecdotes and additions to the described history in the FMP to demonstrate personal connections to and local significance of the ESRF.

One comment was specifically in regards to Figure 4.11, which the commenter noted is four years outdated and requested an updated figure be created for future versions of the FMP.

## Consideration of Comments in the FMP

All comments received for the ESRF FMP are reviewed by DSL and responded to by DSL by topic area by subject matter experts. For the current proposed responses from DSL, please see Attachment A.1. Comments deemed relevant and important to achieve the objectives and purposes of the ESRF will be incorporated into future FMP revision efforts and addressed as part of the future FMP iteration proposed for Land Board adoption on October 15, 2024.

## References

- Biosystems, Water Work Consulting, Coos Watershed Association, Alsea Geospatial, Inc. and Karen Bahus Technical Writing. 2003. Elliott State Forest watershed analysis. Submitted to Oregon Dept. of Forestry. Biosystems, Corvallis OR.
- Franklin, J.F. and Dyrness, C.T. 1988. Natural vegetation of Oregon and Washington. OSU Press. Oregon State University, Corvallis Oregon. 468 p. Reprint with updated bibliography and ~500 additional references. Originally published (1973) as: Gen. Tech. Rep. PNW-GTR-008. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 427 p.
- OSU (Oregon State University) College of Forestry. 2021. Proposal: Elliott State Research Forest. Updated April 2021.  
[https://www.forestry.oregonstate.edu/sites/default/files/041421\\_esrf\\_proposal.pdf](https://www.forestry.oregonstate.edu/sites/default/files/041421_esrf_proposal.pdf)

## Attachment A.1 – Comments by Topic Area and Current Proposed Responses

This attachment includes tables by comment themes and the current status of proposed responses to those comments.

Table A-1. General Support for the Proposed Plan

Letter Number	Commenter Name	Comment	Response
03	Wendy Wagner	As someone who grew up on the border of the Elliott State Forest, I am ecstatic to read the June draft of the Forest Management Plan. There is so much great stuff in here that promises to revitalize the region and to really help expand our understanding of the temperate rainforest.	Thank you for your comment.
03	Wendy Wagner	My only concern with the plan is in defining a Climate and Biodiversity Management Area within the forest's boundaries. I strongly support allocating all 10,000 of the proposed 6,000-10,000 acres of forestland on the Elliott to a newly created Climate and Biodiversity Management Area (CBMA). Until the entire Elliott can be managed as a climate and biodiversity reserve, this represents a strong step in the right direction if combined with other protections already in place.	Instead of a new CBMA designation, DSL's proposed FMP includes a redesignation into the CRW of 10,000 acres that are allocated to the MRW (Intensive, Flexible, Flexible-Extensive, Volume Replacement and MRW Reserve allocations) in the proposed HCP. By locating these redesignated acres adjacent to the existing CRW, it assures broader carbon sequestration additionality over time across a contiguous block of conservation-dedicated landscape (the CRW). It is a commitment to further carbon sequestration-focused management on the ESRF that allows an approach to carbon and related biodiversity management that can be compared with approaches on other CRW acres. Thank you for recognizing that while the overarching driver of management in the previously-proposed CBMA was optimizing carbon sequestration through older forest growth, that this does not preclude "harvest and other types of management in some portions of the CBMA" so long as the management purpose is consistent with achieving overall carbon sequestration objectives and related biodiversity outcomes.

Letter Number	Commenter Name	Comment	Response
12	Ken Rawles	Firstly, I appreciate the inclusion of a 6,000-10,000-acre Climate and Biodiversity Management Area in the plan. This initiative underscores our forests' crucial role in carbon sequestration and biodiversity conservation, especially in the face of climate change. The addition of this area demonstrates a commitment to enhancing the forest's ecological resilience and overall health.	The State is trying to achieve a variety of values and outcomes with the creation of the ESRF. The Land Board has been clear on its desire to achieve multiple public values from the outset of the process. Also, diverse and varied interests were part of the Advisory Committee that collaborated on the formation of the forests design, and the Department intends to honor the agreements and compromises they made in coming together over the ESRF. While managing the entire Elliott as a climate and biodiversity reserve is not intended, the Department is interested in the ESRF playing a significant and meaningful role in contributing to the State's carbon sequestration, climate resilience, and biodiversity management efforts.
09	Cascadia Wildlands et al	The current draft of the FMP produced by the Department of State Land (“DSL”) differs substantially from the prior version developed by Oregon State University (“OSU”). Overall, we find this draft more concise, focused and readable. It contains some significant improvements over the prior draft but also includes both areas of significant concern and areas that need more detail.	Thank you for your comment.

Letter Number	Commenter Name	Comment	Response
09	Cascadia Wildlands et al	We strongly support the inclusion of a 6,000-10,000 acre Carbon and Biodiversity Management Area. Oregon's coastal rainforests are among the most effective carbon sequestering forests on the planet. To date, we do not believe that the ESRF planning efforts have done enough to integrate carbon sequestration into the goals of the ESRF. The addition of a CBMA designation represents a significant step in the right direction. We strongly urge the state to designate all of the proposed 10,000 acres described in the HCP. We understand that while there will still be harvest and other types of management in some portions of the CBMA, the goal will be to grow older trees through a combination of stronger conservation measures and longer rotations than would otherwise be required.	Instead of a new CBMA designation, DSL's proposed FMP includes a redesignation into the CRW of 10,000+ acres for carbon sequestration outcomes. These acres are allocated to the MRW (Intensive, Flexible, Flexible-Extensive, Volume Replacement and MRW Reserve allocations) in the proposed HCP. By locating these redesignated acres adjacent to the existing CRW, it assures broader carbon sequestration additionality over time across a contiguous block of conservation-dedicated landscape (the CRW). It is a commitment to further carbon sequestration-focused management on the ESRF that allows an approach to carbon and related biodiversity management that can be compared with approaches on other CRW acres. Thank you for recognizing that while the overarching driver of management in the previously-proposed CBMA was optimizing carbon sequestration through older forest growth, that this does not preclude "harvest and other types of management in some portions of the CBMA" so long as the management purpose is consistent with achieving overall carbon sequestration objectives and related biodiversity outcomes.
53	Gail Sabbadini	I like the idea of creating a climate and biodiversity reserve. The more of the Elliott State Research Forest protected in this way, the better. Anything that can be done to protect more of this forest, should be done.	Thank you for your comment.

Table A-2. General Opposition for the Proposed Plan

Letter Number	Commenter Name	Comment	Response
07	Kent Tresidder	Opening Statement: It is my humble opinion that your (DSL - Division of State Lands) Draft Management Plan for the Elliott State Research Forest is so faulty in it's concepts and goals that it should be totally scrapped and replaced with a new plan. (See my Recommendations, below.)	Thank you for your comment.
41	William Wagner	This plan was created to under-achieve both ecologically and economically. It begs the question if the Elliott is a research entity at all.	Your comment is acknowledged.
63	Rob Taylor	We conclude this plan is misdirected and likely to fail on both economic and scientific fronts. According to our analysis, this misdirection will continue to cost Oregon schools hundreds of millions of dollars, cost local communities hundreds of needed blue-collar jobs, significantly increase the risk of catastrophic wildfire to people and wildlife, and will be unlikely to produce scientific information of value to Oregon landowners, resource managers, and taxpayers.	Since Mr. Taylor's comments are an endorsement of the review submitted by Dr. Bob Zybach et al., please refer to DSL's response to those comments.

Table A-3. Background, Setting, Overarching Direction

Letter Number	Commenter Name	Comment	Response
04	Caroline Skinner	The 82,500-acre Elliott State Research Forest provides crucial habitat for Marbled Murrelets, Northern Spotted Owls, and Coho Salmon, and helps address the climate crisis by sequestering carbon. The Elliott is managed by the Department of State Lands, which has developed a draft Forest Management Plan to determine how the forest will be managed to address a broad array of values, including conservation, carbon management, research and monitoring, and more. It's critical that the Department of State Lands listen to conservation-seeking comments on the draft Forest Management Plan for the Elliott.	Thank you for your comment.
07	Kent Tresidder	<p>General Background Summary of the Elliott</p> <p>To summarize, the Elliott was born of fire. It was managed by the Oregon Department of Forestry - very well, by the way - from the 1950's through the 1980's. During much of that time, Elliott timber sales sold at higher prices than any timber in the Pacific Northwest. It could be said that Elliott timber was the highest priced timber in the world. Most of the revenue went to the Common School Fund, as you well know. It was a windfall and a blessing to Oregon school children.</p> <p>Then, by the 1990's the "green" political movement had gained enough power to begin shackling the professional management of the Elliott, as well as other public forests, as evidenced by the NW Forest Plan. Timber sales (and revenue) from the Elliott began declining sharply. Federal timber revenues plummeted also. Ultimately, because it was not being effectively managed at all and produced no meaningful revenue, the Common School Fund was paid off by DSL (without an appraisal?) and converted into a "Research Forest" with Senate Bill 1546. That was wrong.</p>	The Department respects that the commenter disagrees with the State's policy decision to "decouple" the Elliott from the Common School Fund and compensate the Fund as part of transitioning the Elliott to creation of the Elliott State Research Forest. The payments, however, were based on a fair market appraisal of the Elliott State Forest and later re-verification of that appraisal.

Letter Number	Commenter Name	Comment	Response
07	Kent Tresidder	Much of my concern in this testimony relates to Senate Bill 1546. I understand that the current Land Board, the DSL, and The Board of Directors of the Authority aren't totally responsible for this legislation. But they are in a position (and it could be argued, required) to provide the Legislature with informed counsel. And they are responsible for carrying out it's provisions. This Draft Management Plan for the Elliott State Research Forest is weighted toward non-economic values (which don't pay the bills) and against economic values (revenue production) which would significantly benefit the taxpayers and the school children of Oregon. It would also, simultaneously, provide jobs and the raw materials necessary to alleviate homelessness in America. I do not see how Senate Bill 1546 can benefit the citizens of Oregon or its school children. Again, it's difficult for me to understand why DSL apparently did not resist it's passage.	DSL appreciates this perspective. In addition, while DSL will certainly continue to engage with the Legislature, it is worth noting that SB 1546 has been nullified and most of its provisions are no longer legally viable. That said, the Land Board has incorporated the Legislature's direction for the ESRF's mission and management policies into its ESRF Oversight Structure (April 2024) commitments.
08	Mark Trenholm, Wild Salmon Center	The Elliott State Research Forest (ESRF) near Coos Bay is a coastal gem consisting of 82,500 acres that has the potential to support salmon and wildlife habitat, mature conifer forests and stored carbon, forest products, recreation, and education. With formal designation as a State Research Forest that is permanently decoupled from school funding and under independent public ownership, a unique opportunity exists to advance a durable solution with significant conservation protections.	Your comment is noted.
08	Mark Trenholm, Wild Salmon Center	The draft Elliott FMP under consideration is at a level of detail between the high-level strategic planning vision of the ESRF Research Proposal developed by the OSU College of Forestry in 2021 and the more site-specific Biennial Operational Plans that establish research and management activities. In addition to the ESRF HCP and the ESRF Mission and Management Principles, this draft FMP will inform the more detailed Biennial Operational Plans.	Your comment is noted.

Letter Number	Commenter Name	Comment	Response
09	Cascadia Wildlands et al.	The FMP continues to reference the “key unifying question” of comparing the efficacy of different types of management (intensive, extensive, reserves) to achieve multiple goals. With the departure of OSU from the process, we question whether this key unifying question should remain. It appears to us to be one of many important questions that will be researched on the Elliott alongside biodiversity, climate, stream health, economic benefits, etc. We urge removal of the term “key unifying question.”	While DSL continues to explore--along with the ESRF Board of Directors, OSU, Tribes and others--how questions over Triad design flexibility and a research partner will be resolved, DSL believes the FMP should set an overarching framework for how research on the Elliott (by any entity) would occur. In that context, the existence of a unifying research question as well as sub-themes is important, and especially relevant to the ESRF's intention as a place where longitudinal, long-term research occurs (with shorter-term valuable research efforts as well, but nested within a broader framework). The reality is that various types of forestry or other active as well as passive management will be advanced on the ESRF. And, DSL does intend that research on "biodiversity, climate, stream health, economic benefits, etc." occurs on the ESRF (these are covered by the research subthemes). Elimination of an overarching research question seems unnecessary to being able to pursue that research and may detract from or inject further confusion into the ESRF's overarching research framework.
55	Sierra Club Oregon Chapter	First, we recognize the substantial effort dedicated to drafting a new, comprehensive FMP for what will become our nation's largest research forest. We find the language, style, and content of this DSL document far more readable and useful than the FMP developed by Oregon State University (which it replaces). We appreciate DSL's leadership in bringing about this positive change.	Thank you for comment.
55	Sierra Club Oregon Chapter	We are glad to see some acknowledgment of the inappropriateness and shortcomings of the “Triad” research model which was used as a basis for the OSU Research Forest Proposal (RFP). As the esteemed experts Dr. Jerry Franklin and Dr. K. Norman Johnson wrote in November of 2020 [footnote 1: “Creating a Scientifically Credible and Socially Relevant Research Agenda for	The proposed FMP advances flexibility and moves away from rigid adherence to the Triad design as originally proposed. Commenter's perspective is part of why ongoing conversation (and space in the FMP) exists over resolving this research design question.

Letter Number	Commenter Name	Comment	Response
		the Elliott State Research Forest”, By Jerry F. Franklin with assistance of K. Norman Johnson, November 28, 2020]: “Triad is inappropriate as either an intellectual or experimental focus for OSU COF’s research program on the ESRF...what Oregonians need most is research that will assist managers of the Triad category 3 lands in achieving their goals of managing forests simultaneously for economic, environmental and cultural values.” [bold emphasis added]	
55	Sierra Club Oregon Chapter	With DSL now assuming oversight of the ESRF, we see an opportunity to revisit and reset some of the underlying assumptions that were embedded in the previous RFP and FMP documents. We urge DSL and the Elliott Board to apply the following guiding principles: An extensive problem analysis must be done to determine how this research forest will address economic, environmental and cultural values that are relevant to Oregonians and the nation.	DSL does not intend to start from scratch, so to speak, or abandon the collaborative agreements underlying the ESRF approach. The Department feels the underlying 6+ years of ESRF development have involved a significant amount of information and analysis relevant to the "problem analysis" commenter speaks to here. This includes a significant amount of information, analysis, materials, and related discussions through the Advisory Committee process (involving conversations with and input from Dr. Franklin and others), OSU's work on the original research proposal and its FMP process, and refinements of the research design and ESRF approach over time including this proposed FMP.

Letter Number	Commenter Name	Comment	Response
78	Bob Zybach	The photos and maps that illustrate this section of the review document the dynamic nature of the Elliott's history in comparison to the 100+ arbitrary polygons that have been integrated into the current FMP draft. The codependent HCP proposal has added another 9000 polygons to this mix, as stated during public hearings and meetings. However, of the approximately 83,000 acres of the Elliott, about 50% of the land, or 42,000 acres, has been transformed into conifer plantations following logging operations. This form of habitat is unprecedented in the history of the Elliott, as it is throughout much of the Douglas Fir Region following WW II.	<p>DSL does not agree that the management allocations and polygons related to it are arbitrary. Further, the proposed HCP does not advance an additional 9,000 management polygons. This is a reference to underlying GIS layers that DSL recognized in a public meeting and has been working with data managers to consolidate.</p> <p>That said, DSL agrees with commenter that the current extent of younger conifer plantations on the Elliott is likely unprecedented. These young plantations are allocated to various management designations as part of the ESRF HCP and FMP (e.g., CRW-Thin, Intensive, Flexible), and the proposed HCP and FMP set forth approaches to increase habitat diversity and complexity across many of these plantations (whether in the CRW or MRW). On this front, it seems commenter and DSL may have common ground. Doing so in areas of restoration thinning, and in combination with other areas of management (e.g., Extensive and Intensive allocations), is part of how the proposed FMP will achieve a diversity of early seral habitat and late seral habitat conditions (or in between) over time and space on the forest in support of a diversity of wildlife as well as research and recreational values (e.g., hunting, wildlife watching, etc.)</p>
78	Bob Zybach	The principal conclusion of this review is the ESRF FMP proposal is fundamentally misdirected and likely to fail on both economic and scientific fronts if it is adopted in its present form. This analysis suggests this misdirection will continue to cost Oregon schools hundreds of millions of dollars, cost local communities hundreds of needed blue-collar jobs, significantly increase the risk of catastrophic wildfire to local people and	DSL appreciates the review that commenter has conducted. That said, DSL disagrees with the principal conclusions drawn.

Letter Number	Commenter Name	Comment	Response
		wildlife, and will be unlikely to produce scientific information of particular value to Oregon landowners, resource managers, students, and taxpayers.	
78	Bob Zybach	<p>The term "restoration treatment" is used throughout the document but never clearly defined. It is unclear how that term is being used, but it seems unlikely the intent is to actually "restore" a past landscape condition. Conifer plantations were mostly established after the 1950s and were unprecedented on the landscape before that time. Actual "restoration" to a previous condition would necessitate a clearcut or other stand-replacement event in order to return to -- or "restore" -- a desired condition that existed in precontact or early historical times (Zybach 1994: 3).</p> <p>Rather than clearly defining terms such as "restoration treatment," "Indigenous Knowledge," or "decolonization," DSL uses them throughout the FMP with the apparent assumption that the reader understands those terms as the planners had intended. The absence of a Glossary* or clear definition of such terms in the text makes much of the document undecipherable or open to a wide number of possible interpretations. For example (DSL 2024: 6-31): "In this section, traditional definitions of restoration and conservation of ecological systems are framed through a sustainability lens and broadened to include the restoration of a whole socio-ecological system that coalesces conservation of habitat with conservation of cultural values and cultural resources."</p>	<p>DSL agrees with the point that the FMP should be clear as to what it means when using certain terms. And, DSL feels the proposed FMP has done this. Commenter has pointed to examples of terms as well as an excerpt within the proposed FMP. That said, whether in the FMP Glossary or in the body of the FMP's chapters specifically relevant to these terms and issues, the proposed FMP has described what is meant by various terms. For example, there are detailed descriptions of restoration thinning treatments (including where they can occur, and under what standards) as well as extensive, intensive, or other approaches to forest management. And, terms like Indigenous Knowledge are included in the Glossary but also discussed in greater detail as part of relevant portions of the FMP that speak to Indigenous interests and working with Tribes. The proposed FMP has been updated to increase clarity, but just as terms such as "timber operations" or "road management" can be vague on their face and perhaps not included in a glossary, it is not as if the proposed FMP's content fails to speak to them in relevant chapter locations at a level of detail that adds clarity. Selecting one excerpt (from p.6-31) and referencing it as demonstrating the FMP is indecipherable or vague fails to recognize other areas of the FMP that provide clarity, individually and/or collectively.</p>
78	Bob Zybach	<p>Restoration Treatment: Neither this phrase nor even the word "restoration" is in the Glossary. However, in the body of the DSL FMP (2024: 6-31), the following definition is given:</p> <p>"A diversity of seral stages will be sought through restoration that reflect emerging fire history data on the Elliott (see Appendix J) and support</p>	<p>The FMP sections related to restoration thinning provided additional detail above and beyond this in describing this restoration approach. DSL does not deny the dynamic nature of forest ecosystems that commenter speaks to here</p>

Letter Number	Commenter Name	Comment	Response
		<p>culturally important flora and fauna, Indigenous Knowledge, and educational accessibility."</p> <p>"Appendix J" is discussed in the Wildfire Risk section of this review and Indigenous Knowledge is discussed above. "Seral stages" typically don't exist in the Douglas Fir Region (Heilman, et al. 1981), including the Elliott, where vegetation patterns are best described in terms of primary species, age classes, and volumes (Zybach 2018: 33). Such forested areas are dynamic and typically respond with even-aged populations of the principal species present prior to stand replacement events such as fire, windstorms, and clearcuts. The term "seral stages" has been derided for many years by knowledgeable forest scientists as existing "only because they are easy to teach" (Benjamin Stout, personal communications: 1994-2004).</p>	<p>but does not feel removal of "seral stages" is needed to address this or scientific credibility.</p>
78	Bob Zybach	<p>In 1993 ODF attempted to implement a draft management plan that intended to do the same thing as the current FMP draft -- to dictate long-term static conditions for the Elliott with the rationale that researchers and planners knew what was best for targeted animals. This was the coordinated public response from professional forest managers (Zybach 1994: 9):</p> <p>"Today's populations of native coastal birds have all descended from thousands of generations of animals that had to periodically adapt to vastly changed conditions time and time again. Their environment was never a sea of "steady-state" "climax stage", old-growth trees (ODF, 1993: III-31), and never can be. Perhaps it was the process of adapting to periodic fire or wind-caused deforestations over the landscape that helped permit owls and murrelets to survive to the present. Should we then again adopt these processes into the environment? Perhaps even exaggerate their occurrence, in hopes of increasing depleted populations? Or can these effects be simply mimicked, with trees being cut and processed into human products, instead of simply burned and turned into hazardous events and mass air pollution?"</p>	<p>DSL agrees that the approach to management and research on the ESRF will need to be adaptive over time due to what commenter points out as the dynamic nature of forests including the Elliott. Various provisions in the FMP and HCP address approaches to ensure this and processes for it. This does not mean, however, that a long-term vision and approach to research on a research forest should not be pursued. Or that certain areas of the forest shouldn't be committed to the achievement of certain management objectives (to do otherwise seems to suggest the lack of a plan, or that forest plans should not be setting directional commitments) while still knowing that forest disturbance dynamics will affect this, and adaptation will likely be needed over time. To be clear, the proposed FMP does not "dictate long-term static conditions for the Elliott" as suggested by commenter. The proposed Plan recognizes forest dynamics, provides for adaptive management flexibility, as</p>

Letter Number	Commenter Name	Comment	Response
		<p>The proposed triad research design is discussed in greater detail in another section of this review, but it's 100-year timeframe is supposedly being adopted for wildlife habitat creations such as described here (DSL 2024: 9-43):</p> <p>"The Triad research design for the ESRF will allow researchers to test the current hypothesis posed in literature that creating “spatial-temporal heterogeneity in forest age and structure at landscape scales and retain mature forest trees with cavities are likely to benefit bats” (Frick et al. 2019)."</p>	<p>well as the role of science, research and monitoring in informing and advancing this over time.</p>
78	Bob Zybach	<p>Due to the Elliott's proximity to the ocean and its climate of coastal fogs, frequent showers, cool temperatures, and heavy seasonal precipitation, almost every major fire on record has started in the hot summer months of July or August and continued until heavy fall rains in late September or October. The other eight or nine months of the year are usually too wet for fires to go wild (Zybach 2018: 23-25). An exception is an east wind, which has driven all of the catastrophic scale coastal wildfires in the past 200+ years and can occasionally drive wildfires during any month in which they occur for sustained periods of time (ibid.: 32, 189, 277). These facts were not clearly recognized in the FMP and not addressed as a result. In our opinion, the failure of the FMP to accurately present or consider the documented fire history of the Elliott is a strong indication of the inability of this proposed plan to be successfully implemented, consistently funded, and/or completed.</p>	<p>DSL appreciates these comments and the relevance of the Elliott’s geographic setting and climate factors to issues like wildfire behavior. DSL has revised the FMP in the area of wildfire and its history on the Elliott.</p>

Table A-4. Governance

Letter Number	Commenter Name	Comment	Response
07	Kent Tresidder	Appoint some professional foresters (with extensive experience) to The Board of Directors of the Authority and DSL staff.	DSL is in the midst of working with the Land Board on appointment of additional board members, and DSL is currently hiring program staff for the ESRF, including a Forester.
09	Cascadia Wildlands et al.	Board Positioning in Figure 3.1: The appointed Elliott Board Plays a key oversight within the Elliott governance structure. Figure 3.1 appears to put it on par with various stakeholder groups. This figure should be revised to more accurately portray the role of the Elliott Board.	The ESRF Board is not on par with stakeholder groups, and the Oversight Structure adopted by the Land Board in April 2024 makes this clear. DSL will re-examine the noted Figure 3.1.
09	Cascadia Wildlands et al.	Unfortunately, the Elliott has been subject to decades of unsustainable and illegal harvest of its mature and old growth stands resulting in a situation where approximately 50% of this forest has been clearcut and is now less than 65 years in age. We strongly applaud the State’s efforts to suspend logging operations while a more collaborative and sustainable path forward could be charted. In particular we applaud the decision to decouple the Elliott from the Common School which drove unsustainable logging levels. Our comments on the FMP are informed by the fact that the public invested \$221 million to achieve this decoupling. All plans related to the Elliott, including the FMP, must realize the goals of this investment including protection of the Elliott’s mature and old growth stands, streams and imperiled species. Our support for continuing to advance the Elliott State Research Forest process forward is contingent on achieving these objectives.	Thank you for your comment.

Letter Number	Commenter Name	Comment	Response
07	Kent Tresidder	Appoint some professional foresters (with extensive experience) to The Board of Directors of the Authority and DSL staff.	DSL is in the midst of working with the Land Board on appointment of additional board members, and DSL is currently hiring program staff for the ESRF, including a Forester.
55	Sierra Club Oregon Chapter	<p>With DSL now assuming oversight of the ESRF, we see an opportunity to revisit and reset some of the underlying assumptions that were embedded in the previous RFP and FMP documents. We urge DSL and the Elliott Board to apply the following guiding principles:</p> <p>The governance structure of the ESRF must be thoroughly revised to align with democratic principles. Members of the Elliott Authority Board, the Scientific Advisory Committee, and leadership positions must be chosen and appointed by our elected officials, not DSL. The Land Board must have the authority to choose their own, independent candidates for these important positions.</p>	Pursuant to the Oversight Structure adopted by the Land Board in April 2024, the Land Board does have the authority and responsibility to choose and appoint ESRF Board of Director members. Members of other governance bodies and staff would be advanced by the Land Board's administrative agency arm (Dept. of State Lands) subject to ESRF Board of Director engagement and oversight, public engagement through the ESRF Board and other processes, as well as overall Land Board oversight of DSL.
78	Bob Zybach	Despite spending millions of dollars and nearly five years on these tasks, SB 1546 was sunsetted on January 1, 2024 because an HCP was not completed by that date, an Elliott Forest management plan had not been accepted by the Land Board; and plans for selling carbon credits were still moving forward. As a result, OSU President Jayathi Murthy sent a letter to DSL and the State Land Board saying a vote to accept management responsibilities would not be taken at the next Board of Trustees meeting (Murthy 2023). It is unknown at this time if the failure of SB 1546 also meant the proposed ESRF name would reinstate its original Elliott State Forest title.	DSL disagrees with this comment's factual framing. The lack of an affirmative vote by OSU's Board of Trustees by Dec. 31, 2023 to support OSU's management of the forest and related lack of Land Board adoption of an FMP (voting on OSU's 2023 FMP would have made no sense given the University's lack of affirmative vote to support OSU's management role in implementing it) were the unmet SB 1546 pre-conditions that caused nullification of the statute.

Table A-5. Partnership and Management

Letter Number	Commenter Name	Comment	Response
07	Kent Tresidder	Normally, I don't like to find fault with a proposal without also finding some positive aspects about it. Frankly, I had difficulty finding positives in this draft. About the only positive feature I found in the draft FMP for the ESRF is the reliance which DSL has placed on the previous FMP work conducted by OSU School of Forestry, an highly regarded institution. But OSU's withdrawal from the original partnership with DSL was troublesome and raised some sobering questions in my mind about the DSL goals and objectives for the ESRF.	Your comment is acknowledged.
12	Ken Rawles	Maintaining robust protections for the CMA is essential for several reasons: Long-Term Research and Education: The CMA provides a valuable long-term ecological research and education baseline. Ensuring its protection allows for continued scientific study that can inform sustainable forest management practices.	DSL assumes commenter is speaking to the Conservation Research Watershed (CRW) designation on the ESRF, not a Conservation Management Area (CMA). DSL appreciates the concern raised by commenter and does not believe it is weakening the CRW.
09	Cascadia Wildlands et al.	The FMP appears to continue to promote the concept of a lead research entity. However, as has been discussed by the Elliott Board, it is possible for DSL Elliott staff, the Elliott Board and associated advisory committees to establish research priorities and contract directly for those activities with qualified institutions and consultants. With the withdrawal of OSU, we believe that this	Commenter is correct that it remains unknown whether OSU will be the lead research entity or whether or how it might be engaged on the ESRF. This is and other commenter statements about the best way to proceed forward are part of ongoing conversations, including with the ESRF Board. It should be noted, however, that DSL and the ESRF Board are not researchers or research

Letter Number	Commenter Name	Comment	Response
		might be the most efficient and effective way to proceed forward. We would note that adding a lead research entity could create significant challenges including substantially driving up costs and removing primary control of research priorities from DSL and the board. Reference to OSU as the lead research entity should be removed from Section 3.1.1.	entities. Having a lead research entity advance a research plan and projects (including coordination across other potential researchers) within the FMP's research direction, sideboards, and governance structure (e.g., engaging with the Science Advisory Committee) remains the path proposed by this FMP. That said, other permutations and research partnership models are conceivable and could work. DSL has revised the proposed FMP to further reflect this. Resolving these issues and questions is part of next steps DSL will take in working with the ESRF Board.
15	Coos Watershed Association	The development of an Implementation and Adaptive Management Committee (IAMC) to participate in research and monitoring planning is appreciated. The list of State and Federal participants will be important to this committee's success, but local practitioners must also have a valued seat at this table. We have outlined our concerns with many areas of the study design, priorities and monitoring consistency in sections related to the aquatic and riparian zones of the ESRF. These concerns reaffirm the need for agency members and restoration practitioners familiar with riparian restoration and management to be present in the formation and execution of the FMP. Coos WA has been working alongside partners for over 28 years to mobilize the local community around collecting data, monitoring and implementing restoration projects within the bounds of the ESRF, and hope that we can be a partner and resource moving forward.	DSL agrees that integration of local partners with restoration, monitoring, and/or research experience and expertise should occur as part of next step populating of planning and implementation tables such as the IAMC. The proposed FMP has been revised to reflect this.

Letter Number	Commenter Name	Comment	Response
41	William Wagner	Further, Indigenous cultures have occupied and lived with coastal forest lands far longer and much more successfully than our northern European culture. They should have far more input into the development of a research plan than evidenced in the Elliott Forest Management Plan	DSL appreciates this comments and has revised the proposed FMP to clarify that conversations with Tribes over integrating Indigenous stewardship and research into the ESRF are ongoing. The revised FMP also clarifies DSL's commitment to this effort and approach to circling back with the Land Board on potential FMP updates or amendment in response. This includes specifically in the context the research design and related research planning.
48	Albert LePage	Integrate tribal traditional ecological knowledge with modern conservation biology approaches to create a comprehensive science-based management plan that addresses contemporary ecological challenges. Combining these perspectives, we can ensure the long-term health and resilience of the forest while honoring cultural heritage.	DSL agrees with this comment and believes the proposed FMP does so through its existing language as well as next step commitments to working with Tribes around integration of Indigenous stewardship and research on the ESRF (and future related FMP updates)
54	Rod Krahmer, Oregon Department of Fish and Wildlife	<p>The department also provides the following more specific comments related to research and partnerships; streams, designations, and treatments; wildlife; and previously unaddressed comments for your consideration:</p> <p>Research and Partnership</p> <p>The department appreciates the inclusion of ODFW in the HCP Implementation and Adaptive Management Committee. The following recommendations relate to partnering with the department and others, including:</p> <p>Section 1.1.2 (page 1-3) Guiding Principles “ The department believes that guiding principles would benefit from more specificity on including other applicable state agencies, such as but not limited to ODFW, in meaningful engagement. Engagement with the department would also be applicable to the Recreation, Educational Partnerships, and Conservation categories of this section.</p>	The Guiding Principles referenced in this comment were developed as part of foundational work advanced by the original ESRF Advisory Committee (working with DSL, the Land Board, and OSU) in creating the ESRF's design. As such, the FMP has carried them forward as adopted then. That said, DSL does not believe the Principles are inconsistent with or would preclude meaningful engagement of ODFW or other agencies or entities in the future advancement of work within Recreation, Educational Partnerships, or Conservation categories referenced by commenter. DSL has clarified the FMP to this effect.

Letter Number	Commenter Name	Comment	Response
54	Rod Krahmer, Oregon Department of Fish and Wildlife	<p>The department also provides the following more specific comments related to research and partnerships; streams, designations, and treatments; wildlife; and previously unaddressed comments for your consideration:</p> <p>Research and Partnership</p> <p>The department appreciates the inclusion of ODFW in the HCP Implementation and Adaptive Management Committee. The following recommendations relate to partnering with the department and others, including:</p> <p>Section 2.3.1 (page 2-9) Structure for Decision-Making on New Research and Integration with Existing Projects This section does not include discussion on the process and criteria for determining whether a proposed project is approved if it determined to have one or more conflicts with the listed compatibility criteria.</p>	<p>Commenter is correct that the FMP does not get into this level of detail. Chapter 2 sets forth an application and review process to ensure potential conflicts between proposed research projects are surfaced and recognized if they exist. If conflicts cannot be resolved, the FMP would not support a path that allows research under that circumstance, but the FMP does not contain details on how potential conflicts that may hypothetically arise in the future would be resolved. The lead research partner role and Research Coordinator role are critical to informing this kind of circumstance.</p>
54	Rod Krahmer, Oregon Department of Fish and Wildlife	<p>The department also provides the following more specific comments related to research and partnerships; streams, designations, and treatments; wildlife; and previously unaddressed comments for your consideration:</p> <p>Research and Partnership</p> <p>The department appreciates the inclusion of ODFW in the HCP Implementation and Adaptive Management Committee. The following recommendations relate to partnering with the department and others, including:</p> <p>The department recognizes that Section 6.1.2 (page 6-4) indicates that approval from the Oregon Department of Forestry (ODF), Oregon Department of Environmental Quality (DEQ), ODFW, and other agencies will be sought for alternative practice applications. However, it is not clear what resolution process will be followed should one of those other agencies, including the department, not approve of proposed actions due to fish and wildlife resource concerns. Since notifications for alternative practice are not typically</p>	<p>DSL has revised this portion of the proposed FMP. ODF has a process for plans for alternative compliance and/or stewardship agreements under the OFPA. DSL intends that the ESRF follow that process. DSL commits to early engagement and collaboration with ODFW and other state agencies prior to submitting an application to ODF. If agencies have concerns over impacts to resources under their jurisdiction as a result of such an application on the ESRF, the ESRF Manager or relevant staff will work to address and resolve such concerns prior to submitting an application to ODF. Application for such a plan or agreement with ODF would also be part of review and discussions with the ESRF Board (including public review and comment). If resolution is not possible, DSL (ESRF Manager or relevant ESRF staff) will make ODF aware of the situation as part of forward movement of any application.</p>

Letter Number	Commenter Name	Comment	Response
		distributed to other agencies through a standard process, the department recommends that the research director and lead forester coordinate with and seek approval from the other agencies prior to submission of a plan for alternative practice. If a stewardship agreement is sought with ODF, early engagement with the department on research and treatment actions that may impact fish and wildlife populations, particularly any riparian treatments, is requested.	
55	Sierra Club Oregon Chapter	With DSL now assuming oversight of the ESRF, we see an opportunity to revisit and reset some of the underlying assumptions that were embedded in the previous RFP and FMP documents. We urge DSL and the Elliott Board to apply the following guiding principles: OSU's College of Forestry should not play a leading role in managing research or determining which research should be undertaken in the ESRF, due to its long history of timber-industry funding and bias .	DSL appreciates this perspective but has been working with OSU on the ESRF concept since its inception, and based on Land Board direction, continues to work with OSU first in resolving the question of who will play the lead research role on the ESRF. Whether this is OSU, another entity, or a different model is part of ongoing conversations yet to be resolved.
63	Rob Taylor	Here is an outline of the principal topics of concern we address in this review, and our reasons for addressing these concerns: Economic Value: The FMP lacks essential economic facts, such as the forest's productivity, timber volumes, market value, and potential for improved yields These are crucial for informed management decisions for most forest management plans. For example, multiple methods of evaluating the forest's productivity suggest it grows at least 60-80 million board feet (mmbf) a year, yet the FMP's restrictive harvest limit of 17 mmbf per year results in significant millions of foregone income, and at a level unlikely to sustain economic viability. Without comprehensive economic analyses, the plan fails	Since Mr. Taylor's comments are an endorsement of the review submitted by Dr. Bob Zybach et al., please refer to DSL's response to those comments.

Letter Number	Commenter Name	Comment	Response
		to provide a clear picture of the forest's economic potential and management implications.	
78	Bob Zybach	<p>The review is organized in eight sections, with each focused on a key topic in the FMP:</p> <p>Economic Values (p. 3): The DSL appraised value of the Elliott is substantially less than its market value, resulting in a significant loss to the Common School Fund and Oregon taxpayers. The FMP's arbitrary limit of only 17 mmbf of timber sales per year is not enough to cover basic management costs, and leaves nothing for funding proposed research projects.</p>	Over the course of the Elliott no longer producing timber revenue for the Common School Fund due to litigation outcomes and instead presenting costs, the Land Board charted a new path based on both fiduciary responsibility towards the CSF and transitioning the Elliott to a research forest. The State has compensated the CSF with \$221 million (as part of decoupling the Elliott from the CSF), which can be reinvested and earn interest. Meanwhile, the ESRF will produce timber (although at a volume level negotiated through a collaborative process and not the level desired by commenter), with related timber revenue being a meaningful part of other multiple streams that fund ESRF operations, management and research.
84	Beverlie Woodsong	Our forest management practices need to follow in step with Menominee Tribe Enterprise's 150 year record of sustainable forest management.	Thank you for your comment.

Table A-6. Research Forest Design

Letter Number	Commenter Name	Comment	Response
02	David Stone	Research must be done by <ul style="list-style-type: none"><li>- non-partisan</li><li>- Independent</li><li>- Scientists qualified in the specialty they are researching</li><li>- No conflict of interest<ul style="list-style-type: none"><li>- No financial interest or investment in the timber industry or timber related<ul style="list-style-type: none"><li>- business</li><li>- Logging</li><li>- Mills</li><li>- Equipment</li><li>- Trucking</li><li>- Road building</li><li>- Logging machinery</li></ul></li></ul></li><li>- Not sponsored or working for private interests looking to justify their preferred outcome</li><li>- Peer reviewed</li></ul>	FMP Chapter 2 speaks to the process for approving proposed research.
04	Caroline Skinner	While I am excited about a proposal to dedicate thousands of acres as a Carbon and Biodiversity Management Area, I have concerns about potential weakening of protections in other parts of the plan.	Thank you for your comment and noting your concerns.
08	Mark Trenholm, Wild Salmon Center	Lack of design standards and geographic extent for in-stream habitat enhancement: The FMP indicates that it will “follow established practices used by local watershed groups, however the amount of area treated and the number of wood jams added will vary from one to at least 12,” which we find to be insufficient for the research purposes of the ESRF.	To address this comment and others about design standards and the need for further ESRF aquatic restoration clarity, the revised proposed FMP includes language committing to next-step restoration strategy work. See also DSL’s response to CoosWA’s comments along these same lines below.

Letter Number	Commenter Name	Comment	Response
08	Mark Trenholm, Wild Salmon Center	For stream habitat restoration research, the process should, at a minimum, involve the design and integration of a suite of discrete project elements that are identified during a concept-level design process. Design criteria are then used to define the intent and expectations of each project element. Design criteria are specific, measurable attributes of project features that clarify the purpose of each project element and articulate how each element will contribute to meeting project objectives. The detailed design of each project element determines how the project meets specific objectives; the integration of project elements determines how the project meets overarching project goals.	This comment and that above are related. See DSL's response above.
08	Mark Trenholm, Wild Salmon Center	Establishing design criteria can facilitate the integration of engineering practice with restoration practice by articulating specific design and performance expectations. Where design criteria serve the primary purpose of clarifying project objectives for the design team, design criteria also establish measurable attributes for project elements that can serve as the basis for post-project monitoring. Given that large wood placement is the only instream habitat restoration action identified in the FMP, and that large wood can be a key component in maintaining channel stability and structure in forested streams and wetlands, having a minimum standard for design criteria is the only way for the ESRF to adaptively manage the in-stream habitat enhancement across its landscape.	This comment and that above are related. See DSL's response above.
15	Coos Watershed Association	With the forest remaining in public ownership there is a great opportunity for DSL to manage the forest in a manner that goes above the minimal legal threshold for ESA listed coho and instead manage for maximizing productivity. Due to management shifts, restoration activities have already been stalled within the Coos portion of the ESRF for over 7 years. Local, State and Federal partners have used a science-driven approach to prioritize a suite of restoration projects (fish passage improvement, large woody debris placement, road upgrades) to be implemented in the future on ESRF land, and encourage DSL to prioritize implementation of these projects in the FMP and	DSL has updated the proposed FMP to clarify its intention to advance actions in the Strategic Action Plan for Coho Salmon Recovery in the Coos Basin (CBCP, 2022) as well as other restoration efforts by working with partners. The FMP sets this intention (and establishes overarching direction that helps advance rather than stall restoration efforts) while recognizing that specific project implementation would be part of the biannual operations planning

Letter Number	Commenter Name	Comment	Response
		first year of operations planning (Coos WA, 2015a). Although there are many improvements to the FMP to include the work of Coos WA and other agencies and organizations, we see the need to improve the design, implementation and monitoring of research and restoration projects to be consistent with this work.	process and be prioritized based on available funding, permits, and implementation capacity.
15	Coos Watershed Association	To improve the instream enhancement research objectives, the draft FMP must establish clear guidelines installing LWD placements predicated on work completed by restoration practitioners throughout hundreds of LWD placement projects. The FMP needs further clarification on the study design that acknowledges the current habitat quality thresholds within the ODFW Stream Channel and Riparian Habitat Benchmarks (Moore et al., 2005) which dictate how many placements per 100 m are necessary to create high-quality habitat.	<p>This and other comments on the draft FMP (from several commenters) have indicated a need for more detail in describing how aquatic habitat restoration actions (apart from RCA thinning, which the FMP speaks to in more detail) would move forward on the ESRF. DSL has updated the FMP to acknowledge best available science regarding restoration approaches (including the reference provided in this comment) while also acknowledging that part of the purpose of a research forest endeavor is to test and generate new science based on research. The intent is for restoration projects to help rather than harm habitat outcomes, so DSL appreciates commenter's flagging of a need to clarify guidelines or minimum objectives or thresholds relevant to habitat-altering restoration actions.</p> <p>DSL intends for the proposed FMP to both advance currently-designed and planned restoration actions that have already been prioritized in current restoration plans while also providing more clarity regarding how future habitat restoration approaches (and related projects on the ESRF) would integrate research questions, related monitoring, guidelines or sideboards from best available science, as well as locations and/or approaches tied to existing prioritization efforts and plans. DSL believes this could be done as part of an aquatic restoration strategy effort tied to the ESRF FMP, and that the Implementation and Adaptive Management Committee (IAMC) identified in the HCP and FMP could be a relevant process table. This effort needs to include and integrate across local restoration partners, existing adopted restoration plans (including priority areas and restoration approaches), state and federal agencies, Tribes, and research partners. It would be based on the proposed FMP's direction but would provide an additional level of detail that</p>

Letter Number	Commenter Name	Comment	Response
			many commenters are not finding in the proposed FMP. For several reasons (e.g., research partner conversations are ongoing, scope of partnerships is still being assessed, and process table would need to be formed--IAMC has not yet been populated given that HCP and FMP efforts are still pending), this effort would occur following FMP adoption. DSL, however, has revised the proposed FMP to reflect this intention and direction.
15	Coos Watershed Association	The FMP should clearly define guidelines and minimum objectives for habitat quality for instream restoration projects to assist with project design and effectiveness monitoring. As currently stated in section 7.4.2 of the FMP, "the amount of area treated and the number of wood jams added will vary from one to at least 12," leaves the scale of this research largely unknown. Designs and placement of structures should use the best available science to meet specific project objectives at the treatment reach scale and account for net export of wood, as the amount of large wood in past project sites is shown to decrease after a 6-year period (Jones et al., 2014).	See previous response.
15	Coos Watershed Association	The FMP describes how wood jam structures can affect habitat complexity, stream temperatures and nutrient releases. It does not connect how the study design will achieve these objectives, as the impact of the placement and wood jam structure engineering on achieving these outcomes is not properly discussed. Expanding on how you will, "follow established practices used by local watershed groups," and utilize and improve on the Guide to Placement of Wood, Boulders and Gravel for Habitat Restoration (ODFW, 2010) used by these watershed groups is needed in the FMP. Data driven stakeholder restoration planning has identified 37 high-priority reaches for future large woody debris within the West Fork Millicoma (Coos WA, 2015a; CBCP, 2022). Using previous work that has defined priority areas for restoration will help to streamline site selection for the FMP. The clarification of the study objectives, design and monitoring is a fundamental first step for the FMP, as	See previous response.

