

# OAR 141-079 Rulemaking Public Comments and Agency Response



## Comments & Agency Response

The comment period was open from February 2, 2025, to March 5, 2025, at 5:00 p.m. The Department received four comments in total, three of which were submitted via an online form and one via email as a PDF.

Please note that comments are presented in the order they were received by the Department, with the most recent comments listed first. Comments that were received via PDF are attached at the end of the document.

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### Doug Pollock, Friends of OSU Old Growth – March 5, 2025 (PDF letter via email)

**Comment:** Please see the attached PDF (pages 4-11 of this appendix) for the full letter and comments.

**Agency Response:** The Department thanks you for your comments and interest in the Elliott State Research Forest. The State Land Board adopted the Forest Management Plan at its October 2024 meeting, at which time the plan was put into effect. While it appears the commenter did not advance these or any comments during the public comment period for the Department's Elliott State Research Forest (ESRF) – Forest Management Plan (FMP), the Department did receive many comments reflecting similar input and addressed them in its response to comments and FMP revisions at that time. The commenter references several of these comments and the Department's responses in his comments.

The current rulemaking process is focused on whether the FMP should be incorporated into the Oregon Administrative Rules, which the Department's 2024 FMP proposed to do contingent upon FMP adoption by the Land Board. This rulemaking process is not for the purpose of supplanting or re-opening the FMP public process conducted by the Department in 2024 or the related Land Board decision that concluded that process (i.e., the October 2024 decision to adopt the ESRF FMP).

The commenter's points focus on underlying disagreement with Oregon State University's earlier FMP (and with OSU College of Forestry management in general), the belief that the Department's adopted FMP did not revise or deviate from OSU's approach enough, criticism of the ESRF active forest management approaches (as adopted in the FMP), and the assertion that OSU, the Department, and the Land Board have a pro-timber bias (as reflected in the ESRF FMP). These points, whether raised by the commenter now or instead by others who did

so through comments during the 2024 FMP process, were addressed by the Department during that process and reflect dissatisfaction with the 2024 FMP decision adopted by the Land Board. Even if the Department and Land Board chose not to incorporate the 2024 FMP into rule now, the commenter's criticisms would still remain since the 2024 FMP was adopted through a public process that is now closed. That said, incorporation of the 2024 FMP into administrative rule commits the Department to a 5-year periodic review of the FMP and evaluation of criteria relevant to the commenter's concerns. As part of the October 2024 Land Board FMP decision, the Department committed to appearing before the Land Board in October 2025 with an update on the FMP, the status of issues that are placeholders in the 2024 FMP decision, and potential proposed revisions at that time. The commenter's points are relevant to the FMP and can be brought into that effort.

**Fergus McClean, Sierra Club, Oregon State Grange – March 5, 2025 (via online form)**

**Comment:**

It would be premature to adopt the Forest Plan as administrative rules at this point. With brand-new staff and the first, improvisational Operations Plan only begun, it is far from clear how the structure inherited by current research forest participants will play out.

Considering the intended enabling legislation for the new forest, SB1546, went down in flames when the chief agent in the process, OSU, withdrew, leaving a theoretical and operational vacuum for overwhelmed DSL staff to attempt to fill- with much of OSU's previous work called into question- the fat lady is not yet ready to sing.

**Agency Response:** The Department thanks you for your comment and interest in the Elliott State Research Forest. The State Land Board adopted the Forest Management Plan at its October 2024 meeting, at which time the plan was put into effect. This rulemaking codifies the plan into administrative rule. Doing so will ensure this new rule is reviewed by the agency no later than five years from adoption. The agency will analyze whether the rule, and in this case the codified Plan, meets its intended effect. This allows the adaptation of the Plan as needed, and address the commenter's concerns, all of which the Department believes will ensure accountability.