Letter Number	Commenter Name	Comment	Response
		these projects represent important opportunities to expand the restoration communities' understanding of how to best design these projects.	
15	Coos Watershed Association	The draft EIS and HCP acknowledge the extensive road network that is already in place within the Elliott, but then states that the permanent road network could expand with up to 40 new miles of road. We appreciate the inclusions of our work on the current inventory of road systems in the portion of the ESRF in the Coos Watershed (Coos WA, 2015b) and the substantial negative impact these roads can have on water quality and aquatic species health. The draft FMP acknowledges that an effort should be taken to decrease the number of new roads, and decommission roads that are not necessary, which should be a top priority. However, the FMP and HCP both identify a 12-year timeline for inventorying the existing road network and hydrological connectivity. This inventory should be a first step before determining that more roads are needed, and a tool for identifying upgrades or restoration projects that need to be made to existing roads to adequately protect aquatic resources before heavy use resumes and the network is extended, particularly in areas not covered by our 2015 assessment. This timeline does not adequately prioritize the need for this baseline assessment, or account for the work already completed towards this goal by other surveys. We agree that the forest road inventory and identification of high conservation value projects can and should be completed within the first 5 years of implementation, but the entire ESRF near term road strategy in section 6.6.4 should also be prioritized within this 5-year period.	While the HCP and FMP would allow up to 40 new miles of road, this is in the context of the commitment to a net reduction of road density on the forest over the permit term. DSL agrees with commenters point about the importance of the roads assessment / inventory work in informing future work, whether construction, decommissioning, or other significant road system changes ("This inventory should be a first step before determining that more roads are needed, and a tool for identifying upgrades or restoration projects that need to be made to existing roads..."). DSL will ensure the FMP reflects the direction that this inventory / assessment work will build upon work already completed by other surveys. As to timing, DSL will strive to advance this effort within the first 5-years of implementation subject to available funding, capacity, and contractor availability to perform assessment work.
25	Skye Decker	Please consider Bird Alliance of Oregon's asks regarding conserving the full 10,000 acres under consideration for habitat protection.	Thank you for this comment. The proposed FMP would re-designate 10,000+ acres from the MRW to the CRW. See DSL's response to Cascadia et al. comment on this issue for further detail.

Letter Number	Commenter Name	Comment	Response
47	Lisa Brenner & Tom Stibolt	We are concerned that the adopted Management Plan doesn't degrade the forest, but leads to long term health and growth of this complex ecosystem. That means not degrading protections in the Conservation Management Area, and placing the whole proposed 10,000 acres in the Climate and Biodiversity Management Area.	DSL's proposed FMP includes proposed integration of 10,000+ new acres into the CRW (as opposed to creating a new CBMA designation). DSL does not believe its approach to CRW management would degrade the forest given that all active management in the CRW is conservation-oriented.
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Streams, Designations, and Treatments Section 4.2.1 (page 4-19) has a confusing sentence, "... (e.g., stream restoration project, ...road decommissioning or other efforts to increase road density and improve conservation values such as hydrologic function and wildlife security." Increasing road densities may be counter-productive to other goals listed.	DSL appreciates this comment and has clarified the proposed FMP in order to reduce confusion.
63	Rob Taylor	Triad Research Design: Jerry Franklin's critique highlights the lack of practical value for other forested lands, particularly private ones, in the triad research design proposed in the FMP.	Since Mr. Taylor's comments are an endorsement of the review submitted by Dr. Bob Zybach et al., please refer to DSL's response to those comments.
78	Bob Zybach	Triad Research Design (p. 8): The proposed triad research design lacks practical value for other forested lands, particularly private ones. The design's complexity, long timeframe, and high costs raise concerns about its applicability and utility in real-world forest management scenarios.	The proposed FMP advances flexibility and moves away from rigid adherence to the Triad design as originally proposed. Commenter's perspective is part of why ongoing conversation (and space in the FMP) exists over resolving this research design question.

Table A-7. Research, Planning, and Implementation

Letter Number	Commenter Name	Comment	Response
02	David Stone	Research must test <ul style="list-style-type: none"><li>- Traditional logging methods</li><li>- Clearcutting</li><li>- Selective harvest</li><li>- Shelterwood</li><li>- Pre-commercial</li><li>- Commercial</li><li>- “restoration”</li><li>- Stream buffering</li><li>- Leaving or removing living trees of various heights</li><li>- Leaving or removing living trees at various distances</li><li>- removal of logs and woody debris in streams</li><li>- Placement of logs and woody debris in streams</li></ul>	The proposed FMP details the types of harvest treatments, forestry approaches, restoration activities or other active or passive management approaches that would be subjects for research on the research forest, as well as a unifying research question and subthemes related to these approaches. As noted in the proposed FMP, DSL is not a research entity and does not intend to be conducting the research on the ESRF directly itself. As also noted as a placeholder in the proposed FMP, further detail on specific research plans, projects, and research partner roles are part of next steps on the ESRF.
02	David Stone	Prescribed burning Planting various species of trees Planting trees at varying distances Planting trees of varying ages Genetic diversity Hardwood plantings Impact of roads, bridges, culverts Impact of sediments in all classes of streams Impact of landslides on <ul style="list-style-type: none"><li>- Uncut parcels</li><li>- Old clearcuts</li><li>- Recent harvests</li></ul>	It is not clear what commenter is asking for here, but these subjects are addressed in the proposed FMP and eligible areas of research.

Letter Number	Commenter Name	Comment	Response
		<ul style="list-style-type: none"> <li>- Plantations</li> <li>- Streams</li> </ul>	
08	Mark Trenholm, Wild Salmon Center	<p>Conservation Research Watershed (CRW) Management in FMP: As stated in the draft FMP, the "CRW anchors the ESRF conservation strategy by establishing a contiguous 33,440-acre area managed for long-term ecological functions and supported by restored and undisturbed terrestrial, riparian, and aquatic ecosystems" (p. 4-19). The CRW is a cornerstone of the agreements that allowed for development of the ESRF and HCP. We are concerned that Section 6.4.1 establishes the following proposed restoration treatments within the CRW without additional information or context: 1) 40% of stands at 20-40% pre-treatment density; 2) 40% of stands at 41-60% pre-treatment density; and 3) 20% of stands at 61-80% pre-treatment density (p. 6-32). The draft FMP should not include specific management targets in the CRW without a strong rationale grounded in best available science for how they are aligned with the overall objectives for the CRW.</p>	<p>DSL has revised the proposed FMP to address concerns raised by this and other commenters. The FMP does not advance numeric "targets" for restoration thinning. The percentages and numeric ranges in the draft FMP were an artifact from the proposed HCP, where DSL needed to identify numeric percentages and ranges in order to allow federal services as they evaluate impacts and potential "ESA take" from various management approaches. These percentages were developed as sideboards to support HCP analysis based on a "minimum floor" below which retention levels would not go. While DSL can appreciate how inclusion of them in the draft FMP context led to a misinterpretation, they were not intended as targets.</p> <p>The time window and number of entries for restoration thinning in the CRW has been extended as part of the HCP and proposed FMP. The intention was to allow DSL more opportunity to advance HCP biological objective commitments related to creation of old-forest habitat, and as commenters point out, to allow for greater flexibility for lighter-touch thinning than a single one-and-done entry.</p> <p>DSL has revised proposed FMP language to reflect restoration thinning direction based on the application of best available science related to conversion of younger plantation stands to beneficial habitat conditions (or intentional development of that science through research) and consideration of stand-specific conditions within individual eligible thinning sites. The percentages have been removed from the proposed FMP and would exist as bounds within DSL's HCP commitments, given that they were part of that</p>

Letter Number	Commenter Name	Comment	Response
			analysis. Guidelines for applying restoration thinning to individual, site-specific stand conditions include: (a) the degree to which older forest overstory structure can still be achieved within that stand (relates to stand age, density, and branching); (b) opportunities for integrating habitat complexity into the surrounding landscape consistent with mimicking conditions that natural disturbance would otherwise create; (c) minimizing adverse effects on adjacent habitat (including edge impacts if adjacent to occupied MAMU habitat); and (d) relative tradeoffs between the potential of a site to yield complex early seral or understory habitat benefits (including cultural practices or resources) versus its potential to produce valuable habitat from higher retention levels of overstory trees. These guidelines will be part of biannual operation planning discussions and likely involve field visits and discussions with scientists and practitioners who bring relevant expertise in the context of restoration thinning.
Form Letter 3	Form Letter 3	There should be no reduction in protections for the 33,000-acre, large-block Conservation Research Watershed on the west side of the forest. This has been a foundational piece of the Elliott State Research Forest vision since its inception more than six years ago. It should not be weakened now.	The Department does not view the proposed FMP as weakening the Conservation Research Watershed (CRW) or its outcomes. Changes in management direction in the FMP (compared to the original research design) continue the CRW's commitment to conservation and restoration-based management (i.e., not driven by timber harvest objectives) and flexibility in management exists in order to serve conservation and restoration outcomes.
Form Letter 2	Form Letter 2	I support the proposal to place 6,000-10,000 acres into Carbon and Biodiversity Management Areas, and strongly urge you to allocate the full 10,000 acres under consideration. However, in order to secure carbon credits, the State must commit to additional forest protections beyond those required	Instead of a new CBMA designation, DSL's proposed FMP includes a redesignation into the CRW of 10,000+ acres that were previously allocated to the MRW. See DSL's response to comments from Cascadia Wildlands et al. for more detail.

Letter Number	Commenter Name	Comment	Response
		by the Habitat Conservation Plan or otherwise required by state or federal law.	Additionality is a fundamental principle and outcome that carbon projects must meet. The State is committed to this. The additional carbon sequestration that would be achieved on the Elliott is relative to what could otherwise reasonably be harvested on the Forest under the law. The HCP was designed with a carbon project in mind, and the carbon project assumes that any carbon credits would be generated from commitments above base compliance with the Endangered Species Act.
Form Letter 2	Form Letter 2	I am concerned that the plan appears to weaken habitat protections in the 33,000-acre Conservation Management Area. Restoration harvests should focus on creating older and more complex forests and should not extend beyond 30 years. Herbicides should be prohibited in the Conservation Management Area	The FMP and HCP direct that restoration thinning in the CRW will be for the purpose of creating older and more complex forest habitat types. This activity is limited to the first 30 years of the HCP permit term as well as other limitations. Also, herbicide use is prohibited as part of stand management thinnings in the CRW (use is limited to efforts to restore native vegetation / address invasive species). Also, Note--the formal designation is the Conservation Research Watersheds (CRW), not the Conservation Management Area (CMA).
Form Letter 1	Form Letter 1	The mature forests of the Elliott are also critical for sequestering carbon and advancing Oregon's climate strategy. I am therefore very supportive of the proposal in the current FMP to allocate an additional 6,000-10,000 acres as a Climate and Biodiversity Management Area (CBMA). At the same time, I am very concerned about potential reduction in protections for the 33,000 Conservation Management Area (CMA). This has been a foundational piece of the Elliott vision since its inception more than 6 years ago. It should not be weakened now.	Instead of a new CBMA designation, DSL's proposed FMP includes a redesignation into the CRW of 10,000+ acres that were previously allocated to the MRW. See DSL's response to comments from Cascadia Wildlands et al. for more detail. DSL is not reducing protections for the Conservation Research Watersheds / CRW (referred to here as CMA, but DSL assumes commenter means CRW).

Letter Number	Commenter Name	Comment	Response
Form Letter 1	Form Letter 1	I strongly support the proposal to place 6,000-10,000 acres into Carbon and Biodiversity Management Areas (CDMAs). I urge you to allocate the full 10,000 acres under consideration. It is critical that the State recognize the important role that the Elliott plays in carbon sequestration. Designating 10,000 acres of habitat on the Elliott as CDMAs would represent an important step forward in that direction.	The proposed FMP redesignates 10,000+ acres from the MRW to the CRW for carbon sequestration outcomes.
Form Letter 1	Form Letter 1	I am concerned that the plan appears to weaken habitat protections in the Conservation Management Area. Restoration harvests in the Conservation Management Area should be "light touch" and focused explicitly on creating older more complex forests. Restoration harvests should not extend beyond 30 years and no herbicides should be used in the Conservation Management Area	The FMP and HCP direct that restoration thinning in the CRW will be for the purpose of creating older and more complex forest habitat types. This activity is limited to the first 30 years of the HCP permit term as well as other limitations. Also, herbicide use is prohibited as part of stand management thinnings in the CRW (use is limited to efforts to restore native vegetation / address invasive species). Also, Note--the formal designation is the Conservation Research Watersheds (CRW), not the Conservation Management Area (CMA).
02	David Stone	Research proposals must be approved by independent panels.	The proposed FMP describes the principles, themes, and process related to advancement of research proposals, as well as the role of the lead research partner and Science Advisory Committee in advancing a coherent and relevant approach to research on the ESRF.
08	Mark Trenholm, Wild Salmon Center	Establishing defined thresholds for research phases: As drafted, the FMP lacks clarity about the thresholds that must be met to proceed between the proposed treatment phases and the monitoring that will occur to determine whether or not those thresholds are met. While recovery of riparian forest communities will benefit aquatic organisms in the long term, there may be	The proposed FMP and HCP's sections related to monitoring and riparian thinning have been updated in ways responsive to this comment.

Letter Number	Commenter Name	Comment	Response
		short term implications, especially in regards to decreased canopy closure and decreased stream shading, that should be clearly accounted for in the FMP.	
08	Mark Trenholm, Wild Salmon Center	Timescale and restoration treatments in Phase One (pilot phase): The draft FMP does not provide adequate information regarding the time scale of Phase One (pilot phase) nor does it establish sufficient detail regarding the type of riparian thinning planned in the initial phase. Chapter 7 states that single-entry riparian thinning experiences in RCAs adjacent to Conservation Research Watershed (CRW) restoration treatments will be completed in the first 20 years. Outside of reserves, riparian treatments in RCAs “have the potential for multiple-entry treatments, supporting the use of a range of silvicultural treatments and experimentation to reduce short-term impacts” (p. 7-20). We are concerned that the draft FMP does not provide adequate detail to evaluate proposed riparian thinning treatments in RCAs in the pilot phase.	The proposed FMP has been revised to include current proposed HCP provisions related to this activity.
09	Cascadia Wildlands et al.	The FMP assumes that all stands under 65 years are managed stands when in fact it is possible that some younger stands are the result of disturbance rather than management. It is important to recognize this fact as the management goals and prescriptions may differ.	If stands under 65 years old (as of 2020) are derived from past disturbance rather than past intensive clearcut practices, the biennial operations planning process for any project activity in these stands would recognize and account for this as part of stand management objectives and prescriptions.
54	Rod Krahmer, Oregon Department of Fish and Wildlife	In general, the department finds the Draft FMP to be a science-informed management strategy that includes foundational direction and practical guidance relevant to implementing the ESRF’s integrated research management approach as well as details on the ESRF and how it is to be managed. While the department understands that an intent of the Draft FMP is to increase flexibility for ESRF research and management, it is difficult, in some cases, for the department to assess potential impacts to fish and wildlife	Flexibility advanced by the proposed FMP relates to management within various management allocations (e.g., Extensive, Intensive, Flexible) for purposes of forestry approaches, carbon, research, or financial outcomes. The revised proposed FMP has added clarity and missing details. As called out in the proposed FMP, additional work will occur in contexts including research design (Triad flexibility), Indigenous management, recreation and education, and related potential partnerships will occur and inform future updates to the

Letter Number	Commenter Name	Comment	Response
		<p>because of the inherent uncertainty also associated with the added flexibility and missing details indicated by placeholders. For example, page 2-17 reads:</p> <p>“In order to accommodate and account for the bi-modal age structure on the ESRF, restoration thinning commitments and other conditions or contingencies, the acreage and volume caps involve some degree of flexibility. The annual 1000 acre cap may be exceeded by ** acres of restoration thinning within the first three decades of the HCP if needed to accomplish that activity within this HCP timeframe commitment.”</p> <p>Along those lines, the department recommends adding specified ranges or “sideboards” around timber harvest and restoration thinning treatment acres, wherever possible in the FMP, to improve clarity and understanding about how the ESRF is to be managed, especially within designated land use allocations that have been identified for more flexible research and management options in the Draft FMP. In addition, it was also unclear to the department how added flexibility in the Draft FMP fully layers or tiers from the ESRF HCP. As mentioned in the Draft FMP, the HCP provides important regulatory sideboards for the FMP’s management actions and a baseline for its conservation commitments. Notwithstanding, these sideboards were often not readily apparent or confusing to the department within the context of “flexibility” as described in the Draft FMP. Since the ESRF HCP also remains under final negotiation with the federal government, the department recommends documenting a more comprehensive crosswalk in the FMP which more clearly and thoroughly describes links to the final approved ESRF HCP, especially in areas related to the added focus on flexibility in the Draft FMP.</p>	<p>FMP. And next-step carbon project inventory and modeling work will provide further information related to revenues. That said, DSL agrees that sideboards or commitments constraining flexibility should be clear in any management context and the Department believes the revised proposed FMP does so. It includes clear sideboards or caps related to timber volume, annual acreage levels and allowances above 1000 acres annually for restoration thinning in the first three decades, standards for treatment types (intensive timber production, ecological forestry, and restoration thinning), and an overarching structure (unifying question, subthemes, and process) within which research will occur.</p>

Letter Number	Commenter Name	Comment	Response
58	Michael Heumann	Hello. I am writing to voice my support for strong protections for the Climate and Biodiversity Management Area in the Elliott State Forest. Practicing climate smart forestry is a key component to our efforts to mitigate the climate crisis we are facing. The forests from Northern California to Southern Alaska play a vital role in sequestering carbon, and building upon the Climate and Biodiversity Management Area (CBMA) in the Elliott Forest is a very important component in this effort. Ideally, your office will expand the acreage that is protected within the CBMA, and perhaps this can become a model for protections of additional forests in Oregon and elsewhere in the Pacific Northwest.	Thank you for this comment. Instead of a new CBMA designation, DSL's proposed FMP includes a redesignation into the CRW of 10,000+ acres for carbon sequestration outcomes. See DSL's response to comments from Cascadia Wildlands et al. for more detail.
58	Michael Heumann	This has been a foundational piece of the Elliott State Research Forest vision since its inception more than six years ago. Please do not allow it to be weakened now. There is an opportunity to ensure that the Elliott Research Forest continues to be managed under climate smart forestry practices. At this point in time please allocate all 10,000 acres of forestland to the CBMA.	Thank you for this comment
55	Sierra Club Oregon Chapter	With DSL now assuming oversight of the ESRF, we see an opportunity to revisit and reset some of the underlying assumptions that were embedded in the previous RFP and FMP documents. We urge DSL and the Elliott Board to apply the following guiding principles: Reserve areas within the ESRF must be off-limits to ALL timber harvesting, immediately and in perpetuity. The move to allow “treatments” within the conservation reserve areas (now targeted for 30 years) fundamentally violates the very premise of a “reserve”. We have no confidence that such treatments would be limited to a so-called “light-touch” approach.	The allowance of restoration thinning treatments in the Conservation Research Watershed (CRW) and MRW Reserves has been part of the ESRF design since its inception, including original Advisory Group agreements, and is not something newly advanced by this FMP. These treatments are limited to only younger, homogenous plantation stands of <65 yrs as of 2020. DSL disagrees that such restoration treatments are contrary to the term "reserve". Instead of managing these plantation stands for continued timber harvest outcomes (i.e., continued repetition of intensive, clearcut management), which DSL could have pursued including under Alternative 4 of the proposed HCP, the CRW and MRW Reserves have been reserved from the timber harvest-oriented allocations on the forest. Treatments in these areas must be

Letter Number	Commenter Name	Comment	Response
			advanced for habitat restoration not harvest-driven revenue purposes, and while cut trees can be sold commercially, this is as a byproduct of conservation-based management.
78	Bob Zybach	<p>3. Triad Research Design</p> <p>This research design for the Elliott was developed by OSU as a proposal and accepted by the State Land Board in April 2021 (OSU 2021: 16-22); after slight modifications, it was formally adopted by the Board in December 2023 (OSU 2023: 84-120). This approach involved the creation of 5,735 GIS polygons (ibid.: 491), reduced to four acronyms and 14 color-coded replications (ibid.: 94), and scheduled to last at least 100 years (ibid.: 141). Start-up was estimated to take three years' time and cost nearly \$35 million (OSU 2021: 31-32).</p> <p>When OSU formally declined to accept management of the Elliott in November 2023, DSL was granted management responsibilities by the Land Board and adopted the OSU triad research design as written (DSL 2024: 1-6), but with one provision: "Landscape-scale research would be advanced across both the CRW and MRW (and in RCAs), and while research may be conducted based on OSU's triad experimental design, this FMP does not require it" (ibid: 4-4).</p>	For clarification, the proposed FMP does not adopt the OSU Triad design outright. It advances the underlying geospatial allocations related to the Triad design (the subwatersheds allocated to various management types, as modified over time and currently reflected in the proposed HCP and FMP), as commenter points out, the proposed FMP provides flexibility on whether or how (e.g., number of research polygon replicates, duration, integration of Indigenous research) the Triad design's particular approaches to management treatment and research will play out within that structure.
78	Bob Zybach	<p>Although DSL has given itself this loophole to possibly avoid implementing the triad design -- and offers no evidence of an alternative approach -- the proposed revisions that it advances are intended: "... to address the most pressing problem facing humanity: how to provide for the carbon, timber, ecosystem services needs of a global population of nearly 8 billion people without compromising the conservation of biological diversity and ecosystem health" (OSU 2021: 116).</p> <p>Rather than consider whether the vision for research on the Elliott is too</p>	<p>DSL appreciates the concerns and specifics raised by commenter regrading the Triad design. The concerns raised related to the duration, scale (and value in research at smaller scales), adaptability, and practical utility of findings (compared to utility of other approaches) are among and not exclusively the concerns the Department has heard over time.</p> <p>That said, the Triad design and its proposed merits did go through considerable work, feedback, and discussion through the Advisory Committee</p>

Letter Number	Commenter Name	Comment	Response
		broad, general, or misdirected by this global research approach, our concerns have been more focused on the cost, scale, timeframe, and practical utility of any potential findings.	<p>process that resulted in previous Land Board support for forward movement of the ESRF. And, for each point raised by commenter and others referenced here, there is likely a valid counterpoint worth considering. It is not as if these concerns and points were totally absent from past Advisory Committee or other deliberations. DSL is trying to honor that as well as advance a path that is responsive to these points and concerns raised by commenter and others.</p> <p>At this point, DSL believes flexibility in the research design can and should occur. For this reason, the proposed FMP advances flexibility both within the Triad allocations and as an overall matter (including but not limited to considerations of the scale, nature, and rigidity of any potential Triad-based research on the forest). The proposed FMP still provides the overarching structure for research on the forest (principles, unifying question, theme, subthemes, research partner roles and process) in a manner consistent with foundational ESRF work through the Advisory Committee process. And the FMP (and proposed HCP) provides clear direction related to operations, management treatments, and monitoring relevant to re-activating management on the ESRF in the near-term. But commenter is correct that the exact research plan or approach remains less than clear. Resolving next step details of the research approach (and related research roles) on the ESRF is part of ongoing conversations with OSU, Tribes, the ESRF Board, state agency and other partners, and the public. The proposed FMP recognizes this is unfinished business and includes relevant placeholder language for next steps.</p>
78	Bob Zybach	When OSU first proposed this research design in 2020, they had six established scientists conduct a transparent peer review of their proposal: two from the University of Washington	See previous response.

Letter Number	Commenter Name	Comment	Response
		<p>(UW); two from Australia; one from Canada; and one from London (OSU 2021: 112). Of these reviews, our opinions of the triad design are most closely aligned with those of Jerry Franklin (Franklin and Spies 1983; Franklin and Dyrness 1988) from UW.</p> <p>In a recent email exchange (July 4, 2024), Franklin confirmed that his initial concerns regarding the proposed research remain unchanged to the present, including the issues of time, scale, and utility: "There is no way that any of us can possibly anticipate the critical forest conservation issues that we are going to be needing to address one, two, or three decades from now" (OSU 2021: 115).</p> <p>The triad research design for the ESRF is intended to last for 100 years. The large number of research polygons makes that timeframe impossible, no matter economics, changing social values, or ownership patterns. The documented history of mass landslides (Benda 1990; Phillips 1998: 271), windstorms (ibid.: 248), and catastrophic wildfires (ibid.: 7), all but guarantee the destruction of hundreds or thousands of the nearly 6,000 research polygons at a time. These changes take place in a matter of a few hours or days, and such events typically occur several times on the Elliott during the course of a century. A research design based on thousands of polygons cannot persist, given this history and likely future.</p>	
78	Bob Zybach	<p>In addition to the impractical timeframe, the triad concept is being tested at the scale of small watersheds, whereas in Pacific Northwest (PNW) forests it is typically applied at the level of large landscapes. This scale mismatch can undermine the credibility of the results, as the production, integrated, and conservation elements of the triad are usually represented by large-scale land uses such as fiber farms, federal forests, and large reserved forest areas .</p>	See previous response.

Letter Number	Commenter Name	Comment	Response
78	Bob Zybach	<p>A third concern is practical utility of the research findings. The triad design was mostly constructed by OSU on the basis of "Six Guiding Principles," of which Principle 5 states (DSL 2024: 4-2):</p> <p>The scope and relevance of the research program are intended to contribute scientific knowledge about forest ecosystems and management of value to practices and policy at local, statewide, national, and global levels. While the ESRF is located on state public land along the Oregon Coast, it is capable of advancing management and research of much wider public interest and value. Franklin's critique highlights the lack of practical value for other forested lands, particularly private ones, in the triad research design proposed in the OSU FMP (OSU 2021: 117):</p> <p>"... the whole notion that you are doing a meaningful test of the TRIAD concept is nonsense. You are trying to test it at the wrong scale. TRIAD in the PNW forests is occurring at the level of large landscapes, not small watersheds ...</p> <p>"Personally, I think you need to start all over beginning with a truly long-term perspective on the potential of the property and an examination of what research will benefit the people (and forests) of the PNW both in the short and long term."</p> <p>In a sentence, DSL -- working with an OSU theoretical research design intended to be implemented by a Land Grant University created for the purpose of conducting applied research for the use of Oregon residents and agencies -- decided the highest and best use for Oregon's first State Forest -- which was specifically created solely for the purpose of funding Oregon public schools -- was to instead focus on the "most pressing problems to face humanity." These problems somehow includes carbon sequestration, "biodiversity," and "ecosystem services" among those pressing needs (OSU 2021: 116).</p>	See previous response.

Letter Number	Commenter Name	Comment	Response
78	Bob Zybach	<p>Finally, in addition to a debatable research design unlikely to persist over time and of little apparent practical value to Oregon's state and private forestland managers, there is the issue of cost. This topic is not addressed in the DSL FMP but was spelled out in the OSU proposal -- which gives the total start-up cost as being \$34.8 million over three years' time, including: Research Facilities (\$17 million); Working Capital (\$10 million); Research Plots and Inventory (\$3 million); Monitoring Equipment for carbon, streams, wildlife, and recreation (\$4.3 million); and 15 vehicles at \$34,000 each (OSU 2021: 31-32). Based on the 2021 proposal, the total annual cost to maintain the triad research design is approximately \$7.8 million (ibid.: 4), covering both forest management and research operations. The DSL FMP emphasizes the need for ongoing financial evaluations and startup funding but doesn't provide a single total annual cost figure; instead, asterisks are substituted in place of actual dollar amounts for generating the needed budget (e.g., DSL 2024: 2-20): "Revenue modeled from the ESRF's approach to timber harvest is anticipated to be *** / year after costs have been netted out." In sum, according to Franklin (ibid.: 116-117): "We are going to be surprised . . . taking what will be your major research property and committing it all to an experiment of any kind along with committing all of the financial resources necessary to sustain it is not – to use a kind word – prudent. " . . . And, as I noted initially, I don't consider an experiment about how to divide forest landscapes at any scale among production and conservation goals to be a high priority in our current world . . . . There are so many important things to be done and this is not one of them. " . . . I have probably said more than I needed to at this point. It is your proposal. I do not think that it does credit to the institution or yourselves; you can do much better than this."</p>	<p>See previous response regarding DSL's response to Triad-related concerns in this comment. In addition, the proposed FMP includes DSL's draft annual budget for the ESRF is contained as Appendix E (it was previously in the body of the Draft FMP and has been relocated to this appendix).</p>

Table A-8. Aquatic and Riparian Systems

Letter Number	Commenter Name	Comment	Response
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Streams, Designations, and Treatments Several places in the Draft FMP have numbers or references missing. For example, page 4-17 MRW (B) totals “***” acres; this lack of detail makes assessing potential impacts difficult.	The proposed FMP addresses these deficiencies in the draft FMP.
78	Bob Zybach	HCP Modeling (p. 11): The 2012 ODF Elliott plan had 15 subbasin polygons; the 2017 ORWW Giesy Plan had 25 named creek polygons; OSU subdivided these into 125 polygons, but with only three acronyms; USFW currently has over 9000 polygons in its HCP analysis. The Giesy plan scientifically tests HCPs, and literature review suggests fish prefer sun. The FMP relies almost entirely on untested modeling and assumptions (Zybach 1993) without field validation.	Thank you for this comment.
Form Letter 2	Form Letter 2	The plan should reduce the Elliott’s expansive road network, with a focus on those impacting fish bearing streams. The Elliott has approximately 550 miles of roads of which about 30 miles are located within 100 feet of fish bearing streams.	The Department has made commitments to reducing road density on the ESRF (through the HCP and FMP). Priorities for vacating roads (including decommissioning), restoration needs, or other efforts to address road location or density impacts on natural resource health will be established by a Roads Assessment conducted within the first 12 years of HCP permit issuance. This assessment and subsequent road-related work will also be advanced with consideration of the positive attributes that the road system provides.
Form Letter 2	Form Letter 2	The plan should incorporate specific strategies to address temperature impaired streams, and provide a list of scenic resources and strategies for protecting those resources.	The proposed FMP addresses water quality protection as well as temperature monitoring. In addition, it addresses scenic resource protection. The proposed FMP has updated both of these sections.

Letter Number	Commenter Name	Comment	Response
Form Letter 1	Form Letter 1	The plan should commit to an aggressive reduction in the overall road network on the Elliott. The Elliott currently has approximately 550 miles of roads of which approximately 30 miles are located within 100 feet of fish-bearing streams. Priority should be given to roads that impact these streams.	The Department has made commitments to reducing road density on the ESRF (through the HCP and FMP). Priorities for vacating roads (including decommissioning), restoration needs, or other efforts to address road location or density impacts on natural resource health will be established by a Roads Assessment conducted within the first 12 years of HCP permit issuance. This assessment and subsequent road-related work will also be advanced with consideration of the positive attributes that the road system provides.
Form Letter 1	Form Letter 1	The plan should include specific strategies to address temperature-impaired streams.	The proposed FMP addresses water quality protection as well as temperature monitoring. The proposed FMP has updated this section.
08	Mark Trenholm, Wild Salmon Center	In-stream habitat enhancements: In general, the FMP lacks a clearly defined restoration strategy, both for restoration treatment in RCAs and in-stream habitat enhancements. The science is clear that restoration of stream ecosystems requires a coordinated and comprehensive strategy to reestablish and sustain the natural physical, chemical, and biological processes and interactions that have been compromised by human activities. Individual projects must be considered within the overall watershed-scale restoration strategy to ensure that their incremental gains will collectively achieve restoration goals. Aquatic and upland ecosystems are interconnected and interdependent; the varying processes and range of native species that comprise a functioning aquatic ecosystem cannot be reasonably or effectively treated separately. The restoration strategy should take into account cumulative impacts to habitat abundance, quality, connectivity, and diversity on a watershed or other landscape scale appropriate to the affected species.	DSL appreciates these comments. Advancement of instream aquatic restoration work is something DSL intends as partnership work on the ESRF with local watershed associations / councils, state and federal agencies, and ideally Tribes and other partners (conservation ngo or otherwise). The Chapter 3 Partnership section of the FMP speaks to this. DSL agrees that more could be done regarding an aquatic restoration strategy that speaks to the issues commenter has raised here and below, as well as coordinates with other existing plans and partners in the area. The FMP has been revised to commit to this in its next steps.

Letter Number	Commenter Name	Comment	Response
08	Mark Trenholm, Wild Salmon Center	<p>We strongly recommend that DSL develop a restoration strategy for inclusion in the FMP that considers the following:</p> <p>Stream ecosystems are dynamic in space and time, and an effective strategy for restoration therefore requires consideration of the influence of past, current, and future events and activities on the processes that create and maintain habitat and access to that habitat. Given the natural variability of these processes, aquatic ecosystem restoration activities should focus less on recreating and maintaining specific instream habitat forms, and more on reestablishing the processes responsible for creating and maintaining natural patterns of habitat diversity, often by reducing or removing constraints to these processes.</p>	See previous response.
08	Mark Trenholm, Wild Salmon Center	<p>We strongly recommend that DSL develop a restoration strategy for inclusion in the FMP that considers the following:</p> <p>The identification of the ‘problems’ identified as needing to be ‘restored’ should serve as the basis for defining the FMP restoration goals; with the root causes of the problems informing the selection and scale of restoration strategies and actions to be included. Differentiation of the problems (e.g. specific habitat conditions) from their root causes (disrupted processes) is critical to developing an appropriate restoration strategy; it is unreasonable to expect problems not to recur if their causes have not been addressed.</p> <p>Restoration measures that treat only at the scale of the problem and not at the scale of the root cause may provide only short-term benefit. Addressing the root cause at an appropriate scale will ultimately provide a more sustainable and effective strategy.</p>	See previous response

Letter Number	Commenter Name	Comment	Response
08	Mark Trenholm, Wild Salmon Center	The ESRF also needs to set clear large wood restoration guidelines, including: i) design should only proceed when project goals and specific objectives have been clearly identified; ii) large wood structures will only be constructed from native and locally derived species and remain in place and functional under all flows up to the 25-years discharge for a minimum of 5 years; iii) created habitat will provide rearing refuge for specified species of native fish and will not strand adult fish; and iv) created off-channel habitat will be accessible during all flows greater than 100 cfs.	DSL has updated the proposed FMP to clarify its intention to advance actions in the Strategic Action Plan for Coho Salmon Recovery in the Coos Basin (CBCP, 2022) as well as other restoration efforts by working with partners. The FMP sets this intention (and establishes overarching direction that helps advance rather than stall restoration efforts) while recognizing that specific project implementation would be part of the biannual operations planning process and be prioritized based on available funding, permits, and implementation capacity.
08	Mark Trenholm, Wild Salmon Center	Most importantly, the FMP should add clarity concerning the quantity of in-stream habitat enhancement work to occur. Is the FMP proposing to allow the installation of one to twelve logjams across ESRF managed lands or one to twelve logjams per stream reach restored? The science is clear that large areas of the watershed need to be improved to detect fish response, with Roni et al. 2008 reporting that more than 20% of a watershed would need to be improved to measure a population/watershed scale response to enhancement. Given this, the in-stream enhancement proposed in the FMP is significantly inadequate to achieve any type of response for Oregon Coast coho.	The quantity of stream restoration work on the ESRF will depend in part on available budgets. The proposed restoration strategy approach can address this as well as potential partnership contributions.
08	Mark Trenholm, Wild Salmon Center	Beaver recolonization: We appreciate the FMPs recognition that the “system has areas that may be viable for additional beaver colonization and dam building.” We encourage utilization of the Beaver Restoration Assessment Tool model for structured assessment of the ESRF. This could validate site selection for smaller scale in-stream habitat enhancement projects to accelerate beaver recolonization through the installation of beaver dam analogs (BDAs) or post assisted log structures (PALS). The use of these emerging restoration techniques, which have a standard set of field fit design criteria, may produce	DSL appreciates this comment about the valuable role of beaver. The proposed FMP section on beaver has been updated. While the proposed FMP does not make a firm commitment to specific management projects (DSL is not aware of any being proposed by others on the ESRF), the FMP direction provides an overarching framework for such projects. DSL views beaver management as a partnership opportunity, including with ODFW, watershed groups, and others.

Letter Number	Commenter Name	Comment	Response
		substantial ecosystem responses across the ESRF landscape. We know that, given the influence of beaver activity on stream morphology, process based approaches like BDAs and PALS can influence habitat at broad spatial scales.	
09	Cascadia Wildlands et al.	The OSU Research Plan included experiments that allowed for selective thinning in a limited amount of acreage in riparian buffers. Depending on outcomes related to this experiment, the riparian buffer thinning could potentially be expanded over time. The key element to getting approval in the HCP for this controversial approach was that thinning in riparian buffers would be tied to long-term research. Our understanding is that subsequent to OSU's departure from the ESRF process, DSL contracted with OSU to initiate this experiment. We do not believe that this experiment should advance unless DSL has secured sufficient funding to support this project over an extended time period 10-20 years. Impacts on streams should be measured over an extended time frame. For example, studies have shown that impacts on amphibians may not be observed for up to seven years. DSL should not allow any harvest in RCAs until it had its research approach fully developed and funded. Advancing this experiment without those things in place could result in negative impacts to riparian resources with no scientific justification. This would run counter to the HCP and the stated goals of the ESRF.	DSL appreciates this comment and is committed to RCA thinning as part of research. Thinning activity will not occur without initial baseline monitoring, a research approach, and post-thinning monitoring and research. The FMP sections related to RCA thinning have been updated as part of the proposed FMP. DSL has contracted with Dr. Gordon Reeves (not OSU) as part of advancing this RCA thinning research, who is working with OSU and other scientists on this effort.
09	Cascadia Wildlands et al.	The plan should commit to an aggressive reduction in the overall road network on the Elliott. The Elliott currently has approximately 550 miles of roads of which approximately 30 miles are located within 100 feet of fish bearing streams. While the plan lays out a process for developing a plan for road removal, it is important that the FMP be more than a "plan for a plan."	The proposed FMP carries forward HCP commitments for a net reduction in road density on the ESRF over time, with a focus on the CRW. Specific targets and planning related to this will flow from the overall Roads Assessment that the FMP commits to advancing during the initial phase of the ESRF's operations.

Letter Number	Commenter Name	Comment	Response
		The FMP should set some preliminary targets for reducing the extensive road network on the Elliott.	
09	Cascadia Wildlands et al.	The OSU Research Plan left protections on Np and Ns streams vague with assurances that more data would be developed via the FMP and that the intent was in fact to provide protection for these resources. Similarly when the HCP was under consideration, these details were again deferred to the FMP. Np and Ns streams are important for a variety of wildlife including stream dwelling amphibians. Degrading Np and Ns streams also impacts the streams into which they feed. The currently drafted FMP does an inadequate job of laying out strategies for protecting these important resources.	In the proposed HCP, DSL has incorporated an Equipment Limitation Zone and other strategies relevant to type Np and Ns streams. DSL will review the proposed FMP to see that it is up to date.
09	Cascadia Wildlands et al.	The public was assured that amphibians would be addressed in the FMP. This was of particular concern since some of their most significant habitat on Np and Ns streams has limited protection. At bare minimum the FMP should include a placeholder providing assurances that DSL will work with amphibian experts to develop strategies to protect stream dwelling and terrestrial amphibians. We are concerned that on Page 10-13 the FMP indicates that amphibian work is contingent on funding. We believe that this should be a priority especially on Np and Ns streams. We would note that the Private Forest Accords prioritize stream dwelling amphibians for research. The Elliott would be an outstanding location to conduct some of the long-term research that is needed. Also in section 9.4.7 the FMP indicates that stream dwelling amphibians are covered under the Elliott HCP. This is not accurate. Stream dwelling amphibians are covered under the Private Forest Accords HCP but not the Elliott HCP.	The proposed FMP (Ch. 9—species conservation) has been updated based on this comment. Amphibian monitoring and research are contingent upon next step resolution of research partnership conversations (as DSL is not itself a researcher) as well as ESRF budget prioritization, which will include ESRF Board and public engagement. DSL encourages commenter’s engagement in that process. The inaccuracy referenced in Sec. 9.4.7 has been clarified.

Letter Number	Commenter Name	Comment	Response
15	Coos Watershed Association	The Upper West Fork Millicoma and Upper Haynes Inlet Tributaries (Palouse and Larson Creeks) are among the most productive coho salmon subbasins on the Oregon Coast. These anchor habitats are contained in the ESRF boundary. The management of ESRF land is therefore critical for the health and productivity of the entire Coos coho population and should be managed in a manner to not only protect coho, but increase their productivity.	Your comment is acknowledged.
15	Coos Watershed Association	Very recent basin-wide analysis and modeling completed for the Strategic Action Plan for Coho Salmon Recovery in the Coos Basin (CBCP, 2022) has confirmed the high quality habitat of the ESRF and identified actions to protect and restore the essential functions it provides. Over 10 million dollars of coho restoration, much of which was managed by CoosWA, has already occurred on the lands of the ESRF (Oregon Watershed Enhancement Board : Oregon Watershed Restoration Inventory (OWRI)). We appreciate DSL's acknowledgment of that historic work in the draft FMP and want to ensure that future management, harvest and experimental operations carefully consider and monitor the impacts those actions will have on past restoration investments.	DSL has updated the proposed FMP to acknowledge this work, as well as to indicate the intention for future management, restoration, and monitoring to build upon and not conflict with or harm past restoration work.
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Streams, Designations, and Treatments Section 1.4.6 (page 1-23) Stream Classification “ This section does not accurately describe the department’s role in relation to the ODF regulatory stream layer. The ODF still has responsibility for maintaining the authoritative Flow Line Data or stream layer for the purposes of administering and implementing the Forest Practices rules, whereas ODFW has a new role to approve/disprove field surveys for fish use and perennial stream flow. In addition, ODF shall incorporate the department’s findings regarding fish use	Thank you for this comment. DSL has updated this referenced FMP section for accuracy.

Letter Number	Commenter Name	Comment	Response
		and perennality into ODF's reporting and notification system (Oregon Administrative Rule [OAR] 629-635-0200 (3)).	
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Streams, Designations, and Treatments Section 4.2.1 (page 4-11) - "Watershed Designations, Treatment Allocations, Management and Research Direction" identifies revisions that would, "require recalculation of the descriptions and acreage numbers in this subsection below relevant to the categorization of lands within the MRW [Management Research Watersheds] and CRW [Conservation Reserve Watersheds] ...". The department recommends identifying thresholds whereby change of acreages within designations/allocations triggers the need for additional consultation with the federal Services.	Revisions to the acreage figures and related descriptions for various MRW allocations and the CRW would occur assuming Land Board adoption of the proposed FMP's approach to new CRW acre designation for carbon sequestration purposes. Given that any redesignation or recalculation of acres in the FMP would be more conservative than management approaches in the HCP (i.e., would not result in exceedances of analyzed ESA effects or violations of conservation measures, conditions, or commitments related to the covered activities), DSL does not believe development of additional ESA consultation thresholds is needed. That said, DSL will remain engaged with the federal Services (and state and other partners) related to implementation of the HCP and activities on the ESRF.
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Streams, Designations, and Treatments Section 7.2.3 (page 7-8) Delineation of Riparian Conservation Areas (RCAs) - Other non-fish bearing streams that are not likely to deliver wood (defined as XNFB) are currently proposed to receive 0-width Riparian Conservation Area (RCA) protections across all watershed protection zones (Table 7.6, page 7-10). The Draft FMP states that 58% of XNFB streams across the ESRF are located within reserves/RCAs which would receive protections thereby implying a balance with other XNFB streams located within intensive management allocations that would receive no protections. Notwithstanding, a recent paper by Brinkerhoff et al. (2024) indicates that ephemeral streams account for, on average, 55% of the total water volume each year. Additionally, in the department's 2022 comments on the Draft FMP it was pointed out that even short reaches with denser canopy struggle to recover thermal conditions	As part of monitoring the effects of management on the ESRF to understand outcomes related to different forest management approaches within the various allocations, DSL has committed to temperature and flow monitoring relevant to this point and these concerns. The FMP has been revised to reflect this.  XNFB streams are non-fish-bearing, non-perennial, and non-HLDP streams. In many instances, delineated XNFB streams may not have a defined stream channel and do not meet the OFPA definition of a stream type, and therefore would not receive protection under the OFPA. That said, DSL is not saying they are unimportant. ESRF Aquatic and Riparian monitoring will include thermographs located across the forest that are expected to elucidate trends in temperature associated with the treatment types permitted under the HCP.

Letter Number	Commenter Name	Comment	Response
		from sections where canopy is thinned. The department recommends considering the value of these ephemeral streams and affording some RCA protections in harvest areas.	In addition, of relevance to this comment, DSL has added an equipment limitation zone (ELZ) commitment to the HCP, with which the FMP will be consistent.
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Streams, Designations, and Treatments Section 7.4.1 (page 7-16) Restoration Treatments in Riparian Conservation Areas (RCAs) -The proposal is only 3 years of post-treatment assessment, then presumably a decision on moving forward with Phase 2 will be made. However, it is not clear to the department what factors will be used to determine success. Improved habitat quality and persistence of salmonids is stated in the Draft FMP, but it is not clear what threshold constitutes "persistence". Is it just whether salmonids are still there? This would not be a sufficient metric to determine efficacy and may have detrimental impacts to the population at a broader scale. Phase three will progress only if the results from the two earlier efforts indicated significant declines in salmonid abundances in association with the experimental treatments. The department recommends that DSL coordinate with ODFW and other partners on assessment of significance.	Based on HCP negotiations but also relevant to this comment, the proposed FMP has been revised to reflect current HCP direction for RCA thinning.  Outcomes for success are habitat based and will look at changes in ecological metrics (e.g., temperature, sediment) associated with the thinning treatment. The proposed FMP has been revised in Sec. 7.4.1 to focus on ecological metrics and remove the term “persistence”, as this metric is significantly influenced by factors beyond the ESRF’s borders and outside DSL’s control. The decision to move forward between Phases will be made in conjunction with the Implementation and Adaptive Management Committee which includes tribal, state (ODFW), and federal entities, as well as other experts.
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Wildlife Section 6.1.5 9 (page 6-7) Animal Control - The department advises that animal control actions can also introduce bias depending on research objectives and should be considered when evaluating and discussing results, when applicable.	Thank you for this comment. It is relevant to research plans and interpretation of research results, and as such, is something DSL believes should be part of conversations related to specific research plans, projects, and partnerships.

Letter Number	Commenter Name	Comment	Response
54	Rod Krahmer, Oregon Department of Fish and Wildlife	<p>Unaddressed Comments</p> <p>The department previously submitted comments on the Draft FMP in November 2023. The following comments reflect comments from that letter that the department believes were not fully addressed in this most recent Draft FMP, including:</p> <p>Section 7.4.1 (page 7-19) Restoration Treatments in Riparian Conservation Areas (RCAs); Study Design - It is not clear to the department what factors will be used to determine success of a thinning for production of fish. Most stands over 20+ years old are sufficient in height and canopy for shading small and smaller medium streams. Conifers that are over 40 years old are generally 15+ inches diameter breast height (DBH) and large enough to provide for functional large wood, especially in small streams. The department believes that thinning within riparian areas with the purpose of increasing growth rates to produce larger trees which may fall into the stream in the future needs to be balanced with consideration of thermal protection of the stream in the short term as well. While thinning increases sunlight which may yield more periphyton, macroinvertebrates and fish within the stream reach, elevated stream temperature may also affect downstream habitats. The southeast portion for the ESRF includes many of the hydrologic unit codes (HUCs) within the range of coastal coho, and cold-water thermal inertia or the flush of cold water downstream is important to offset warming in lower stream reaches. The department recommends guidance be included in the Draft FMP that can be used by decision-makers to better evaluate short-term impacts versus long term benefits or trade-off analyses associated with restoration treatments in RCAs.</p>	<p>DSL has advanced revisions relevant to RCA thinning and monitoring approaches in both the HCP and FMP contexts. The proposed FMP has been updated to reflect this. Further, the IAMC (which will include ODFW) will be part of shaping and evaluating RCA thinning approaches and outcomes.</p>

Letter Number	Commenter Name	Comment	Response
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Unaddressed Comments Section 7.4.1 (page 7-20) Restoration Treatments in Riparian Conservation Areas (RCAs); Study Implementation - The department recommends restoration treatments also recognize and prioritize the establishment and enhancement of hardwoods in RCAs. Hardwoods, especially along small and medium streams provide exceptional shade and large wood recruitment to the stream, as well as other high value wildlife habitat structures and functions, including important nutrient input for macroinvertebrates. The department highly supports restoration treatments in RCAs which create a patchwork or mosaic pattern of conifer/hardwood habitats.	<p>DSL appreciates this comment and does not believe the proposed approach to RCA thinning on the ESRF is at odds with it.</p> <p>Vegetative conditions in many parts of RCAs have been altered as a result of past management. Plantings of Douglas-fir plantations following historical timber harvest have created dense plantation stands in some areas, including in riparian zones. In other areas, hardwoods are the dominant trees, resulting in a low occurrence of conifers.</p> <p>The IAMC (tied to the proposed FMP and HCP, and which will include ODFW) will be part of reviewing, shaping and evaluating RCA thinning approaches and outcomes. The IAMC could identify areas where prioritization of hardwoods would enhance long-term ecological function of RCAs. DSL would support that approach and has revised the proposed FMP to note this; and it would not require any update to the proposed HCP.</p>
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Unaddressed Comments Section 10.1.2 (page 10-13) Aquatic and Riparian Systems; Coho Salmon - The department is unclear whether this means a standard survey reach in each independent population basin will be sampled every third year.	The proposed FMP has been revised to reflect updating monitoring language.
63	Rob Taylor	HCP Modeling: The 2012 ODF Elliott plan had 15 subbasin polygons; the 2017 ORWW Giesy Plan had 25 named creek polygons; OSU subdivided these into 125 polygons, but with only three acronyms and six assigned colors; USFW currently has over 9000 polygons. The Giesy plan scientifically tests HCPs and	Since Mr. Taylor's comments are an endorsement of the review submitted by Dr. Bob Zybach et al., please refer to DSL's response to this same comment from Dr. Zybach.

Letter Number	Commenter Name	Comment	Response
		literature review suggests fish prefer sun. The FMP relies almost entirely on untested modeling and assumptions without field validation.	

Table A-9. Climate Change, Adaptive Silviculture, and Forest Carbon

Letter Number	Commenter Name	Comment	Response
Form Letter 3	Form Letter 3	Carbon credits only deliver real climate benefit if they are additional: any carbon credits claimed must be tied to durable protection of forest habitat that is demonstrably additive above legally obligated protections. In order to secure carbon credits, the State must commit to additional forest protection above protections outlined in the Habitat Conservation Area or otherwise required by state or federal law.	Additionality is a fundamental principle and outcome that carbon projects must meet. The State is committed to this. The additional carbon sequestration that would be achieved on the Elliott is relative to what could otherwise reasonably be done on the Forest under the law. The HCP was designed with a carbon project in mind, and the carbon project assumes that any carbon credits would be generated from commitments above and beyond base compliance with the Endangered Species Act.
Form Letter 1	Form Letter 1	Any carbon credits must be tied to durable protection of forest habitat that is demonstrably additive above legally obligated protections. In order to secure carbon credits, the State must commit to additional forest protection above protections outlined in the HCP or otherwise required by state or federal law	Additionality is a fundamental principle and outcome that carbon projects must meet. The State is committed to this. The additional carbon sequestration that would be achieved on the Elliott is relative to what could otherwise reasonably be done on the Forest under the law. The HCP was designed with a carbon project in mind, and the carbon project assumes that any carbon credits would be generated from commitments above and beyond base compliance with the Endangered Species Act.

Letter Number	Commenter Name	Comment	Response
12	Ken Rawles	Maintaining robust protections for the CMA is essential for several reasons: Climate Resilience: Forests are pivotal in mitigating climate change. Protecting the CMA ensures the forest can continue sequestering carbon effectively and provide climate resilience.	DSL assumes commenter is speaking to the Conservation Research Watershed (CRW) designation on the ESRF, not a Conservation Management Area (CMA). DSL appreciates the concern raised by commenter and believes conservation protections in the CRW are strong.
09	Cascadia Wildlands et al.	It is important that the FMP clearly defines what additional, additive protections will be put in place, especially if it plans to seek carbon credits. It is also important that the state be clear that biodiversity objectives within this designation will be consistent with growing older forests that sequester more carbon. For example, while early seral habitat is valuable, making early seral habitat an objective within the CBMA would work in direct opposition to carbon goals.	<p>Instead of a new CBMA designation, DSL's proposed FMP includes a redesignation into the CRW of 10,000+ acres for management that advances carbon sequestration and related biodiversity outcomes. These acres are allocated to the MRW (Intensive, Flexible, Flexible-Extensive, Volume Replacement and MRW Reserve allocations) in the proposed HCP, and their integration into the CRW is thus additional to what the HCP would require. By locating these redesignated acres adjacent to the existing CRW, it assures broader carbon sequestration additionality over time across a contiguous block of conservation-dedicated landscape (the CRW). The management direction for these new CRW acres is focused on optimizing carbon sequestration and related biodiversity. Passive management would occur on over half of these acres as the forest ages forward. Active management through thinning on other acres would likely result in some complex early seral habitat over time across these new CRW acres, but it would be part of movement through seral stages relevant to the objective of optimizing carbon sequestration across these acres. This attempts to recognize that late successional forest or old growth conditions are not static or homogenous, and areas of habitat complexity within these new acres through time can be consistent with overall carbon sequestration uplift.</p> <p>Acres selected for incorporation into this designation a mix of ages and forest conditions already contiguous with the existing CRW. Over half of the 10,000+ acres are existing mature forest that would be grown forward passively for</p>

Letter Number	Commenter Name	Comment	Response
			<p>development of old-growth conditions. Other acres could be managed with ecologically-based approaches to thinning that are not driven by or designed for harvest outcomes but rather support achievement of carbon sequestration objectives while allowing for habitat complexity and diversity within the overall late successional development direction across these new CRW acres. Salvage logging would not be allowed within this designation, nor would herbicide use as part of reforestation. Ecologically-driven (non-harvest driven) approaches to thinning on these new CRW acres would be available beyond the time caps on existing CRW acres in the proposed HCP (30 year window and 80 year entry limits). This approach to the new CRW acres is intended to advance carbon sequestration and conservation objectives consistent with those of the existing CRW but with greater ability to research, compare, and contrast approaches and outcomes across adjacent lands(as compared to managing the new acres exactly the same as existing CRW acres). This FMP-based direction constrains harvest above and beyond what would otherwise be allowed on these acres (and analyzed effects) in the HCP context. In addition, should natural disturbance on the existing CRW acres reduce carbon sequestration there, the new acres add a buffer pool of within the ESRF to help protect against overall loss of carbon sequestration outcomes on the ESRF over time.</p>
09	Cascadia Wildlands et al.	Carbon Credits: The FMP makes it clear that the DSL intends to seek carbon credits in exchange for increased levels of protection for mature stands on the Elliott. To the degree that the DSL chooses to enter the carbon market, it is critical that it results in real and durable protections above those being proposed to meet regulatory mandates. There must be real and measurable additionality in order to qualify for carbon credits and any sort of double-counting must be rigorously avoided. We are concerned about the concept	<p>DSL agrees and is committed to the principles of additionality and avoiding double-counting (i.e., claiming carbon credits for the same acres needed for ESA compliance). DSL's response to Form Letter 3 and other comments addresses this. DSL believes carbon sequestration additionality (forest carbon growth beyond levels achieved on acres needed for ESA compliance alone) exists in the ESRF's base design, including management of many areas of young plantations for restoration and carbon outcomes instead of intensive harvest production, and is enhanced through additional carbon sequestration</p>

Letter Number	Commenter Name	Comment	Response
		that carbon credits will not interfere with harvest targets or science goals (2.5.1).	<p>commitments made through this FMP, As to the concern raised over a carbon project not interfering with research goals or harvest targets: The FMP is advancing a carbon project while also still intending to advance the ESRF's foundational approach to a landscape management design capable of achieving 17mmbf on a 4 year rolling average; and the FMP remains committed to a carbon project that does not interfere with planned research approaches, including on forestry approaches but also on carbon dynamics.</p> <p>A carbon project is not explicitly a mechanism to protect mature or old-growth stands in and of itself, but rather as a means of ensuring a specified amount of additional carbon is sequestered and achieved on the ESRF over time (as compared to what could otherwise legally occur). Both the carbon project under consideration and the HCP hold multiple co-benefits that are not explicitly measured or outlined in either process along (HCP or CO2 project). Moreover, the additional funding that may become available through the advancement of a carbon project can provide an increased ability to conduct research and monitoring on the forest. This point is important to recognize because many of the mature and old growth stand protections on the ESRF are related to commitments DSL is making as part of the proposed HCP. The carbon project will advance additionality primarily related to management of younger forest stands (managing them in ways that allow additional carbon sequestration than the harvest approaches that could otherwise occur) and other approaches in this FMP (e.g., longer rotations, new CRW acres) rather than how mature and old-growth stands would be managed pursuant to the proposed HCP.</p>

Letter Number	Commenter Name	Comment	Response
09	Cascadia Wildlands et al.	If in fact they [carbon credits] have no impact on harvest targets, can it legitimately be said that they are truly additive?	DSL and the Land Board have advanced HCP Alternative 2 based on the assumed integration of a carbon project. The Land Board has clarified over various meetings that, in the absence of an integrated carbon project, the timber harvest and revenue levels associated with Alternative 2 would be concerning and merit consideration of a more timber-focused approach. In this regard, DSL believes Alternative 2 and the ESRF's foundational agreement to a landscape design capable of achieving 17 mmbf as resulted speak to compromises that have certainly impacted harvest outcomes otherwise possible on the Elliott.
47	Lisa Brenner & Tom Stibolt	Carbon sequestration in the Eliot State's mature forests is a critical goal for the State. It must not be compromised! We have followed reporting of sham carbon credit programs, and insist that any carbon credit programs actually contribute to the forest ecosystem well beyond current practice and legal requirements. Reduction in the roads within the forest, particularly those within 100 yards of streams is one activity with a big return on investment.	DSL agrees with this comment regarding carbon credits and refers to DSL responses to Cascadia et al. Comments on this subject for more detail. In addition, proposed FMP and HCP commit to a reduction in overall road density on the ESRF over the permit term and speaks to the value of reducing road-related impacts to streams.
53	Gail Sabbadini	I support the idea of carbon credits as long as they are carefully managed and audited. No double dipping should be allowed, the same trees used as carbon credits multiple times. Also, carbon credits should have a high cost to corporations applying for them in order to offset their profits from their production of greenhouse gasses burdening the public.	DSL's approach to a carbon project ensures against double counting concerns raised here.
53	Gail Sabbadini	The protection of Oregon's existing forests is the easiest and most economical way to decrease atmospheric CO2 production. It is our best hope for reducing the slope of the global temperature rise.	Thank you for your comment.

Letter Number	Commenter Name	Comment	Response
48	Albert LePage	Carbon credits must be tied to additional, durable habitat protections. The U.S. Department of Energy (DOE) explains that biological carbon sequestration involves storing CO2 in vegetation and soils, which removes CO2 from the atmosphere and transforms it into stable forms of organic carbon [2]. Ensuring that carbon credits are based on additional protections beyond legal requirements will enhance the credibility and effectiveness of these measures. Integrating traditional forestry practices with modern conservation strategies that include carbon sequestration and ecosystem service markets can create new economic opportunities, enhance forest resilience, and ensure long-term community benefits while maintaining the ecological integrity of the Elliott State Forest	DSL agrees and refers to its responses to Cascadia et al. comments on this same subject for more detail. The approach to integrating a carbon project, an HCP approach to ESA compliance, and various approaches to forest management, cultural engagement, and timber harvest all on one landscape more broadly dedicated to a research forest is part of the ESRF's overall innovation. DSL is interested in next-step efforts that explore (through demonstration and research) the potential relevance of this ESRF model in larger social, economic, and forest management contexts.
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Streams, Designations, and Treatments Section 4.2.1 (page 4-11) - The Draft FMP identifies the Carbon and Biodiversity Management Areas (CDMAs) as a new designation. Notwithstanding, it is not clear to the department how CDMAs layers or tiers from the ESRF HCP since it would allow for additional timber harvest within designated reserve areas.	Instead of the proposed CBMA designation in the Draft FMP, the proposed FMP would integrate new acres into the CRW. This approach would not allow for less not additional timber harvest within these new acres compared to what would be allowed under the proposed HCP. DSL refers to its response to Cascadia et al. on the subject of how the proposed new CRW acres tier to or interact with the proposed HCP. In short, as a regulatory matter, management within the proposed new CRW acres would be more conservative than the management sideboards (and analyzed ESA effects) otherwise allowed on those acres in the proposed HCP.
55	Sierra Club Oregon Chapter	In this regard, although we are generally skeptical of forest carbon offsets, we are supportive of DSL's efforts to use carbon credits as an alternative funding source. This approach could change how forests are valued economically, reducing logging for revenue, while simultaneously advancing research that has great relevance to society. Both fraud and destructive management practices have been exposed within the voluntary carbon market. To be	Thank you for this comment. DSL is committed to a carbon project approach on the ESRF that is credible, advances additionality, and does not compromise relevant research on the forest. DSL agrees the ESRF's approach to integrating a research forest, an HCP, and carbon sequestration approaches including but not limited to a carbon project is unique and could demonstrate meaningful value in the larger forest management context. While a carbon project would

Letter Number	Commenter Name	Comment	Response
		credible and effective, any offsets developed within the Elliott need to have 100-year terms, protect both old growth and mature forests, disallow salvage logging, and result in verified additionality. Of course, such a model would entail meaningful, long-term changes in how the forests are stewarded.	ensure and credit forest growth and carbon sequestration, some of the terms commenter wishes to see are more related to other tools (e.g., provisions in an HCP, FMP, or other protective mechanisms) than what a carbon project contract would provide.
63	Rob Taylor	Income: Carbon Credits: DSL promotes the sale of carbon credits on the Elliott as compensation for its lack of planned timber sales. This is a fairly recent market option with a volatile economic history, based on unproven scientific assumptions, and for a highly dynamic coastal Douglas fir forest with a documented history of catastrophic wildfires, major windstorms, floods, landslides, and vandalism. The FMP’s carbon sequestration strategies lack a feasible approach for long-term carbon storage in the forest. This aspect requires thorough evaluation, as described by OSU, to ensure it aligns with both ecological sustainability and economic practicality.	Since Mr. Taylor's comments are an endorsement of the review submitted by Dr. Bob Zybach et al., please refer to DSL's response to those comments.
63	Rob Taylor	Climate Change: Climate has been about the same for coastal Oregon for hundreds of years [Cite]. There is no documented information that it is changing in any significant way at the current time. Douglas fir, western hemlock, and Sitka spruce are principal conifer species and red alder and bigleaf maple are primary species and all have adopted to a wide range of climatic conditions over time and current geographical ranges. There is currently no pressing need to assume, or plan for, management problems related to a changing climate for the foreseeable future	DSL is not in agreement with this comment, and since Mr. Taylor's comments are an endorsement of the review submitted by Dr. Bob Zybach et al., please refer to DSL's response to those comments.
78	Bob Zybach	Income: Carbon Credits (p. 5): The FMP promotes the sale of carbon credits as an alternative revenue source to timber sales. However, this market is volatile, based on unproven scientific assumptions, and presents documented financial risks. The economic feasibility and long-term sustainability of relying on	DSL appreciates this comment and has been diligent in considering the benefits and risks associated with a carbon project. It is true that this revenue source does not have as long or proven track record compared to timber, which argues for a careful approach. That said, it should be noted that what

Letter Number	Commenter Name	Comment	Response
		carbon credits are questionable. Issues related to the transparency and accuracy of financial projections, as well as past hidden financial details, further complicate this strategy.	commenter says about carbon markets (volatile, questions over scientific assumptions, presents risks) has also often been said of timber markets.
78	Bob Zybach	Climate Change (p. 25): The FMP's focus on climate change and carbon sequestration lacks scientific basis and practical relevance for the Elliott's coastal environment. The emphasis on selling carbon credits and conducting climate-adapted forestry research is not justified by the forest's historical climate stability.	DSL appreciates but disagrees with this comment.
78	Bob Zybach	<p>Three days prior to Murthy's decision the DSL-OSU Advisory Board on the Elliott had received a confidential report from a contractor hired to analyze the economic potential of a 100-year carbon sequestration plan (Elder 2023). The bottom line to the plan -- and assuming the Elliott could even be "certified" to sell carbon credits -- is that DSL would receive less than \$1 million per year for the first 10 years by putting most of the Elliott off-limits to timber sales (ibid.: 6). Of this amount, the sponsoring company would get 20% for assessment, verification, sales, and 5-year monitoring inspections -- unless the sequestered carbon was affected by wildfire, windstorm, landslides, or other causes, in which money would have to be repaid. This was not a new development, but rather an ongoing concern regarding OSU's participation in the management planning process. In OSU Forestry Dean DeLuca's August 2022 Memorandum to the State Land Board, for example (DeLuca 2022), "several reasons" are given why OSU "has consistently resisted selling offset credits in the regulatory compliance market" (ibid.: 1). Among the reasons given by OSU regarding these concerns and resulting decision included: 1) a carbon credit sale would "consistently restrain"</p>	<p>Commenter references a "confidential report from a contractor". The carbon project feasibility analysis report submitted to DSL was and is not confidential. It was shared publicly as part of public-facing materials posted associated with meetings where this subject was discussed openly and with opportunity for public comment--including in 2023 with the ESRF advisory group as well as more recently with the ESRF Board.</p> <p>Three other responses are worth noting in light of this comment:</p> <p>(1) carbon credits tied to a carbon project are in addition to, not in lieu of, revenue from timber (active management that produces timber harvest remains a part of the ESRF's approach; a diversified management model that includes carbon sequestration with related revenue plus harvest treatments with related timber revenue is the ESRF's approach rather than a binary one vs. the other);</p>

Letter Number	Commenter Name	Comment	Response
		<p>research activities on the forest -- instead, carbon sequestration should be a significant "research opportunity"; 2) a "non-viable" 100-year commitment against entering "alternative carbon markets" in a dynamic world; 3) costly carbon credit management and compliance obligations; 4) serious financial risks; and 5) a sale would compromise the options and authority of ESRF managers (ibid.: 1-2).</p> <p>Despite these legitimate and well-documented concerns, DSL has continued to fund and pursue efforts to market carbon credits to generate income in lieu of timber sales on the Elliott. This commitment included a "foundational" ESRF "Mission and Management Policies" statement submitted to, and approved by, the State Land Board that: "(1) Advances and supports forest health, climate resistance, carbon sequestration . . ." (DSL 2024: 2-3).</p>	<p>(2) DSL is advancing a voluntary carbon market project not a "compliance" market project that commenter references OSU as having resisted (there are important differences, and carbon sequestration can and does remain a significant research opportunity on the ESRF with a voluntary market project in place); and</p> <p>(3) It is not simply the Land Board that has supported forest health, climate and carbon sequestration objectives as important components of the ESRF's overarching direction (mission and management policies); the Legislature has also done so with bi-partisan support of SB 1546 (2022) (including not just these broader objectives for the ESRF but the authority to sell carbon credits), and as referenced in the proposed FMP, the State has adopted broader policy plans and objectives related to climate change and carbon apart from the ESRF process but within which the Elliott plays a part.</p>
78	Bob Zybach	<p>This Mission Policy is further detailed in the Introduction to the FMP with a more precise commitment to carbon credit purchases, and the related legislation and rationale for doing so (ibid.: 1-6):</p> <p>"The FMP connects to the State's Climate Change and Carbon Plan and related policies advanced by the State's Board of Forestry, including through increased carbon sequestration on the forest, related demonstrations and research on climate-adapted forestry, carbon and forest-management dynamics, wildfire and disturbance dynamics, and integration with a voluntary project for the sale of carbon credits."</p> <p>This commitment to the sale of carbon credits on the Elliott had been initiated and supported by Huntington from the beginning of the signing of the MOU while representing OSU College of Forestry, throughout his tenure at DSL, and</p>	<p>The existence of a carbon sequestration program and intended carbon project on the ESRF has long been contemplated and vetted through public meetings of DSL advisory bodies since the inception of the ESRF effort. Regardless of personal references or positions, a contemplated carbon project approach has been advanced by the Land Board and by the Legislature (SB 1546, 2022). The ESRF's start-up costs do not depend on the existence of a carbon project, and DSL believes OSU rather than commenter is best placed to say whether the existence of a carbon project was a primary reason for OSU's 2023 determination not to take up a vote on ESRF management.</p> <p>The use of asterisks in the cited draft FMP parenthetical is only to denote the need to create a specific Appendix naming convention for a document (ESRF Oversight Structure) that was not yet in existence and therefore not part of</p>

Letter Number	Commenter Name	Comment	Response
		continuing to his present position as an environmental advisor to Oregon Governor Kotek. As a result, a significant portion of the Elliott's startup costs are claimed to be dependent on the sale of credits and a principal reason that OSU defected from the project. The few specific mentions of this strategy are deeply buried in the FMP and asterisks are even used to further shield these efforts (e.g., <i>ibid.</i> : 2-21, emphasis added): "DSL intends, based on this FMP's approach, that the ESRF participate in available ecosystem services or forest carbon programs and markets consistent with the State Land Board's adopted Management Policies as well as Oversight Structure for the ESRF (see ***Appx / Oversight Structure**)."	the 2023 OSU FMP that formed the basis of DSL's draft FMP and Appendices. There is nothing nefarious in the use of asterisks in the draft FMP in order to flag a detail update that has been addressed in the proposed FMP. The Oversight Structure document was reviewed and adopted by the Land Board at its April 2024 public meeting, following several open public meetings of the ESRF advisory group where this document was discussed and shared publicly, and it has (since April 2024) been publicly displayed on DSL's ESRF website as referenced in the draft FMP.
78	Bob Zybach	Further, the selling of carbon offsets in the compliance market comes with long-term obligations, including both management responsibilities, such as reporting and compliance costs, and monetary obligations, such as those resulting from potential reversals (i.e., re-release of stored carbon through wind, fire, landslide, or disease).	DSL agrees with this comment, which has informed its due diligence in considering a carbon project.
78	Bob Zybach	McAfee (2021) has argued that offsetting carbon emissions through the sale of carbon credits has had little or no effects -- as advertised -- on Global warming, in part because it does nothing to reduce the emissions in the first place. Further, because forests are dynamic, even if offsets were effective in the short term (with no indication they are), the purchased offsets would be compromised when forests die or begin dying ( <i>ibid.</i> : 172).	This and related comments speak to the dynamic nature of forests, including growing concerns related to wildfire and other disturbance forces that are influenced by climate change, as well as the issue of controlling and reducing CO2 emissions being a central part of addressing climate change concerns. DSL respects these points and also recognizes the Department does not have policy control over the state's, the country's, or the international community's approach to broader carbon emission reduction. In the context of a narrower decision about an FMP for the ESRF, DSL believes the FMP's approach to carbon sequestration (including but not limited to a voluntary carbon project) and related research will play a positive role in demonstrating and advancing positive contributions relevant to the broader carbon and climate arena

Letter Number	Commenter Name	Comment	Response
			(whether they be sequestration, science, business model exploration or otherwise).
78	Bob Zybach	McAfee also points out that, on a global scale, there is often an adverse effect on poor communities adjacent to carbon offset forests through the banning of cattle grazing, mining, or harvesting of traditional forest crops (McAfee 2021: 174). The reduction in local jobs can be illustrated on the Elliott itself. Jerry Phillips (personal communications) expressed concerns on many occasions that "critical habitat" reserves on the Elliott had cost hundreds of local jobs related to selling, logging, trucking, and processing wood products, and the creation of 100-year set-asides would only prolong these problems and make them worse.	DSL believes concerns raised here related to banning cattle grazing, mining, or traditional forest crops are not relevant to the ESRF context. Regarding traditional uses by Indigenous peoples, DSL intends for the ESRF to be a place where such uses remain and are restored; a carbon project would not ban them, and the FMP and HCP cover approaches relevant to ensuring they exist or are expanded (e.g., cultural use of cedar as an HCP covered activity, native plant restoration or management for habitat relevant to first foods, use of indigenous fire). Regarding concerns over impacts of management decisions or designations related to wildlife / species habitat upon jobs related to wood products, DSL appreciates this comment and notes that the status quo on the Elliott for over 10 years has been no timber harvest as a result of litigation related to this issue. DSL is looking to move beyond the status quo and avoid further legal conflict over wildlife / species habitat in a manner that also produces wood products and related social and economic benefits. Harvest levels and wood product outcomes will not be what they once were, but compared to the status quo and in the context of managing public forests for achievement of multiple values, DSL believes the ESRF approach will be meaningful.
78	Bob Zybach	In sum, the promoted sale of carbon credits on the Elliott has already resulted in a significant amount of time and cost to Oregon taxpayers without any indication as to whether a stable market even exists, much less whether the Elliott is even qualified to make sales or not. And even if credits can be sold, their value is so low in comparison to traditional timber sales and at the cost of hundreds of local jobs that it is difficult to justify this effort on either	Your comment is acknowledged.

Letter Number	Commenter Name	Comment	Response
		economic (jobs and income) or biological grounds for any dynamic forested area, including the Elliott.	
78	Bob Zybach	The phrase "climate change" appears more than 100 times in the FMP and is promoted as a significant and dangerous reality that needs to be addressed from both a management perspective and a research approach that can inform others. One problem with this concern is the Elliott's position adjacent to the Pacific Ocean, which greatly modifies the local climate and is not representative of most of the Douglas Fir Region (Taylor and Hannan 1999: ix, 7-41; Taylor and Hatton: xii, 7-37).	Your comment is acknowledged.
78	Bob Zybach	<p>Another problem is that many scientists do not think the climate is actually changing in an abnormal or adverse way. And even if it does, most plants and animals -- especially people -- will either adjust, migrate, or else go extinct, like always. The large majority of scientists in both camps (e.g., CO2 Coalition; Climate Etc.) seem to agree that 1) CO2 emissions and forest carbon sequestration have no measurable effect on global temperature estimates or climate; and 2) additional CO2 in the atmosphere is probably beneficial in terms of food production and forestland expansion.</p> <p>The Elliott is located along the central Oregon Coast, which has among the mildest temperatures and foggiest, windiest, rainiest, and cloudiest climates in both Oregon and all of the western US, and mostly because of its proximity to the Pacific. According to Hansen (1947: 47):</p> <p>"That part of the area lying west of the Cascades has a milder climate than that of any other section of the continent in the same latitude. Some localities on the west slope of the Coast Range and Olympic Mountains have the heaviest annual precipitation in the country . . ."</p> <p>Hansen's pioneer regional pollen studies included at least two key research</p>	DSL agrees that the Pacific Ocean effect plays a significant role in the past, current, and future conditions on the Elliott. Other statements and conclusions in this comment are those of the commenter. DSL also appreciates that commenter does not view the intentional approach to carbon sequestration and a carbon project on the ESRF as a positive thing. It should be noted that carbon sequestration and a carbon project on the ESRF is not in lieu of timber harvest and revenue; it is in addition to not instead of.

Letter Number	Commenter Name	Comment	Response
		<p>sites a few miles west of the Elliott, between Coos Bay and Florence. These sites show evidence of local Douglas fir presence for at least 13,000 years (Hansen 1941; 1943; Zybach 2018: 30-33; 49-51). This finding is in contrast to the more dynamic regional research and revealed this climate pattern (Hansen 1947: 116):</p> <p>"On the coastal strip adjacent to the Pacific Ocean there is little indication of a climate drier and warmer than the present at any time during the Postglacial. The marine influence has moderated the climate and the available moisture has probably never been a limiting factor."</p> <p>In the face of this long-established and accepted research regarding the historical and current weather and climate of the western Coast Range, the FMP has adopted a political decision to manage the Elliott for "increased carbon sequestration," and conduct research on topics named "climate-adapted forestry" and "carbon and forest-management dynamics." This work would be funded, at least in part, by selling "carbon credits" (DSL 2024: 1-6):</p> <p>"In addition, this FMP intentionally addresses forest management in the context of growing pressures related to climate change and disturbance. The FMP connects to the State's Climate Change and Carbon Plan and related policies advanced by the State's Board of Forestry, including through increased carbon sequestration on the forest, related demonstrations and research on climate adapted forestry, carbon and forest-management dynamics, wildfire and disturbance dynamics, and integration with a voluntary project for the sale of carbon credits."</p> <p>It is not surprising that this intention to sell carbon credits in lieu of selling timber is touted as important research that is "not only atypical of plans for managed forests, it may be unprecedented," as if that were a positive consideration. And further: "unlike typical plans . . . these activities will occur in the context of scientific research relevant not just to current western</p>	

Letter Number	Commenter Name	Comment	Response
		science, but the future shape of that science as informed by Indigenous Knowledge and other ways of knowing" (ibid.: 1-7)	
78	Bob Zybach	In sum, the climate of the Elliott State Forest is atypical for almost all of the US in that it has been generally stable and predictable for thousands of years; and during which times lodgepole pine, Douglas fir, hemlock, and spruce have all been the dominant form of forest vegetation. There is no indication that these circumstances will change in the foreseeable future, and yet DSL plans to sell carbon credits and conduct costly carbon sequestration research because of "climate change."	Regardless of whether the State or DSL agree with this comment, the existence of a research forest such as the ESRF seems relevant and valuable. How can the conclusion or assumption of "no indication that these circumstances will change in the foreseeable future" be ascertained as true or false without scientific research?

Table A-10. Silviculture, Harvest Systems, and Operations Planning

Letter Number	Commenter Name	Comment	Response
02	David Stone	<ul style="list-style-type: none"><li>- Impact of logging on recreational activities<ul style="list-style-type: none"><li>- Hiking</li><li>- Fishing</li><li>- Hunting</li><li>- Camping</li><li>- Dispersed camping</li></ul></li><li>- Impact on soils by<ul style="list-style-type: none"><li>- Harvest method</li><li>- Logging equipment</li><li>- Hauling equipment</li><li>- Season of logging</li></ul></li><li>- Impact of logging on climate change</li><li>- Demand for logs per<ul style="list-style-type: none"><li>- Size of logs</li></ul></li><li>- Quantity of lumber offered by unit, timber sale</li><li>- Jobs supported in<ul style="list-style-type: none"><li>- Traditional mills</li><li>- Automated mills</li><li>- Associated businesses<ul style="list-style-type: none"><li>- Logging</li><li>- Tourism</li></ul></li></ul></li></ul>	Thank you for this comment. DSL believes monitoring approaches and research on the ESRF will provide information relevant to the values and considerations listed here.
07	Kent Tresidder	<p>Four Recommendations</p> <p>1. I highly recommend that DSL adopt the Geisy Plan Option, or at least seriously consider it as a viable starting point for replacing the Draft Management Plan you are soliciting. I'm sure you are aware of the Geisy Plan, since it has been mentioned and introduced in response to your previous efforts at public</p>	DSL appreciates commenter's affinity for the "Geisy Plan". It was an option explored as part of the 2017-18 Oregon Consensus independent assessment effort to explore alternative public ownership options for the Elliott. This assessment did not indicate widespread support for this option as an approach to the Elliott's future (compared to other pathways). The ESRF Advisory Committee

Letter Number	Commenter Name	Comment	Response
		<p>outreach. I have learned, however, that it has apparently been totally ignored by DSL and staff. The Geisy Plan Option is not as quite as aggressive at revenue production as I might prefer. However, it was very well thought out by professionals who have valuable on-the-ground experience. It is a compromise which, from my experience as a forester, can be very successful. I just ask that you give it serious attention. More information relating to the Geisy Plan Option may be found at Oregon Websites and Watersheds Project, Inc. (ORWW) website (<a href="http://www.orwww.erg/ElliottForest/Research/GiesyPlan/index.html">http://www.orwww.erg/Elliott Forest/Research/Giesy Plan/index.html</a>).</p>	<p>collaborative effort resulted in agreements and compromises tied to the research forest approach that emerged. In addition, DSL is well aware of the OSU President Murthy letter and its content, but DSL does not wish to assume it knows what specifically caused the President to reach her conclusions (or validate what other people ascribe as her motivations), other than what is on the face of the letter.</p>
55	Sierra Club Oregon Chapter	<p>With DSL now assuming oversight of the ESRF, we see an opportunity to revisit and reset some of the underlying assumptions that were embedded in the previous RFP and FMP documents. We urge DSL and the Elliott Board to apply the following guiding principles:</p> <p>Current land allocations, which divide the ESRF into so-called “reserves” and watersheds subject to various types of “harvesting,” should be replaced with broad protections contingent upon the research needs determined by the problem analysis.</p>	<p>DSL appreciates this perspective. Over time, DSL has revised management allocation types and boundaries in ways that differ from the 2021 Research Proposal. And the proposed FMP does advance additional direction (and designation) in order to advance carbon sequestration and biodiversity while also creating room for flexibility in the Triad research design (part of ongoing research design conversations with Tribes, OSU, and the ESRF Board). That said, DSL has not proposed undoing the foundations of the base CRW and MRW arrangement on the forest and related subwatershed allocations. These foundations were part of original collaborative agreements and compromises around the ESRF design.</p>
55	Sierra Club Oregon Chapter	<p>With DSL now assuming oversight of the ESRF, we see an opportunity to revisit and reset some of the underlying assumptions that were embedded in the previous RFP and FMP documents. We urge DSL and the Elliott Board to apply the following guiding principles:</p> <p>The extractive logging-based “research” focus should be entirely replaced with one that is primarily focused on restoration, forest carbon, climate change, wildfire resilience in existing plantations, wildlife habitat, Tribal values and collaboration, and recreation.</p>	<p>The overarching direction that the proposed FMP advances for ESRF research is not single-value focused but rather is inclusive of all values mentioned by commenter. The unifying question, theme and subthemes, and other research-related provisions in the proposed FMP speak to this.</p>

Letter Number	Commenter Name	Comment	Response
78	Bob Zybach	<p>In 2016 Wayne Giesy and I were requested by State Senator Ted Ferrioli to develop an alternative strategy for managing the Elliott, rather than selling it. This proposal was also requested by Governor Kate Brown personally, and again in a public meeting in December of that year (Giesy and Zybach 2017a). The 2024 FMP described the appraised value and sale process in this manner (DSL 2024: 1-51):</p> <p>"The total \$221M payment to the Common School Fund was derived from underlying property appraisal work on the Elliott (and subsequent verification). At the time the State Land Board and DSL voted to decouple the Elliott from its constitutional obligations to the Fund in 2022, this sum represented an exceedance of the verified appraised value. The Land Board's December 2022 decoupling vote (and related actual payments as compensation into the Common School Fund) marked a major milestone in the forest's history and significant step in enabling the creation of the ESRF."</p>	Thank you for sharing this and the related comment information below.
78	Bob Zybach	<p>More than seven years earlier, in February 2017, Giesy and I formally presented the requested proposal to the Governor and DSL, which included this analysis (Giesy &amp; Zybach 2017a: 3):</p> <p>"It is estimated that existing timber on the Elliott State Forest is worth "at least" \$600 million. Other estimates place the market value of combined land and timber at over \$1 billion. The existing sales price — based on arbitrary evaluation restrictions by the State Lands Board — is only \$220 million. If this sales amount is accepted, there will be an apparent and permanent loss in value to the Oregon School Fund of at least \$380,000,000, and possibly much more over time."</p>	Thank you for sharing this information. DSL appreciates commenter's affinity for the "Geisy Plan". It was an option explored as part of the 2017-18 Oregon Consensus independent assessment effort to explore alternative public ownership options for the Elliott. This assessment did not indicate widespread support for this option as an approach to the Elliott's future (compared to other pathways). The ESRF Advisory Committee collaborative effort resulted in agreements and compromises tied to the research forest approach that emerged.

Table A-11. Species Conservation

Letter Number	Commenter Name	Comment	Response
09	Cascadia Wildlands et al.	The FMP notes that DSL is not obligated under the proposed terms of the HCP to protect newly discovered Northern Spotted Owl nests (6-25). While this is in fact accurate, our hope would be that DSL would recognize that the discovery of a new nest, especially given the dire circumstances facing the Northern Spotted Owl, would be cause for real celebration and would work to protect that nest site. The terms of the FMP and HCP give DSL that kind of flexibility. Our expectation would be that in the event of the discovery of a new Northern Spotted Owl nest or other valuable natural resource (e.g. martens, imperiled plant species, etc.) that, consistent with the mission of a research forest and the values that underpin the Elliott, special consideration would be given to their preservation.	DSL generally agrees with this comment, and in the context of operations planning, would work with the flexibility provided in the HCP and proposed FMP.
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Unaddressed Comments Section 7.5 (page 7-27) Additional Stream Restoration and Stream Assessment Activities -The department recommends adding a literature citation or reference to the sentence, “While there is currently limited beaver activity in the ESRF, the system has areas that may be viable for beaver colonization and dam building”.	DSL has updated the FMP provisions related to beaver based on responses and information provided during the Draft FMP review process as well as ongoing proposed HCP process. A citation has been added in Sec. 7.5 in response to this comment.
78	Bob Zybach	The first HCP (Habitat Conservation Plan) on the Elliott was adopted in 1996 in response to a series of anti-logging lawsuits by environmental organizations in response to federal listings and considerations of spotted owls and marbled murrelets by the federal Endangered Species Act (Kruse, et al. 2012). The stated purpose of the HCP was to allow continued timber sales on the State Forest to benefit the Common School Fund, as required by law, and to provide needed jobs and income for local communities while providing	DSL appreciates the overall thrust of this historic recounting and does not disagree that impacts from various events have certainly occurred related to timber harvest and revenue over time. DSL, however, disagrees with the factual accuracy of certain characterizations here and in the referenced chart.

Letter Number	Commenter Name	Comment	Response
		<p>"critical habitat" for targeted ESA species. This chart, compiled directly from official Oregon Department of Forestry (ODF) annual reports, shows that the ESA listings and subsequent HCP adoption resulted in a reduction of nearly half of the Elliott's historical 50 mmbf/year sales to only 25 mmbf/year. For the 20-year period from 1990 to 2010 this resulted in a loss of most profits earmarked for the Common School Fund and an estimated reduction of more than 200 local jobs (Zybach 2024a: 67-72; 97-119).</p> <p>The spotted owl was listed as "threatened" by the ESA in 1990 and the Elliott took immediate steps to reduce timber harvest levels (Phillips 1998: 348-351). In 1992, the marbled murrelet was also listed (Marshall 1998), and in 1995 the Elliott had its first HCP approved for the two birds.</p> <p>In 1996, coho were added to the list (Zybach and Ice 1997: 281), and in 2001 the HCP on murrelets expired and ODF began planning for a new HCP (EcoTrust 2011: 12).</p> <p>In 2011, ODF completed a forest management plan (ODF 2010) for the Elliott that was immediately challenged in court by Portland Audubon Society, Cascadia Wildlands, and the Center for Biological Diversity as being potentially harmful to marbled murrelets (Kruse, et al. 2012). By 2014 all logging was stopped on 28 different ODF sales, including more than 900 acres on the Elliott, and the environmental organizations received a settlement for an unknown amount and their lawyers were also paid.</p> <p>The DSL draft FMP documents this loss of jobs and income and current efforts to obtain an HCP (DSL 2024: 1-6): "The ESRF Habitat Conservation Plan provides programmatic permit coverage under the Endangered Species Act for covered management and research activities over an 80-year term. This programmatic permit coverage is an intentional part of addressing federal legal compliance that has idled active management on the forest since roughly 2013."</p>	

Letter Number	Commenter Name	Comment	Response
		<p>Forsman (1976) studied spotted owls for his Masters degree under Chuck Meslow at OSU and Nelson (1986) studied marbled murrelets for her Masters degree under Chuck Meslow, also at OSU. These original findings were then combined with Franklin's study of old-growth Douglas fir (Franklin and Spies 1983) to create legal "critical habitat" definitions for the two birds, and thereby set the criteria for designing HCPs for the Elliott. These circumstances were referenced and discussed regarding the 1993 Elliott draft forest plan by Zybach (1994: 9):</p> <p>"Today's populations of native coastal birds have all descended from thousands of generations of animals that had to periodically adapt to vastly changed conditions time and time again. Their environment was never a sea of "steady-state" "climax stage", old-growth trees [ODF, 1993: ill-31], and never can be. Perhaps it was the process of adapting to periodic fire or wind-caused deforestations over the landscape that helped permit owls and murrelets to survive to the present." Coho were first listed in 1996, but there is discussion as to whether these fish benefit more from sunlight (Zybach 1994: 3; Zybach 2024a: 14-17; 109-13), as with most fish, or are "very much affected by forest cover," along with steelhead (Zybach and Ice 1997: 295).</p> <p>These animals have been written about extensively in both the academic press and in popular publications. Much of what has been written about spotted owls (Zybach 2024 a: 9-13, 73-78), marbled murrelets (ibid.: 44-49), and coho (ibid.: 14-17, 109-113) is specific to the Elliott. These findings strongly challenge the assertions regarding the need -- or even value -- of HCPs without some form of scientific assessment that is generated in the field, rather than on a computer.</p>	

Letter Number	Commenter Name	Comment	Response
Form Letter 2	Form Letter 2	I share the same concerns as others about the Elliott forest plan; including, but not limited to the points below: The mature forests of the Elliott provide crucial habitat for Marbled Murrelets, Northern Spotted Owls and Coho Salmon, and help address the climate crisis by sequestering carbon.	The HCP and FMP make significant commitments to protecting old-growth, conserving and restoring mature and old forests, and protecting and enhancing species and their habitats.
Form Letter 2	Form Letter 2	The plan should support no-cut buffers in occupied Marbled Murrelet habitat, and remove any reference to experimental harvest in these areas	No harvest activity is allowed in Occupied murrelet habitat as defined in the HCP. References to experimental harvest opportunity in these areas was removed from the HCP and, based on correction of an oversight, it has also been removed from all sections of the proposed FMP.
Form Letter 1	Form Letter 1	The plan should clearly address buffers for occupied Marbled Murrelet habitat.	No harvest activity is allowed in Occupied murrelet habitat as defined in the HCP. Significant effort through proposed HCP negotiations has addressed concerns over edge-effects to murrelet habitat, and the FMP carries HCP commitments forward.
02	David Stone	Wildlife: The plan must protect all state and federally endangered and threatened species: - Northern Spotted Owl - Marbled murrelet - Salmonid species - Salamanders - Etc.	The proposed Habitat Conservation Plan (HCP) is the primary means of protecting federally listed species under the Endangered Species Act.