**Mary Love – March 4, 2025 (via online form)**

**Comment:**

Clear cutting and logging should be a no-go as the area should be preserved for cultural and ecological heritage. Any research should be on the pretext and for purposes of preservation in perpetuity of the environment and development of the public interest and education of the ecology and sustainable uses of the forests and its non lumber related agricultural products.

No to clear cuts. No to bunk research. No to work arounds for corporations. Create jobs and enhance the economic relationship to the forest in researching models of applied forest education and researching potential medicinal uses of specimens unique to old growth forests. Do not rely on logging for economic growth, there are alternatives.

**Agency Response:** The Department thanks you for your comment and interest in the Elliott State Research Forest. The State Land Board adopted the Forest Management Plan at its October 2024 meeting, at which time the plan was put into effect. This document articulates the State Land Board's vision for the Elliott as providing for multiple forest benefits, including recreation, education, conservation, carbon sequestration, timber production, and a variety of types of forest research. Further, the Plan outlines Tribal partnerships, ecological and cultural values, and recreation and education principles, as well as next steps. This rulemaking codifies the Plan and its contents into administrative rule.

**Barb Shamet – February 3, 2025 (via online form)**

**Comment:**

Hi, thank you for your work regarding the Elliott Forest adjacent to where I have lived for the past 50 years, I understand the Elliott is now in a Carbon Credit Program securing its safety and contributing to it's longevity and true worth to our state, our country and our planet. I understand also that 95% has been secured in the old growth stands while providing \$9 million dollars in 10 years to sustain forest management. Good. As long as the public sees this and remains true we, the people of the state of Oregon who fought for its Conservation will remain grateful, likewise, if we see the old trees getting chipped away there will be public outcry once again, We remain committed to the Conservation efforts this forest provides and will remain vigilant as well in its defense. Thank you again for your work, Sincerely Barb Shamet, Allegany Oregon, 97407, phone [redacted]

**Agency Response:** The Department thanks you for your comment and support of the Elliott State Research Forest.

March 5<sup>th</sup>, 2024

To: Brett Brownscombe, Oregon DSL

Cc: Oregon Land Board

Elliott State Research Forest Board

Vicki Walker, Oregon DSL

Shannon Murray, OSU

Thomas DeLuca, OSU

RE: Adoption of the ESRF Forest Management Plan into OAR 141-079

From: Doug Pollock, founder, Friends of OSU Old Growth ([www.friendsofosuoldgrowth.org](http://www.friendsofosuoldgrowth.org))**Dear Mr. Brownscombe,**

In November of 2023, I submitted extensive comments concerning Oregon State University's *draft* Forest Management Plan (FMP) for the Elliott State Research Forest (ESRF) – which I've resubmitted as reference for the current public input opportunity. I do this because many of the concerns I articulated in my previous testimony were clearly NOT incorporated in DSL's review and rewriting of the OSU FMP. It is disappointing to see that many of the underlying faults in the original plan remain unchanged.

My sense is that you and your DSL colleagues took a procedural approach and figured that it was beyond your purview (or legal obligation) to wade through the past public criticism of the OSU FMP. Regardless of intent and the constraints of your process, it is a disservice to everyone involved to limit your review to the relatively limited number of comments received in response to DSL's draft FMP for the ESRF (included in your "Community Engagement Report") - especially when the public has already provided extensive critique of the prior FMP. **While DSL has clearly invested substantial efforts in changing the FMP approach, most of the underlying forest management structure (and its egregious shortcomings, courtesy of OSU) remain.**

You and the Oregon Land Board must also recognize the shortcomings and challenges of having multiple public review periods (over the course of many years), dealing with a series of complex, jargon-laden, technical documents (in addition to the many public meetings and presentations, including those of OSU, the previous Elliott Advisory Committee (EAC), and the Oregon Land Board). The overwhelming majority of Oregonians grew weary of all of this bureaucratic proceduralism long ago – and understandably so!