Letter Number	Commenter Name	Comment	Response
02	David Stone	Impact of barred owl Impact of Predators - Crows - Ravens	The proposed HCP provisions, to which the FMP will also adhere, incorporates a barred owl management commitment relevant to addressing Northern Spotted Owl conservation. The HCP and FMP also contain habitat protections and a buffering approach aimed to address impacts corvid predation upon Marbled Murrelet.
02	David Stone	Prey base - Red backed voles - Flying squirrels - Etc.	The landscape design and allocations on the ESRF provide conservation benefits beyond ESA listed species, which includes benefits for prey species such as those mentioned here. The FMP's Wildlife chapter also speaks to this.
12	Ken Rawles	However, the proposed reduction in protections for the CMA is deeply troubling. The CMA serves as a critical habitat for numerous species and plays a vital role in maintaining the forest's ecological balance. Any rollback of protections in this area could significantly negatively impact wildlife, water quality, and the overall ecosystem.	DSL assumes commenter is speaking to the Conservation Research Watershed (CRW) designation on the ESRF, not a Conservation Management Area (CMA). DSL appreciates the concern raised by commenter and does not believe it is weakening the CRW.
12	Ken Rawles	Maintaining robust protections for the CMA is essential for several reasons: 1. Biodiversity Conservation: The CMA is home to diverse flora and fauna, some of which are imperiled. Reducing protections could lead to habitat degradation and loss of biodiversity.	DSL assumes commenter is speaking to the Conservation Research Watershed (CRW) designation on the ESRF, not a Conservation Management Area (CMA). DSL appreciates the concern raised by commenter and does not believe it is weakening the CRW.
09	Cascadia Wildlands et al.	The 1400 acre Marbled Murrelet experiment in which logging would occur in occupied Marbled Murrelet habitat, was among the most controversial aspects of the Elliott process. We appreciate DSL's decision to remove it from the HCP. However, the experiment continues to appear in multiple locations in the FMP. Consistent with the HCP, any reference to this experiment must be	This harvest experiment in occupied MAMU habitat has been removed from HCP covered activities and DSL believed this had also been reflected across all pages in the draft FMP. The proposed FMP has been revised to do so.

Letter Number	Commenter Name	Comment	Response
		completely removed from the FMP. The location in which reference to this experiment occurs (both explicitly and implicitly (i.e. “logging in occupied habitat”)) include pages 6-23, 6-23, 6-26, 9-13, 9-17 and section 9.2.3.	
09	Cascadia Wildlands et al.	On page 9-18, the FMP states that there is as much as 37,000 acres of Marbled Murrelet breeding habitat on the Elliott. This is far more than appears to be covered by the occupied and consolidated layers. It is not clear why there is a significant discrepancy between these numbers. The consolidated layer was supposed to include all occupied and potential habitat minus a few limited categories (e.g. stringers). This discrepancy needs to be resolved. Also on page 9-16, the FMP states that intensive stands found to be occupied by MAMU will be reassigned. It should say that both intensive and extensive stands found to have MAMU will be resigned.	DSL appreciates this comment and will make the correction on p.9-16. Regarding the page 9-18 comment and apparent discrepancy, DSL is looking into this and will either respond with an explanation and/or correct the perceived discrepancy as part of the revised FMP.
09	Cascadia Wildlands et al.	Much of the past year was spent addressing the lack of MAMU buffers within the active management areas. While this issue is addressed in the HCP, it is barely mentioned in the FMP. In fact, the FMP should provide an additional layer of detail beyond what is in the HCP to guide operational plans over the next 10-20 years. This is an issue of critical importance and the FMP should provide detailed guidance as to how it will be addressed.	The FMP has been revised to provide additional detail.
09	Cascadia Wildlands et al.	The draft FMP references the DEIS regarding the value of beavers for healthy streams and providing rearing habitat for juvenile coho, a covered species for the ESRF. Beaver benefits to water storage and longer seasonal flows, provision of large woody debris, leaf litter supporting aquatic insects, other wildlife habitat and food sources, are described (ODFW). Given likely changes in precipitation and temperature with climate change, protecting and	DSL appreciates this comment about the valuable role of beaver. The proposed FMP section on beaver has been updated. While the proposed FMP does not make a firm commitment to specific management projects (DSL is not aware of any being proposed by others on the ESRF), the FMP direction provides an overarching framework for such projects. DSL views beaver

Letter Number	Commenter Name	Comment	Response
		expanding beaver populations should be a proactive Conservation Action. The DFMP states that the southern portion of the permit area is less steep, and more likely to have beaver habitat, referencing Figure 5-3 of the DEIS. Despite the stated benefits of beaver for coho and secondary benefits, the DFMP fails to make a commitment to implement management to increase beaver in the Elliott.	management as a partnership opportunity, including with ODFW, watershed groups, and others.
09	Cascadia Wildlands et al.	<p>Recommendation for inclusion in the FMP for beaver management:</p> <ol style="list-style-type: none"> <li>1. Prohibit hunting and trapping of beaver in the ESRF.</li> <li>2. Early assessment of beaver presence and vacant potential habitat for beaver.</li> </ol> <p>This is most likely in the southern streams in the ESRF, where the topography is less steep.</p> <ol style="list-style-type: none"> <li>3. Evaluate the benefit of beaver dam analogs in unoccupied beaver habitat, which can raise water levels to promote growth of beaver-preferred woody vegetation and deeper water which is safer and preferred by beaver.</li> <li>4. If unoccupied beaver habitat is identified, investigate offering recipient sites for relocation of beaver for non-lethal beaver management programs.</li> <li>5. Partner with NGO groups who do surveys for beaver and potential beaver habitat, do willow plantings and other revegetation to promote beavers, and participate in beaver relocation efforts.</li> </ol>	DSL has revised language in the proposed FMP related to these recommendations. While DSL is committed to working to advance points 1 and 5 in these recommendations, DSL notes that it does not have legal authority over the hunting and trapping of wildlife (point 1), and it will need to advance agreements with willing partners on point 5. As to the other recommendations, these relate to what DSL regards as partnership-related efforts that DSL could engage so long as capacity exists.
09	Cascadia Wildlands et al.	The plan should more clearly delineate a strategy for monitoring for federally listed martens. Martens are not covered in the HCP so a “no take” strategy must be adhered to in order to comply with the Endangered Species Act. Martens	As noted, the marten is not among the covered species under the proposed HCP, and as such, DSL intends a "take avoidance" approach to addressing marten conservation. DSL will review the list on p.9-28.

Letter Number	Commenter Name	Comment	Response
		should also be added to the Oregon Conservation Strategy list found on page 9-28.	
09	Cascadia Wildlands et al.	Section 9.4.6 which describes strategies related to avian species is cursory at best. The FMP should include a more robust avian management and research strategy. OSU bird surveys are referenced on page 10-25 which may be sufficient to remedy this deficiency. However, given the current status of OSU, it is not clear that these surveys will actually continue. The FMP should explicitly commit to continuing these surveys either with OSU or another entity.	DSL appreciates this perspective but does not agree the FMP approach is cursory. The bird surveys referenced in the FMP's monitoring chapter are certainly relevant to overall avian conservation and management. As noted, uncertainty over OSU engagement, funding availability, as well as future needs around budgeting priorities are relevant to advancement of these surveys. These issues are part of next step conversations with the ESRF board, OSU, and related public engagement.
48	Albert LePage	The plan should remove any references to experimental harvests in occupied Marbled Murrelet habitat. Given the species' endangered status, it's critical to maintain strict protections for their habitat. Scientific studies have shown that preserving mature forest structures is essential for the nesting success of Marbled Murrelets [ 4].	See DSL's response to comments from Cascadia et al. On this same subject.
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Streams, Designations, and Treatments The department recommends field surveys for marbled murrelet (MAMU) and northern spotted owl (NSO) be conducted in any Volume Replacement (page 4-18) stand prior to moving forward with exchanging harvest plans with a MRW allocation due to MAMU occupancy.	DSL is committed to the survey approach for MAMU set forth in the proposed HCP within acres of modeled potential habitat, specified in HCP Condition 7 and designated according to maps in the HCP and FMP. The proposed FMP would integrate acres in the Volume Replacement allocation into the CRW, which would ensure treatments within these limited acres are related to optimization of carbon and biodiversity (not harvest-driven).

Letter Number	Commenter Name	Comment	Response
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Streams, Designations, and Treatments Section 6.3.2 (page 6-21) - Goals and objectives for extensive watersheds in the Draft FMP have a focus on NSO, MAMU, and Oregon Coastal coho. The department recommends consideration of goals and objectives that include assessing a broader spectrum of species, including but not limited to sensitive, Oregon Conservation Strategy (2016), and game species.	The proposed FMP has been revised to clarify that this broader spectrum of species is part of the goals and objectives for extensive allocation management.
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Wildlife Section 7.4.1 (page 7-16) states that potentially birds and bats are outside the scope of the FMP assessments. It is not clear to the department what is meant by this statement because there are many research objectives focused on MAMU and NSO. The department also believes it is important to note that several bat species are facing future threatened and endangered species listing concerns, so incorporating monitoring methods such as the Motus Wildlife Tracking System (MOTUS, <a href="https://motus.org/">https://motus.org/</a> ) to support research efforts and contribute to baseline data for tagged wildlife species that can fly.	The proposed FMP has been revised to address this comment regarding Section 7.4.1. And Chapter 9 (Wildlife) and 10 (Monitoring) have been updated to include the information provided here regarding bats.
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Wildlife Section 7.5 (page 7-25) Additional Stream Restoration and Stream Assessment Activities. The Draft FMP states, "... any beaver activity that is observed will be noted as a component of stream monitoring and research activities." The department recommends utilizing the American Beaver Activity Survey Protocol for the Pacific Northwest (Petro and Stevenson 2020) and associated data collection form(s) to be consistent with efforts being conducted by state, federal, and other partners.	The proposed FMP has been revised to reflect this.

Letter Number	Commenter Name	Comment	Response
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Wildlife Section 9.4 (page 9-32) Species of Interest or Concern – The department believes there are many assumptions being made in the Draft FMP about the value of the CRW, reserves within the Triad treatments, and protections and restoration treatments within the RCAs for birds, amphibians, reptiles, and bats. Many of these species have significant data gaps which limit the ability to accurately state that there will be benefits, particularly for the restoration treatments in RCAs. In addition, the Draft FMP has integrated options for flexibility in harvest treatments in these areas, so it is not clear to the department if monitoring for these species will occur when harvest is shifted to these other protected areas.	This comment relates to broader biodiversity monitoring and research objectives on the ESRF, as articulated in the draft FMP's Wildlife and Monitoring chapters. The approach to biodiversity monitoring on the ESRF is intended as systematic and landscape scale, which should address concerns raised here. Commenter rightly points out the existence of assumptions and data gaps, which DSL intends that monitoring and research address. Further work between DSL, research entities, and partners including ODFW around coordination of baseline monitoring efforts and long-term biodiversity sampling will be relevant to addressing this comment, including in proposed RCA thinnings (which will proceed through the Implementation and Adaptive Management Committee, and which includes ODFW).
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Unaddressed Comments Section 9.3 (page 9-28) Oregon Conservation Strategy and the ESRF. Strategy Species - The department recommends describing how management will affect all strategy species and habitats; only discussing species that are associated with late successional mixed conifer may imply greater importance of those species/habitats over other species that are also identified in the Oregon Conservation Strategy (2016).	DSL believes that the proposed FMP does discuss likely outcomes and benefits (and biodiversity research intentions) associated with early-seral or complex early-seral oriented management approaches on the ESRF to various early-seral species identified in the OCS.
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Unaddressed Comments Section 9.4.1 (page 9-32) Coastal Marten ( <i>Martes caurina humboldtensis</i> ) - The model developed by Schrott and Shinn (2020) was based on old growth habitat. The department recommends also using the model developed by Moriarty et al. (2021) which may more appropriately represent habitats used by coastal marten in Oregon.	The proposed FMP has been revised to reflect this..

Letter Number	Commenter Name	Comment	Response
63	Rob Taylor	Cultural Landscapes: The 550 miles of roads and trails are integral to the Elliott’s second-growth forest, which emerged after wildfires, settler fires, grazing, and plantations. The absence of old-growth and the impact of plantations on biodiversity, including ESA-listed species, are overlooked. Coho salmon are not threatened in the Elliott, and marbled murrelets have only minor seasonal use.	DSL does not disagree that the ESRF road system is a cultural resource, and since Mr. Taylor's comments are an endorsement of the review submitted by Dr. Bob Zybach et al., please refer to DSL's response to those comments.
63	Rob Taylor	Wildlife Biology: The FMP prioritizes superficial modeling and politicized regulations over actual population data, species adaptability, and historical populations. Spotted owl populations are declining, while barred owls are a better ecological fit, but are being considered for systematic removal. Coho production is adequate, and marbled murrelet use is limited and seasonal.	Since Mr. Taylor's comments are an endorsement of the review submitted by Dr. Bob Zybach et al., please refer to DSL's response to those comments.
78	Bob Zybach	Wildlife Habitat (p. 17): The FMP prioritizes superficial modeling and politicized regulations over actual population data, species adaptability, and historical demographics. Spotted owl populations are declining, while barred owls are a better ecological fit, but are being considered for systematic removal. Coho production is adequate, and marbled murrelet use is very limited and seasonal.	DSL appreciates these comments and generally disagrees with them except the statement that spotted owl populations are declining.

Table A-12. Monitoring

Letter Number	Commenter Name	Comment	Response
02	David Stone	Wildlife surveys - Before - After - Immediately - 1 year - 5 years - 20 years	See the FMP's chapter on Monitoring for relevant approaches.
02	David Stone	Research must be monitored for compliance to approved projects.	See the FMP's chapter on Monitoring for relevant approaches.
02	David Stone	Results of approved projects must be evaluated - [After] 2 year - 5 years - 20 years	See the FMP's chapter on Monitoring for relevant approaches.
08	Mark Trenholm, Wild Salmon Center	Lack of clarity on in-stream habitat enhancement monitoring plan: The FMP as currently drafted has only a limited description of the monitoring techniques that will be utilized to determine project effectiveness. Monitoring plans must be developed hand-in-hand with development of restoration strategies. In particular, monitoring metrics should be derived directly from stated restoration objectives - this ensures that monitoring can be used to test project outcomes relative to state objectives, and to meaningfully inform adaptive management practices. The minimum goal identified in the FMP: "to approach all in-stream and riparian restoration from an experimental standpoint with at least one year (ideally more) of data prior to project	The proposed FMP has been revised to included updated monitoring provisions from the proposed HCP.

Letter Number	Commenter Name	Comment	Response
		implementation and one year (ideally more) of data after implementation” is manifestly insufficient. To optimize the probability of success, stream restoration efforts must adequately provide for and assure ongoing long-term monitoring. Monitoring protocols must be based on developing easily observed and measurable parameters of success, including water quality, channel morphology, stability after high flow events, progress in establishing native plant communities, and measuring fish and wildlife use and presence. We strongly encourage that the ESRF use multiple fields of expertise, multiple ecosystem metrics, multiple tools for response, multiple life stages of fish, and multiple years of biological pre and post treatment data in their monitoring effort. Long term, sustained monitoring is needed to identify a response because external confounding factors such as large storm events or low spawner density unrelated to restoration can occur in any given season. Without long term data sets, it will be difficult to quantify the difference between the signals (i.e. treatment effects) and the noise (i.e. the natural variability).	
15	Coos Watershed Association	Monitoring and attributing changes in fish abundance to stream restoration or management actions is known to be difficult. Although coho are considered in many sections of the FMP, we believe that the scale and intensity of monitoring is insufficiently described to be able to monitor for the outcomes of the restoration and management planned within the ESRF. The FMP outlines that each of the three ESU (Ecologically Significant Unit) populations will be monitored using a rotating panel design, "where one stream in each of the independent populations will be sampled once every 3 years" (FMP pg. 10-35), using the methods of Hankin and Reeves (1988) (FMP pg. 10-13). All other habitat related surveys for these same stream reaches have and will continue to use the ODFW Aquatic Inventories Program (AQI) protocols. It would be more cohesive to use the AQI snorkel survey ore-fishing protocol to	DSL has been working to revise aquatic monitoring language in both the HCP and FMP contexts. The proposed FMP’s monitoring language has been revised, including to recognize past and ongoing data collection efforts by state and watershed association (or council) partners. While the FMP intentionally indicates that research efforts may explore issues that call for different monitoring or data collection over time, DSL has revised the proposed FMP to indicate its intention for future monitoring to build upon, not duplicate, and advance efficiencies, partnerships, and integration with existing monitoring datasets and approaches when possible. To achieve that intention, future monitoring planning based on FMP direction, HCP

Letter Number	Commenter Name	Comment	Response
		monitor coho so research outcomes can be compared to work completed outside this FMP. Adjusting the AQI surveys to be conducted every 3 years, rather than 5 (FMP pg. 10-14), for these streams would provide more useful information on changes in habitat and abundance in these focal streams. CoosWA and ODFW have also monitored coho abundance at the stream and watershed/population level in this area for decades. There is currently no mention within the FMP of utilizing this data, either for historical pre-project abundance when applicable or more robust population estimates, to address the high variation that will likely be seen every three years as proposed. Fully utilizing current data and conducting future monitoring using standardized approaches when possible will be critical to maximizing the learning opportunities the future research forest provides.	commitments, and research objectives is needed and intended to occur between ESRF staff, state and local partners, researchers, and others.
15	Coos Watershed Association	Experiments on riparian thinning also provide an opportunity to improve watershed health and coho productivity. While we agree that a phased approach should be used, there is limited information in the FMP on what benchmarks of success will trigger proceeding to each next phase. This is a critical component of the plan, as it determines what parameters need to be monitored, and how, to reach these decision benchmarks. We appreciate the inclusion of 5 riparian plots along forest restoration sites along with the LiDAR mapping, however since the size of plots and sites are not clearly defined this may be below established riparian monitoring standards. The Bureau of Land Management National Aquatic Monitoring Framework (Cappuccio, 2017) suggests sampling a minimum of 10% of restoration project areas, and EPA environmental monitoring and assessment program (EMAP) protocols call for 11 evenly spaced transects (22 plots) for reaches	The proposed FMP's monitoring section has been revised to address these concerns.

Letter Number	Commenter Name	Comment	Response
		150-500 m long. Using a percentage-based plot layout that meets or exceeds these standards should be the minimum guidelines in the FMP.	
15	Coos Watershed Association	For coho monitoring in RCA treatments, it is unclear in the FMP whether only the population-scale data collected every 3 years will be used to track the changes in coho abundance from restoration actions, or if additional treatment reach-scale fish monitoring within the BACI design in section 7.4 will be implemented. At any one time, the focal stream surveyed for each coho population could be influenced by any number of instream habitat enhancements, RCA treatments, roads and natural variation. The proposed initial location of the phase 1 pilot study shown in Fig. 7.6 is known to have significant spawning and rearing areas for coho downstream of this location outside the ESRF. Insufficient information is provided in the FMP on how this area outside the ESRF will be monitored, which should be included in both the monitoring plan, study design and decision tree benchmarks for moving forward to phase 2. Overall, a much more robust study design will need to be put in place to provide the data that supports the research objectives for coho production stated in the FMP, and also quantifies any potentially negative effects of riparian thinning such as temperature and turbidity increases during key salmonid life history stages of rearing and spawning. The ESRF riparian restoration experiments should only occur when there is sufficient funding secured to conduct the long-term monitoring needed to track the project effectiveness, which can often take more than 10 years to be realized.	The proposed FMP has been revised to reflect these comments. It should be noted that Fig. 7.6 does not propose the initial location of Phase 1 RCA thinning pilot study. Specific locations would be determined through ongoing RCA thinning planning work and biannual operations planning (with public and ESRF Board review and input). DSL agrees with commenter's point that RCA thinning is a research experiment and would not occur without pre-treatment baseline monitoring and commitment to post-thinning monitoring.
54	Rod Krahmer, Oregon Department of	Streams, Designations, and Treatments The department recommends that stream temperatures be monitored downstream of RCA treatment study areas as proposed actions above	DSL has revised its approach to aquatic monitoring in both the HCP and FMP. The proposed FMP has been updated to indicate that this approach to thermal monitoring will occur.

Letter Number	Commenter Name	Comment	Response
	Fish and Wildlife	anadromy may affect temperatures outside (downstream) of study boundaries.	
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Wildlife Section 10.1.5 (page 10-25) Biodiversity – The Draft FMP identifies monitoring methodologies for a range of taxa, but it is unclear to the department how frequent monitoring will occur for some taxa outside of the initial pilot study and 2023 surveys.	The proposed FMP does not identify a specific monitoring frequency for this range of taxa. Clarifying the question / concern raised by this comment is part of addressing the ESRF research partner conversation and budgeting for research-related monitoring over time.
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Unaddressed Comments Section 10.1.5 (page 10-26) Biodiversity; Figure 10.4. Illustration of Sampling Design - This design would not capture small mammals or reptiles. The department recommends that best management practices for pitfall traps include having traps checked daily or fitting traps with escape devices to avoid incidental mortality of non-target species.	The proposed FMP has been revised to address this comment and concern.

Table A-13. Adaptive Research, Strategy, and Implementation

Letter Number	Commenter Name	Comment	Response
08	Mark Trenholm, Wild Salmon Center	Adaptive research strategy and public input: Chapter 11 of the draft FMP describes the importance of adaptive experimental design and an overall process to identify target levels for individual indicator variables subject to regular review. The draft FMP states that, “If and when decision triggers are reached, the lead research partner and DSL (in coordination with the ESRF Board of Directors) may elect to hold public meetings and workshops to assess the state of knowledge and promote understanding and consensus regarding experimentally sound research options” (p. 11-8). The draft FMP should provide additional information and assurances that public review and engagement will occur when decision triggers are reached.	Issues raised by commenter here are addressed by the ESRF Oversight Structure document adopted by the State Land Board in April 2024, which is available on the DSL Elliott website ( <a href="#">Oregon Department of State Lands : Exploring an Elliott State Research Forest : State of Oregon</a> ). The ESRF will follow Oregon's open meetings law and related transparency laws (e.g., public records act). The public will receive notices of ESRF Board of Director meetings and proposed actions on the Forest. If decision triggers are hit, and adaptive management-based changes are developed as a result, this would be considered an action relevant to ESRF Board discussion. The public will have the opportunity to review and comment on proposed on-the-ground projects. And monitoring and other reports that DSL is committed to produce will be made publicly available. Signing up for the ESRF distribution list on the DSL ESRF website will ensure receipt of ESRF Board meeting notices, public comment opportunities, availability of materials and other information about ESRF happenings.
09	Cascadia Wildlands et al.	The FMP should include detailed descriptions of all sub watersheds and partial watersheds within the ESRF. This is a significant omission that we also noted in our prior comments on the FMP drafted by OSU.OSU repeatedly assured stakeholders that it would provide a more detailed analysis of sub watersheds and partial watersheds in the FMP that would allow readers to better understand the currently conditions, desired future conditions, management strategies, treatments, opportunities and constraints at a sub watershed scale. This work was initially deferred during the covid outbreak and continues to be neglected in the FMP. We would recommend inclusion of both maps and narratives pertaining to each sub watershed and partial watershed. Maps and narratives should identify geographic features, stand	Commenter is correct that this level of detail is not in the proposed FMP. DSL has and will maintain publicly available GIS layers that provide a good amount of this detail. In addition, as part of next-step work on data-viewers and other tools, DSL will consider advancing this type of sub watershed and partial watershed detail.

Letter Number	Commenter Name	Comment	Response
		ages, listed species habitat, roads, scenic resources, recreational resources and proposed treatments, etc.. Narrative should discuss species issues germane to that specific watershed. We recognize that this could add a second volume to the FMP but it is essential for stakeholders and the public to really understand the current status of the landscape and how it is expected to change over the term of both the FMP and the HCP.	
09	Cascadia Wildlands et al.	<p>We would encourage DSL upload into the descriptions of intensive, extensive and reserve treatments found in Appendix 5 of the OSU Elliott Research Plan. This chapter provides good framing language that describes both what these treatments should and should not look like. In particular, we believe that the following language pertaining to extensive treatments is important:</p> <p>Examples of attributes that would not characterize an extensive treatment:</p> <ul style="list-style-type: none"> <li>• Conversion of a forest from a diverse to a less-diverse condition by not retaining key existing legacies</li> <li>• A selective harvest without accounting for whether the objective of regeneration has been accomplished so that the long-term desired characteristics of the stand are not sustained</li> <li>• Establishing merchantable volume as the primary or dominant management objective</li> <li>• Routine or pervasive use of herbicide</li> <li>• No plan for or monitoring of desired forest, riparian or wildlife attributes</li> <li>• No landscape level plan</li> </ul>	The FMP has been revised to incorporate this language.

Letter Number	Commenter Name	Comment	Response
15	Coos Watershed Association	Not only is there opportunity to implement restoration actions that have already been prioritized and have known efficacy, but there is also great opportunity to expand our knowledge of restoration techniques on the forest. We appreciate DSL including a research question around the implementation of large woody debris stream enhancement projects, which are a core and widely used restoration technique. There is substantial literature showing that these projects effectively create critical habitat features and improve water quality for aquatic species, some of which has been informed by prior work on the Elliott (52 prior projects on the West Fork of the Millicoma within ESRF boundary, OWRI). Past work does also show that having more wood jams spread throughout a stream reach, with substantial wood and root wad structures in each, is important to achieve maximum benefit. Honing the research question to expand upon that knowledge and focus more on how far apart these jams should be for a given reach length to increase both habitat and water quality benefits would be a valuable contribution to the current understanding of this widely used restoration technique.	Thank you for this comment. DSL would like to collaborate with COOSWA, research partners, and other local partners in advancing research on this approach relevant to honing this restoration technique. Revisions to the proposed FMP speak to more detailed restoration strategy work as a next step effort.
41	William Wagner	Finally, why a forest management plan without a research development approach as a basis? I believe the Elliott should not establish timber harvest goals and objectives in terms of an annual cut until it recognizes and understands the dynamic nature of coastal forest systems under the influence of both change in climate trends and human society	DSL disagrees that the FMP is without a research development approach as its basis. The proposed FMP includes the structure for research on the ESRF (e.g., principles, unifying question, themes and subthemes). Research on the ESRF must be consistent with that structure. While a Triad design within this structure is not precluded, flexibility for other research approaches exists and the FMP indicates where non-Triad research is valuable and either part of the ESRF design (e.g., RCA thinning) or intended. Commenter is correct to note that research development is unfinished. The FMP clearly indicates that DSL is not a research entity and sets forth next steps with other partners and the ESRF Board in addressing this uncertainty.

Letter Number	Commenter Name	Comment	Response
			DSL agrees that coastal forest ecosystems are dynamic, but despite this, timber harvest objectives have been established as part of the ESRF planning process to date. FMP adaptive management provisions are relevant to addressing dynamic factors as they arise in the future

Table A-14. Disturbance, Forest Health, and Resilience

Letter Number	Commenter Name	Comment	Response
07	Kent Tresidder	<p>Consequences of Inaction</p> <p>During the interim between the NW Forest Plan and the passage of Senate Bill 1546, private inventories of old growth stands were depleted and the timber industry had made the conversion from an old growth economy to a young growth economy, just as our OSU forestry professors had predicted in the 1960's. That means that today, if you happen to have some old growth timber to sell, you won't be able to find a buyer who is able mill it. That's called a lost opportunity. It could also be called waste. During the decades that public forest management agencies were contemplating what to do with "old growth" forests, they had become nearly worthless. Furthermore, the fire hazard of unmanaged forests increases over time to pre-settlement conditions. Forest scientists, such as Dr. Robert Zybach, have documented what that was like. The Elliott will burn again. Amongst other things, that is also called waste. I should not have to tell you that allowing the Elliott to</p>	DSL appreciates this comment and the points it makes but disagrees with commenters characterization of the ESRF's approach. While passive management will occur on the forest, active management of various types is intended and allowed across significant portions of the ESRF including in the CRW. And, DSL believes that research comparing various management approaches (including passive vs. active, RCA thinning vs. passive, ecological forestry vs. intensive approaches, etc.) will yield meaningful information relevant to forest management policy.

Letter Number	Commenter Name	Comment	Response
		remain in a predominantly unmanaged condition is not only dangerous but is wrong.	
09	Cascadia Wildlands et al.	<p>We are deeply concerned that protections for the CRW appear to have been substantially weakened in the FMP. The CRW is a foundational part of the Elliott Plan. It was one of the earliest components of the plan and helped set the stage for negotiating other more difficult issues. Stakeholders and the public repeatedly heard OSU and the DSL compare the CRW to wilderness areas within the Oregon Coast Range. The only harvest activities allowed within the CRW are restoration harvests designed to set plantations under 65 years of age on a more complex and diverse trajectory. OSU repeatedly assured stakeholders that the entrees would primarily be “light touch” and driven solely by the goal of creating healthier, more complex stands. The work was supposed to reflect natural disturbance regimes. The FMP now includes specific numeric targets for restoration harvest that have nothing to do with the goals of a restoration thinning and which, contrary to the light touch presented previously by OSU and DSL, moves the approach towards the clearcutting end of the spectrum. The FMP currently proposes the 40% of restoration harvests range from 20-40% retention, 40% of restoration harvests range from 40-60% retention and 20% of restoration harvests range from 60-80% retention. This is completely contrary to assurances given to stakeholders over the course of this multi year process and contrary to the objective of the CRW.</p>	<p>DSL has revised the proposed FMP to address concerns raised by this and other commenters. The FMP does not advance numeric "targets" for restoration thinning. The percentages and numeric ranges in the draft FMP were an artifact from the proposed HCP, where DSL needed to identify numeric percentages and ranges in order to allow federal services as they evaluate impacts and potential "ESA take" from various management approaches. These percentages were developed as sideboards to support HCP analysis based on a "minimum floor" below which retention levels would not go. While DSL can appreciate how inclusion of them in the draft FMP context led to a misinterpretation, they were not intended as targets. The time window and number of entries for restoration thinning in the CRW has been extended as part of the HCP and proposed FMP. The intention was to allow DSL more opportunity to advance HCP biological objective commitments related to creation of old-forest habitat, and as commenters point out, to allow for greater flexibility for lighter-touch thinning than a single one-and-done entry.</p> <p>DSL has revised proposed FMP language to reflect restoration thinning direction based on the application of best available science related to conversion of younger plantation stands to beneficial habitat conditions (or intentional development of that science through research) and consideration of stand-specific conditions within individual eligible thinning sites. The percentages have been removed from the proposed FMP and would exist as bounds within DSL's HCP commitments, given that they were part of that analysis. Guidelines for applying restoration thinning to individual, site-</p>

Letter Number	Commenter Name	Comment	Response
			specific stand conditions include: (a) the degree to which older forest overstory structure can still be achieved within that stand (relates to stand age, density, and branching); (b) opportunities for integrating habitat complexity into the surrounding landscape consistent with mimicking conditions that natural disturbance would otherwise create; (c) minimizing adverse effects on adjacent habitat (including edge impacts if adjacent to occupied MAMU habitat); and (d) relative tradeoffs between the potential of a site to yield complex early seral or understory habitat benefits (including cultural practices or resources) versus its potential to produce valuable habitat from higher retention levels of overstory trees. These guidelines will be part of biannual operation planning discussions and likely involve field visits and discussions with scientists and practitioners who bring relevant expertise in the context of restoration thinning.
09	Cascadia Wildlands et al.	The restoration harvests should be driven by the best available science for converting plantations to complex older forests. The approach should be done on a stand by stand basis. There is simply no credible basis for DSL to set numeric harvest targets for these stands in advance. We would also note that if in fact these numeric targets remain in place, they are actually more intensive than the targets for “extensive “ stands which are actually supposed to generate timber related revenue. These targets must be removed from the FMP. Instead the FMP should describe guiding principles and a clear framework for how restoration harvests will be applied in the CRW with a continued emphasis on “light touch, mimicking natural disturbance regimes, and creating complex older stands.	See previous comment.

Letter Number	Commenter Name	Comment	Response
09	Cascadia Wildlands et al.	We understand that the term for restoration harvests in the CRW was extended from 20 to 30 years in order to allow more plantations currently under 65 years of age to be set on a healthier trajectory. However, the FMP leaves open the possibility that the term could be extended beyond 30 years with approval from the federal agencies. This is not acceptable. The additional ten years that were added at the end of the HCP process represented a good faith concession. It was clear at that time that 30 years would be a hard stop. That hard stop must be reflected in the FMP. All restoration work in the Conservation Reserve Area must be completed within 30-years. There should be no extensions beyond 30 years.	The ability to potentially extend restoration thinning beyond 30 years (based on concurrence of federal wildlife agencies under the Endangered Species Act) is an HCP artifact and relates to consistency with generally applicable HCP adaptive management provisions. DSL intends its FMP to reflect that restoration thinning in the CRW (existing acres in the draft FMP) will be complete within 30 years, and the proposed FMP has been revised to reflect this. Should the results of restoration thinning within this timeframe present a degree of beneficial conservation outcomes that argue for more restoration effort and time, whether through HCP adaptive management or otherwise, then the ESRF FMP would need to be amended at that time.
09	Cascadia Wildlands et al.	Pior Elliott documents consistently stated that extensive forestry retention rates could range from 20-80% but the overall goal would be to produce approximately 50% of the volume of intensively managed forest stands. That 50% target has now been removed. This would effectively allow the state to shift most or all of the extensive units to the low retention rate end of the spectrum. This is inconsistent with commitments repeatedly made over many years. The overall 50% target should be restored.	DSL appreciates the commenters' concern about managing Extensive allocation stands to the lower end of allowable retention. That said, the 50% could also compel extensive harvests to increase volume levels (relative to desired stand conditions or otherwise applicable forestry objectives). DSL is interested in the ESRF's ability to demonstrate and compare social, economic, and conservation outcomes from extensive or ecological forestry to those of intensive forestry. DSL is interested in the FMP allowing a full range of ecological forestry approaches to be represented on the ESRF.
09	Cascadia Wildlands et al.	Herbicides: The FMP appears to take a more permissive approach to the use of herbicides than was agreed to in the OSU Elliott Research Plan. The FMP should pull the specific language regarding herbicide use from the Research Plan and add a section to the FMP that encapsulates all of this information in one place. This language in the Research Plan was carefully crafted and should be strictly adhered to including the commitment to not used herbicides in	DSL reviewed the OSU research proposal, and the proposed FMP is consistent with it. The proposed FMP states how herbicides would/could be applied within each treatment type.

Letter Number	Commenter Name	Comment	Response
		reserve areas and use intensive management areas to explore strategies to minimize the use of herbicides	
48	Albert LePage	Adopt comprehensive ecological management practices in general grounded in cutting edge forest science and decades of field research, especially relevant here is Jerry Franklin's book "Ecological Forest Management." [7] These strategies will enhance forest resilience, biodiversity, and long-term productivity while balancing ecosystem health with sustainable resource utilization.	Thank you for the comment. The proposed FMP does so.
48	Albert LePage	Finally, also “attached” as an embedded direct link , are the recommended conservation actions by the Oregon Department of Fish & Wildlife, including strategy habitats and habitats consistent with the Oregon Conservation Strategy. This highlights existing biodiversity and suggests the potential to protect and enhance biodiversity in Elliot State Forest, by developing and implementing a plan that prioritizes conservation biology in accordance with ecological forest management rather than traditional sustainable forestry approaches.	The proposed FMP highlights the Oregon Conservation Strategy and DSL's intent and approach to advancing its objectives on the ESRF.
55	Sierra Club Oregon Chapter	It is unclear from our review of the FMP whether DSL is prepared to commit the time and resources necessary to achieve the “problem analysis” goals which Dr.'s Franklin and Johnson so powerfully articulated: “The problem analysis is critical to identify the important issues relevant to managing Oregon’s forest that OSU COF can address on the Elliott Forest. Such a document would provide a systematic approach to identification, review, and prioritization of potential research topics for the OSU program. It would be the basis for identifying the research, including experiments, necessary to address those issues. Examples of the scientific issues that need consideration	DSL feels the underlying 6+ years of ESRF development have involved a significant amount of analysis relevant to the "problem analysis" commenter speaks to here. This includes analysis, materials, and discussions through the Advisory Committee process (involving conversations with and input from Dr. Franklin and others), OSU's work on the original research proposal and its FMP process, and refinements of the research design and ESRF approach over time including this proposed FMP.

Letter Number	Commenter Name	Comment	Response
		are development and demonstration of approaches to creating managed forests that are more resilient in the face of disturbances, such as wildfire, and climate change, and techniques to better integrate forest management with restoration of salmon populations.” Without this important, underlying “problem analysis,” the entire premise of a research forest lacks meaning and relevance for the society which must support it and which stands to benefit from it.	
63	Rob Taylor	Wildfire Risk: The FMP ignores the increasing risk of catastrophic wildfire created by artificial "reserves," purposeful retention of dead trees and downed woody debris, and the insufficient proposed harvest levels. The documented history of the Elliott is the same as the rest of the Douglas Fir Region in that catastrophic-scale wildfires will occur when fuels accumulate to sufficient levels, and the likelihood of wildfires greatly increases over time unless fuels are actively managed. The creation of passively managed reserves and retention of snags as outlined in the draft FMP will almost certainly result in a major wildfire at some point in time and likely threaten the communities to the west of the Elliott, from Reedsport to Coos Bay.	Since Mr. Taylor's comments are an endorsement of the review submitted by Dr. Bob Zybach et al., please refer to DSL's response to those comments.
63	Rob Taylor	Landscape scale (subbasins) needed for disturbance, wildlife population monitoring, fire management, and meaningful research.	Since Mr. Taylor's comments are an endorsement of the review submitted by Dr. Bob Zybach et al., please refer to DSL's response to those comments.
78	Bob Zybach	Wildfire Risk (p. 21): The FMP fails to address the increasing risk of catastrophic wildfires due to fuel accumulation. The creation of passively	Regarding wildfire risk, DSL plans to continue fire protection on the ESRF and related spending for these services (through ODF and fire protective associations). Commenter's concerns focus on reserves, and this response speaks to that comment rather than the other portions of the forest where different active harvest management will occur. While some portions of the

Letter Number	Commenter Name	Comment	Response
		managed reserves and the retention of snags increase this risk, threatening surrounding communities to the west.	CRW and MRW Reserves will be passively managed, other portions will see thinning and other allowed active approaches (e.g., covered activities under the HCP include native plant restoration, invasives control, road system work, and potential use of human fire). While the HCP and FMP authorize the use of prescribed fire, which is another means of reducing fuels and advancing habitat, this activity would need to be carefully planned if it is used.
78	Bob Zybach	<p>The photos and maps that illustrate this section of the review document the dynamic nature of the Elliott's history in comparison to the 100+ arbitrary polygons that have been integrated into the current FMP draft. The codependent HCP proposal has added another 9000 polygons to this mix, as stated during public hearings and meetings. However, of the approximately 83,000 acres of the Elliott, about 50% of the land, or 42,000 acres, has been transformed into conifer plantations following logging operations. This form of habitat is unprecedented in the history of the Elliott, as it is throughout much of the Douglas Fir Region following WW II.</p> <p>Most conifer plantations in the Elliott have resulted from planting thousands of Douglas fir seedlings throughout a logging or alder conversion unit on a grid, using typical 8-, 10-, or 12-foot spacing intervals and including preexisting pastures, meadows, and berry patches. The purpose of the plantations is to produce as much commercial fiber as possible for future harvests and income.</p> <p>Successful plantations result in a contiguous canopy of Douglas fir saplings, which can greatly increase risk of stand replacement crown fires (Zybach 2024b: 98-100). Unsuccessful plantations have openings in the canopy created by poor quality stock or workmanship, dense shade created by competing native vegetation, or animal damage primarily created by people, elk, deer, bugs, rabbits, or mountain beaver ("boomer"); the latter of which were trapped by the thousands in order to stop them from eating Douglas fir</p>	DSL appreciates this comment and agrees with much of what it says. DSL does not feel the proposed FMP is necessarily at odds with it. Commenter's sense of scale and type of work needed to achieve the habitat and social values mentioned here may or may not be at odds with ESRF management direction, and DSL suggests future engagement as part of operations planning could address this.

Letter Number	Commenter Name	Comment	Response
		<p>seedlings (Phillips 1998: 278, 326, 345).</p> <p>The result of a successful plantation is that all competing vegetation, including wildflowers, huckleberries, hazel, myrtle, and other food plants, are shaded out, providing little or no sustenance for native animals. A young, successful plantation soon becomes a very dark and quiet area in the absence of direct sunlight, songbirds, and most mammals. To "restore" a plantation to an earlier condition it is first necessary to remove the plantation, whether to recreate berry patches, campsites, skunk cabbage meadows, and open ridgelines and riparian meadows, or to mimic desired "wildlife habitat" conditions of past centuries.</p> <p>The Elliott has more than 40,000 acres of failed and successful plantations that have attained, or will soon attain, commercial size and that can be economically transformed into desired conditions for future generations. This approach would create hundreds of long-term local jobs and hundreds of millions of dollars for Oregon schools and local communities -- and for the significant advantage of most local wildlife populations, including fish, owls, murrelets, game animals, and boomers. This option should be a primary consideration of any management plan, in our opinion, but is not included in the draft FMP.</p>	
78	Bob Zybach	<p>The history of the Elliott State Forest, apart from human use and occupation, has been largely shaped by catastrophic wildfires, landslides, and windstorms. These predictable events should be a significant focus of any long-term management plan: namely, "How to best respond following an event resulting in widespread deforestation and/or wildlife mortality?"</p> <p>Windstorms and landslides (Benda 1990) are impossible to predict more than a few days in advance due to their weather-based nature. However, wildfires, which are mostly fuel-based, human-caused, and seasonal, can be moderated with vegetation management strategies that impact their predictability</p>	<p>DSL appreciates this comment about wildfire dynamics and risks, including those related to the CRW management approach. DSL does not deny the role of disturbance in shaping the forest's past as well as its future (FMP Chapter 12 speaks to this). The ESRF's design diversity (CRW and MRW with different management sub-allocations and intended versus prohibited activities) will allow disturbance dynamics to play out across various management conditions over time, and in the context of research aimed at examining disturbance dynamics, impacts, and management effects. Salvage logging is prohibited in certain parts of the ESRF as noted by commenter, but not in</p>

Letter Number	Commenter Name	Comment	Response
		<p>(Zybach 1994: 12). This has been observed and documented numerous times in western Oregon, where wildfires bordered by ridgeline or riparian roads, recent logging operations, or thinned stands drop from deadly crown fires to mostly beneficial ground fires (e.g., Phillips 1998: 27; Zybach 2024b: 116-118).</p> <p>The FMP does not address practical responses to these types of events or mitigating strategies. Instead, it outlines a policy to not salvage highly flammable snags that develop through the forest (DSL 2024: 12-35) and proposes creating a 27,000-acre, 100-year "CRW" (Conservation Research Watersheds) along the ESRF's western boundary (ibid.: 4-11). These approaches will likely lead to massive fuel build-ups, increasing the likelihood of wildfires driven by east winds that could threaten homes and communities between Coos Bay and Reedsport (Phillips 1998: 92; Zybach 2024a: 102-108).</p>	<p>others. DSL will continue to advance wildfire protection (paying through ODF for related protection services) across the forest.</p>
78	Bob Zybach	<p>Despite these fuel accumulation strategies, the FMP states that: "wildfire is the principal disturbance process that shapes the structure, composition, and dynamics of forest landscapes over time in temperate forests in the Pacific Northwest," and therefore, "understanding fire and forest dynamics is thus critical to long-term management and conservation planning" (ibid.: 12-3). The FMP description further notes: "However, datasets that describe the size, frequency, and severity of historical wildfires and how these fires influenced forest conditions and dynamics across landscapes are lacking. Thus, our understanding of the historical fire regime, which includes traditional burning by Indigenous Peoples, is still evolving in the Coast Range and in other Douglas- fir forests in the PNW."</p> <p>This statement is a complete fabrication. The fact that it continues to be used despite the FMP authors having been presented clear evidence to the contrary on several occasion is very concerning. Millions of dollars and more than five years have been spent on this draft plan by DSL and by forest scientists</p>	<p>There is no political motivation or anti-management conspiracy behind this referenced statement about wildfire history and dynamics. And, DSL does not believe the statement represents a fabrication, or that referenced models or fire history (tree ring) research is incompatible with commenter's point that other existing knowledge and work has been done relevant to this issue. DSL believes the issue of wildfire history and dynamics on the ESRF (and elsewhere) is an issue of evolving understanding where further work is needed.</p> <p>This provision has been revised in the proposed FMP to say, "However, datasets that describe the size, frequency, and severity of historical wildfires and how these fires influenced forest conditions and dynamics across landscapes are lacking incomplete and evolving. Research results and Indigenous Knowledge is challenging the generally prevailing paradigm (or at</p>

Letter Number	Commenter Name	Comment	Response
		<p>employed by OSU College of Forestry, yet this misleading rationale for poor scholarship somehow persists.</p> <p>A simple Google Search would have addressed this serious shortcoming and revealed the apparent anti-management political bias of the FMP; but rather than doing an actual literature review or consulting directly with known experts on this topic, OSU and DSL elected to use an outdated and disproven computer model and a student tree ring study instead (ibid.: 4-31). The reasoning behind this continued misdirection can only be considered for political reasons and directly undermines the claims and public promotions of conducting objective "research" of value to other forest managers and ownerships (e.g., ibid.: 1-6, 6-16).</p>	<p>least the uniform application of it) that fire in Pacific Northwest ecosystems West of the Cascade Mountains was relatively infrequent, long return interval (300-400 years) and high severity in nature. It is not that such large, high severity fires did not exist (or were spaced out over long intervals), but evidence also exists of more frequent, smaller, mixed severity fire occurrence and behavior. This has been pointed out before (Zybach ***) and current research supports this different understanding than the general paradigm. Thus, our understanding of the historical fire regime, which includes traditional burning by Indigenous Peoples, is still evolving in the Coast Range and in other Douglas- fir forests in the PNW".</p> <p>This attempts to indicate is that the current generally established paradigm and understanding of fire history and fire dynamics on the Elliott and other west-side forests is evolving.</p>

Table A-15. Anti-Timber Industry

Letter Number	Commenter Name	Comment	Response
60	Jill Riebesehl	[Preserve whatever possible] of the Elliott Forest plan that was worked out several years ago. From what I have noticed, much of that plan has been invaded by timber demands.	Thank you for your comment.

84	Beverlie Woodsong	Speaking to any and all Forest Management Plans: stop any and all clear cutting, now! For the Elliot Forest specifically, the damage already done to it by all the previous bad logging practices needs immediate reparations.	Thank you for your comment.
----	-------------------	--	-----------------------------

Table A-16. Preservation of Old Growth Forests

Letter Number	Commenter Name	Comment	Response
01	Valerie Vashon	Please protect this crucial habitat. Too many green spaces are being destroyed.	Thank you for your comment.
03	Wendy Wagner	The temperate rainforest offers humanity an incredibly powerful tool for absorbing greenhouse gases, and it harbors the greatest biodiversity of all habitats. Let's make sure to protect this treasure to our utmost ability!	Thank you for your comment.
04	Caroline Skinner	I want to ensure the Elliott Forest Management Plan includes the provisions necessary to help protect Oregon's mature and older forests.	DSL believes the proposed FMP and HCP protect older forests and represent a positive approach to sustainable conservation and restoration of mature forests. DSL agrees that it can be difficult to discern with accuracy whether certain trees fall specifically on one side of the other of 1868. And in light of this, DSL agrees with the approach of using caution and erring on the side of protection when it comes to trees that raise this question. As to road construction, DSL would make efforts to locate any new or temporary roads in ways that avoid these trees or removal of them.
04	Caroline Skinner	My highest priority is protecting true old growth forests, what little we have left, for wildlife habitat. Thank you for your consideration.	Thank you for these comments.
12	Ken Rawles	The Elliott State Research Forest represents a unique opportunity to balance ecological preservation with sustainable forestry and research. Weakening protections in the CMA undermine this balance and risk compromising the forest's long-term health and sustainability.	DSL assumes commenter is speaking to the Conservation Research Watershed (CRW) designation on the ESRF, not a Conservation Management Area (CMA). DSL appreciates the concern raised by commenter and does not believe it is weakening the CRW.

Letter Number	Commenter Name	Comment	Response
12	Ken Rawles	I urge you to reconsider any reductions in protections for the CMA and to prioritize its conservation. Strengthening, rather than weakening, protections will demonstrate a steadfast commitment to sustainable forest management and ecological integrity	DSL assumes commenter is speaking to the Conservation Research Watershed (CRW) designation on the ESRF, not a Conservation Management Area (CMA). DSL appreciates the concern raised by commenter and does not believe it is weakening the CRW.
09	Cascadia Wildlands et al.	To this end, it is important that CBMAs be allocated to areas best suitable for old growth forest management, including areas that already contain mature stands, and do not preclude management to promote biodiversity and culturally important species.	The proposed FMP would allocate new acres to the CRW, as opposed to the CBMA designation in the Draft FMP. Outcomes and intentions related to this proposed approach still relate to carbon sequestration and related conservation. This includes late old seral forest development. Of the new acres proposed for the CRW, the vast majority are in current mature or older forest conditions or suitable for its development.
09	Cascadia Wildlands et al.	On page 6-22 the FMP gives assurances that trees predating 1868 will be preserved but does leave open exceptions for road placement. In fact the only exception included in the agreements pertained to situations where specific aging accuracy might be in question. Pre 1868 trees are a rare and exceptionally important resource on the Elliott. Extreme effort and care should be taken to preserve these trees. Roads placement should circumnavigate these trees. In situations where it may be questionable as to whether a tree pre or post dates 1868, the tree should be preserved. If the goal is to truly protect and preserve these trees, there is no reason that DSL should not err on the side of extreme caution.	DSL agrees that it can be difficult to discern with accuracy wither certain trees fall specifically on one side of the other of 1868. And in light of this, DSL agrees with the approach of using caution and erring on the side of protection when it comes to trees that raise this question. As to road construction, DSL would make efforts to locate any new or temporary roads in ways that avoid these trees or removal of them.
25	Skye Decker	We need to choose wildlife and the health of our forests and aquifers over profits. Oregon's aquifers are an often overlooked rising issue. Can you imagine the rainy Oregon state actually having an issue with water supply to people? You can see what lack of water resources costs everyone by looking at California. Oregon's aquifers are being drained due to over-logging of our	Thank you for your comment.

Letter Number	Commenter Name	Comment	Response
		forests. The healthy old growth keeps the water sequestered and flowing. Healthy aquifers and keeping our forests is vital to keeping Oregon green, alive and full of wildlife that give back to us.	
31	Carolyn Hinds	Please keep the plan strong to protect nature and all its inhabitants. No more road building. Let the trees grow to help climate issues.	Thank you for your comment.
41	William Wagner	Research should advance the balance between youth and maturity in the socio environmental forest system. Society is currently well adapted to a rapid growth stage of development but is demonstrating that it has little understanding and is poorly adjusted to the ultimate equilibrium stage.	DSL generally agrees with this comment.
43	Barb Shamet	Here from the banks of the West Fork of the Millicoma, been a very busy summer, thanks for all your work, however I understand there are some upcoming issues regarding the protection of our native stands, what is left of old growth in the Elliott, on the west side, I encourage you to think twice about cutting anything over the age of 65 years in these precious stands or risk the inevitable consequence of litigation which no one on either side wish to engage in.	Thank you for your comment.
43	Barb Shamet	The time could not be more consequential regarding the protection of these precious stands and the priceless value they provide to our salmon spawning grounds, air and water quality in Oregon and the Pacific Northwest not to mention the entire globe. It is therefore imperative to LEAVE these stands in tact as carbon sequestration mitigation in the face of our ever present climate change, mass wild fire, drought and diminishing protected species, we, the people of the State of Oregon look forward to your continued and valued work	Thank you for your comment.

Letter Number	Commenter Name	Comment	Response
		for the Elliott. I trust you will do the right thing, no amount of money or management can measure up to the value of these precious lands	
47	Lisa Brenner & Tom Stibolt	We have witnessed the environmental destruction in the name of "Restoration" next to our own rural property, and urge you to require that any "restoration" harvesting actually promotes the old growth around it; and further, to not allow the use of herbicides which destroy resident populations and food sources needed by those populations.	The proposed FMP's approach to restoration thinning is for conservation purposes only. Herbicides are not part of CRW management (unless targeted to address invasive species and/or specific native plant restoration efforts).
53	Gail Sabbadini	In my opinion, the objective should be to keep trees standing. Live trees continuing active carbon dioxide sequestration and dead trees passively sequestering carbon dioxide, while all of the trees provide habitat, shade, prevent soil erosion and protect watershed.	Thank you for your comment.
62	Maude Levesque	It is essential for the current generation and future generations to protect this fragile ecosystem to which we are entitled. The loss of one ecosystem sooner or later leads to the loss of another ecosystem. Let's protect biodiversity. Let's protect this animal and plant heritage.	Thank you for your comment.
74	Lindsay Bishop	I would like to reach out to express my support for protecting the areas of the Elliott Forest near Coos Bay, OR. Protecting old-growth forests is crucial for preserving our planet's biodiversity and combating climate change. After the lumbar harvesting that has already impacted the Oregon Coast, it is important as an Oregonian for me to continue to advocate for support of these wild areas.	Thank you for your comment.

Letter Number	Commenter Name	Comment	Response
81	Linda Hartling	<p>It also breaks my heart that Oregonians have to continue to beg our state government to protect the Elliott State Forest so Oregon can provide crucial habitat for wildlife. One would think that the plight of Oregon sea otters and beavers in this state would be enough of a lesson in the importance of maintaining habitats. Learning from the past mistakes never seems to be enough when big companies put pressure on local communities and the state government to exploit our remaining natural resources.</p> <p>I'm particularly worried about old forests that are endangered in Oregon. I'm tired of the Mass Timber's efforts to greenwash logging with mass media messages describing how they are replanting so many trees. Most newly planted trees die. Plus, small trees do not provide the service of our great old evergreen forests, which sustain habitat, oxygen, and other vital benefits to life on this earth!</p>	Thank you for your comment.
82	Linda Palmer	<p>We have not learned all we need about the incredible aspects of old growth forest. Old growth is complex and needs to be preserved so knowledge can continue to be advanced helping learn the proper methods to maintain and restore our ecosystem for the benefit of all human beings.</p> <p>Please adopt policies to preserve the forests. waters and inhabitants in as whole and pristine a state as possible.</p>	Thank you for your comment.

Table A-17. Enforceability

Letter Number	Commenter Name	Comment	Response

09	Cascadia Wildlands et al.	The right to challenge decisions related to the Elliott (plans and practices) was included in the now defunct legislation. Stakeholders have been assured that it would be advanced through the current process. The FMP must define how the public can legally challenge operational plans, other plans or forest activities that do not comply with the FMP.	The proposed FMP has been revised to address this concern. Assuming adoption by the State Land Board, DSL would then incorporate the FMP into an Oregon Administrative Rule for the Land Board's consideration and adoption.
Form Letter 2	Form Letter 2	The enforceability of the plan is unclear. The plan should outline how the public can legally challenge forest activities that do not comply with its provisions.	See DSL's response to comment from Cascadia et al. on this subject.

Table A-18. Anti-Experimental Harvesting

Letter Number	Commenter Name	Comment	Response
Form Letter 1	Form Letter 1	Any reference to experimental harvest in occupied Marbled Murrelet habitat must be removed	No harvest activity is allowed in Occupied murrelet habitat as defined in the HCP. References to experimental harvest opportunity in these areas was removed from the HCP and, based on correction of an oversight, it has also been removed from all sections of the proposed FMP.

Table A-19. Scenic Resources

Letter Number	Commenter Name	Comment	Response

Form Letter 1	Form Letter 1	The plan should provide a clear list of scenic resources and strategies for protecting these resource	The proposed FMP addresses scenic resources.
09	Cascadia Wildlands et al.	Substantively addressing scenic resources is another issue that was deferred to the FMP. However, the FMP gives barely cursory attention to this issue. The FMP should provide a clear list of scenic resources and viewsheds and strategies for protecting these resources.	The proposed FMP has been revised to address this comment, including resources in the Loon Lake area. Scenic resource identification and protection is part of the FMP and will also be part of operations planning efforts. If commenter has specific resources or locations and strategies it believes should be considered, please send them to DSL.

Table A-20. Plan Budget/Funding

Letter Number	Commenter Name	Comment	Response
Form Letter 1	Form Letter 1	The \$5.2 million budget proposed by DSL is not realistic and is likely to create pressure to increase harvest levels. DSL should aim for a budget in the \$3-\$4 million range.	Costs for advancing the ESRF and related operations, program administration, and research are based on the Department's evaluation of what it would reasonably take to achieve these and other outcomes stated as desired for the Research Forest. The Department believes its proposed budget is conservative, and it is noteworthy that certain costs continue to rise (e.g., wildfire protection) or are not fully addressed in this budget (e.g., restoration costs, funding for research, etc.), which may create upward budget pressure. The Department believes funding for these costs is achievable from multiple revenue sources derived from a level of management activity within the FMP and HCP's sustainable commitments. Further budget development work will occur with public and ESRF Board of Director engagement, including as part of biennial operations planning.

Letter Number	Commenter Name	Comment	Response
08	Mark Trenholm, Wild Salmon Center	Long-term viability and funding: The draft FMP should provide additional detail around long-term planning and commitments for funding this type of long-term research, which has uncertain outcomes that could impact Oregon Coast coho (positive benefits or adverse effects).	DSL is committed to an approach on RCA thinning that embeds it in research, meaning it will not occur before baseline monitoring occurs and will proceed under a research design that includes longer-term monitoring to assess effects. This has been clarified in the proposed HCP and FMP.
08	Mark Trenholm, Wild Salmon Center	Timeline and funding for in-stream habitat enhancements: The draft FMP should provide additional detail around long-term planning and commitments for funding this long term proposed research component, especially given that the draft FMP requires that work occur in a phased approach and begin in non-anadromous waters. Given the lack of identified and committed funding, we are concerned with the proposed sequencing of restoration work as it appears that work befitting priority species - such as Oregon Coast coho - does not have a clear timeline for implementation.	DSL appreciates this comment and acknowledges that specific instream and other related aquatic restoration project actions, long-term commitments, and funding have not been identified as part of the proposed FMP. DSL views instream restoration efforts as a partnership conversation and need. The proposed FMP has been revised to reflect next-step strategy planning with state, federal, local, and other partners (e.g., ngo) where this can be addressed. A specific timeline for implementation of instream work will depend on partnership resources as well as future ESRF budgeting efforts and prioritization, operations planning, and ESRF Board and public input.
09	Cascadia Wildlands et al.	The public invested \$221 million to remove the Elliott from the Common School fund and eliminate pressure to harvest timber. This is a massive public investment and it must be honored. We are deeply concerned that at \$5.2 million, DSL is advancing a budget that is also unsustainable and which will replicate the harvest pressure previously exerted by the Common School Fund. While the proposed budget may currently be augmented by state and federal subsidies, in	DSL is planning ESRF finances / budgets in accordance with commitments made, which we believe are sustainable. This includes a collaboratively agreed-upon landscape design that could yield roughly 17mmbf in timber / yr. and a carbon project that would also yield revenue. The original ESRF Advisory Committee and subsequent iterations of ESRF advisory bodies spent a lot of time working on a

Letter Number	Commenter Name	Comment	Response
		the long term it has the potential to drive unsustainable timber harvests. We believe it would be prudent for DSL to start off with a significantly smaller budget (\$3 million-\$4 million) and only grow over time if sustainable harvest practices can support increased funding. DSL must not swap one unsustainable paradigm for another.	<p>design it felt is sustainable, so this comment makes DSL wonder if commenters are saying agreements made are not sustainable?</p> <p>DSL's budgeting principle for the ESRF (including in the Oversight Structure adopted by the Land Board, and the principle of a self-sufficient forest) is to keep costs scaled to what is available within revenue. Forest operational and management costs will be prioritized in the budgeting order. The ESRF is a research forest, however, and providing funding for research and related scientific information is intended. While budgeting decisions remain on the horizon and will occur with the ESRF Board's (and public's) engagement, DSL intends that once revenues available after operational costs are covered, additional revenue would be put into a contingency fund and/or be made available for research. DSL believes that calling out a \$3-4M budget figure (without actually saying or showing what would go into that budget) seems somewhat arbitrary as well as potentially inconsistent with other portions of commenter's input, which would take DSL's proposed budget in an upward direction (e.g., stating the FMP should make firm commitments of additional expenditures related to items including beaver restoration, amphibian research, bird surveys, and others). Given the underlying collaborative efforts and compromises made in order to reach the proposed research forest design, DSL cannot agree with any implication that only a forest that generates \$3-4M in timber revenue / year would be sustainable.</p>
48	Albert LePage	Proposed future self-sustaining annual budgets need to ensure the long-term health and resilience of the forest in accordance with conservation biology, ecological principles, research goals, and sustainable forest management practices. A conservative budget approach, for example, will ensure that timber	DSL does not disagree with this comment. See further detail in DSL's response to comment from Cascadia et al. on this subject.

Letter Number	Commenter Name	Comment	Response
		harvest levels will be based upon appropriate and approved management objectives, and not upon realizing future budget amounts	
54	Rod Krahmer, Oregon Department of Fish and Wildlife	<p>The department also provides the following more specific comments related to research and partnerships; streams, designations, and treatments; wildlife; and previously unaddressed comments for your consideration:</p> <p>Research and Partnership</p> <p>The department appreciates the inclusion of ODFW in the HCP Implementation and Adaptive Management Committee. The following recommendations relate to partnering with the department and others, including:</p> <p>Additionally, in Section 2.3.1 (page 2-9) there is conflicting information on whether an applicant should or should not submit funding information. In Structure for Decision-Making on New Research and Integration with Existing Projects, the Draft FMP states that requests should be made before obtaining funding. However, in Requirements for Submitting Research Proposals (page 2-10) it reads other information collected through the proposal process will include the primary funding source. The department encourages clarification on this as the former process would allow for more time to negotiate resolutions to potential conflicts identified in the review process while not under a timeline imposed by an awarded funding source.</p>	<p>DSL agrees that, unless funding for a research project has already been secured, it is preferable for research requests to be made before obtaining funding in order to have more time to flag potential conflicts with existing research and address them. That said, research applicants would be encouraged to flag their proposed primary funding source(s) and status of potential funding in order to allow an assessment of whether proposed research would be supporting itself fully, partly, or looking to the ESRF for funding. The FMP has been revised to clarify this as well as the conflicting information referenced by commenter in Section 2.3.1.</p>
55	Sierra Club Oregon Chapter	<p>We remain deeply skeptical about the fundamental assumption that this research forest enterprise shall be financially self-supporting through timber “harvests.” This “working forests” approach only reinforces the false narrative that forests need to produce wood fiber in order to be “productive,” The reality is that the Elliott, like all forests, has produced a wide range of ecological services of benefit to humans and the natural world for millennia, including clean air and water; biodiversity, critical wildlife habitat, carbon storage and sequestration, and</p>	<p>DSL appreciates this perspective but disagrees with the underlying rationale that simply because the ESRF advances and derives revenue from timber harvest, it is somehow unable to produce the other broad forest values mentioned by commenter. DSL agrees that forests produce—and should be valued for producing—services well beyond timber. The notion of a productive forest should not be a matter of binary logic around the existence of timber harvest. And, the ESRF’s approach is very much a broadening and break from the historical timber</p>

Letter Number	Commenter Name	Comment	Response
		wildfire resilience. To insist that research must be funded through logging revenue fundamentally biases the entire research approach, as we have seen widely throughout the history of the OSU Research Forests. The primary challenge for DSL and the Oregon Land Board will be to find a way to decouple research funding from the historical, extractive ways of “managing” forests.	extraction focus of the Elliott's recent past. The ESRF will create and allow for funding other than timber revenue. But it seems equally binary to say that the entire ESRF approach is fundamentally biased or flawed in its ability to produce broader values just because timber harvest and revenue is part of it.
55	Sierra Club Oregon Chapter	With DSL now assuming oversight of the ESRF, we see an opportunity to revisit and reset some of the underlying assumptions that were embedded in the previous RFP and FMP documents. We urge DSL and the Elliott Board to apply the following guiding principles: Research funding must be entirely decoupled from a timber-based funding mechanism (the so-called “working forests research model”) as this imparts substantial bias and only perpetuates the problems that need to be addressed in forestry.	While the Elliott has been decoupled from its obligation to provide timber revenue for the Common School Fund (a key part of allowing the Elliott's transition to a research forest that serves broader values), timber harvest and revenue from harvest remains part of the approach to funding operations and research on the ESRF. Other sources of revenue would also exist (e.g., carbon project revenue, federal funds, research grants, etc.), and the principle of a self-sustaining research forest has been part of the ESRF design since the early stages of its development.
78	Bob Zybach	Economic Values The FMP lacks basic economic information that is critical to most forest management plans. Although a detailed budget is suggested for operating the forest and for funding research projects, there is a striking lack of consideration of the Elliott's basic and proven assets regarding timber volumes, annual productivity, potential for improved yields, and current market values. These numbers are significant for several reasons and their absence in the planning process is concerning.	As commenter notes, the proposed FMP does include a budget (Appendix E) and speaks to revenue and sources thereof. DSL respects that commenter disagrees with the level of proposed timber harvest as being lower than historic levels.
78	Bob Zybach	The Elliott contains about 3.5 billion board feet of timber, grows an estimated 75 mmbf more a year, has 550 miles of road, and more than two dozen fish-bearing streams, but has done no timber harvesting for the past 10 years while spending millions of dollars on consultants and lawyers to develop an FMP and an HCP. In	DSL appreciates commenter's affinity for the "Geisy Plan". It was an option explored as part of the 2017-18 Oregon Consensus independent assessment effort to explore alternative public ownership options for the Elliott. This assessment did not indicate widespread support for this option as an approach to

Letter Number	Commenter Name	Comment	Response
		<p>the meantime, it has not developed an operating income the entire time. According to Walker (2023):</p> <p>"The forest also must be financially self-sustaining. DSL is continuing with an independent analysis of financial information submitted by OSU. This will help inform our path forward and ensure the research forest is managed within the means available."</p> <p>The "independent analysis" of the Elliott's ability was performed by Newton Forestry, LLC in 2022 and then reconsidered in 2023 (Newton 2022; 2023). In 2017, Ferrioli had Christine Broniak an Oregon Legislature economist, project Elliott income if the "Giesy Plan Alternative" management proposal was followed. Broniak used a 2017 timber value of \$367.50/mmbf and a 50 mmbf/year sales figure, to estimate the Elliott would be produce an income of approximately \$20 million/year for 10 years, and about \$25 million/year for the next 10 years (Giesy and Zymbach 2017b).</p> <p>Newton used a figure of \$675/mmbf in 2022 (Newton 2022: 1), however, the 2024 FMP calls for an annual harvest of only 17 mmbf/year (DSL 2024: 6-4), leading him to conclude: "An evaluation of the accumulated cashflow using the OSU 2023 financial information does not paint a good financial future under the current plan for managing the ESRF (Newton 2023: 2).</p> <p>These reduced evaluations and funding strategies are what caused Murthy to conclude:</p> <p>"OSU continues to have significant concerns with the State's intent to limit variations in annual harvest volumes in the ESRF, and to move forward with a carbon project on the ESRF. The October 13, 2023, email from the State Land Board Assistants . . . made clear that harvests on the ESRF would be subject to a set annual timber volume with minimal year-to-year variation . . . the notion that the research forest managers could maintain a near static timber volume in annual harvest within the research goals and management commitments of the ESRF fails to (1) support the health and resiliency of the forest, (2) recognize the</p>	<p>the Elliott's future (compared to other pathways). The ESRF Advisory Committee collaborative effort resulted in agreements and compromises tied to the research forest approach that emerged. In addition, DSL is well aware of the OSU President Murthy letter and its content, but DSL does not wish to assume it knows what specifically caused the President to reach her conclusions (or validate what other people ascribe as her motivations), other than what is on the face of the letter.</p>

Letter Number	Commenter Name	Comment	Response
		dynamic nature of both forest ecosystems and adaptive management, and (3) support the integrity of a functional, replicated research design as described in the ESRF Research Proposal."	
78	Bob Zybach	<p>Carbon Credits</p> <p>When OSU and DSL signed a Memorandum of Understanding (MOU) in February 2019 (Walker and Huntington 2019), a key component of the agreement was to produce a research and management plan for the Elliott by the end of the year in which "key conservation values" would be identified. The second "key value" listed was "a carbon sequestration program" (ibid.: 2).</p> <p>Nearly five years later, in November 2023, OSU President Murthy informed DSL that the University would be terminating its agreements regarding research and management on the ESRF, other than submitting a formal management plan within the following month (Murthy 2023). A key reason for this decision was OSU's "significant concerns" regarding DSL's "intent" to "move forward with a carbon project on the ESRF" (ibid.: 1).</p>	<p>Commenter is correct that a carbon sequestration program has long been a part of ESRF development efforts. Consideration of a carbon project and related options has been part of this, including various public-facing information, presentations and conversations with ESRF advisory bodies over time at public meetings. This includes eventual advancement of a competitive contracting process for development of a feasibility analysis and public sharing of results. The proposed FMP speaks to the Sate's larger plans and objectives related to climate change and carbon, and it embeds related direction for advancement of voluntary market carbon project on the ESRF that is consistent with planned active management approaches (including timber), advancement of contemplated research, and sequestration additionality. DSL has discussed carbon project considerations with OSU and its concerns, but it has not heard OSU take a position that it opposes a carbon project. Further, DSL does not read the 2023 OSU President Murthy letter as indicating a termination of relationship between OSU and DSL, and as opposed to commenter translating OSU's intentions, DSL believes OSU the most appropriate entity to speak to its own intentions.</p>
78	Bob Zybach	<p>Finally, in addition to a debatable research design unlikely to persist over time and of little apparent practical value to Oregon's state and private forestland managers, there is the issue of cost. This topic is not addressed in the DSL FMP but was spelled out in the OSU proposal -- which gives the total start-up cost as being \$34.8 million over three years' time, including: Research Facilities (\$17 million); Working Capital (\$10 million); Research Plots and Inventory (\$3 million); Monitoring Equipment for carbon, streams, wildlife, and recreation (\$4.3</p>	<p>Thank you for this comment. The proposed FMP has been revised in areas related to revenue. That said, many start-up costs in the OSU FMP related to research-specific costs. And, as the proposed DSL FMP notes, the status of OSU as a potential research lead for the ESRF or partner remains uncertain and an ongoing conversation, thus making research-related costs tied to OSU uncertain as well. In addition, funding for a potential research forest headquarters facility at Shutter Creek is not part of this FMP (it is a separate</p>

Letter Number	Commenter Name	Comment	Response
		<p>million); and 15 vehicles at \$34,000 each (OSU 2021: 31-32). Based on the 2021 proposal, the total annual cost to maintain the triad research design is approximately \$7.8 million (ibid.: 4), covering both forest management and research operations. The DSL FMP emphasizes the need for ongoing financial evaluations and startup funding but doesn't provide a single total annual cost figure; instead, asterisks are substituted in place of actual dollar amounts for generating the needed budget (e.g., DSL 2024: 2-20): "Revenue modeled from the ESRF's approach to timber harvest is anticipated to be *** / year after costs have been netted out."</p> <p>In sum, according to Franklin (ibid.: 116-117):</p> <p>"We are going to be surprised . . . taking what will be your major research property and committing it all to an experiment of any kind along with committing all of the financial resources necessary to sustain it is not – to use a kind word – prudent.</p> <p>". . . And, as I noted initially, I don't consider an experiment about how to divide forest landscapes at any scale among production and conservation goals to be a high priority in our current world . . . . There are so many important things to be done and this is not one of them.</p> <p>". . . I have probably said more than I needed to at this point. It is your proposal. I do not think that it does credit to the institution or yourselves; you can do much better than this."</p>	<p>planning process). ESRF-specific start-up costs, however, remain a real and necessary part of next-steps for the research forest.</p>

Table A-21. Community Involvement

Letter Number	Commenter Name	Comment	Response
Form Letter	Form Letter 1	The FMP must clearly define how the public can legally challenge biennial operational plans, other plans, or forest activities that do not comply with the FMP.	See DSL’s response to comments from Cascadia et al. on this subject.
02	David Stone	Transparency <ul style="list-style-type: none"><li>- Public notification of</li><li>- Proposed projects</li><li>- Follow NEPA process even though this is a state forest</li><li>- Scoping</li><li>- Comment period</li><li>- Draft decision with comment period</li><li>- Record of decision</li><li>- Approved projects</li><li>- Conclusions of projects</li><li>- Monitoring reports</li><li>- Active distribution</li><li>- No FOIA needed</li></ul>	Issues raised by commenter here are addressed by the ESRF Oversight Structure document adopted by the State Land Board in April 2024, which is available on the DSL Elliott website ( <a href="#">Oregon Department of State Lands : Exploring an Elliott State Research Forest : State of Oregon</a> ). The ESRF will follow Oregon's open meetings law and related transparency laws (e.g., public records act). The public will receive notices of ESRF Board of Director meetings and proposed actions on the Forest. The public will have the opportunity to review and comment on proposed on-the-ground projects. And monitoring and other reports that DSL is committed to produce will be made publicly available. Operation of the ESRF and its governance structure will not adhere to the National Environmental Policy Act (NEPA), as that is a federal law not applicable to state forest management. Singing up for the ESRF distribution list on the DSL ESRF website will ensure receipt of ESRF Board meeting notices, public comment opportunities, availability of materials and other information about ESRF happenings.
07	Kent Tresidder	Public Input I believe one of your (DSL) stated goals has been to invite, consider, or incorporate public input. Have you looked back to see how that's been working? I network with a few others who share some of my views on the Elliott. There seems to be sparse attendance at your public meetings. Written testimony and commentary are likewise small in number and	Your comment and participation in this process is acknowledged and appreciated. Hopefully DSL’s response to commenter’s individual comments as well as from others indicates DSL takes public input seriously.

Letter Number	Commenter Name	Comment	Response
		weighed toward the environmental lobby. I've also heard there is seldom any comment, response, or discussion at public meetings. In fact, I've had individuals tell me that "it's a waste of time providing DSL with any input. They've already got their minds made up and are going to do what they've planned to do anyway." It would appear to me that your public outreach effort has been a near total failure. Hopefully, this failure is due to ineptitude, rather than intent. In either case, it is wrong and inconsiderate to those who have taken the time and effort to submit commentary. I don't think I've ever submitted comments to DSL on the topic of the Elliott. So, why am I submitting this testimony now? Because if something is clearly wrong or being handled in a clearly unfair manner, I firmly believe it is my duty, as a citizen, to point that out to you - for the record! As I've noted above, there are a number of political and administrative things currently wrong with the concept and the management plan for the Elliott State Forest.	
07	Kent Tresidder	DSL should be more aggressive and positive with their public outreach program and do something constructive with the valuable and applicable information they receive.	DSL will take this comment into consideration and is open to more specific suggestions from commenter or others on ways they believe this should be done beyond DSL's existing approaches.
07	Kent Tresidder	Request. Would you please provide me with some form of response which indicates that you (the Land Board, the DSL, or the Board of Directors of the Authority) have actually read and recorded this testimony?	Yes, in addition to the response to comments that will be recorded and provided publicly in the Community Engagement Report for the proposed FMP, DSL staff has followed-up with commenter directly.

Letter Number	Commenter Name	Comment	Response
08	Mark Trenholm, Wild Salmon Center	We submit the following comments for your consideration: Proposed new designation for Carbon and Biodiversity Management Areas (CDMA): We support the inclusion of a potential CDMA of up to 10,000 acres where intensive management would be prohibited and the area would be managed for carbon and biodiversity values through long rotations, ecological forestry, or Indigenous forestry approaches. We support efforts to align management with the state’s Climate Change and Carbon Plan and opportunities to support carbon and climate research. The draft FMP states that this will be “subject to feedback, potential alternation and shaping as part of this FMP process (subject to HCP commitments, and other FMP commitments, including timber harvest-related)” (p. 4-11). Please provide additional detail regarding processes through which the public can engage to provide feedback or otherwise inform the development of this CDMA.	DSL has provided further information on the proposed CDMA designation as part of public listening sessions on the FMP, ESRF Board meetings (public meetings), additional meetings, and in the revised proposed FMP. As noted in response to other comments on this subject, the current proposed FMP would designate 10,000+ new acres to the CRW rather than move forward with a separate CBMA designation.
48	Albert LePage	The FMP should clearly define a process for public challenges to operational plans or activities that don't comply with the FMP. Transparency and accountability are essential for effective forest management and conservation. Ensuring that the public can legally challenge non-compliant activities will enhance the plan's credibility and effectiveness	See DSL’s response to comments from Cascadia et al. on this same subject.
63	Rob Taylor	Public Involvement: Public participation has not been previously involved in planning process; solicited input was ignored. How will current process address this problem?	Since Mr. Taylor's comments are an endorsement of the review submitted by Dr. Bob Zybach et al., please refer to DSL's response to those comments.

Table A-22. Recreation

Letter Number	Commenter Name	Comment	Response
06	Jon Haynes	<p>Thank you for the opportunity to comment on the Draft ESRF Management Plan. This comment regards the lack of any specific plan for creating OHV riding infrastructure. Specifically I would like to address the lack of riding opportunities in Coos and western Douglas counties for Class 1 OHV's, i.e. 4 wheeled motorized quads with widths of 50 inches or less, also known as ATV's. Enthusiasts of Class 1 OHV's are running out of places to ride in this area. Let's look at the existing opportunities (1) Forest Service. The Oregon Dunes NRA has been taken over by Class 4 side by sides (UTV's) . Class 4's are powered by engines at least twice to three times the size of Class 1's and have a much longer and wider wheelbase and substantial suspension systems making faster speed over rough terrain possible. It also means they often travel a lot faster than Type 1's and usually hog entire trail widths. They often travel in packs. Riding a Class 1 on sand roads and trails in the NRA can be a hair raising experience due to the aggressive UTV traffic. I have installed mirrors on my Class 1 to help me detect fast moving UTV's coming up behind so I can get out of their way. (2) BLM. The Blue Ridge Trail system is open only to Class 3 (motorcycles) even though some of their trails would be suitable for Class 1 ATV's. I recently talked to BLM recreation managers and they affirmed that the overall direction of the Blue Ridge Trail System is single track and only for Class 3 motorcycles and bicycles. Class 1's can be used only on the adjacent gravel roads. In addition, the North Spit is closed to all motorized OHV's due to plover restrictions and jetty work. (3) County. Coos County has recently gated off the Coos County Forest and the sole access to the Winchester Trails is a staging area along US 101 which appears to be single track suitable for Class 3 only. Some of the wider trails further in the interior of the Coos County Forest suitable for Class 1's have become inaccessible with the gate closures, as well as the overall gravel road system. The Elliott State Research Forest could be a wonderful resource to develop a Class 1 trail</p>	<p>The proposed FMP speaks to outdoor recreation in Chapters 1, 3 and elsewhere. The Department has placeholdered further formal development of a recreation plan for the ESRF, which is intended to be the effort that addresses specific locations, levels and management of recreation on the Forest, including motorized use. The Department acknowledges the commenter's concerns over a need for more specific direction in the FMP as well as commenters substantive points about Class 1 OHV (versus Class 4 or other uses) recreation in the region as well as potential opportunities on the ESRF. The Department encourages commenter to engage in the future ESRF recreation planning process and will bring this input into that process. To ensure notification of the future recreational planning process for the ESRF, the Department encourages commenter to sign up for notices on DSL's Elliott website: <a href="https://www.oregon.gov/dsl/pages/elliott.aspx">Oregon Department of State Lands : Exploring an Elliott State Research Forest : State of Oregon</a>  <a href="https://www.oregon.gov/dsl/pages/elliott.aspx">https://www.oregon.gov/dsl/pages/elliott.aspx</a></p>

Letter Number	Commenter Name	Comment	Response
		riding system. The State has done this up in the Tillamook State Forest, why not here? With the myriad of road grades in the ESRF, some open, some closed, some rock surfaced, some dirt surfaced, it seems like a plan could be developed to incorporate some of these grades into Class 1 trails. What would be really cool would be a loop system with staging areas and some camping opportunities along the route, similar to the NRA sand camps. I am very fortunate to live in this area but riding gravel roads gets old real fast as does exclusively riding on sand. We need more dirt trail riding opportunities in this area particular for the Class 1 ATV's.	
78	Bob Zybach	Cultural Landscapes (p. 13): The FMP overlooks the historical and cultural significance of the Elliott's 550 miles of roads and trails, as well as the impact of plantations on biodiversity. The absence of old-growth and the historical context of these plantations are not adequately addressed or accurately described.	DSL appreciates these points and has revised this portion of the FMP accordingly.

Table A-23. Taxes/Common School Fund

Letter Number	Commenter Name	Comment	Response
07	Kent Tresidder	<p>All Land Pays Dues</p> <p>As I'm sure you are all aware, with few exceptions, all land pays dues to local governments for public services and schools. That includes state and federally owned lands. The exceptions are normally parks, reserves, and tracts beneath publicly owned offices. Private lands pay property taxes. Federal lands pay a portion of gross receipts from resource revenue or "in-lieu-taxes" to local governments. State land also pays a portion of gross receipts from resource revenue (historically, this included the Elliott State Forest). Currently, the Elliott pays no dues. This concept of "all land pays dues" seems to be ignored in the draft plan. Not only is it unfair to Oregon school children, it is wrong.</p>	<p>The Department is committed to continuing the following payments or commitments relative to locally-relevant funding and services: payment of wildfire protection costs (relevant to Coos and Douglas Forest Protective Associations); law enforcement payments); road system upkeep and maintenance of the Forest; and others. Commenter's concept of "dues" payments is part of a broader conversation that would need to occur with State officials beyond DSL.</p>
07	Kent Tresidder	<p>Senate Bill 1546</p> <p>This bill effectively stole a valuable asset, the high productivity of the Elliott, from the Common School Find - from the children of Oregon. What kind of "research" emanates from the government, other than that which supports political ideology? Research should be left to OSU School of Forestry or other institutions of higher learning. It is even questionable whether DSL's plans for the Elliott, under SB 1546, are legal. To pretend that transforming the highly productive Elliott into an amorphous research entity which would benefit the average Oregon taxpayer is ludicrous. It is wrong.</p>	<p>Your comment is noted.</p>
07	Kent Tresidder	<p>Transformation</p> <p>Once upon a time, the Elliott paid generously into the public coffers, easing the tax burden of OR citizens. Today the Elliott, as managed by DSL, is an absolute sinkhole for millions of dollars of taxpayer dollars. The Draft Research Management Plan has no provision or promise that will ever change that scenario. I really don't understand why the Land Board, The DSL and the</p>	<p>As commenter notes, the State as paid \$221 into the Common School Fund, which are available to be used and/or reinvested to advance the CSF's public purposes and outcomes for many years to come. This substantial funding would not have flowed directly into the CSF without the existence of the ESRF approach that the State is advancing. DSL understands commenter's point about the reduction in timber harvest revenue to the State as a result of the</p>

Letter Number	Commenter Name	Comment	Response
		Board of Directors of the Authority cannot see how wrong this transformation is. As I understand it, the \$221 million to "free the Elliott of it's obligation to generate revenue for the K-12 public schools" was paid for by the taxpayers of Oregon. Not only is that unfair to Oregon school children, it is clearly unfair to Oregon taxpayers also.	ESRF approach compared to historic harvest levels. But the current status of Elliott management (referred to as a "sinkhole") is the result of litigation outcomes that demonstrated the unsustainability of going back to historic logging levels. Through the proposed HCP and FMP, the Department is working to advance pathways out of this status quo and back to active management of the Elliott as a research forest. While perhaps not as significant as commenter would like, timber harvest revenue is being advanced under this approach, and DSL feels it will be through approaches and at levels meaningful to public interests related to local economies, communities, and other social values.
07	Kent Tresidder	Go back to the legislature and point out to them the flaws and failures I have highlighted in Senate Bill 1546.	DSL is and will remain in contact with the Legislature related to the ESRF.
63	Rob Taylor	[Trust] Law: The FMP does not adequately analyze the legal requirements of the Common School Fund or align with these requirements, raising concerns about its compliance with fiduciary obligations.	Since Mr. Taylor's comments are an endorsement of the review submitted by Dr. Bob Zybach et al., please refer to DSL's response to those comments.

Table A-24. Water Quality

Letter Number	Commenter Name	Comment	Response
12	Ken Rawles	Maintaining robust protections for the CMA is essential for several reasons: Water Quality: The CMA's intact forest ecosystems are crucial in maintaining water quality for surrounding communities. Decreasing protections could result in increased sedimentation and pollution in waterways.	DSL assumes commenter is speaking to the Conservation Research Watershed (CRW) designation on the ESRF, not a Conservation Management Area (CMA). DSL appreciates the concern raised by commenter and does not believe it is weakening the CRW.
09	Cascadia Wildlands et al.	The FMP discusses the fact that several waterways within the Elliott have become water quality impaired for temperature (FMP at 1-31) The FMP should specifically address how temperature will be addressed on these listed streams.	The proposed FMP's monitoring section has been revised to address temperature-specific concerns.
15	Coos Watershed Association	Water quantity and quality monitoring underpins the effectiveness monitoring for most restoration and management activities within the FMP and HCP. Again, the FMP should aim to use monitoring protocols that are consistent with state standards or best practices (when applicable) for comparability with other work done in this area. To meet the established Department of Environmental Quality (DEQ) standards, all temperature data should be collected at 15-minute intervals, rather than one hour (FMP pg. 10-18) using data loggers that meet DEQ accuracy requirements. We welcome the acknowledgement of our experience and partnership opportunities in operating an array of gaging station water quality monitoring sites in the FMP. From this experience, we know that gaging stations are time intensive and expensive to operate, even more so if they plan to be uploaded real-time to the public. The annual cost and staffing requirements to operate the proposed 16-24 gaging stations throughout the ESRF seems unrealistic. Although flumes can be more cost effective, they only work well in very small watersheds and require more frequent maintenance to obtain accurate discharge measurements. Additionally, there is no mention in the FMP that developing a	Thank you for these comments. DSL desires that monitoring efforts advanced on the ESRF are non-duplicative and compatible with other monitoring efforts done in the area. Use of protocols consistent with state standards or applicable best practices is a seems a reasonable approach (i.e., in the case of temperature data mentioned here). DSL has revised the FMP to reflect this intention, while also allowing for different monitoring approaches if needed for specific research efforts. Regarding gaging stations, DSL appreciates the caution that this comment signals. The proposed FMP has been revised to indicate that the overall number of new gaging stations on the ESRF will be based on further work with technical experts and practitioners specializing in stream hydrology in the region to address the issues raised in this comment, as well as budget availability.

Letter Number	Commenter Name	Comment	Response
		<p>new ratings curve for a new site requires years of stream measurements before stage heights can be accurately converted to discharge estimates. The FMP lacks clear objectives on how discharge estimates will be used. Clarifying this will help determine where/how many gaging stations are realistically required in the ESRF and how this ratings curve development time will affect monitoring capabilities. This is an important clarification as this will be critical for monitoring predicted climate change effects on increased precipitation as detailed in the ESRF FMP, HCP and EIS documents. Trends in water levels and stream discharge are also important for coho migration ability and timing, stream temperatures, and hydrological modelling for designing and implementing instream restoration projects. Utilizing tested standards and working with practitioners specializing in stream hydrology in the region will be crucial in improving the draft FMP.</p>	

# ELLIOT STATE RESEARCH FOREST FOREST MANAGEMENT PLAN

## SUMMARY REPORT: GOVERNMENT ENGAGEMENT

**PREPARED BY:**

Oregon Department of State Lands  
Contact: Brett Brownscombe  
[Brett.Brownscombe@dsl.oregon.gov](mailto:Brett.Brownscombe@dsl.oregon.gov)

**October 2024**



## Introduction and Context

This document is the Summary Report of Government Engagement (Report) for the Oregon Department of State Lands (DSL) draft Elliot State Research Forest (ESRF) Forest Management Plan (FMP). The proposed plan reflects the ways in which the ESRF is to become an enduring, publicly owned, world-class research forest that advances and supports all aspects of forestry, including forest health, climate resilience, carbon sequestration, biodiversity, recovery of imperiled species, timber and other forest products, water quality and quantity, recreational opportunities and local economies. The plan includes a menu of management, research, and treatment options to better understand forest ecology, as well as maintaining educational opportunities and public access for recreation and traditional cultural uses of the forest.

This Summary Report provides an overview of the work DSL has advanced in engaging government entity input around DSL's draft Forest Management Plan (FMP) for the research forest since the draft's release in June 2024. Government entities include local, state, federal, and Tribal government entities, agencies and/or elected officials or bodies. This Summary Report does not reflect but builds upon government engagement around the ESRF's creation that has been ongoing at multiple levels since early 2018, when the Land Board and DSL began formal efforts related to transitioning the Elliott State Forest to become a research forest of local, statewide, national and international significance as reflected in the planning effort to date and the current DSL draft FMP.

## Summary Report Overview

This Summary Report does not contain but rather builds upon information contained in the [Community Engagement Report](#) for the draft DSL FMP, which reflects more detailed information about the ESRF effort, the draft FMP and guiding principles, public outreach and engagement. In addition to the Community Engagement Report, the [DSL Elliott State Research Forest website](#) contains important information relevant to the ESRF's development, including key moments, the Oversight Structure adopted by the Land Board, and links to the draft FMP itself. Please see the Community Engagement Report and the DSL ESRF website for those informational resources and level of detail.

Importantly, it is not the intention of this Summary Report to delve into detail or ongoing deliberations with government entities, including Tribal nations. Instead, this Report's purpose is to summarize the nature of DSL's engagement and status of conversations with government entities around the DSL draft FMP and inform the Land Board, the ESRF Board, and broader public with this information.

## Government Engagement Efforts

As stated in Chapter 3 of the DSL draft FMP, effective collaboration and partnerships will be key to the successful advancement of the ESRF. Government entities play key roles with respect to human communities, infrastructure, and natural resources relevant to the ESRF. DSL's intent has been and remains one of positive coordination and engagement of government entities as potential partners

in the ESRF. Some of this partnership fabric is in place and some remains in the formative or potential stage. This Summary Report speaks to the status of these efforts.