In reviewing the current state of the ESRF process and DSL's response to the prior FMP comments, I will focus on elements that were missed, dismissed, or inadequately addressed. **It is incumbent on DSL and the Oregon Land Board to ensure these issues are addressed *before* the FMP can be codified in the OAR.**

I will begin by reminding you of the original vision for an Elliott State Research Forest: **to create a world-class public research forest.** The specific details of what a "world-class public research forest" looks like have been articulated in various forms. Without getting into the details, it is important to note that nearly all of the definitions have come from entities or individuals which have a long history of timber industry funding and influence. As Rob Davis exposed in his ground-breaking 3-part series "[Polluted by Money](#)", Oregon has the highest per capita funding of politicians by

corporations in the nation! **The enormous undercurrent of timber-industry funding and influence has corrupted nearly all of the elected officials and public servants involved in the Elliott process (from the Oregon Land Board, to the “Cheryl Ramberg Ford and Allyn C. Ford Dean of the College of Forestry”, to the current DSL director and most of the senior DSL staff).**

The Oregon Department of State Lands has a long and deep history of “pro-timber” bias, as anyone who has followed the Elliott issue knows. DSL's past decision to sell off a choice parcel of old-growth forest (East Hakki Ridge) in the Elliott to a timber company (Seneca Jones) not only resulted in the Oregon Supreme Court ruling the sale was illegal, it also greatly diminished public trust in the agency. Going back a bit further, in 2009, DSL made a controversial decision to sell more than 600 acres of old-growth in the McKenzie Watershed, to Giustina Resources. The [resulting land exchange](#) was clearly a "sweetheart deal" for the timber company. It also exposed glaring conflicts of interest and unethical decisions by DSL staff. These are only a few examples from DSL's checkered history of stewardship of our public lands.

Given this backdrop of timber-industry collusion, how can Oregonians have any faith in this bureaucratic institution and the processes it has created? It is completely understandable that many Oregonians are deeply cynical when it comes to the involvement of OSU, DSL, and the Oregon Land Board in establishing a “world-class public research forest”. If state leaders had really intended to create a world-class entity, they would have bent over backwards to ensure independence, rather blessing Director Walker's [heavily-biased \(pro-timber\) Elliott Advisory Committee](#). As one College of Forestry veteran (and original member of OSU's Elliott team) told me years ago, “*the process was baked from the start*” (by intentionally prioritizing timber production behind a facade of scientific research).

Here are some specific examples (deficiencies) in the current FMP when it comes to pro-timber bias:

First and foremost is the stubborn insistence on perpetuating clear-cut forestry across vast swaths of the ESRF under the guise of “intensive” management. Let's be clear: **THERE IS NO RESEARCH RELEVANCY TO PERPETUATING CLEARCUTTING IN A WORLD-CLASS PUBLIC RESEARCH FOREST!** Clearcutting has been going on for roughly 400 years in our country (and a millennium before that in Europe). Weyerhaeuser and their competitors have already perfected their extractive forestry practices far beyond the ability of OSU, DSL or some new ESRF board to add to their expertise. Besides, OSU has already clearcut (and supposedly studied said clearcutting of) our public “research forests” for several generations. What more is there to learn through continued clearcutting?

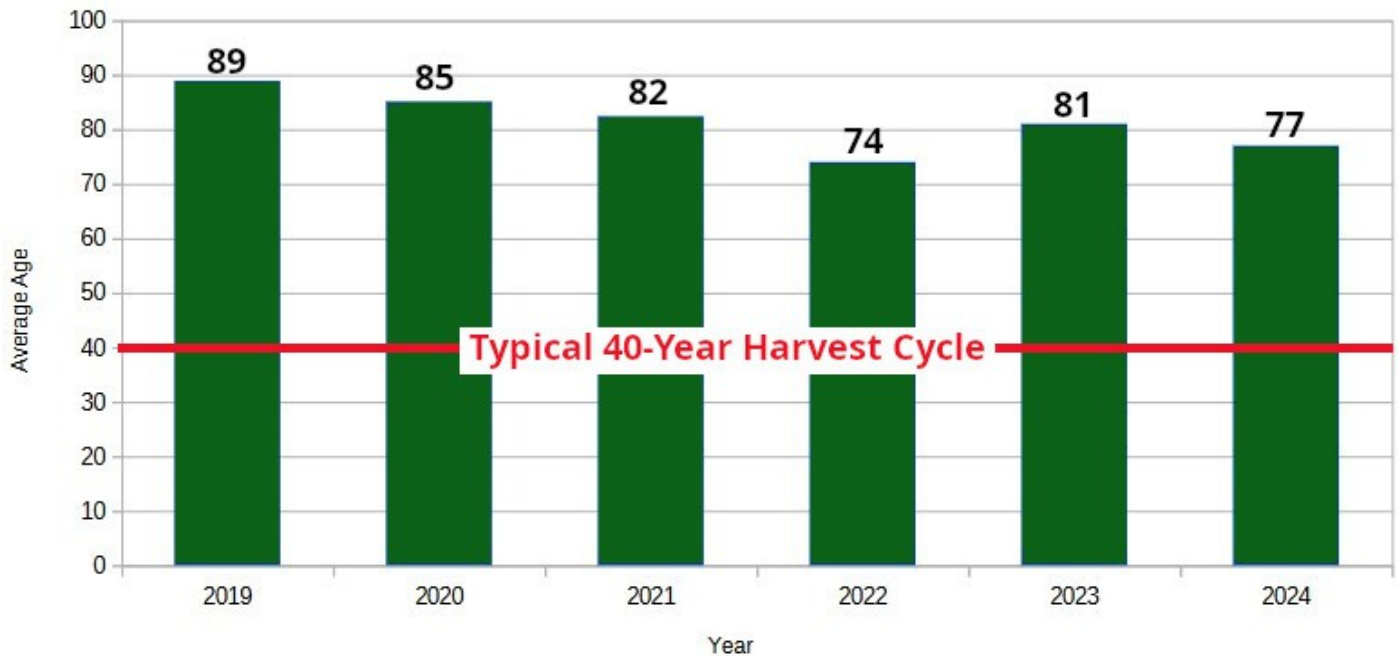
If you're going to claim that clearcuts are needed in perpetuity (as the FMP implies), then you are obligated to provide a substantial justification and detailed description of what you intend to research in these sections of land you intend to rape over and over again. Otherwise, your entire research enterprise is a joke! I ask this question with all sincerity: **Please articulate in detail what specific research will be done in the future clearcuts planned for the Elliott.** Why does a substantial portion of this “world-class public research forest” need to be relegated to perpetuating the worst practices of industrial forestry (if not to simply appease your timber-industry sponsors)? Remember, the debt to the Common School Fund (\$221M) has been paid by Oregonians! And while you're at it, please explain how these clearcuts will meet the pressing needs of society.

**The lack of specifics concerning “ecological forestry practices” to be utilized in the ESRF is also a big, glaring deficiency in the current FMP.** It is not nearly enough to simply refer to the textbook, “Ecological Forestry Management” (by Johnson, Johnson, and Franklin) and state that you intend to follow their guidelines! If you've read the book, you'd know that it covers a wide spectrum of forestry practices (it's not a “recipe” to follow).

It is also important to point out that OSU was very reluctant to use the term “ecological forestry” in their research plan and other documents and presentations concerning the ESRF. My sense is they understood that an honest employment of ecological forestry practices would impose significant constraints on their intended logging. You cannot simply follow a uniform prescription (e.g. leave 50% of the trees in a stand) and call it “eco-forestry”. Ecological forestry, if done correctly, is far more nuanced and holistic in nature. It is also anathema to nearly every timber company - and OSU leaders, who are supporting the destruction of our older public forests under their stewardship (see, “[OSU Leaders Reprimanded for Outdated Forestry Practices – Do Any of them Care?!](#)”). As a recent analysis of OSU's timber harvests

shows, our “nation's leader in forestry education” is cutting trees on average that are 83 years old – more than twice the industry average!