Since the release of the DSL draft FMP in June 2024, DSL has advanced engagement with the following government entities around the draft FMP:

- Tribal Governments
  - Specific outreach and engagement efforts with the following five federally recognized Tribes of Western Oregon, who to one degree or another, have ancestral and ongoing connections to the landscape that encompasses the ESRF today:
    - Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians
    - Confederated Tribes of the Grande Ronde
    - Confederated Tribes of Siletz Indians
    - The Coquille Indian Tribe
    - Cow Creek Band of Umpqua Tribe of Indians
- State Government
  - Specific meetings around state agency input and coordination with the following:
    - Oregon Department of Forestry (ODF)
    - Oregon Department of Fish & Wildlife (ODFW)
    - Oregon Department of Environmental Quality (DEQ)
  - Additional outreach and/or conversations with state legislators, and the Environmental Justice Council
- Local Government
  - Outreach and/or conversations with Coos and Douglas County commissioners
  - Outreach at additional local levels including the Coos County Sheriff's office as well as Coos Fire Protective Association.
- Federal Government
  - Outreach and/or conversations with the following:
    - Oregon Congressional Delegation offices
    - US Fish & Wildlife Service (USFWS)
    - National Marine Fisheries Service (NMFS)
    - U.S. Forest Service
    - Bureau of Land Management

## Summary of Feedback and Ongoing Efforts

This section presents a summary overview of input to DSL from government entity conversations and potential next step opportunities.

### **Tribal Governments:**

A comment theme across engagement with the five Western Oregon Tribes is the reality of the Tribes being busy and short on capacity. Tribes are being asked by other governments to engage at multiple levels and on multiple issues of importance to them (e.g., federal NW Forest Plan revision, fishery

issues, energy development, etc.). This level of desire and demand for Tribal engagement is somewhat unprecedented and beyond the capacity of many Tribal departments and staff. This reality should not imply that these Tribes do not care about the ESRF or obscure their connections to this landscape and its future, but time to engage deeply remains challenging. In addition, staff transitions are ongoing for some Tribes, and many Tribes are very focused on advancing or implementing plans and work tied to their own lands, some of which have been relatively recently restored by the federal government.

DSL has updated these Tribes at the Tribal Chairperson and staff levels around the ways DSL has incorporated past Indigenous input and requests into both the proposed Habitat Conservation Plan and the draft FMP for the ESRF. The agency has also reflected the ways in which the draft FMP incorporates Indigenous connections to the ESRF landscape, reflects an intention for partnership around Indigenous management and research on the ESRF, incorporates principles and opportunities for working with Tribes on these opportunities. DSL has listened to feedback from the Tribal Council and staff levels on how individual Tribes view potential opportunities and constraints around ESRF engagement (reflected below at a summary level), and DSL will continue to listen and engage.

The draft FMP recognizes that the nature of conversations with Tribes around Indigenous management and research on the ESRF is complex and will take more time, as desired by Tribes. This conversation is also intertwined with ongoing conversations around the lead research partner role on the ESRF and how research will integrate Indigenous interests, values, and approaches to management and research. DSL has advanced conversations on this subject with OSU and Tribes, which will take more time to develop. While larger conversations continue, DSL has also advanced potential opportunities to work with Tribes at a project level around demonstrating Indigenous stewardship through on-the-ground work that could potentially cover Tribal staff costs.

A high-level summary of potential opportunities and constraints are listed below:

Opportunities—

- The ESRF remains a place of significant importance to several Tribes. This relates to recognition of ancestral homelands, restoration of Indigenous culture and opportunities, demonstration of Indigenous stewardship approaches, and advancement of Indigenous values and approaches to research. The potential for state public land to be a place that intentionally advances these efforts and outcomes would be a valuable and positive historic turn.
- Demonstration of Indigenous interests and stewardship through practice--even at a small-scale level, a project-level effort could represent an initial, tangible step to build from in advancing potential broader partnership around reflecting Indigenous stewardship and research values on the ESRF.

Constraints—

- The ESRF (through the draft FMP and proposed Habitat Conservation Plan) does detail clear intentions, principles, and specific opportunities for Indigenous management, cultural uses and practices, and research. Tribal staff capacity, however, remains limited and constrained. Realizing partnership potential with Tribes likely involves discussions and solutions that support Tribal staff capacity.

- Governance—
  - Tribes seem to appreciate that DSL will take more time in advancing conversations related to Indigenous management and research on the ESRF but also worry that once the State Land Board adopts an initial FMP for the ESRF, then the State will lose momentum and/or focus on these conversations and advancement of next-step commitments related to Indigenous stewardship, research, and ESRF governance connections.
  - In addition, meaningful involvement of Indigenous interests in the ESRF's governance is a remaining need and challenge. Tribes are sovereign governments not stakeholders, and each Tribe is unique. DSL does not wish or intend to choose one Tribe over another, and this is an area where conversations among and across Tribes remains relevant. Further, as the draft FMP points out, a question remains as to the proper table or structure for Indigenous engagement in ESRF governance. While DSL is committed to government-government engagement with individual Tribes, resolution remains needed as to engagement at other levels. Potential options include Memoranda of Understanding, engagement in the ESRF Board, development of another structure with staff representation across Tribes that is meaningfully integrated into ESRF governance. DSL intends to continue conversations related to this issue across Tribes.

### **State Government:**

State agencies have been very responsive and engaged in the context of the draft FMP and potential next steps on the ESRF that advance or connect to their missions and programs. Some examples are:

- Water quality monitoring and improvement—the draft FMP includes approaches relevant to these outcomes and work with DEQ. FMP revisions between the draft and Oct. 15 proposed document reflect further work and conversations in this area. ESRF research will focus on this as well, based on testing different approaches to forest and riparian management.
- Aquatic and terrestrial habitat—the draft FMP strives to highlight the Oregon Conservation Strategy and how the ESRF can contribute to its conservation and biodiversity outcomes. ODFW input has shaped revisions to the draft FMP. This includes in the context of restoration projects, which DSL intends to advance on the ESRF but the specifics of planning, capacity, and implementation approaches with partners will take additional time.
  - In the context of monitoring, DSL seeks to work with ODFW (and other entities) on coordinating monitoring efforts, programs, and key research opportunities. The revised proposed HCP and FMP address this.
  - In the past, DSL has had inter-governmental agreements with ODFW related to habitat projects on the Elliott (e.g., relevant to elk, bear and coho). As a means of integrating other state agency missions, programs and interests into the ESRF, DSL is interested in continuing those types of agreements and related partnerships with ODFW, other state agencies, and other partners where state agency staff are involved (e.g., Coos Watershed Association, Tenmile Lakes Basin Partnership, Coos Basin Coho Partnership) as the Elliott transitions to the ESRF. Many of these partnership

efforts are currently supported by the Oregon Watershed Enhancement Board (OWEB), and DSL intends that the ESRF will help support and grow these partnership efforts over time with OWEB and related partners as well as enhance connections through ESRF research and monitoring.

- Longer rotation, carbon, and other forestry considerations—the draft FMP includes many areas relevant to ODF programs and ongoing conversations, including:
  - ESRF focus on forest management objectives and models relevant the Climate Change and Carbon Plan adopted by the Board of Forestry as well as forestry approaches and outcomes related to growing and cutting larger trees than 40 or 50-year rotations more typical on private commercial timber lands.
  - Advancement of active management and research relevant to riparian areas, steep slopes, and restoration thinning that may prove insightful in the context of policy conversations across other state, federal, and private forest lands. This includes ongoing conversations related to Plans for Alternative Compliance and/or Stewardship Agreement for the ESRF under the Oregon Forest Practices Act.
  - Consideration of approaches and/or potential partnership opportunities related to shared resources, management efficiencies or other approaches in the context of a landscape that includes Board of Forestry Lands within and directly adjacent to DSL lands on the ESRF.

DSL has incorporated feedback from ongoing state agency meetings into the revised proposed FMP.

Some conversations at the legislative level have reflected both continued interest in the ESRF's positive movement forward and concern over carbon sequestration-focused elements of the ESRF effort. A recent news article about DSL's intentions to advance a voluntary carbon market project on the ESRF led to some impressions that timber harvest was no longer a focus of the ESRF's future or would be dramatically curtailed from foundational commitments through the ESRF planning process. While DSL understands how that impression may have been conveyed by the news article, this is not the case. The draft FMP advances both carbon-sequestration outcomes as well as timber harvest and other "working" forest outcomes. The commitment to a self-sustaining research forest remains, and having multiple revenue sources (e.g., timber and carbon) supports this commitment while also supporting the State's broader interests, plans, and objectives related to carbon / climate, conservation, economic development and forest products. While the draft FMP's approach places more emphasis on carbon sequestration and climate outcomes, it continues to advance timber and other "working" research forest outcomes. It is not an either/or proposition. For example, longer rotation forestry has relevance to value-added wood products and economic as well as social benefits beyond carbon, with the ESRF potentially able to play a unique role in this area. And, carbon research can include life-cycle analysis related storage in wood products.

### **Local Government:**

Outreach and/or conversations with Coos and Douglas County commissioners as well as at local levels including the Coos County Sheriff's office and Coos Fire Protective Association has occurred and will remain ongoing. Some points from input DSL has heard to date include:

- Some county commissioners would prefer the Elliott not become a research forest, or at least not as proposed. One concern relates to the amount of timber volume projected to be produced from this landscape under the ESRF design (and reflected in the draft FMP) compared higher levels tied to historic production or what is perceived to be reasonable and sustainable. This concern relates to concerns over management restrictions in the proposed Habitat Conservation Plan and draft FMP.
- Revenue sharing with counties is another concern, with a desire to see a more direct contribution. DSL does intend to continue advancing payments relevant to local government in the areas of law enforcement patrols as well as fire protection, but local government interest exists in going further.
- Some county commissioners value the ESRF's potential contribution and uniqueness in the area of diversifying wood product types and supply. This relates to the ESRF's approach to growing and cutting larger trees.
- DSL is advancing an agreement with the Coos Fire Protective Association over the installation of a fire detection camera on the communications tower at the Shutter Creek property. This would add benefits for fire protection both on the ESRF as well as broader land base, communities, and other ownerships. DSL is also committed to continued use of this communications tower for local emergency communications and other purposes that provide public benefit in the region.
- DSL has also heard local interest, including from the mayor of Elkton, around recreational development opportunities on the ESRF. DSL is interested in furthering this conversation as part of future recreational planning on the ESRF (placeholder in the draft FMP). In addition, DSL desires the ESRF to continue to be a place that serves and benefits educational values tied to schools, both locally and beyond. The education planning component of future work (called out in the draft FMP) provides intentional space for this and partnerships related to existing and potential future efforts.

### Federal Government:

Federal agency conversations remain ongoing and offer a source of future partnerships, some of which are already planned and called out in the proposed Habitat Conservation Plan and draft FMP, and some of which need further development in the context of research and research partnerships, habitat restoration work, or other joint management efforts.

- **USFWS and NMFS**—both as part of and distinct from work w/ DSL on the proposed Habitat Conservation Plan, the USFWS and NMFS have missions, programs, and interests in the substantive management and research outcomes on the ESRF. DSL is advancing conversations with both agencies related to these interests and future integration of work. Both agencies will be part of the ESRF's Implementation and Adaptive Management Committee—created as part of the HCP but also relevant to the FMP—which will play an important role in shaping, reviewing, and adapting ESRF management over time. In addition, areas of ongoing conversation and potential partnership include the following:
  - Both USFWS and NMFS have programs and staff focused on efforts beyond regulatory and permitting oversight under the Endangered Species Act, which relates to the broader missions of these agencies. This includes species recovery plans, research, and advancement of habitat restoration partnerships that advance

technical, scientific, and financial assistance. For example, USFWS has the [Partners for Fish and Wildlife Program](#). And NMFS has program centers tied to both habitat restoration and science. Opportunities and intentions exist to further early ongoing conversations over integration of federal staff and interests at its NMFS's [Restoration Center](#) as well as its [Science Center](#) with those of the ESRF.

- NMFS is also engaged in NOAA's broader system of regional climate centers through the [Western Regional Climate Center](#). Opportunities exist—related to DSL's ESRF efforts as well as broader State efforts—to advance partnership between climate-related research and management approaches on the ESRF with those of the WRCC.
- Habitat restoration and research projects—both terrestrial and aquatic habitat restoration projects are a planned part of the ESRF's future, of relevance to the Oregon Conservation Strategy but also to various federal recovery plans, programs, or other efforts tied to several species. The draft FMP speaks to this and provides more detail on approaches and next step planning. The proposed FMP contains revisions to reflect input over next-step restoration strategy work. Opportunities and intentions exist around partnership in this work between DSL, USFWS, NMFS and other state agency and non-agency partners.
- Related to the above, DSL is in ongoing conversation with the Oregon Congressional Delegation, US. Department of the Interior, and USFWS related to advancement of existing budget language into federal funding for efforts on the ESRF. Further conversations are needed at the state and regional office levels of USFWS around specific opportunities to advance interests in management work and/or research that achieve mutual USFWS and ESRF benefits that are beyond existing HCP commitments.
- Barred owl management—USFWS has advanced a programmatic approach to this subject and, as part of the HCP, barred owl management will occur on the ESRF. Planning and implementation of this work will occur as part of ESRF next steps and will be integrated between DSL, USFWS, and other partners on adjacent lands as part of Northern Spotted Owl conservation efforts and research. USFWS oversees permitting of this activity under the Migratory Bird Treaty Act.
- **USDA / US Forest Service**—the ESRF sits adjacent to the Siuslaw National Forest. At a variety of levels, including research and management partnerships, the relatively contiguous block of public land ownership resulting from this adjacency provides opportunity for further partnership development with the Forest Service. This includes on planned efforts related to barred owl management. In addition, the Forest Service and State agencies have management demonstration and research interests that may align well in the areas of ecological forestry, restoration thinning, carbon sequestration, biodiversity efforts, and other areas.
  - The Forest Service has a separate research arm (distinct from the National Forest System management) in research stations across the United States, including the Pacific Northwest. Potential opportunity exists for integration of research plans and programs on the ESRF with Forest Service research station interests, programs and staff. Additional work on the ESRF lead research partner conversation and research planning could further this potential opportunity.

- State and Private Forestry is another distinct administrative area of the Forest Service. Creation of the ESRF and advancement of its various management approaches, efforts, and research—as articulated in the draft FMP—aligns well with State and Private Forestry program interests. An existing award of \$3.5M in federal State and Private Forestry funds exists for the ESRF (through Oregon State University), and DSL is currently working with OSU to advance baseline monitoring on the ESRF with these funds pursuant to a proposed Memorandum of Agreement. DSL is interested in deepening this partnership with State and Private Forestry on the ESRF through next step efforts.
- **Bureau of Land Management**—The Bureau also manages federal public land adjacent to and around the ESRF, and opportunity exists for alignment of management interests, programs, activities and research. There is interest in potential partnership related to recreation and education, specifically in the context of the ESRF and existing Bureau facilities and programs (e.g., Loon Lake). DSL desires to further these conversations beyond current early stages and the draft FMP’s sections related to recreation and education provides context for this.
- **Oregon Congressional Delegation**—the Oregon delegation has been very helpful to date in securing federal funding relevant to the ESRF’s success as a model of statewide and unique national relevance. DSL will remain in communication with delegation offices, who remain interested in the ESRF’s creation and success. Staff remain interested in updates from DSL regarding the draft FMP outcome and opportunities stemming from it.



# Oregon

Tina Kotek, Governor

## Department of State Lands

775 Summer Street NE, Suite 100

Salem, OR 97301-1279

(503) 986-5200

FAX (503) 378-4844

[www.oregon.gov/dsl](http://www.oregon.gov/dsl)

## State Land Board

## State Land Board

**Regular Meeting  
October 15, 2024  
Agenda Item 4**

Tina Kotek

Governor

LaVonne Griffin-Valade

Secretary of State

Tobias Read

State Treasurer

### **SUBJECT**

Adoption of the Asset Management Plan for School Lands

### **ISSUE**

Whether the Land Board should adopt the 2024 Asset Management Plan which guides the Department of State Land's management of rangelands, forestlands, and other lands dedicated to funding K12 public schools for the next ten years.

### **AUTHORITY**

Oregon Admission Act.

Article VIII, Section 5 of the Oregon Constitution; requiring the Land Board to "manage lands under its jurisdiction with the object of obtaining the greatest benefit for the people of this state, consistent with the conservation of the resource under sound techniques of land management."

ORS 273, State Lands Generally.

ORS 273.245, Asset Management Plan.

ORS 273.171; relating to the duties and authority of the Director.

### **BACKGROUND**

School lands have supported public education in Oregon since statehood, when Congress provided sections 16 and 36 of every township "for use of schools." Today, the Oregon Department of State Lands manages Oregon's 681,000 acres of school lands to generate revenue for the Common School Fund. Land management decisions

at the Department are guided by a key policy document that has recently been updated, the 2024 Asset Management Plan, see Appendix A. The updated plan guides the Department's management of rangelands, forestlands, and other lands dedicated to supporting K12 public schools for generations to come. In 1995, the Legislature directed the State Land Board to develop an asset management plan. This updated plan is the fourth iteration.

## **2024 ASSET MANAGEMENT PLAN**

Overall, the plan has a focus on increasing management performance on lands dedicated to the Common School Fund and looking at the potential to expand school lands ownership. The document opens with historical and legal context, defines existing and new land classifications, clarifies what are and are not school lands, identifies 12 action areas to guide the next ten years, and addresses performance measures.

This 2024 Asset Management Plan differs from previous plans in the following ways:

- Increases focus on renewable energy, partnership projects, wildfire resiliency, and strategic action in land management.
- Shifts the focus from sale of low performing lands to maintaining and improving the lands retained by the Department.
- Adds four new land classifications specific to Department programs to better define what lands are covered in this plan and to help with Department reporting.
- Excludes lands managed by other Department programs. Other programs manage an additional 93,000 acres, all of which are statutorily dedicated lands. Management of state-owned waterways, statutory lands managed by the South Slough Reserve, and the Elliott State Forest are not covered in this plan.

12 goals are defined in the "Action Areas" section, including:

- Exploring environmental markets to increase revenue potential on lands, including carbon sequestration, conservation easements, and sage grouse mitigation
- Growing renewable energy leased lands
- Growing partnerships for habitat enhancement and climate change resiliency
- Departing from reporting on market value as a measure of performance
- Increasing DSL-managed forestlands
- Developing timber and fire resiliency projects on DSL-managed forestlands

## **PLAN DEVELOPMENT AND PUBLIC INVOLVEMENT**

Revisions began in 2022, with review of the Department's past asset management plans, similar plans from 11 other states with school lands, and by engaging community members and partners early in the process through 15 listening session interviews. Staff worked through several plan versions throughout 2023, and the draft was reviewed by the Oregon Department of Justice.

The draft plan was circulated for a public review and comment period from March 4 to April 3, 2024, with a virtual public hearing held on March 12<sup>th</sup> and an in-person meeting on March 14<sup>th</sup> in Burns, Oregon. The Department sent a public notice to inform interested parties, current lease holders, partners, and Tribes of the updated plan and the opportunity to comment. All information and project materials were posted to the DSL website at: [www.oregon.gov/dsl/lands/Pages/2023plan.aspx](http://www.oregon.gov/dsl/lands/Pages/2023plan.aspx)

In total, the Department received 10 comments, see Appendix B. Comments ranged widely with few common themes. The United States Fish and Wildlife Service commented on the Department's enrollment in the Greater Sage-grouse Candidate Conservation Agreement with Assurances and their concerns over renewable energy development on these enrolled lands. These comments led to changes in the land classification section and additional references to the agreement. The Oregon Department of Fish and Wildlife provided specific comments with page numbers, regarding their concerns about sage-grouse habitat and habitats of other species, climate change, mitigation banking, and land development and conservation. The Department addressed their comments in the final edits of the proposed plan.

### **RECOMMENDATION**

The Department recommends that the Land Board adopt the proposed 2024 Asset Management Plan, to be effective on December 1, 2024.

### **APPENDICES**

- A. 2024 Asset Management Plan
- B. Public Comments and DSL Responses



# *2024 Asset Management Plan*

**OREGON DEPARTMENT OF STATE LANDS**

## TABLE OF CONTENTS

<b>3</b>	Letter From The Director
<b>4</b>	Introduction
<b>7</b>	Guiding Principles and Considerations
<b>10</b>	Land Classifications
<b>25</b>	Action Areas
<b>31</b>	Measuring Success
<b>34</b>	Appendix A: Lands Managed By Other DSL Programs
<b>36</b>	Appendix B: Other Plans
<b>38</b>	Appendix C: Plan Development Process
<b>39</b>	Appendix D: General Acquisition and Investment Guidelines
<b>40</b>	Appendix E: Land Evaluation Criteria
<b>41</b>	Appendix F: Greater Sage-grouse Candidate Conservation Agreement

## LETTER FROM DIRECTOR VICKI L. WALKER

*We are temporary stewards of a long-term legacy for the schoolchildren of Oregon.*

Like so many families in our state, generations of my family were educated through Oregon's K-12 public schools. We are grateful for the work of Oregon Department of State Lands.

Throughout our state's history, land managed by the Department has helped fund public education. Revenue from leasing rangelands for grazing cattle, selling timber from forestlands, or strategically selling school lands all goes to the Common School Fund. Over 154 years ago, the Common School Fund made its first contribution to public schools of \$39,452 or \$1.16 per student. In 2024, public schools received a record \$74.2 million from the Common School Fund or approximately \$141 per student.

We, the staff at the Department, are temporary stewards of a long-term legacy for the schoolchildren of Oregon. This 10-year Asset Management Plan protects the value of land for generations of schoolchildren by caring for the health of Oregon's diverse ecosystems in an enduring and collaborative effort by public agencies, Tribes, nonprofits, and individuals.



Director Vicki L. Walker

## I. INTRODUCTION

*165 years ago, on the same day Oregon became a state, approximately 3.4 million acres of land was granted by the United States to our new state “for the use of schools.”*



These "school lands" have helped fund public education since 1859. Revenue from leasing rangelands to ranchers, selling timber from forestlands, or strategically planning and selling school lands all goes to the Common School Fund.

This 2024 Asset Management Plan seeks to continue Oregon’s school land legacy and the historical role of the State Land Board—the Governor, State Treasurer, and Secretary of State—in overseeing the Common School Fund and the lands dedicated to long-term, multi-generational support of Oregon’s K-12 public schools.

This Asset Management Plan is intended to guide the land management decisions of the Department’s Real Property Program. The Real Property Program manages 681,000 acres of school lands, including all of DSL’s constitutionally dedicated lands and a small portion of statutorily dedicated lands.

The Real Property Program additionally handles mineral rights leasing and sales for all other state agencies, and acts as the repository for deed records for all state agencies.

### THE REAL PROPERTY PROGRAM EMPLOYS 11 STAFF WITH EXPERTISE ON:

Land ownership

Preservation of archaeological and cultural resources

Land authorizations

Rangeland and forest management

Commercial leasing

Land and mineral rights sales, exchanges, and acquisitions

## INTRODUCTION

### WHAT THIS PLAN DOES AND HOW IT WAS DEVELOPED

In 1995, the Oregon Legislature directed the Land Board to adopt an asset management plan to guide the management and disposition of real estate under the Department's jurisdiction to improve long-term financial performance and revenue generation.

The Asset Management Plan provides policy guidance, management standards and principles, action areas, and measures regarding school lands entrusted to the Department on behalf of the Land Board to provide the greatest benefit for the Common School Fund and the people of Oregon. Updating this Asset Management Plan is also a critical strategy to meet the Supporting Schools goal in the Department's Strategic Plan (see [Appendix B](#)).

This 2024 Asset Management Plan is the fourth version since 1995. It has been developed by looking back over the history of the school lands, as well as looking forward to potential changes in land management. Program staff first connected with partners and lessees to gather early input and ideas through interviews, before diving into comparing management plans of other U.S. states with school lands. The public again had an opportunity to guide content and direction when a complete draft was presented in March of 2024 for public comment. For a more detailed timeline of plan development, see [Appendix C](#).

This 2024 Asset Management Plan is different from previous plans in the following ways:

- Increases attention on climate change, carbon sequestration, renewable energy, wildfire resiliency, habitat mitigation, partnership projects, and environmental markets in land management.
- Shifts the focus from the previous plan's sale of low performing lands to improving management opportunities and performance on school lands retained by the Department.
- Adds four new land classifications specific to Department programs to better define what lands are covered in this plan and to help with Department reporting.
- Excludes lands managed by other Department programs, and focuses on school land assets managed by the Real Property Program. Other programs manage an additional 93,000 acres, all of which are statutorily dedicated lands. Management of state-owned waterways, the South Slough Reserve, and the Elliott State Research Forest are not covered in this plan. More information about those lands and their land classifications are detailed in [Appendix A](#).

This plan is referenced by staff in strategic planning, read by members of the public to engage on land management practices of the Department, and used by other state agencies to understand opportunities to work together. Throughout the plan there are connections to the Department's Strategic Plan, other Department programs, and key documents that guide Department operations.

### OVERVIEW – PLAN STRUCTURE

The plan starts with guiding principles which provides an umbrella under which all management decisions are made.

Following the guiding principles, the seven primary land classifications are defined. For each land classification the characteristics, management requirements, performance expectations, and opportunity considerations are discussed. Maintaining a system to classify and accurately inventory land assets is essential to the Department's management of school lands.

## INTRODUCTION

Once the land classifications are defined, the plan discusses twelve action areas the Department has identified as priorities. These action areas are broken into the following categories:

- Administrative rule updates and expansion
- Data modernization
- Maintaining land ownership
- Land access
- Streamlining performance reporting
- Increasing forestland performance
- Increasing active forestland management
- Complete in-lieu acquisitions
- Renewable energy market expansion
- Options for ecologically important lands
- Opportunities for lands in urban areas
- Focusing on partnerships and projects

The final section of the plan looks at performance and measuring success. For example, measuring outcomes of land management in terms of revenue, expenses, and net operating income.

Finally, there are many references to other programs, management, and methods used in the Department. Many of these details are placed in Appendices. [Appendix A](#) covers other DSL program land classifications. [Appendix B](#) covers related plans and documents of the Department, including the Strategic Plan, which is closely tied to this Asset Management Plan. [Appendix D](#) and [Appendix E](#) are guidelines and criteria for land evaluation and acquisition.

The lands the Department manages are mostly in rural or remote areas of the state with limited infrastructure and are often leased for livestock grazing or managed for timber.



## II. GUIDING PRINCIPLES AND CONSIDERATIONS

*There are three guiding principles for the 2024 Asset Management Plan.*



- 1 The first guiding principle is advancing the Department's Strategic Plan goals—specifically goals for Supporting Schools and Thriving Oregon.
  - Supporting Schools focuses on increasing revenue to the Common School Fund, with five specific strategies identified for increased revenue.
  - Thriving Oregon focuses on building a legacy of healthy, resilient, and accessible natural resources for the people of Oregon, with six strategies identified.

Updates on the Department's Strategic Plan progress are available [on our website](#).
- 2 The second guiding principle for this plan, which is also a strategy in the Department's Strategic Plan, is to implement projects that promote resiliency in the face of climate change. The impacts of climate change include increased wildfires, decreased forest health, fish and wildlife habitat degradation, and losses to school land performance. The 2024 Asset Management Plan references many examples of climate change resiliency actions and considerations.
- 3 Throughout Oregon, there are certain communities that tend to suffer disproportionately from the impacts of climate change. Attention to these communities, known as environmental justice communities, is the third guiding principle of this plan. Environmental justice communities broadly include communities of color, communities experiencing lower incomes, limited infrastructure, or health inequities; tribal, rural, remote, and coastal communities; and other communities traditionally underrepresented in public processes and adversely harmed by environmental and health hazards. We embrace diverse backgrounds and experiences, actively identifying and addressing inequities toward people and lands and engaging widely to provide inclusive public service and working environments. As a natural resource agency, we report to the state's Environmental Justice Council on our progress meeting these goals.

**Environmental justice** means the equal protection from environmental and health risks, fair treatment and meaningful involvement in decision making of all people regardless of race, color, national origin, immigration status, income, or other identities with respect to the development, implementation and enforcement of environmental laws, regulations and policies that affect the environment in which people live, work, learn and practice spirituality and culture.

## GUIDING PRINCIPLES AND CONSIDERATIONS

### TWO CATEGORIES OF SCHOOL LANDS

This plan uses the general term "school lands" to refer to all lands managed by the Department's Real Property Program. But technically, school lands fall into two distinct categories:

- The majority of program-managed lands are **constitutional lands**, which are obligated to the Constitutional Common School Fund because they were set aside for this purpose by the Oregon constitution at statehood.
- Four percent of program-managed lands are **statutory lands**, which are obligated to the Statutory Common School Fund because they were, typically, set aside through federal or state statutes.

The general term "school lands" is generally suitable because, whether they were dedicated constitutionally or statutorily, both benefit Oregon's schools.

### CONSIDERATIONS FOR MANAGEMENT OF CONSTITUTIONAL LANDS

The majority of lands under the Real Property Program's management are constitutional lands. These lands are managed "with the object of obtaining the greatest benefit for the people of this state, consistent with the conservation of this resource under sound techniques of land management."<sup>1</sup> When managing constitutional lands, the Real Property Program employs the following considerations, which have existed in similar forms in past asset management plans. These statements are intended to serve as guidelines for the Land Board and Department:

- Continue to manage constitutional lands to create a sustained and consistent stream of revenue to assist in building the principal of the Common School Fund, thereby increasing annual distributions to schools.
- Recognize the need to balance revenue enhancement and resource stewardship to ensure lasting resource protection while still meeting obligations to schools.
- Undertake opportunity-driven land acquisitions and sales in the best interest of the Common School Fund with land retention to be prioritized on performing lands. All acquisitions and sales will consider targeted returns of at least eight percent and use real estate investment guidelines and land evaluation criteria.
- Use appropriate measures and partnerships in land management to conserve natural and cultural resources, unique geologic and physical features, and sensitive and threatened species.

In leasing lands for the purposes of Common School Fund investments, the Land Board will negotiate, bid, or solicit proposals to maximize financial benefits. However, consideration will also be given to protection and conservation of all natural resources, consistent with the requirements of federal and state law. These considerations include recreational resources and enjoyment, public health, and conserving plants, wildlife, and aquatic resources.

In a changing climate, these considerations also include protecting property and human life, especially regarding wildfires and managing fuels that can accumulate on state lands. Land transactions, leases, investments in land improvements, and other management considerations may be made if it is determined that such action will enhance school land value, including income, for the benefit of future contributions to the Common School Fund.

1 Article VIII, Section 5(2) of the Oregon Constitution

## GUIDING PRINCIPLES AND CONSIDERATIONS

When considering the sale of school lands, the Department must evaluate if:

- The property is situated such that management is not feasible or practical
- The property has resources that might be better managed by another state agency
- The sale results in the conservation of the property for continued public use and access

The focus is financial benefit to the Common School Fund because the sale represents a one-time-only benefit to the fund. Lands near urban areas may best benefit the fund by being sold for development. Most remaining constitutional lands are leased for various uses and have been actively managed for decades.

## CONSIDERATIONS FOR MANAGEMENT OF STATUTORY LANDS

Four percent of lands covered by this plan are statutory lands dedicated to Land Board or Department management through the direction of the Oregon legislature. These lands are managed to obtain the greatest benefit for the people of the State and to achieve legislative directives that are specific to each land dedication, including the protection of Public Trust Rights for state-owned waterways. These lands are not dedicated for the “use of schools” and do not share the objective of generating revenue for the Common School Fund, but uses of these lands may contribute to the statutory portion of the Common School Fund.

Statutory lands managed by the Department include the bed and banks of Oregon-owned waterways, which include navigable rivers, tidally influenced waterways, three miles of the territorial sea, and meandered lakes. In accordance with the Oregon Public Trust Doctrine, the paramount goal of the State’s management of waterways is to avoid unreasonable interference with public rights for navigation, recreation, fisheries, and commerce.

Other statutory lands under the jurisdiction of the Department include the Elliott State Research Forest, the South Slough National Estuarine Research Reserve, properties deeded to the state as part of the Swamp Lands Act of 1860, and lands acquired through land exchanges involving other statutory lands. For more information on these lands, see [Appendix A](#).



### *Climate Resiliency Field Report* **WILDFIRE MANAGEMENT**

From bunch grasses and sagebrush supporting a thriving habitat of native flowering plants to giant ponderosa pines standing sentry over multilayer forest canopies, the many types of healthy ecosystems on school lands depend on fire. Lightning strikes (historically) and culturally prescribed burning practiced by Tribes (since time immemorial) provided low intensity surface fires that kept the natural landscape in balance.

With settlement and fire suppression, the natural sequence was interrupted. To achieve similar benefits of low intensity surface fires, the Department uses different tools to help the land resist catastrophic wildfire and be more resilient should wildfire occur. Prescribed burning—intentionally lighting a controlled, low intensity surface fire—keeps native vegetation vigorous. Removing ladder fuels—overstocked vegetation that acts as a ladder for low-intensity fire to climb into the forest canopy—reduces the threat of catastrophic fire. Thinning juniper—an aggressive species that was traditionally controlled by fire—prevents habitat depletion, monopolizing of water resources, and the active suppression of native species. These are some of the strategies used by the Department for making rangeland and forest more resistant and resilient.

### III. LAND CLASSIFICATIONS

*Whether talking about greater sage-grouse habitat on rangelands or solar arrays on renewable energy lands, the Department organizes management around **land classification**.*



Maintaining a system to classify and accurately inventory land assets is essential to the Department's management of school lands. Having an accurate inventory allows the Department to report on annual revenue and authorizations issued for each land classification.

While the land classification is a descriptive name based on the natural resources and primary uses of a property, subclassifications are used to further describe properties. For forestlands, the subclassification might describe if the property is part of a block or isolated. For rangelands, the subclassification might describe if the property is actively leased or not. In some cases, subclassifications are used to help describe a property that has a different use than its resource classification may suggest, such as a grazing lease on forestland.

Other land uses, such as telecommunications sites, pipeline easements, public recreation, and road rights-of-way do not have land classifications, but may also exist on school lands. Below are the seven primary land classifications covered by this plan. Management opportunities on these lands may be considered that could impact land classifications when in the best interest of the Department, including different land uses, responses to disturbance, or new authorizations.

*Classification Changes of Note:* Minerals and energy were previously combined as one classification. Going forward, the mineral lands classification will indicate mineral reservations held, or mining and resource extraction below the surface of a property or geologic carbon sequestration, while the renewable energy lands classification will refer to lands converted to generate or store energy through solar, wind, or geothermal means.

## LAND CLASSIFICATIONS: AGRICULTURAL LANDS

### AGRICULTURAL LANDS

There are approximately 7,000 acres of lands classified as agricultural lands, all of which are located within central and eastern Oregon. The lands may be developed (for example, cultivated or irrigated) to produce all types of agricultural commodities.

Agricultural lands have a significant impact on rural economies of central and eastern Oregon, providing crop production opportunities to local farmers.

The majority of agricultural lands are school lands, with only 2 acres (0.03%) that are statutory lands.

#### Characteristics: Agricultural Lands

Agricultural lands may possess a combination of characteristics such as:

- Class I-IV soils as identified by the National Resource Conservation Service's Soil Capability Classification System
- Climate and growing season are conducive to crop production
- Precipitation and water availability required for crop production
- Water rights held by the Department

#### Management Requirements: Agricultural Lands

When land is converted into agriculture, the native vegetation is removed for the purpose of crop production as the primary use. Agricultural lands are usually irrigated, though non-irrigated farmland is included in this definition. For a property to be classified as agricultural lands, it must be under lease for agriculture or in the process of being converted to agriculture. While the Department strives for multiple-use opportunities on lands under its jurisdiction, agriculture is inherently a single use that may restrict public access.

#### Performance Expectations: Agricultural Lands

Although agricultural lands comprise a small portion of the asset base and revenue, these lands are expected to continue providing a stable flow of revenue. Agricultural lands perform substantially better economically than rangelands. Conversion from rangeland to agricultural lands, where feasible, is a viable means of enhancing Common School Fund revenues. However, acquiring water rights is a limiting factor in agricultural conversion.

#### Opportunity Considerations: Agricultural Lands

In certain scenarios, the Department can increase the income generated on a property by converting it into agricultural lands. For this to be done, typically, the Department must have water rights for irrigation and the property must be located where soil is capable of growing crops, ideally in an area where there is already agriculture present.



Cereal grain, triticale, being grown by a lessee on school lands in Deschutes county

## LAND CLASSIFICATIONS: FORESTLANDS

### FORESTLANDS

There are approximately 41,000 acres of forestlands under the purview of the Real Property Program, see [Figure 1](#). Most of these forestlands are in western Oregon. State forestlands provide many resource values for Oregonians, including clean water, recreation, fish and wildlife habitat, and carbon sequestration, all while supporting local economies through the sustainable harvest of timber.

Forestlands are nearly all school lands. Less than 0.5% of forestlands are statutory; about 180 acres of forestlands were received in a land exchange that involved statutory lands.

#### Characteristics: Forestlands

Lands in the forestland classification may possess a combination of characteristics such as:

- Dominant vegetation is comprised of coniferous trees or other woody vegetation
- A stratified structure which includes the forest floor, understory, and canopy cover
- Forests typically contain many microbiomes that contribute to diverse plant species and wildlife habitats

Forestlands on the west slopes of the Coast Range are the most productive for timber harvest. Forestlands on east slopes of the Coast Range and foothills of the Cascades are moderate to highly productive sites. Forestlands in the southwest, Klamath Basin, and eastern Oregon tend to be slower growing and the least productive due to drier climates.

#### Management Requirements: Forestlands

The Department has two subsets of forestland classification, one is in collaboration with Oregon Department of Forestry (ODF).

**ODF-Managed Forestlands.** Currently there are 28,000 acres of forestlands referred to as either Common School Forest Lands, certified forests, or ODF-managed forestlands. Management of these forestlands is governed by statute and an intergovernmental agreement between the Land Board and ODF (ORS 530.490). The majority of ODF-managed forestlands are in the Western Lane, Tillamook, and Western Oregon ODF Districts.

**DSL-Managed Forestlands.** Currently, there are about 13,000 acres of DSL-managed forestlands, also known as noncertified forestlands, that have been determined to be not well suited for growing of timber or other forest products<sup>1</sup>. These forestlands are typically on slower growing sites, and marginally capable of producing income from timber harvest. The DSL-managed forestlands consist of many scattered parcels lying primarily east of the Cascades. These forestlands are managed directly by Department staff with the goal of maintaining forest health and reducing the risk of wildfire. Active management such as thinning and prescribed burning help build resilient forests protecting against wildfire drought, and insect outbreaks. When managed for these goals, a healthy forest will provide other benefits such as biodiversity, carbon sequestration, and climate change resiliency.

#### Performance Expectations: Forestlands

Forestlands have historically generated most of the Department's asset revenues. Between 2013 and 2024, forestlands have incurred more expenses than revenue due to the lack of harvest on the Elliott State Research Forest. However, the Elliott will no longer be reported as part of the Real Property Program, as it has been decoupled from the Common School Fund and set aside for management as a research forest.

1 ORS 530.450-530.520; ORS 530.460(1)

## LAND CLASSIFICATIONS: FORESTLANDS



### *Climate Resiliency Field Report* **IMPROVING FOREST HEALTH**

Reducing ladder fuels. Thinning of trees damaged by insects or disease. Creating disturbance events, such as prescribed burning, to promote vigor in native species. These are some of the ways in which the Department increases the health of forests on school land and, as a result, discourages catastrophic wildfire, encourages diverse forest habitat, and increases above ground carbon storage.

In Union County, the Johnson Creek Project is a 320-acre forest health effort expected to be completed by 2026. The forest is a mix of young conifers—western larch, Douglas-fir, ponderosa pine, and lodgepole pine—that, lacking fire or active management, have become overcrowded and susceptible to stress and disease. The overcrowded condition of the forest has created a closed canopy stand that doesn't allow sunlight to produce a healthy understory. Without management intervention, the property is at-risk of experiencing a high intensity wildfire.

The Johnson Creek Project started by talking with the Confederated Tribes of the Umatilla Indian Reservation, our neighboring landowners that are also interested in reducing wildfire risk. After collaborating on project design, we applied together to secure funding from the Bureau of Indian Affairs. If funded, work will start in late 2024 and will involve cultural surveys and other prep work.

In addition to meeting the immediate need of reducing wildfire risk, this thinning project meets other important needs as well. Opening the canopy and promoting greater biodiversity will likely enhance deer and elk habitat as well as berry production, important outcomes for the Confederated Tribes of the Umatilla Indian Reservation members. With over 100,000 acres of distributed forest stands to manage, developing long-term relationships with neighboring landowners is a valuable tool for resiliency management.

The remaining ODF-managed and DSL-managed forestlands are expected to generate net revenue. Costs are expected to decrease as the management of certain forestlands transfers and revenues are expected to increase as DSL develops projects to manage forestlands east of the Cascades.

#### Opportunity Considerations: Forestlands

In addition to timber management, other opportunities for income generation exist on forestlands, including forage leases, communication site leases, and firewood and forest product collection permits. In 2024, there were approximately 7,600 acres of forestland under 16 forage leases for livestock grazing. Communication sites exist in forestlands and the number of sites may be expanded with future leases.

There are many forest health funding resources available to the Department through partnerships such as the Natural Resource Conservation Service, the Oregon Department of Forestry, and the Reserved Treaty Rights Lands program that helps fund projects to protect adjacent Tribal lands. Projects are underway utilizing these funding sources through these partnerships. The Department will continue collaborating with neighboring landowners and other entities on forestland projects aimed at reducing wildfire risks and promoting healthier forests.

Other significant revenue opportunities being explored include enrolling forestland in carbon sequestration and similar carbon credit programs. This is an emerging area of land management the Department is exploring through the priority [Action Areas](#) in this plan.

## LAND CLASSIFICATIONS: INDUSTRIAL/COMMERCIAL/RESIDENTIAL LANDS

### INDUSTRIAL/COMMERCIAL/RESIDENTIAL (ICR) LANDS

The Department currently has approximately 4,000 acres of lands classified as ICR. Less than one percent of ICR lands are [statutory lands](#).

#### Characteristics: ICR Lands

Lands in the ICR land classification must be in, or near, an urban area, or urban growth boundary, and may possess a combination of characteristics such as:

- Have the strong potential for being zoned for industrial, commercial, or residential uses
- Be rural lands that are located outside urban growth boundaries if they are designated for use as urban reserves or located within urban unincorporated communities

#### Management Requirements: ICR Lands

When DSL classifies a property as ICR, the management of that land is focused on preparing the land for future development through actions such as rezoning the property or applying to have the property incorporated into an urban growth boundary.

#### Performance Expectations: ICR Lands

The performance of ICR lands is a significant income producer, typically through sale of the property. Preparing a property for sale and completing land use planning is a significant cost in staff time. Holding a property until it is sold requires staff time and management activities such as patrolling for illegal camping or managing vegetation to reduce fire risk. The increase in value of the property over time and through land use planning results in significant returns to the Common School Fund. While the Common School Fund benefits from ICR land sales, they are a one-time financial uplift.

ICR lands may have other opportunities for sustainable annual income. Management of ICR land, including development and administration of industrial, commercial, or residential leases may add to staff workload, but could sustain annual net benefits to the Common School Fund.

#### Opportunity Considerations: ICR Lands

While ICR lands typically exist as bare land that is intended to be sold, there may be opportunities to retain ownership and manage developed lands. Managing developed ICR lands may include allowing commercial development on state lands while leasing the ground or may involve managing a commercial building with tenants.

The sale of ICR lands contributes a one-time input to the Common School Fund, but these lands tend to be valued in the millions. The sale price accrues to the Land Revolving Account within the Common School Fund which may be used for future investments or acquisitions (ORS 273.413). ICR lands have the potential to contribute to community development needs such as increasing the amount of industrial land supply or setting aside land for certain housing needs. Since the returns on ICR lands have the potential to be very high, the Department may consider opportunities by using the Revolving Account funds to acquire more ICR lands that would benefit from land use planning or development. The 2012 Real Estate Asset Management Plan included general acquisition guidelines for investing in ICR lands. A portion of these guidelines are incorporated into the current plan as General Acquisition and Investment Guidelines (see [Appendix D](#)). These guidelines detail various criteria for locations, sizes, uses, and returns on investment for examining acquisitions of bare land for development into ICR lands.

## LAND CLASSIFICATIONS: MINERAL RESOURCE LANDS

### MINERAL RESOURCE LANDS

Oregon is typically not considered a mineral rich state because there are no notable oil or gas resources. Despite that, there are mineral related activities that occur on various DSL land classifications such as rangelands, forestlands, and ICR lands. These mineral activities may not be the dominant use for those lands, and therefore there is not a need to change the classification to mineral resources.

The Department is responsible for the management, leasing, and sale of state-owned mineral rights on over three million acres throughout Oregon. The Land Board is responsible for managing mineral and geothermal rights on most lands owned by the State, including 2.5 million acres of mineral rights held by other State agencies, such as Oregon Department of Forestry and Oregon Department of Fish and Wildlife (ORS 273.780). In 2024, DSL administered two mining leases on State lands managed by other agencies. Proceeds from those leases benefit the Common School Fund.

For the state-owned lands under Department jurisdiction, there are 270,000 acres of inactive mineral rights underlying surface lands with other land classifications. The Department also reserved mineral rights on 768,000 acres of land formerly owned by the state. The majority of these mineral rights are a result of past land exchanges with the federal government to consolidate surface ownership. Even though the surface rights of these lands are no longer owned by the state, the subsurface mineral and geothermal rights have been retained by the state, see [Figure 2](#).

Lands in the mineral resource land classification are either:

- *Split estates*. These are lands where the state sold the surface rights but retained the subsurface mineral rights. The majority of lands in the mineral resource classification are subsurface rights retained by the Department that may be developed for mineral extraction. In 2024, there was only one active mining lease of mineral rights (perlite mining) on a split estate.
- *Mining lease*. In this situation, the state holds both surface ownership and subsurface rights on lands actively leased for mining production. While the Department retains mineral rights on subsurface lands in other classifications (such as rangeland or forestland), those lands are not classified as mineral resource land unless mining becomes the dominant use. In 2024, there was only one lease for mining diatomaceous earth in Malheur County, covering 659 acres of school land.

#### Characteristics: Mineral Resource Lands

Lands in the mineral resource classification may include the following characteristics:

- Material (mineral resources<sup>1</sup>) existing below the earth's surface that may be extractable in economically significant quantities
- Natural deposits of metals or precious metals
- Natural deposits of oil, gas, or other liquids of economic value
- Natural formations of substrate that allow for the storage of certain substances below the earth's surface
- Naturally occurring geothermal heat, or a substrate structure conducive to the generation of geothermal heat
- Substrate material and structure that have no significant economic value

<sup>1</sup> The legal definition for mineral resources: "Mineral resources refer to oil, gas, sulfur, coal, gold, silver, copper, lead, cinnabar, iron, manganese and other metallic ore, and any other solid, liquid or gaseous material or substance excavated or otherwise developed for commercial, industrial or construction use from natural deposits situated within or upon State lands, including mineral waters of all kinds."

## LAND CLASSIFICATIONS: MINERAL RESOURCE LANDS

### Management Requirements: Mineral Resource Lands

In the event extraction of mineral resources changes the dominant use of a property from any of the other classifications, such as rangelands or forestlands, that property may be reclassified to mineral resource lands. Examples include a large development for an open pit quarry, surface hard mineral mine, drilled natural gas well, or a brine extraction facility for a soluble mineral such as lithium. Smaller subsurface mineral extraction, such as natural gas, mineral water, or geothermal brine, may not result in the parcel being changed from the existing classification associated with the dominant land use.

The Department is responsible for handling requests for release of mineral rights that were retained by the Department, as well as the sale or release of mineral rights that are held by other state agencies. Landowners often contact the Department to request that the Department release mineral rights held by the State. These requests may be simple to resolve in the case of small properties in residential areas. However, other properties, that are not zoned for residential use or outside an urban growth boundary, may be more complicated to resolve.

### Performance Expectations: Mineral Resource Lands

Although the state retains many subsurface rights, mineral development is not common as Oregon geology offers few lands with valuable minerals or fossil fuels. Active mining operations are leased on only a few acres of land under the Department's jurisdiction. However, future potential for development and performance remains.

### Opportunity Considerations: Mineral Resource Lands

There are several land parcels in southeast Oregon within or near the McDermitt Caldera where the state has retained mineral rights. This area has been identified as rich in lithium deposits, which is in recent high demand for battery production. The Department will engage with prospectors interested in possible development of mining where state mineral rights exist. There are many constraints in this area, including concerns regarding cultural resources, tribal interests, wildlife habitat, and environmental justice communities. Any mineral development the Department enters into requires intergovernmental coordination and robust public outreach.

If opportunity opens for mining in split estates, where the state has reserved mineral rights but no longer owns the surface land associated with those rights, the Department will receive a share of the revenue produced as owner of the mineral rights. Split estate mineral rights harbor opportunities for geologic carbon storage projects, which is an emerging technology.

Similarly, if opportunity opens for mining on rights the Department is managing for other State agencies, DSL will receive income for the Common School Fund from the extraction of minerals from these lands in the form of royalties on the value of the minerals mined, as prescribed by statute and administrative rules.

Subsurface rights may play a role with carbon capture and storage. Direct air capture is an emerging technology where carbon is pulled from the atmosphere or other emission sources and pumped thousands of feet deep into porous geological formations conducive for storage. These formations are comprised of pore space that can chemically absorb carbon dioxide, creating the potential to remove tens of millions of tons of carbon dioxide each year. Leasing Department lands for direct air capture could be a significant income generator while having a positive impact on the climate crisis.

## LAND CLASSIFICATIONS: RANGELANDS

### RANGELANDS

The largest portion of school lands is made up of rangelands in central and southeast Oregon, see [Figure 1](#). Over time, many Department rangelands have been consolidated, mostly through land exchanges to form larger blocks. These blocks allow much more efficient management than scattered, isolated rangeland properties.

Rangelands have a significant impact on rural economies of central and eastern Oregon, providing grazing opportunities to local ranchers and open lands for hunting and recreating.

There are over 25,000 acres of rangelands that are statutory lands, which is about 4% of this classification. These lands were granted to the Department through the Swamp Land Act of 1860 and are typically lands around the edges of a waterbody, but some are dry with grass as the primary vegetation or seasonal lakebeds.



#### *Climate Resiliency Field Report* **RANGELAND MONITORING**

What deep-rooted perennials should be used to stabilize a particular hillside after wildfire? How well is a particular site responding to sustainable grazing patterns? Did the prescribed burn of a riparian area dramatically increase the number of native grasses as intended?

Rangeland managers at the Department make decisions and determine the success of projects using historical data from the site, institutional knowledge, ongoing monitoring, and awareness of latest rangeland science research. Monitoring points along the 624,211 acres of rangeland managed by the Department have been reporting data since the 1960s and 1970s. Staff continue this legacy of data collection by returning to monitoring points during field season to measure annuals, perennials, and forbs as well as density, composition, and percentage of bare ground. Long-term vegetative trends help staff manage layers of complex relationships that are otherwise difficult to quantify.

Rangelands have the following characteristics:

- Arid or semi-arid (dry) soils
- Dominant vegetation types are bunch grasses and sagebrush, with associated grass and forb understory vegetation
- Many rangelands have varied levels of western juniper and may exhibit some pockets of forested areas with ponderosa pine and other species
- The predominant use of rangelands is livestock grazing, which is administered through forage leases

#### Management Requirements: Rangelands

The Department administered 140 active forage leases on 624,000 acres of rangelands in fiscal year 2023. Additionally, there are approximately 18 forage leases on industrial/commercial/residential lands and forestlands with a subclassification of rangelands. Of these 158 forage leases, 49 are leases on large, blocked parcels of more than 1,000 acres each. The remaining 109 leases are on smaller, isolated parcels. The small portion of statutory Swamp Land Act rangelands are managed pursuant to the same standards as school lands.

When allowing the use of rangelands for grazing, the carrying capacity and grazing rotation are always analyzed and documented. Coinciding with leased uses, rangelands typically require structural improvements (such as fences, waterlines and stock ponds or stock wells) funded through a portion of the lease rents.

## LAND CLASSIFICATIONS: RANGELANDS

Outside of grazing uses, rangelands should be managed to reduce the presence of invasive species and reduce wildfire risk resulting from invasive species. This type of management work is often done through partnerships with Cooperative Weed Management Areas or other local non profit organizations and is often completed using range improvement funding or other grant funds. This type of management work also serves the dual purpose of benefiting wildlife habitat and preserving ecosystem services, such as biodiversity and carbon sequestration, that result from healthy rangelands.

For rangelands in greater sage-grouse habitat, the Department has entered into a Candidate Conservation Agreement with Assurances (CCAA) through the United States Fish and Wildlife Service (USFWS) to commit to maintaining sage-grouse habitat, see [Appendix F](#). This agreement allows the Department to continue leasing lands for grazing and be part of a statewide effort to prevent listing of the greater sage-grouse under the Endangered Species Act. This CCAA restricts management actions that would result in significant development which would impact habitat or cause habitat fragmentation.

Through the CCAA, the Department has committed to a significant amount of monitoring on rangelands enrolled in the agreement. Sage-grouse monitoring data is collected alongside leasehold monitoring on one-third of DSL rangelands annually. The USFWS receives reports on monitoring completed each year. Participating in the CCAA has made a significant amount of federal funds available to complete improvement projects on DSL rangelands.

### Performance Expectations: Rangelands

Forage leases for grazing do not have high revenue performance value. However, as rangelands are the largest land classification, and most of these lands are under active leases, rangelands provide consistent annual revenue generation.

Because of the CCAA for rangelands in greater sage-grouse habitat, opportunities for future developments are limited, which impacts performance potential. Any developments sought on CCAA-enrolled acreages would require approval from USFWS to withdraw lands from the CCAA. The development would also require significant habitat mitigation.

### Opportunity Considerations: Rangelands

Continued rangeland improvement projects such as juniper cutting, noxious weed treatments, and seeding with deep rooted perennial species can improve habitat and forage availability thereby potentially increasing revenue. The Department partners with many entities to complete habitat improvement projects that benefit sage-grouse, promote fire resiliency, improve carbon sequestration, and other work that benefit lands, wildlife, and surrounding communities. These partnerships bring in funding that would otherwise be unavailable to the Department.

Other opportunities found on rangelands include off-site mitigation or other conservation-related easements or contracts, carbon sequestration and crediting programs, wood cutting permits, recreation, monitoring and scientific study, and communication site leases. Depending on geology and other limitations of the site, rangelands may also offer direct air capture or carbon sequestration development opportunities.

In addition, rangelands will play an important role in increasing revenue through leasing land for renewable energy developments, which may be a secondary use revenue similar to communication sites and quarries. Renewable energy projects may result in converting the land classification to renewable energy lands.

## LAND CLASSIFICATIONS: RENEWABLE ENERGY LANDS

### RENEWABLE ENERGY LANDS

As previously mentioned, the former mineral-energy land classification has been split into mineral resources lands and renewable energy lands. There are currently no lands in the new renewable energy lands classification; however, there are a number of projects underway or under lease for renewable energy development. Renewable energy has the potential to significantly increase annual revenues, benefit the Common School Fund, and contribute to Oregon's statewide clean energy goals.

Most solar energy, geothermal, and energy storage sites will be wholly converted and fenced which will require a land classification change. However, wind energy facilities use minor amounts of acreage for equipment, which may allow forage or agricultural leases to continue at wind energy sites and keep the land classification consistent with the primary land use.

#### Characteristics: Renewable Energy Lands

Lands in the renewable energy land classification may possess a combination of characteristics that make them ideal for solar, geothermal, wind energy, or energy storage facilities. The Oregon Department of Energy's new [mapping tools](#) show potential areas for renewable energy and methods of project site selection. Renewable energy sites have the following characteristics:

- Climatic or geological characteristics, such as high number of sunny days for solar energy or subsurface heat sources for geothermal energy production
- Close proximity to the electric grid
- Roads that allow access in all conditions
- No public access within the developed facilities
- Lands will be transformed from natural landscapes to an industrial appearance

Wind energy developments have different characteristics. Wind turbines have a small footprint at the ground level, allowing for agriculture or grazing activities to continue. During project development there may be a larger amount of land disturbance, but after construction is completed, the land may return to its primary vegetation cover. Renewable energy land may only be a subclassification on a wind energy site as grazing, agricultural, or other land classifications may be the primary land use.

#### Management Requirements: Renewable Energy Lands

Land management on renewable energy lands will likely be in the form of lease compliance management. The Department currently has three active solar leases on rangelands in the preliminary stages of development and there is interest in more developments. If a renewable energy project becomes the exclusive use of the property and agricultural or rangeland attributes are removed, the property will be reclassified as renewable energy lands.

The Department is actively pursuing development of other renewable energy sites, where feasible. This work may involve advertising lease sites through solicitation in a competitive proposal process.

#### Performance Expectations: Renewable Energy Lands

Although no renewable energy sites have yet been fully constructed, a handful of properties are under lease for solar development. Renewable energy land classification would lead to significant increases in revenue generation in comparison to forage lease performance on rangelands, where development is feasible. Renewable energy projects are successful in revenue generation for states with similar programs performance increases over time. Performance of renewable energy lands increase over time as lease rates increase through

## LAND CLASSIFICATIONS: RENEWABLE ENERGY LANDS

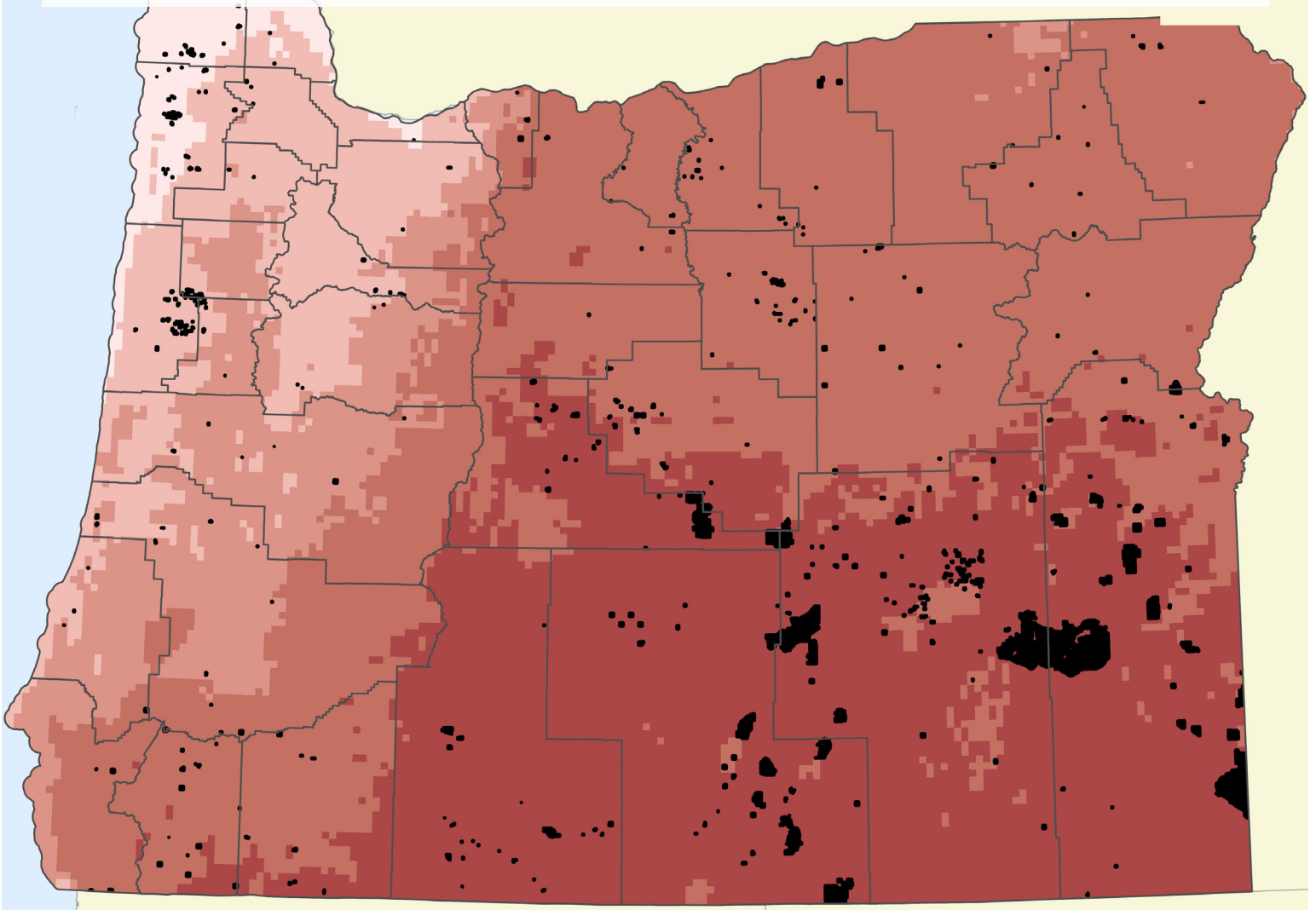
the transition from demonstration phase to construction phase to production phase.

### Opportunity Considerations: Renewable Energy Lands

The Department will develop a more robust understanding of lands that are appropriate for the renewable energy land classification through an analysis of renewable energy opportunities as identified in the Department's Strategic Plan. Known limiting factors for project development are electric grid access, sage-grouse or other sensitive habitats, and existing forage leases at potential sites. Many rangelands are under long-term forage leases, which may require negotiation to alter lease terms. With the help of Oregon Department of Energy resources and various other data sources, the Department will develop an analysis to prioritize future opportunities for renewable energy lands.

In addition, the Department will work with industry to identify marketplaces for offering up sites for renewable energy projects. There are many emerging technologies designed to add renewable energy projects without losing agricultural benefits of the land. There are also emerging technologies for harnessing geothermal energy through closed loop systems that may be minimally invasive to surface uses and use no water. The Department can explore opportunities through demonstration projects.

A promising future: School lands (black) overlaid on a map from the Oregon Department of Energy showing gradations of average annual solar radiation higher in southeast Oregon. Many counties with high solar radiation also have a high concentration of school lands.



## LAND CLASSIFICATIONS: SPECIAL STEWARDSHIP LANDS

### SPECIAL STEWARDSHIP LANDS

Special stewardship lands are managed to ensure the protection of sensitive resources present. These important resources prevent normal management activities on school lands. Previously, this classification included all statutory lands managed under other DSL programs such as South Slough Reserve lands and lands related to Oregon-owned waterways. Those lands have been given new classifications, see [Figure 3](#), so that they can be distinguished from lands managed by the Real Property Program.

For the school lands managed by the Real Property Program, there are approximately 5,400 acres in this special stewardship classification, including about 200 acres (4%) of statutory lands.

#### Characteristics: Special Stewardship Lands

Special stewardship lands may include any natural resource land type, such as grasslands, shrublands, wetlands, forests, and others. They are usually labeled special stewardship due to presence of important or sensitive resources or sites that would be damaged or disturbed under regular land management activities.

Special stewardship lands, see [Figure 1](#), are managed to ensure the protection of these values, for example:

- Cultural resources
- Ecologically sensitive sites, such as aquatic and riparian habitats
- Threatened, endangered and sensitive species
- Aesthetic or scenic value
- Recreation destination

#### Management Requirements: Special Stewardship Lands

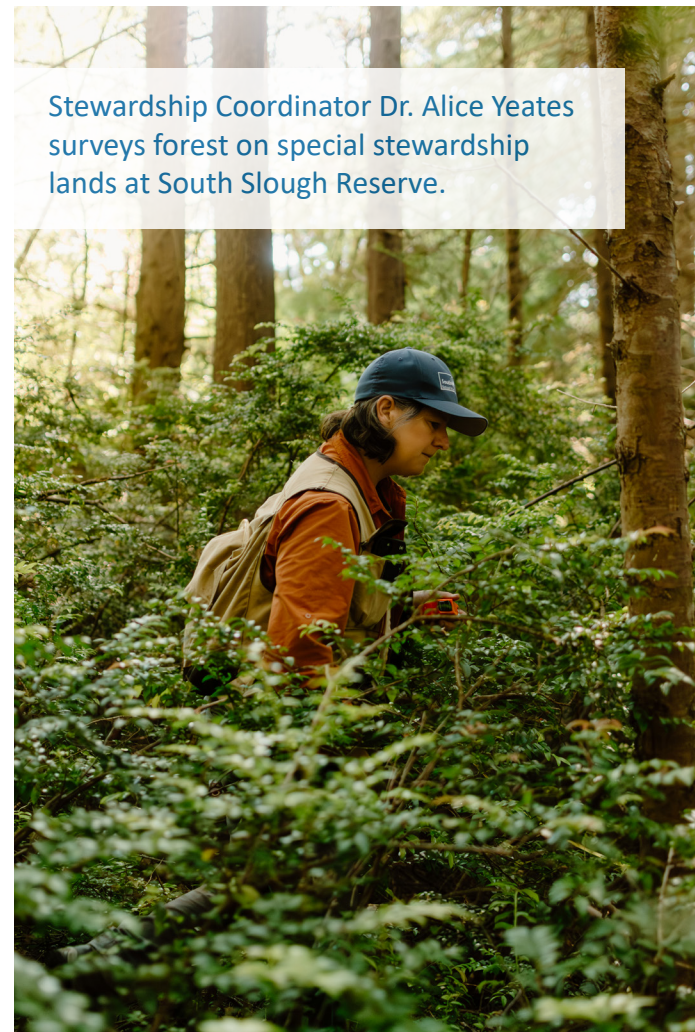
Special stewardship land management activities relate to resource protection, conservation, and monitoring. Management of these lands is generally restricted by federal or state laws specifically applicable to the resources found on these lands. Most of these properties contain sensitive plants or other sensitive resources where traditional management activities, such as forage leases or timber sales, are not possible.

#### Performance Expectations: Special Stewardship Lands

Economic performance is not the main objective for these properties due to legal restraints imposed by applicable federal and state laws. Performance will be measured by continued protection and enhancement of special stewardship land characteristics.

#### Opportunity Considerations: Special Stewardship Lands

Conservation easements, carbon sequestration and crediting programs, or other mitigation or protection incentives may be suitable opportunities to create economic performance while maintaining the intrinsic qualities of a special stewardship property. Special stewardship lands may also be ideal for land transfers to other agencies or organizations that are better suited to protect the sensitive resources of the property. In exchange, the Department could acquire lands more suitable for asset management.



Stewardship Coordinator Dr. Alice Yeates surveys forest on special stewardship lands at South Slough Reserve.

Figure 1. Lands Managed by Real Property Program

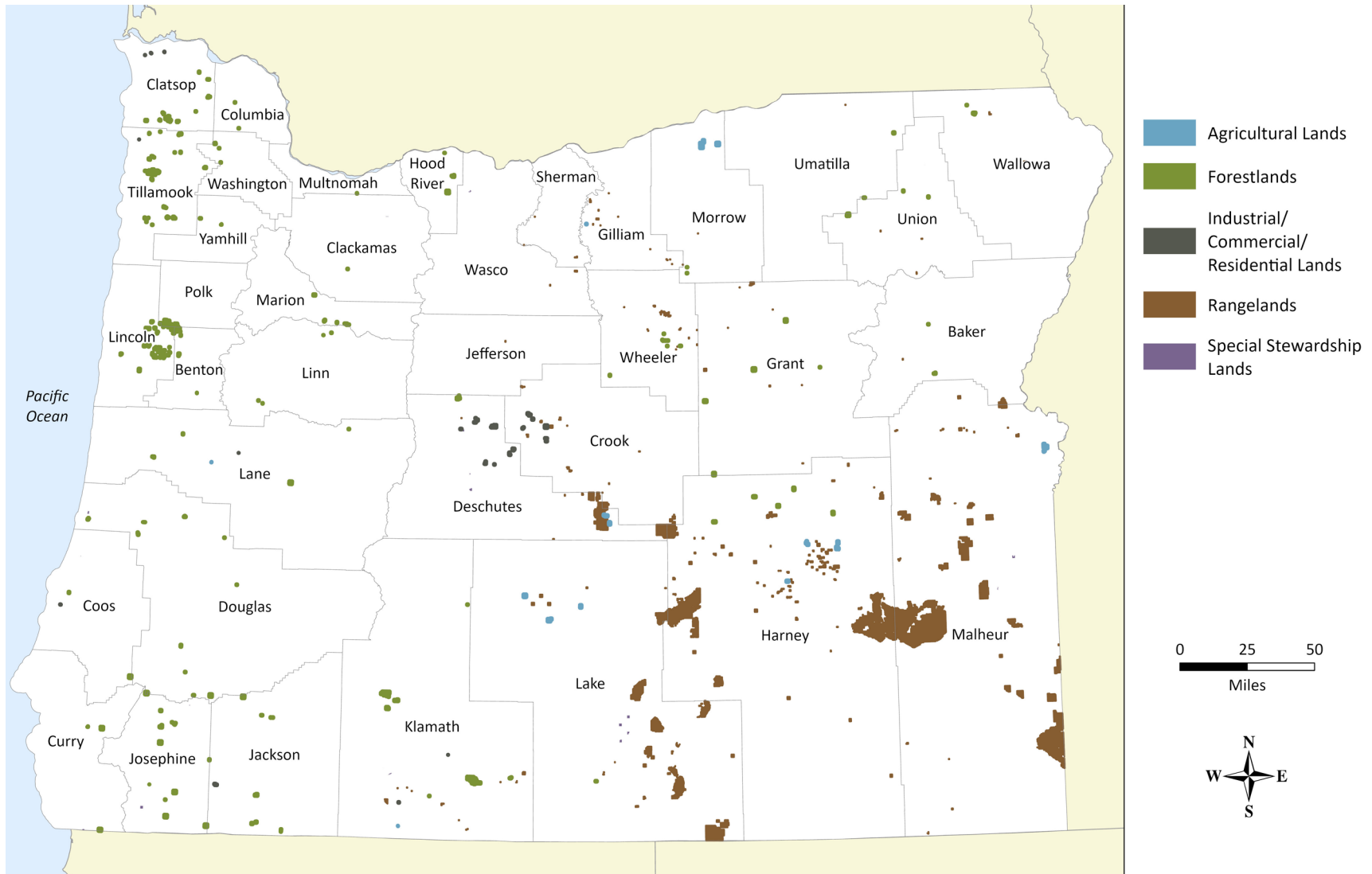


Figure 2. Mineral Rights Ownership for DSL

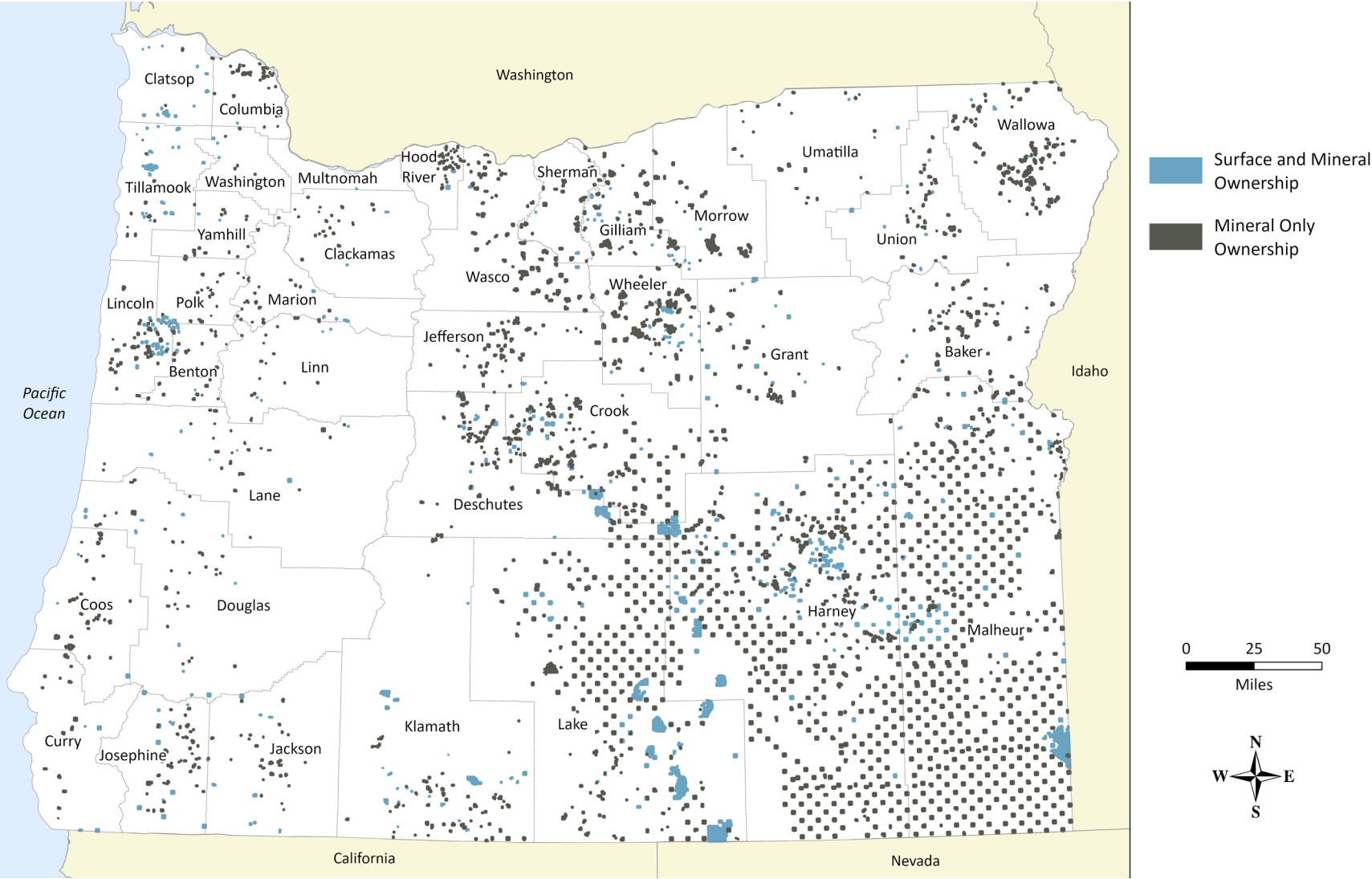


Figure 3. Lands Managed by Other Programs (not Real Property)



## ACTION AREAS

*The Department seeks to maintain or maximize the value of school lands under its jurisdiction.*



The following twelve action areas aim to achieve outcomes of increasing revenue or reducing costs and have been organized by strategy, starting with increasing management opportunities.

## ACTION AREAS: INCREASING MANAGEMENT OPPORTUNITIES

1

## Environmental Markets

*Explore new markets to monetize intrinsic or environmental benefits on school lands.*

The Department will evaluate opportunities for revenue generation through environmental markets on all school lands. These opportunities include various climate solutions available to landowners. In accordance with Oregon policies, [state agencies have been directed to take actions on greenhouse gas emissions](#). This action area includes seeking carbon credits or similar market opportunities that allow continued management of school lands and serve to sequester carbon. There are also potential opportunities for direct air capture and geologic carbon sequestration.

School lands also may be habitat strongholds. These properties may serve as mitigation sites for development projects that are disturbing these valuable habitats elsewhere. Entering into time-bound conservation easements or other mitigation agreements can serve as a significant market for revenue generation. For example, there is a growing need for mitigating losses of greater sage-grouse habitat in eastern Oregon rangelands.

Special stewardship lands are often subject to federal or state law restrictions and usually do not produce revenue for the Common School Fund. Conservation easements, unique leasing options, land exchanges or sales to land protection entities may assure the lasting conservation of these lands while providing revenue to meet the Department's Common School Fund obligations.

Evaluating new potential uses for all state lands is important to ensure the Department is maximizing both economic and environmental values. An examination of the land use potential can assess opportunities in carbon markets, mitigation banking, renewable energy options, mineral resources, conservation easements or leases, consolidation options, habitat protection leases, land exchange options, or new leasing methods.

## ACTION AREAS

2

## Renewable Energy

*Expand renewable energy leases and land classifications through data analyses, outreach, improved administrative rules, and program tools.*

Through the Department's Strategic Plan, the Real Property Program is completing a renewable energy analysis to identify lands suitable for renewable energy development. Considerations for development of renewable energy lands will include habitat fragmentation and fish and wildlife species protections, including the Department's enrollment in the greater sage-grouse Candidate Conservation Agreement with Assurances (see [Appendix F](#)). The analysis will also consider feasibility characteristics, such as access to transmission lines, site access, community concerns, renewable energy attributes, and many other requirements.

Using the results of the analysis, the Department will be able to proactively advertise or auction lands available for renewable energy lease and development. Renewable energy leases such as solar or geothermal have significantly higher lease rates than other uses such as grazing. Increasing the number of acres under lease for renewable energy over the next ten years will increase annual revenue to the Common School Fund long term and help reach Oregon's climate action goals.

The development of renewable energy leases on school lands will inevitably result in removing lands from other uses, primarily on rangelands. To compensate for losses of rangeland, the Real Property Program will develop a policy to allocate a portion of the annual renewable energy revenues to provide rangeland improvements aimed at further enhancing Common School Fund revenues on other grazing lands within the same area, potentially increasing forage production to compensate for lost forage, and to improving habitat and ecosystem functions where feasible. This will be in addition to the Department's ongoing investments in rangeland improvements.

3

## Partnerships and Project Funding

*Proactively seek partnerships that assist in funding projects that benefit school lands, their habitats, and nearby communities.*

Large-scale projects can affect multiple partners and communities. For example, when the Department reduces invasive grasses on school lands or reduces the density of forest stands through thinning, the neighboring landowners also experience reduced risk of wildfire. Partners on these landscape-level projects are diverse, from landowners and cooperative weed management area groups to government agencies and rangeland fire protection organizations. The assistance, information, and funding from these partnerships is a key part of improving state land health and performance.

The Department routinely partners with nonprofit organizations and landowners who are able to apply for grants that fund projects on state lands. In recent years, rangelands successfully received external funds for various projects including water improvements, fencing, juniper removal, and invasive annual grass treatments. Working with local partners to complete landscape-level projects with external funding simultaneously reduces Department expenditures, contributes to the local economy, and increases revenue to the Common School Fund. When contracting for project work, the Department prioritizes contractors with local experience.

## ACTION AREAS

4

## Increasing Active Management of DSL-Managed Forestlands

*Transition from passive to active management on DSL-managed forestlands to improve forest health and wildfire resiliency and increase revenue to Common School Fund.*

Some forestlands, primarily east of the Cascade Range, have a history of passive management because of drier conditions and slower forest growth. In 2019, the Department hired a forester to evaluate these properties and recommend management strategies to improve sustainability and provide harvest revenue. The Department has since been actively managing these properties to improve forest health and wildfire resiliency through fuels reductions and other treatments.

Actively managing DSL-managed forestlands not only contributes to forest health but also improves the financial performance of the forestland classification. Due to the

passive management of these properties in the past, there are many areas that are over stocked with trees experiencing drought stress and at risk of insect or disease infestation. The stand age of many of these forestlands is ideal for thinning treatments that will also produce revenue to the Common School Fund.

## ACTION AREAS: USING LAND TRANSACTIONS TO BENEFIT MANAGEMENT

5

## Use the Common School Fund Revolving Account

*Develop policies to use the Common School Fund revolving account to consolidate and expand the number of acres of school lands managed by the Department.*

The Land Revolving Account within the Common School Fund was established in 1987 and later revised in 1999. The account was set up to finance investments in land through the sale “... of isolated sections and fragments of sections of state lands which are not suitable for management according to long-range policies of the State Land Board” (ORS 273.413(1)). The funds in the account “...are continuously appropriated for the acquisition of lands or other suitable investments as directed by the Board, in consultation with the Oregon Investment Council.”

This action area will use the revolving account to acquire school lands in priority resource categories. The focus of acquisitions

will be forestlands, agricultural lands, industrial/commercial/residential (IRC) lands, and lands suitable for renewable energy development. If used for ICR lands, the Department will use the investment guidelines (see [Appendix D](#)) which target eight percent return on investment. Exchanging isolated lands for lands adjacent to larger tracts will increase efficiency in management.

6

## Legal Access to Lands

*Prioritize, maintain, and develop legal access to all school lands.*

There are isolated tracts of lands with no legal access for management. The Department will work with neighboring landowners, including federal agencies such as the Bureau of Land Management, to acquire easements, access agreements, or additional lands to connect access to public roads. Existing legal access will be protected and improved, where needed.

## ACTION AREAS

7

## Complete In-lieu Acquisitions

*Complete acquisition of remaining in-lieu acres that best benefit the Common School Fund.*

By the time Oregon became a state, a large portion of the land granted to the state for use of schools, Sections 16 and 36 of each Township, had already been claimed by settlers. This meant some sections that should have been granted to the State were unavailable.

To make up for unavailable school lands, the federal government allowed the state to select “in-lieu” lands in their place. Oregon sued the federal government in 1985 to determine the acreages of in-lieu lands still owed. The federal court determined in 1991 that Oregon was owed 5,202.29 acres, and dictated those lands must come from Bureau of Land Management lands.

In 2024, the Bureau of Land Management still owed the Department over 1,400 acres of in-lieu lands. The Department is actively working on evaluating and identifying land parcels which would best perform to maximize benefit to the Common School Fund. Within the ten-year timeframe of this asset management plan, the Department will finalize the list of potential acquisitions and complete the ownership transfers within to make school lands whole as was originally intended at statehood.

8

## Industrial/Commercial/Residential (ICR) Property Planning

*Expand land use planning initiatives on ICR properties that can be sold for a high return to the Common School Fund.*

The Department has ICR properties that have been included in the urban growth boundaries for the cities of Bend, Redmond, and Prineville. These properties were acquired from the Bureau of Land Management as in-lieu lands. Over the course of the last two Asset Management Plans, the Department has been partnering with these cities on land use planning with the goal of increasing the property values and contributing to the availability of developable lands for purposes such as housing, commercial, and industrial uses.

The Department was able to sell 320 acres of school lands within the City of Bend for \$22 million in 2020, 159 acres at

Millican Road in Prineville for \$4.5 million in 2024, and is looking to sell other high value Central Oregon ICR. While land use planning processes can take many years to complete, the return on investment is high. Similar land use purchase and planning strategies are used by other western states with school land obligations.

The Department is in the process of completing in-lieu acquisitions from the Bureau of Land Management and is targeting ICR properties for acquisition where possible. Given the past and ongoing potential for increasing Common School Fund revenue with this strategy, the Department could use the revolving account identified in statute (ORS 273.413) to acquire and conduct land use planning on additional ICR properties.

Development on 945-acre ICR tract in the city of Redmond



## ACTION AREAS

## ACTION AREAS: INCREASING EFFICIENCY IN MANAGEMENT

9

## Modernize Administrative Rules

*Update administrative rules to improve efficiency in managing school lands and increase revenue to the Common School Fund.*

There are several divisions of administrative rules which guide management of state lands, such as mineral leasing, that are antiquated and due for updating. Specifically, new rules are needed for renewable energy and updated rules are needed for mineral resources, special uses, and oil and gas leasing. Creating and updating administrative rules is a proactive measure that keeps the Department current with industry standards and modern technology as well as provides an opportunity for community members and Tribal governments to provide input on land management. The rulemaking process is designed with several opportunities for meaningful involvement, including a Rulemaking Advisory Committee representing diverse interests,

public hearings, and a public comment period. All advisory committee meetings are noticed and open to the public to attend, both virtually and in person, and meeting agendas include time for community comment. All rulemakings require a Fiscal Impact Statement and a Racial Equity Statement.

10

## Transition to Paperless Processes and Electronic Records

*Migrate to paperless records, digitize old files, expand land classifications, and use the Department's new permitting and information system for all land management activities.*

The Department is engaged with software developers to design and implement a modern permitting and information system to replace an outdated database developed in the 1990s. Implementing the new system will provide efficiency in processing authorizations, allow customers to submit and track applications online, and support a full transition to paperless processes and electronic recordkeeping. Additionally, new land classifications will be implemented and changed in the new system, leading to improved record-keeping and reporting. The Department is soon transitioning to a new data management system and online customer portal to better achieve this action area.



*Climate Resiliency Field Report*  
**PROMOTING BIODIVERSITY**

Biodiversity enhances the resiliency of ecosystems. In heavy rain, deep-rooted perennial grasses can hold a hillside that shallow invasive grasses might let slide. Healthy forbs, soft stem plants that die back after flowering, promote soil nutrients and are beneficial to insect and wildlife species.

Managing for biodiversity means supporting layers of relationships with the flexibility to change course based on data. On rangeland in eastern Deschutes County, work with Pheasants Forever and U.S. Fish and Wildlife Service removed juniper, allowing the native understory vegetation to support habitat for sage-grouse and other wildlife species. On forestland northeast of Sisters, tree chipping created disturbance for native bitterbrush to thrive and provide a primary food source for mule deer during winter. While these projects had outcomes that promoted biodiversity, the focus was on supporting layers of healthy relationships.

## ACTION AREAS

11

Depart from market value appraisals for measuring performance

*Transition to reporting revenue from school lands using net operating income and annual revenue.*

For past asset management plans and reporting, market value appraisals were used on all school lands as a metric for evaluating annual management objectives. Land appraisals are expensive and time-consuming, and as the market constantly changes, so does the need to reassess property values. Market value is not a good indicator for evaluating successful management of school lands. The 2012 Real Estate Asset Management Plan acknowledged that this may not be a good metric for evaluating progress in meeting management objectives. The 2012 Plan introduced calculating “return on asset value” which compared income generated from leases to the market value of the property. This resulted in a scenario where the measure of success

being reported could only significantly increase if land values decreased or lease rates skyrocketed, and when neither happened it became a detriment to the program. Secondly, market value does not adequately represent intrinsic values and long-term management and ownership of resource lands. Net operating income and annual revenue are better measures for evaluating performance of school lands over the long term.

The need for market value appraisals will still be necessary for land purchases, exchanges, and sales, but will not be used to measure annual performance on lands under Department management.

12

Transfer Appropriate ODF-Managed Forestlands to DSL Management

*Reduce management costs of forestlands by identifying properties that would benefit from reinstating DSL management.*

Currently, the Department and ODF have an interagency agreement that identifies the DSL forestlands which ODF manages on the Department’s behalf. Through the agreement, the Department pays direct costs for on-the-ground management as well as indirect expenses such as administrative prorate and other ODF overhead costs. When combined with fire protection fees, this creates a management cost structure that may be inappropriate for lands that produce lower revenues.

The Department identified 6,827 acres in the Klamath District that do not meet the definition of Common School Forestlands.

Over \$200,000 can be saved annually by transferring management of these forestlands from ODF back to the Department through a process called decertification. On July 1, 2023, DSL and ODF agreed to decertify 4,907 acres, allowing those acres to fall back into Department management. The remaining 1,920 acres of Klamath District forestlands will be managed by DSL July 1, 2024.

The Department is evaluating other opportunities for decertification of low-performing forestlands in southwest Oregon.

Forest managed by ODF on behalf of the Department in Douglas county

## MEASURING SUCCESS

*The Department will use the performance measures and outcomes below to track and report on progress.*



Having identified management activities and action areas that will collectively increase revenue to the Common School Fund, these are the ways in which the Department will measure success.

### PERFORMANCE MEASURES

Performance measures help the Department evaluate and report on how ongoing management of school lands and action areas are benefiting Oregon through increased revenue to the Common School Fund.

#### Total Annual Revenue (AR)

*What it measures:* AR, expressed in dollars, measures **gross income** from Real Property Program activities.

*How it's calculated:* AR is calculated as the sums of all revenues for each land classification, following the end of each fiscal year (July 1 – June 30).

*How it's reported:* AR is reported in the Real Property Program's Annual Report, broken down by land classification, along with AR from the previous two fiscal years.

#### Net Operating Income (NOI)

*What it measures:* NOI, expressed in dollars, measures **net revenue** from Real Property Program activities.

*How it's calculated:* NOI is calculated as the AR, minus operating expenditures for each land classification, following the end of each fiscal year (July 1 – June 30).

Expenses include Department costs of staff time, operations, contracted services, legal fees, fire protection fees, and other state agency costs. Expenses for maintenance and capital improvements are excluded from operating expenses for purposes of calculating NOI, because those expenses preserve or increase the value of the land. Positive NOI contributes to the Common School Fund.

## MEASURING SUCCESS

*How it's reported:* NOI is reported in the [Real Property Program's Annual Report](#), broken down by land classification, along with NOI from the previous two fiscal years.

### The Complexity of Evaluating Performance of Public Lands

Managing the financial performance of public lands is a constantly evolving process of balancing a wide range of economic, environmental, and social factors. Because of the diversity of school land assets, there is no perfect universal performance indicator.

For example, past asset management plans and annual reports included “return on asset value” and “land value appreciation” as performance measures, though it was noted they may not be the most appropriate measures to evaluate performance of school lands. Return on asset value was calculated by dividing the Net Operating Income by market value of all lands in a classification, and it was expressed as a percentage for each land class. Land value appreciation was the change in market value over time in a land classification. These two measures required regular appraisals of market value for all school lands, a significant expense to the Department. Market value is necessary information for land acquisition and sale transaction. However, the market value of school lands does not provide the best metric to evaluate annual performance of management of state lands.

For this asset management plan, the Department investigated the benefit of moving to a school land value assessment, similar to the [State of Washington's Trust Land Performance Assessment](#). Such an assessment in Oregon would appraise school lands through the lens that they are under the long-term ownership and control of the State of Oregon, acting as a trustee on behalf of defined beneficiaries (Common School Fund). A school land value assessment would better account for noneconomic, intrinsic benefits in appraisals such as ecosystem services. Significant limitations upon sale of the school lands, as well as other Oregon statutes, regulations, policies, and management practices are not considered in market value appraisals. The school land value assessment may be a more appropriate and comprehensive indicator of asset value, but developing and implementing that assessment process would be much more costly than assessing market value. Like market value, school land valuations also require periodic reassessments and updates. For the purposes of this 10-year plan, it was decided that pursuing a school land valuation would be too costly and difficult to implement. The Department will continue to monitor how other states managing school lands value these assets.

## OUTCOMES

The above performance measures capture the quantifiable monetary benefits of school land management activities. However, outcomes include additional benefits to Oregonians that are difficult to quantify but are important to capture.

Outside of revenue generation, state lands provide open space, fish and wildlife habitat, rare plant habitat, archaeological and cultural resources, natural beauty, recreation opportunities, and other ecosystem services. Local economies benefit from recreation, rangeland, agricultural, and timber activities. Land management partnerships also provide jobs for project work. Land use planning on Industrial/Commercial/Residential Lands can also contribute to meeting community needs like housing.

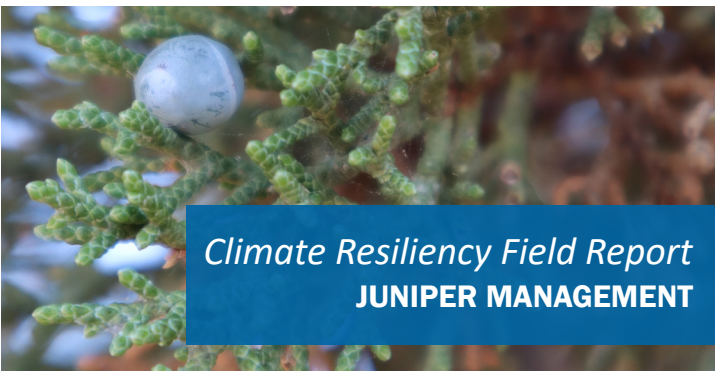
In addition to reporting progress on the above performance measures, the Department will also report how the land management framework and action areas contribute to the following outcomes:

## MEASURING SUCCESS

**Supporting climate resilience, environmental benefits.** Increasing the overall health of state lands benefits wildlife populations, contributes to ecosystem services such as water filtration and storage, sequesters carbon in forestlands and rangelands, increases drought resiliency and the productivity of the land which benefits lessees. Multiple action areas will help increase school land health by engaging with partners on projects aimed at ecological restoration and/or climate resilience. The Department will also pursue other ways to increase climate resilience such as renewable energy development and transmission and geologic carbon sequestration.

**Meeting community needs such as housing and increased supply of industrial lands.** Industrial/Commercial/Residential Lands are uniquely positioned to help contribute lands to develop housing and add industrial land supply in certain areas. Over the past two decades, the Department has been proactively partnering with city and county governments on planning certain properties in Central Oregon for those very uses and is continuing to follow through on adding developable land to the Central Oregon market.

**Reducing wildfire risk for school lands and communities.** Through the many partnerships DSL staff have established, the Department is able to execute projects at a landscape-level to treat wildfire fuels, where the benefits are not just to state lands, but across ownership boundaries to federal public lands and neighboring private lands. Addressing invasive species on a landscape level or addressing overstocked forestlands reduces wildfire risk to the Department and neighbors.



### *Climate Resiliency Field Report* **JUNIPER MANAGEMENT**

Historically, fire kept juniper populations small and relegated to rocky outcrops. However, with fire suppression, the incredibly adaptive juniper has created dense single-layer canopies where diverse ecosystems once flourished. A single established juniper can consume over 35 gallons of water a day. Particularly in rangeland, where juniper has monopolized water resources and turned other vegetation into dry fuel, thinning juniper can reduce the threat of catastrophic wildfires and free water resources for deep-rooted perennial grasses, shrubs, and forbs.

Fortunately, the adverse effects of juniper encroachment are reversible through long-term management. By removing juniper, the Department can mimic the outcomes of a low-intensity surface fire and restore conditions for complex ecosystems.

**Supporting local and state economies.** The grazing of school lands in eastern Oregon contributes to the local economy by supporting rural communities and working landscapes. Some rangelands have been leased for grazing to the same families for over 100 years.

**Increasing school lands acres.** There are several opportunities for the Department to acquire more school lands: Remaining in-lieu lands will be acquired and the land revolving account may be used to replace, consolidate, or expand tracts. Additional acres could increase the amount of land available to generate revenue, contribute to the state's energy goals, and allow for greater public access.

**Advancing environmental justice.** As previously discussed, the Land Board and Department will ensure management actions consider environmental justice and effects on environmental justice communities during the management and planning around school lands. These communities include rural and Tribal communities as well as many other traditionally underrepresented individuals and communities.

## APPENDIX A: LANDS MANAGED BY OTHER DSL PROGRAMS

Outside of the Real Property Program, there are other activities that also contribute revenues to the Common School Fund. These revenues may include rental of space in the Department's Salem office building, fees from removal and fill permits, fees for waterway easements, waterway leases and licenses, revenues generated from a 6% tax on oil and gas production on private lands<sup>1</sup>, interest from unclaimed property, and other various sources of income<sup>2</sup>. Some of these revenues are statutory and some are constitutional. The statutory lands under the Department's jurisdiction are managed under the direction of the enabling legislation, often with a focus on resource protection. Nevertheless, the enabling legislation often directs that net revenue accrues to the Common School Fund, even though the land is also subject to specific management objectives.

The classifications listed below are not managed by the Real Property Program. Some of these classifications are new under this Plan, requiring changes to the Department databases, but will create efficiencies for DSL reporting on performance and other activities.

**Elliott State Research Forest.** For many years, the 83,300-acre Elliott State Forest in Coos and Douglas counties generated millions of dollars annually for the Common School Fund. In 2012, following a lawsuit regarding federal Endangered Species Act compliance, timber harvest was scaled back. By 2017, the forest was producing no revenue and incurring expenses of over a million dollars per year.

The State Land Board sought a new future for the Elliott: A publicly owned forest that has completed its obligation to funding schools, but will continue to contribute to conservation, recreation, education, Indigenous culture, local economies, and more as a research forest.

Since 2019, DSL has been working collaboratively with diverse partners, Tribal governments, and community members to transform the Elliott State Forest into a publicly owned State research forest. In December 2022, the Land Board voted to decouple the forest from its obligation to generate revenue for schools. The Elliott State Research Forest is anticipated to be officially established in 2024. Now statutory land, the former Elliott State Forest lands will be managed by a distinct program and have a distinct classification that will be managed separately from the forestland classification in the Real Property Program.

**South Slough Reserve.** The South Slough Reserve, also known as the South Slough National Estuarine Research Reserve, was the first reserve designated under the National Estuarine Sanctuary Program. Under this program, healthy estuarine ecosystems found in different regions of the country are designated and managed as sites for long-term research and are used as a base for estuarine education and interpretation programs. Many thousands of educators and students in Oregon benefit from the South Slough Reserve's education programs. The land is also open to the public for recreational activities such as hiking, kayaking, and hunting.

The South Slough Reserve is administered as a partnership between the National Oceanic and Atmospheric Administration (NOAA) and the Department. NOAA provides some funding, national guidance, and technical assistance. Administrative operations are overseen by the Department with direction from the South Slough Reserve's Management Commission. Pursuant to statutory direction, the Department provides funding and holds title to the lands within the South Slough Reserve.

Prior to this plan, South Slough Reserve lands were classified as Special Stewardship. Going forward, "South Slough" will be its own classification for lands under this program.

1 ORS 324.070 - 324.340

2 ORS 98.389, 273, 274, 327.405, 777.095

## APPENDIX A: LANDS MANAGED BY OTHER DSL PROGRAMS

**Oregon-owned Waterways.** Approximately 1.26 million acres of submerged and submersible lands, also known as the bed and the banks, are classified as Oregon-owned waterways. These include the submerged and submersible land under the Territorial Sea<sup>1</sup>, tidally influenced land of coastal streams and rivers, and the beds and banks of rivers and lakes determined to be title navigable. Oregon-owned waterways are statutory lands and are managed pursuant to statutory direction, and to protect the Public Trust Doctrine rights of fishing, navigation, commerce, and recreation.

State ownership of waterways is established by the Oregon Admission Act and the Equal Footing Doctrine, and may be established by judicial determinations, Land Board declarations, or legislative acts<sup>2</sup>. Ownership of tidally influenced waterways includes the bed and banks of waterways subject to the ebb and flow of the tides. Generally, the State's ownership extends up to the Line of Ordinary High Water<sup>3</sup>, except in some cases where tidelands have been sold. If a tideland has been sold, then the State's ownership extends up to the Ordinary Low Water line.

**Waterway Related Uplands.** Where there are Oregon-owned waterways, the Department is responsible for managing the state-owned lands below the Line of Ordinary High Water and any land that develops out of a waterway, such as islands or filled lands created upon Oregon-owned submerged and submersible lands. The 2012 Asset Management Plan classified these lands as Special Stewardship lands. To increase accuracy in the Department's reporting, the classification of Waterway Related Uplands has been added. These Oregon-owned, Waterway Related Uplands may be islands within a waterway, abandoned river channels, or Oregon-owned waterways that were filled.

---

1 The Territorial Sea includes the waters and seabed extending three miles seaward from the Pacific coastline, as established by the Oregon Admission Act

2 Oregon Revised Statute 274.402, Oregon Revised Statute 274.430

3 "Line of Ordinary High Water" as defined in Oregon Revised Statute 274.005(3), means the line on the bank or shore to which the high water ordinarily rises annually in season.

## APPENDIX B: OTHER PLANS

Multiple plans guide the Department's work and the work of the Real Property Program. This includes a big-picture strategic plan that orients work across all programs to defined goals with measurable objectives, as well as plans that focus on specific topics like sustainability or specific assets like South Slough Reserve. Plans that intersect the program's management of school land assets are summarized below.

### DSL STRATEGIC PLAN ([LINK](#))

The Department's 2022-2027 Strategic Plan sets the mission, vision, and values of the Department and details four goals: Exceptional Service, Thriving Oregon, Supporting Schools, and Great Workplace. Though the Supporting Schools goal provides the foundation of this Asset Management Plan – and updating this plan is a key project to help advance that goal – the program contributes to multiple strategic goals.

Real Property Program efforts within each strategic goal area include:

- *Exceptional Service.* Improving customer service, both internally and externally when issuing Department authorizations, conducting public outreach, and making information available on DSL lands.
- *Thriving Oregon.* Improving upon the State's resources through increasing the number of projects that contribute to habitat improvement, wildfire resilience, improvements in ecosystem services, providing sustainable renewable energy projects, protecting lands, promoting learning, and providing accessible resources for Oregonians.
- *Supporting Schools.* Increasing revenue to the Common School Fund, through seeking higher income earning leases (such as renewable energy), expanding opportunities for revenue, reducing costs for managing forestlands, and adding efficiency and effectiveness to operations.
- *Great Workplace.* Encouraging staff engagement and growth; retaining and sharing acquired knowledge.

### SUSTAINABILITY PLAN ([LINK](#))

Woven into both the Strategic Plan and this Asset Management Plan are the Department's commitments to environmental, fiscal, and social responsibility through the Sustainability Plan.

The Department's 2024-2027 Sustainability Plan is aligned with our 2022-2027 Strategic Plan to capture programmatic impacts on sustainability through delivery of services. Using the Strategic Plan as an overarching framework, the Sustainability Plan includes specific sustainability outcomes and identifies projects that help achieve those targets.

### SOUTH SLOUGH RESERVE MANAGEMENT PLAN ([LINK](#))

South Slough Reserve's 2017-2022 management plan continues to support the strategic goals of the Reserve, NOAA, and DSL. Its geographic scope covers all lands within the formal boundaries of the Reserve and includes a prioritization plan for future acquisitions. It also includes a strategic plan with goals, objectives, and actions under three management priorities: climate change, habitat protection and restoration, and invasive species.

The management plan was developed through collaborative engagement with partners, including professional colleagues, community members, and local Tribes. It responds to local needs through the integrated activities of the research, stewardship, education, public involvement, and coastal training programs. The purpose of the

management plan is to guide program efforts and provide a framework for Reserve decisions. The Reserve is going to be undertaking a periodic update of its management plan, which will be completed by early 2025.

### MARBLED MURRELET MANAGEMENT PLAN ([LINK](#))

In July 2021, the Oregon Fish and Wildlife Commission voted to reclassify the marbled murrelet (*Brachyramphus marmoratus*) from threatened to endangered under the Oregon Endangered Species Act<sup>1</sup>. The reclassification decision requires state agencies that own, manage, or lease property, and whose lands could play a role in murrelet conservation, to follow the survival guidelines until they develop an endangered species management plan specific to their lands. In November 2021, the Commission identified the Department as an agency that owns land with murrelet habitat in Oregon and has a role in the conservation of this species. Based on this requirement, the Department wrote a consolidated Endangered Species Management Plan for the four classes of terrestrial lands within murrelet habitat range:

- Elliott State Forest (83,300 acres)
- Certified/ODF-managed forestlands (17,846 acres)
- South Slough Reserve (6,972 acres)
- DSL-managed forestlands (42 acres)

Two separate Habitat Conservation Plans are currently in development for both the Elliott State Research Forest managed by DSL and for certified forestlands under Oregon Department of Forestry's Western Oregon Habitat Conservation Plan. Once these plans are complete and Incidental Take Permits have been issued by the U.S. Fish and Wildlife Service and National Marine Fisheries Service, these Habitat Conservation Plans will supersede the marbled murrelet management plan, meaning the Endangered Species Management Plan will no longer apply to these lands. The other two land classifications (South Slough and noncertified forestlands) will continue to follow the Endangered Species Management Plan for marbled murrelets.

### LOWER WILLAMETTE RIVER MANAGEMENT PLAN ([LINK](#))

The Lower Willamette River Management Plan covers the lower 17.5 miles of the Willamette River, from Kelley Point Park to just above the Sellwood Bridge, within the City of Portland. The 1992 Plan was adopted by the State Land Board on September 14, 1992 as an administrative rule (OAR 141-080-0105) and provides policy direction and guidance to the Department's regulatory and proprietary interests of the river. All new and existing developments must comply with the provisions of the Lower Willamette River Management Plan. The overall management goals for the 1992 Plan are:

- Preserve the existing diversity of uses
- Actively enhance the area's water quality
- Enhance fish and wildlife habitat values and aesthetic appearance
- Increase public access to the river
- Encourage new development to further public trust values

The Department is seeking funding in 2024 to update the Lower Willamette River Management Plan.

1 Oregon Revised Statutes 496.171 to 496.192 and 498.026

## APPENDIX C: PLAN DEVELOPMENT PROCESS

In 2022, the 2012 Real Estate Asset Management Plan was ten years old. The Department completed an Achievements Report on the 2012 plan to review accomplishments and lessons. The report concluded a new asset management plan was needed.

### 2022

- *November*: Department lessees were sent a letter regarding the plans to update the Asset Management Plan, community outreach and interviews were completed
- *December*: State Land Board was informed of plans to update the Asset Management Plan

### 2023

- *January to May*: Staff conducted research of other state plans with similar responsibilities to school lands, comparative analysis of management goals between the Department and other states was completed
- *May*: Drafting of Asset Management Plan begins
- *September*: First draft completed; management reviews completed
- *November to December*: Second draft reviewed internally

### 2024

- *January to March*: Agency review and DOJ review completed
- *March to April*: Draft plan is sent out for review to partners, Tribes, and the public
- *April*: Comments reviewed and incorporated into final draft plan
- *April to August*: Completion of 2024 Asset Management Plan
- *October*: 2024 Asset Management Plan is presented to the State Land Board for adoption

## APPENDIX D: GENERAL ACQUISITION AND INVESTMENT GUIDELINES

The 2012 Real Estate Asset Management Plan included an appendix for general acquisition of industrial/commercial/residential lands (ICR), including guidelines for acquisition and investment in bare land, as well as developed properties including office, industrial, flex, retail, and mixed use. Due to the complexity of managing developed properties, a task the Real Property Program is not equipped to do, the guidelines for acquiring developed properties are omitted in this plan. Instead, this Plan provides the following guidelines for the acquisition and investment in bare land, for future development into ICR lands.

Table 1. Acquisition Guidelines for ICR lands

	LAND
TYPE	Long-term ground leases
LOCATION	Portland Metro, Bend Metro, Salem, Eugene, Medford/Ashland, Corvallis
QUALITY	Stabilized; Value Add
PREFERRED SIZE	Urban – 20,000 SF Suburban – 90,000 SF Rural – 225,000 SF
OCCUPANCY PREFERENCE	N/A
WILL NOT CONSIDER	Timberlands or uplands
RISK ANALYSIS	<ul style="list-style-type: none"> <li>• Cap rate (NOI – Net Operating Income)</li> <li>• Target 8% (ROI – Return on Investment), including appreciation (ref. point)</li> <li>• Market condition (unfavorable conditions, over holding period); economic growth</li> <li>• Inflation rate (market rate annual increases)</li> </ul>
TENANT TYPE	Future development
LEASE TERM	10-year+ lease term, developable within 24 months
PHYSICAL AMENITIES	<ul style="list-style-type: none"> <li>• Entitlements in place</li> <li>• Water/sewer/gas/electric</li> <li>• Incorporated land</li> <li>• Regular topography</li> <li>• No or minimal easements</li> <li>• No environmental issues unless Brownfield</li> <li>• Zoning allowing future development</li> <li>• Minimal impact fees</li> <li>• Minimum Size: 15 acres</li> </ul>
RISK	<ul style="list-style-type: none"> <li>• Cap rate (NOI – Net Operating Income)</li> <li>• Target 8% (ROI – Return on Investment)</li> <li>• Vacancy rate (specific property, market &amp; sub-market)</li> <li>• Market condition (unfavorable conditions, over holding period)</li> <li>• Inflation rate (market rate annual increases)</li> <li>• Sustainability; LEED locations</li> <li>• Multi-modal, transit-oriented locations preferred</li> </ul>
APPEARANCE/AGE	<ul style="list-style-type: none"> <li>• Flat land</li> <li>• Identify entitlements in place</li> <li>• No environmental issues on land lease</li> </ul>

## APPENDIX E: LAND EVALUATION CRITERIA

In addition to the land-class-specific criteria, the following general land evaluation criteria are to be applied to school lands to identify the best candidates to sell or trade. The Department will develop internal forms that address these criteria at a detailed level. Guidelines for industrial/commercial/residential properties are included in Appendix D.

### UNIVERSAL LAND EVALUATION CRITERIA

- Feasibility Study: Anticipated use of property; analysis of anticipated demand within area market; and opportunity costs (does buying or holding the property exceed the opportunity cost of having its projected return on investment in the Common School Fund investment corpus?)
- Rate of Return: Analysis of options for property: hold, sell, invest to improve property, anticipated holding period, risk involved
- Comparison of property value to other similar properties within the region
- Shape and/or size of property; use potential and constraints.
- Access and availability of utilities
- Liability issues that could increase risk, e.g., environmental (Threatened and Endangered species, site contamination), unstable bedrock or soils (landslide/slope failure), adjacent residential use, other
- Current income generating potential
- Topography
- Site maintenance and management costs
- In-holding in larger parcel/proximity to other managed parcels and staffing
- Changes in use or zoning that are not compatible with the goal of generating revenue for the Common School Fund

### SPECIFIC LAND CLASS CRITERIA

#### Agricultural Land

- Past farming activities, economically feasibility
- Soil class as per Soil Survey Manual
- Water availability and requirements to obtain water rights
- Configuration or topography considerations
- Crop options
- Lease income projections

#### Forestland

- Soil Class/Site Index
- Size of Parcel
- Logging System/Haul Distance (including road/bridge building)
- Configuration of parcel/liability issues/environmental issues

#### Rangeland

- Soil class
- Size of parcel
- Configuration of parcel/available water/fencing/quality of grazing
- Animal Unit Month capacity
- Adjacent availability of Department lands nearby
- Potential for conversion to, or addition of, higher revenue producing use(s), including but not limited to agricultural conversion, alternative energy sources, communication sites, etc.

## APPENDIX F: GREATER SAGE-GROUSE CCAA

The Department Signed this 30-year [Greater Sage-grouse Candidate Conservation Agreement with Assurances](#) (CCAA) with the U.S. Fish and Wildlife Service on September 18, 2015. The CCAA is a 41-page document with 51 pages of appendices. The CCAA's executive summary is as follows:

"Greater sage-grouse (*Centrocercus urophasianus*; hereafter referred to as 'sage-grouse') have declined across their range for a variety of reasons and now occur in 11 states and two Canadian provinces. On March 23, 2010, the U.S. Fish and Wildlife Service (FWS) released its finding that the sage-grouse warranted listing under the Endangered Species Act (ESA), but listing was precluded by other, higher priority actions (75 CFR 13909). The primary threats to sage-grouse identified in this finding are habitat loss, fragmentation, and degradation. Other threats include an increase in the use of sagebrush habitat for renewable energy, such as wind power and spread of West Nile virus. While improperly managed livestock grazing was identified as a threat FWS noted: "There are data to support both beneficial and detrimental aspects of grazing (Klebenow 1981, p.122; Beck and Mitchell 200, p.993), suggesting that the risk of livestock grazing to sagegrouse is dependent on site-specific management" (75 FR 13998). Positive impacts of livestock grazing could include increased brood use of lightly to moderately grazed areas (as opposed to ungrazed or heavily grazed areas), the maintenance of large areas of contiguous sagebrush, and the ability of ranchers and range managers to detect weed infestations early (increasing the likelihood that weed control will be successful). A neutral impact could be the maintenance of perennial bunchgrasses with moderate levels of livestock use. A negative effect could be a reduction in residual perennial grass cover at nesting sites (i.e. visual obstruction).

"In anticipation of a final listing decision by the FWS, the Oregon Department of State Lands (DSL) requested assistance from FWS in developing a sage-grouse strategy for grazing management activities that could offer DSL assurances their operations could continue in the event the species was listed under the ESA. DSL and FWS have developed this Candidate Conservation Agreement with Assurances (CCAA).

"A CCAA is a voluntary agreement whereby landowners agree to manage their lands to remove or reduce threats to species at risk of being listed under the ESA. In return for managing their lands to the benefit of species at risk, landowners receive assurances against additional regulatory requirements should that species ever be listed under the ESA. Under the CCAA, the FWS issued DSL an Enhancement of Survival (EOS) Permit (Permit) pursuant to section 10(a)(1)(A) of the ESA for a period of 30 years. Since the agreement is voluntary, DSL can end it at any point, although in doing so they would give up any assurances, and coverage under the EOS Permit would terminate. This agreement can also be updated and revised through adaptive management procedures so that it will continue to provide added conservation benefits for sage grouse.

"The purpose of this CCAA is to reduce or eliminate negative impacts of rangeland management practices to sage-grouse and to maintain and support livestock grazing practices that are beneficial or neutral to sage-grouse on State Trust lands administered by DSL in Oregon. Livestock production is a primary use of Oregon's public rangelands, and listing the sage-grouse could have significant impacts on this use, as well as communities and livelihoods which depend on livestock production. This CCAA is an important component of a strategic, landscape-level approach to address the conservation needs of sage-grouse in Oregon.

"This CCAA provides a framework for DSL, often working in partnership with lessees, to voluntarily implement conservation measures (CM) for sage-grouse on DSL-administered lands in Oregon, beyond measures they are already required to implement by state regulation.<sup>1</sup>"

1 Greater Sage-grouse Candidate Conservation Agreement with Assurances between the Oregon State Land Board, Oregon Department of State Lands and the U.S. Fish and Wildlife Service, p4-5

**APPENDIX F: GREATER SAGE-GROUSE CCAA**

The Candidate Conservation Agreement with Assurances includes:

- Responsibilities for both parties, and the area covered under the CCAA
- Sage-grouse information, including background, status and general threats for the covered area, and conservation measures needed to remove or reduce threats
- Expected benefits of prescribed actions
- Level of impacts from activities on enrolled lands, given assurances, monitoring, and annual reporting

# Public Comments and Agency Responses: Asset Management Plan

Oregon Department of State Lands



The 2024 Asset Management Plan will guide the Department of State Land's management of rangelands, forestlands, and other lands dedicated to funding K12 public schools for the next ten years. The public comment period for the proposed Asset Management Plan was open from March 4 to April 3, 2024. The Department received **10 comments** in total.

Comments are presented in the order they were received by the Department:

Elisabeth Zinser, former SOU president, March 24, 2024 (via comment form).....	1
Scott Nichols, Geothermal Industry/Small Business Owner/Former State Trust Land Manager, March 25, 2024 (via comment form) .....	2
Jackie Cupples, U.S. Fish and Wildlife Service, March 26, 2024 (via email) .....	3
Beth Ruehl, March 26, 2024 (via comment form) .....	6
Cuong Nguyen, Oregon Department of Transportation, March 28, 2024 (via email).....	7
Mark Willhite, World Forest Investment, Inc., March 28, 2024 (via comment form) .....	7
Christine Larson, April 1, 2024 (via comment form) .....	8
Barbara Cannady, a lease holder, April 3, 2024 (via comment form).....	8
John Charles, Cascade Policy Institute, April 3, 2024 (via email) .....	9
Jeremy Thompson, Energy Coordinator, ODFW, April 4 (via email).....	10

## **Elisabeth Zinser, former SOU president, March 24, 2024 (via comment form)**

By all means, retain at least 100% of the land still used for support to Oregon Schools. It would be wonderful to add more such public land for this purpose. Oregon's ranking nationally is not pretty, and surely funding is a significant part of the equation. Our future depends on it. Second, adjust the formula to allow for a higher percentage/population in smaller urban areas to adjust to economies of scale and better distribute opportunity for growth and improvements statewide.

**Department Response:** The Department of State Lands appreciates your positive comments on the draft Asset Management Plan. Related to your comment on land retention, a key change to this new plan includes more land retention by considering new management opportunities.

On October 15<sup>th</sup>, the Final Asset Management Plan will be presented to the State Land Board for approval. This version will address much of the public comments received. Once approved, we will send you a new link to download the final plan. Thank you for your interest in the Department of State Lands

**Scott Nichols, Geothermal Industry/Small Business Owner/Former State Trust Land Manager, March 25, 2024 (via comment form)**

Thank you for the opportunity to comment on the 2024 Trust Land Management Plan.

First, I applaud the decision to focus on financial performance using Net Operating Income and Annual Revenue and to move away from a Market Value based approach. The basis for the change is clearly explained and needs no further justification. Second, there are 3 million acres of split estate mineral resources in Oregon. These split mineral estates are both an opportunity and a burden for both the surface owner and the mineral owner. I would recommend a policy and procedure whereby surface owners could apply to consolidate (purchase) the underlying mineral rights. Upon application, DSL staff can determine if any mineral resource exists and the likelihood of development. This will generate one-time cash sales, provide security to surface owners, and may initiate additional mineral development to benefit the public schools.

Third, one page 16, the plan inappropriately indicates that geothermal development is not considered to be compatible with other land uses. In fact geothermal energy is fully compatible with other uses. Only a relatively small core operations area is required to be excluded from public access, recreation or grazing. More important, I recommend the DSL adopt an open door or first-come first-serve approach to most renewable energy development leasing unless the DSL has invested the time and funding to determine suitable development sites, has completed the necessary interconnection studies and identified the wind or geothermal capability of a site. The renewable industry does not have, in my experience, the interest in competing against other developers to drive down long term ROI and increase up front costs for the right to study and permit a potential site. The renewable space is already extremely competitive, don't make it harder!

Lastly, the most overlooked opportunity on state lands is recreation activities and cottage site leasing. Cottage sites, camping, or cabin site leases represent a very significant income opportunity. Oregon should look at sites or areas that are suitable for these types of recreational leases. Recreation leasing could be offered through a competitive bid to a management company or managed directly by DSL staff depending

on the site and initial infrastructure/upgrade costs. Cottage sites are one of Idaho's most lucrative leasing opportunities.

Again, thank you for the opportunity to comment. If you have any questions or need clarification regarding these comments feel free to call me at [REDACTED]

Best Wishes,  
Scott Nichols

***Department Response:***

The Department of State Lands appreciates your positive comments on the draft Asset Management Plan. Your comments were valued and insightful. Either your edits were addressed the final version of plan, or existing agency rules and policies address your comments. Your geothermal correction was addressed. Related to your comment on subsurface minerals, see Oregon Administrative Rule (OAR) 141-067-0320 ([OAR Link](#)). The Department does sell or quit-claim mineral rights in certain situations. For your comments on leasing recreation sites, please see OAR 141-125 ([OAR link](#)), which confirms we do lease recreational facilities.

On October 15<sup>th</sup>, the Final Asset Management plan will be presented to the State Land Board for approval. This version will address much of the public comments received. Once approved, we will send you a new link to download the final plan. Thank you for your interest in the Department of State Lands

**Jackie Cupples, U.S. Fish and Wildlife Service, March 26, 2024 (via email)**

Thank you for the opportunity to provide input related to the Oregon Department of State Lands (DSL) Draft Asset Management Plan. Because approximately 611,000 acres of DSL rangelands are enrolled in a Greater Sage-grouse Candidate Conservation Agreement with Assurances (CCAA) and these lands overlap with sage-grouse habitat, the U.S. Fish and Wildlife Service (Service) is particularly interested in the future management of these rangelands. In addition to sage-grouse, DSL rangelands provide habitat for other sagebrush ecosystem species, including golden eagles and other raptors managed under the Migratory Bird Treaty Act, and pygmy rabbit and monarch butterfly, both under consideration for ESA-listing. Please find the attached letter detailing our comments and do not hesitate to contact me if you have any questions or require further information. Thank you, Jackie Cupples

Attached letter signed by Marisa Meyer, US Fish and Wildlife Service Field Supervisor:

Thank you for the opportunity to provide input related to the Oregon Department of State Lands (DSL) Draft Asset Management Plan. Because approximately 611,000 acres of DSL rangelands are enrolled in a Greater Sage-grouse Candidate

Conservation Agreement with Assurances (CCAA) and these lands overlap with sage-grouse habitat, the U.S. Fish and Wildlife Service (Service) is particularly interested in the future management of these rangelands. A CCAA is a voluntary agreement whereby a landowner agrees to manage their lands to remove or reduce threats to a species that may become listed under the Endangered Species Act (ESA). In return for managing their lands to the benefit of a species at risk, landowners receive assurances against additional regulatory requirements should that species ever be listed under the ESA.

In a November 2, 2012 letter from the Service to Lanny Quackenbush, DSL Eastern Oregon Region Manager, the Service explained that we could not offer CCAA coverage for energy development activities on enrolled lands. This letter, which preceded the development of the DSL CCAA, stated:

“Energy development projects (or other high-intensity land development or conversion actions) in sage-grouse habitats should not be included as covered activities because, in contrast to grazing and range production, which already occur on the vast majority of sage-grouse habitat in Oregon and are relatively compatible with maintaining sage-grouse habitats and populations (or at least can be made so fairly readily and even tailored to enhance conservation of then species), energy development projects typically result in very long-term or permanent adverse impacts to sage-grouse habitat. Additionally, recent experience indicates that avoiding, minimizing or mitigating adverse impacts resulting from energy development projects to an extent that substantially reduces their severity and significance (let alone to an extent that would yield a net conservation benefit) is not readily achieved. The introduction of these projects on or adjacent to sage-grouse habitat where they do not currently exist will irreversibly degrade rather than improve baseline conditions.”

Subsequently, in September 2015, the Department of State Lands entered into a CCAA agreement with the Service with the intent to address the conservation needs of sage-grouse in Oregon. In addition to reducing or eliminating negative impacts of rangeland management practices to sage-grouse, one primary commitment in the CCAA is DSL’s agreement to “maintain contiguous habitat by avoiding further fragmentation.” In exchange for the voluntary commitments by DSL to implement this conservation measure as well as others designed to ensure best-practice livestock management to benefit sage-grouse, the Service issued an Enhancement of Survival Permit pursuant to section 10(a)(1)(A) of the Endangered Species Act (ESA) for a period of 30 years.

Renewable energy development has the potential to fragment and degrade sage-grouse habitat. As a result, developing renewable energy projects on DSL rangelands enrolled under the CCAA would not conform with the primary commitment to Conservation Measure 1 (CM 1) as stated in the CCAA: “On all enrolled lands DSL agrees to CM 1: Maintain contiguous habitat by avoiding further fragmentation. The objective for this CM is for no net loss in 1) habitat quantity (as measured in acres) and 2) habitat quality (as determined by the ecological state),” (p. 11).

Per the CCAA, “Land alterations that are not associated with the immediate operations of range and existing agricultural management are not covered activities under this agreement. Examples of land alteration not covered include multiple unit residential development or subdivisions, resort developments, energy developments, mining activities, and utility lines. Any proposed new alterations impacting existing sage-grouse habitat will include separate and internal analysis including mitigation that will conform to relevant regulatory policies and ensure enrolled lands will still meet the CCAA standard,” (p. 28).

Per DSL’s Draft Asset Management Plan, there are three active solar leases on DSL-managed rangelands in preliminary stages of development (p. 16). The Service requests to review information pertaining to these leases, including location, to confirm that these projects are consistent with the CCAA standard -- that standard being “removal or reduction of threats to the species to such an extent that, if also implemented on other necessary properties, would preclude or remove any need to list the covered species.” Because energy development has both direct (those within the project footprint) and indirect (those extending beyond the project footprint) impacts to sage-grouse habitat, the Service must review infrastructure projects for any potential effects on CCAA-enrolled lands. The Service is also available to assist DSL in the development of appropriate mitigation measures to avoid or minimize impacts associated with the active solar leases.

Significant investments have been committed to restoring sage-grouse habitat on DSL’s rangelands, allowing DSL to make progress towards other CMs outlined in the CCAA. To assist DSL in restoring its CCAA-enrolled rangelands, the Service has enabled the removal 4,355 acres of encroaching juniper in Deschutes and Crook counties by awarding DSL \$390K Bi-partisan Infrastructure Law (BIL) funds (FY22-24, Barbwire project). The Service also awarded FY23-24 BIL funds to remove 1,624 acres of juniper in Lake County. Additionally, the State of Oregon awarded \$532K (Senate Bill 762) to treat invasive annual grasses on 8,334 acres of DSL rangelands as part of the Southeast Oregon Wildfire Resiliency Project in Harney and Malheur counties.

Converting DSL-managed rangelands to land managed for renewable energy investments has the potential to undermine past and ongoing investments to improve their ecological condition and habitat value. Not only does energy development have the potential to fragment these recently restored areas, causing sage-grouse to avoid them, increased disturbance associated with the construction and maintenance of renewable energy facilities can contribute to the spread of invasive vegetation, resulting in further habitat degradation and wildfire risk.

In addition to sage-grouse, DSL rangelands provide habitat for other sagebrush ecosystem species, including golden eagles and other raptors managed under the Migratory Bird Treaty Act, and pygmy rabbit and monarch butterfly, both under consideration for ESA-listing. The Service is available to help DSL consider the impacts of renewable energy to these species as well.

In closing, we would like to reiterate our appreciation for the opportunity to provide comments on DSL's Draft Asset Management Plan. If you have any questions or require further information regarding these comments, please contact Jackie Cupples (La Grande Field Office; [REDACTED]).

Sincerely,  
Marisa Meyer, Field Supervisor

***Department Response:***

We really appreciated your feedback on our Asset Management Plan. We have made some changes to the document to better cover the Greater Sage-grouse CCAA in the plan.

We would like to schedule a virtual meeting with FWS and ODFW to discuss our options with the enrolled CCAA lands regarding renewable energy development. I'm not sure of all the discussion topics, but we need to understand options for development projects near but out outside sage-grouse habitat, inside low density habitat, and if development inside high density habitat is possible; analysis and mitigation involved, old vs new habitat maps, and probably other topics. Who do you suggest should attend this meeting from FWS and ODFW? There are five or six of us from DSL interested in exploring the CCAA and understanding our options.

***Department Response, sent with updated plan draft:***

First, I would like to thank you for taking the time to review our draft Asset Management Plan and providing thoughtful and thorough comments. The draft that went out for public review failed to acknowledge the Departments commitments in our Candidate Conservation Agreement with Assurances for the greater sage-grouse. This is a high-level document that will not delve into specific management decisions, but we have addressed our CCAA commitments in the updated draft attached to this email.

Updated language regarding sage-grouse and DSL's CCAA can be found on page 17 under our rangelands land classification, page 27 under discussion of renewable energy development, and page 40 where we have added the introduction of the CCAA as an appendix.

Please let me know if you have any further questions or feedback.

**Beth Ruehl, March 26, 2024 (via comment form)**

I disagree with intensive logging. I live in a small logging community, Powers, Oregon and I live with the devastation of logging. The deadly chemicals repeatedly sprayed and overspread on our water supplies. The suffocating fires burning from the clear cutting. The erosion of hillsides and mudslides in the only highway in and out. Not to mention the huge lumber companies do not pay taxes or minuscule amounts. We need resilient, healthy, diverse forests. I know other places lease out land for 10 years for green

energy projects. Such as solar and wind to create clean energy, jobs and charge for the lease of the lands. Can we implement such programs? I think these will be a lot more efficient where we can get more money for our schools as well as creating sustainable jobs.

**Department Response:** The Department of State Lands appreciates your positive comments on the draft Asset Management Plan. Your comments were valued and insightful.

On October 15<sup>th</sup>, the Final Asset Management plan will be presented to the State Land Board for approval. This version will address much of the public comments received. Once approved, we will send you a new link to download the final plan. Thank you for your interest in the Department of State Lands

**Cuong Nguyen, Oregon Department of Transportation, March 28, 2024 (via email)**

I am very interested in reading more about DSL's asset management strategies relating to management of forest lands, communication site leases, renewable energy market, etc., to see if we can apply any strategies at ODOT. Someone else may have already reported this, but I noticed the URL shown on page 16 appears to have an error in the hyperlink. It says the correct URL in the text: <https://www.oregon.gov/energy/energy-oregon/Pages/ORESAS.aspx> . But the hyperlink appears to take us to this link: <https://www.oregon.gov/energy/energyoregon/Pages/ORESAS.aspx>) with missing "-" and the ")" at the end. Let me know if you'd like me to submit this through the public comment form. 😊 [Screen shot from "Characteristics of Renewable Energy Lands Classification" which includes the link]

**Department Response:**

Cuong Nguyen, that is a good catch, thank you! I will add this to the list of comments, so no need to fill out the comment form on this matter. Thanks for taking the time to review!

**Mark Willhite, World Forest Investment, Inc., March 28, 2024 (via comment form)**

Hi, would the DSL board consider developing a advisory board of citizens interested in the new program? I think there would be advantages to having input from the private side regarding analysis and choice of various management projects. Consider this advisory board a partner. Members would have experience in real estate, forestry, ag, project financial analysis, etc. "another set of eyes" I realize input can be received through this medium, I'm thinking of more direct interaction. What do you think? Respectfully, Mark

**Mark Willhite (second comment):**

Hi, thanks for the link (I see it was already in the document)

Brian, I have two questions, and again, pardon me if the answers are in the material and I missed them.

- 1) Is there an advisory board for this program that would include private citizens?
- 2) Is it possible to see the webinar presentation that was given on March 12?

I've signed up for notification on the program. Thanks again,  
Mark

***Department Response:***

Thanks for your interest in the Oregon Department of State Lands Draft Asset Management Plan. The public comment link is here: [link]. This plan does not have action areas that would require additional staff for management.

***Department Response, March 28:***

Hi Mark, I am happy to answer your questions. The State Land Board guides our work. <https://www.oregon.gov/dsl/Pages/state-land-board.aspx> There are links to the presentation slides and a YouTube video at <https://www.oregon.gov/dsl/lands/Pages/2023plan.aspx> in the public hearings in March 2024 box. Thank you for your interest.

**Christine Larson, April 1, 2024 (via comment form)**

Recognizing that selling low-value land is not always the most beneficial, and that there is value to society in keeping land for recreational, wildlife, and lifestyle purposes. Schools are funded through property taxes, as well as CAT tax. Society benefits from land rather than funding schools marginally is a refreshing thought. Thank you for your consideration.

***Department Response:***

The Department of State Lands appreciates your positive comments on the draft Asset Management Plan. Your comments were valued and insightful. On October 15<sup>th</sup>, the Final Asset Management Plan will be presented to the State Land Board for approval. This version of the plan will address much of the positive public comments received. Once approved, we will send you a link to download the final plan. Thank you for your interest in the Department of State Lands

**Barbara Cannady, a lease holder, April 3, 2024 (via comment form)**

I realize that I am late to the party. Did have computer down for much of March. Missed your earlier announcements. Just catching up. Do not have cell service available at my residence. Would appreciate written correspondence in the future. When I tried to access plan through your links, went around in a circle between two pages, which included overview and links. Will try again thru you website, but will miss

you deadline. I have another meeting to attend today. Would like to reserve a spot for future comments, if available.

***Department Response:***

The Department of State Lands appreciates your feedback on the draft Asset Management Plan. You are always welcome to send in comments on Department documents and activities.

On October 15<sup>th</sup>, the Final Asset Management Plan will be presented to the State Land Board for approval. This version of the plan will address much of the positive public comments received. Once approved, we will send you a link to download the final plan. Thank you for your interest in the Department of State Lands

**John Charles, Cascade Policy Institute, April 3, 2024 (via email)**

I am sending the attached comments to you directly, as the email address listed in the draft SMP did not accept my email. Sincerely, John Charles

Attached letter:

Dear Director Walker, I have reviewed every AMP published by the Department since 1995, and communicated regularly with DSL on this subject.

The central problem with DSL's management strategy has always been the unwillingness to treat Common School Trust Lands as a money-making asset. Non-financial attributes have always been ranked higher.

This can be seen by comparing the financial performance of Oregon's CSTL with peer states, something Cascade did in a study published in 2018: <https://bit.ly/3dKp5vm>

Oregon has consistently been outperformed by other states. The comparison with Washington was particularly enlightening, since both Oregon and Washington are heavily forested. As of the date of publication, Washington was earning \$37 /acre on its Trust Lands, and Oregon was earning \$4.25/acre.

Nothing has changed since 2018. In the most recent DSL report on the performance of the Common School Fund Real Property, the land portfolio generated NOI of (\$2,339,064) for FY 2023, with a three-year average of (\$872,572).

I understand, of course, that future reports will not be saddled with losses from the Elliott State Forest, so they are likely to be slightly positive. But that's small consolation to taxpayers, who are still subsidizing ongoing losses as the Department tries to reinvent the ESF as a " Research Forest." They are also paying debt service on bonds sold by the state so that they could buy the Elliott from themselves.

It's been obvious for decades that asset management is not a core competency of the Department. The best strategy going forward would be to sell off parcels as market opportunities arise. It would certainly be a mistake to buy any more real property.

Sincerely, John A. Charles, Jr., President & CEO

***Department Response:***

Thank you for your comments on the Draft Asset Management Plan. These comments, along with others received, will help shape the final plan.

**Jeremy Thompson, Energy Coordinator, ODFW, April 4 (via email)**

Not sure if these got uploaded yesterday, including in an email in case.

Page 8-9, While agricultural lands may produce a better income stream for the Common School Fund, rangelands provide essential wildlife habitats throughout the state. ODFW encourages full consideration of ecological value of lands prior to any consideration of conversion. Leasing of easements for intact habitats should be pursued as a means of protecting habitat and providing the required funding stream mandated by management of Common School Fund lands.

With any land classification, ODFW encourage DSL to actively engage with Department staff to catalog know wildlife habitats present on properties around the state to preemptively identify any potential conflicts that could arise from a proposed development activity. Some habitats, such as marbled murrelet, Northern spotted owl, and Greater sage grouse have specific protections in state and federal rule and statute. Identification of these potential conflicts in a proactive planning process such as the draft Asset Management Plan, can streamline permitting and land allocation into the future.

Utilizing lands within identified species habitat zones for mitigation of impacts from development of DSL owned lands, or to offset development on private or federal lands may provide opportunities to diversify earnings necessary for the Common School Fund.

Pages 15-17. ODFW encourages DSL to continue to partner with other state agencies (ODFW, DLCD, ODOE, etc.) to identify lands, in partnership with the solar development community, that are most suitable for solar development. Identification of potential conflicts early in the siting conversation can assist in development of the needed renewable energy resources to meet Oregon's renewable energy goals while minimizing impacts to other resources of the state. In addition, early coordination with Tribes in the state is essential for responsible siting of renewable energy projects.

Pages 25-26. Recommend adding mitigation banking to potential scenarios under management considerations for revenue generation on appropriate lands

Page 29. ODFW commends DSL for their commitment to supporting climate resiliency and environmental benefits. ODFW offers to engage as appropriate on projects aimed at these outcomes.

***Department Response:***

Hi Jeremy, I didn't see these on the public comment link source. How did you submit them yesterday? I'm working on these comments now, so I'm glad you got them to me. Thanks for the input!



# Oregon

Tina Kotek, Governor

## Department of State Lands

775 Summer Street NE, Suite 100

Salem, OR 97301-1279

(503) 986-5200

FAX (503) 378-4844

[www.oregon.gov/dsl](http://www.oregon.gov/dsl)

## State Land Board

## M E M O R A N D U M

Tina Kotek

Governor

LaVonne Griffin-Valade

Secretary of State

Date: October 15, 2024

To: Governor Tina Kotek  
Secretary of State LaVonne Griffin-Valade  
State Treasurer Tobias Read

Tobias Read

State Treasurer

From: Vicki L. Walker  
Director

Subject: Geologic Carbon Sequestration

Over the past year, the Department of State Lands has been exploring opportunities for concurrently expanding and diversifying revenue while contributing to climate goals, particularly in the area of carbon sequestration.

Carbon sequestration is the process by which carbon dioxide is removed from the atmosphere and permanently stored, an action that has been [identified as integral](#) to reducing global climate change. Carbon sequestration reduces the amount of carbon dioxide in the atmosphere and can generate revenue through the sale of carbon credits, fee-based programs, or other funding mechanisms.

In collaboration with the Department of Geology and Mineral Industries, DSL has been examining opportunities for storing carbon dioxide in underground rock formations in a process known as geologic carbon sequestration. Northeast Oregon's Columbia Basin has been recognized [by the U.S. Geological Survey](#) as an area of geologic carbon sequestration study and opportunity – one of two in the Pacific Northwest. DSL owns the surface and subsurface rights for sixteen parcels totaling 1,558 acres within the opportunity area.

Dr. Ruarri Day-Stirrat, State Geologist and DOGAMI Executive Director, will provide an overview of geologic carbon sequestration and considerations for further collaboration.