Average Harvest Age for the McDonald-Dunn Forests  
(using College of Forestry's harvest data)



All of this is to say that it is exceptionally naive for DSL to simply maintain (in the FMP) that ecological forestry practices will be demonstrated in the ESRF. When the underlying research plan for the ESRF (developed by OSU and adopted by a previous Land Board) is based on an antiquated “working forests” plan, the public must understand (and DSL must admit) that there is little basis to believe ecological forestry practices will be correctly demonstrated in the ESRF. Indeed, there is a great deal of evidence to the contrary! **If you honestly believe otherwise, then please provide extensive documentation outlining exactly how and where ecological forestry will be implemented in each section of the ESRF.**

**This leads us to the underlying purpose of creating this “world-class public research forest”. What specific “research needs” (of society and industry) do you envision the ESRF will address?** I have yet to see any effort (serious or superficial) aimed at articulating the fundamental underlying research needs to be met by the ESRF. Page A-91 of the Community Engagement Report (CER) contains an immensely important concern from the Sierra Club Oregon Chapter (SCOC) on this topic:

*“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 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. “*

DSL responded to this SCOC comment as follows:

*“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.”*

**DSL’s dismissive response is completely inadequate and misses the entire point which Dr. Franklin so clearly articulated!** The “6+ years of ESRF development” that you refer to have had very little to do with the research needs of industry or society. OSU’s default position seems to have been that their “working forests” research plan (which is based on a 30+ year-old antiquated model called “Triad”) encompasses all of the relevant “research questions”. But time and time again, the public and experts alike have exposed the egregious bias and shortcomings of OSU’s approach.

***“Activities on the ESRF should begin with development of a problem analysis to identify what research and experiments are needed to address problems of importance to Oregonians. The current document “puts the cart before the horse” by proposing a major experiment before conducting such an analysis and without developing on-the-ground familiarity with the property. In addition, the experiment OSU has proposed is badly flawed, compromises development of the long-term research potential of the forest, and lacks significant relevance to management of Oregon’s forests. The proposed experiment violates basic principles essential to production of statistically valid and socially convincing outcomes. Furthermore, the focus on Triad, an academic concept related to land allocations at regional scales, has no relevance to pressing forestry issues facing Oregonians.”*** (Dr. Jerry Franklin’s critique of OSU’s approach to the ESRF – which DSL seems to be ignoring).

Here are a few examples: OSU’s marbled murrelet “research plan” was based on cutting older stands and seeing how much disturbance the imperiled birds would tolerate. It was a plan that even some of OSU’s MAMU experts privately admitted had little scientific relevancy – and was a thinly-veiled gift to the timber industry (which wanted to cut the older stands). Thankfully, you’ve come to your senses and removed this pseudo research aimed at cutting older stands!

The broad reliance on “intensive” (clearcutting) forestry has little or no research relevance for industry. If DSL maintains that these logging operations are a key solution to the “research problem analysis”, then **please explain what specific research needs (articulated by industry and/or society) the clearcutting will meet.**

In past surveys and throughout the thousands of public comments submitted to both OSU and DSL, Oregonians have overwhelmingly expressed their desire for protecting older forests, supporting recreation, and implementing ecologically-sound forestry practices. They have also expressed great disdain for the perpetuation of industrial forestry practices, such as clearcutting, slash-burning, and spraying of herbicides. Yet these concerns are barely mentioned in the FMP! How do reconcile the obvious hypocrisy and conflicts of interest inherent in your “industrial forestry” approach to operating a “world-class public research forest”?

It seems obvious to me that you just don’t understand (or are intentionally ignoring) the kind of fundamental problem analysis that Dr. Franklin has laid out – and which is absolutely necessary for the establishment of a “world-class public research forest”. I strongly suspect it is because you and your managers (all the way up to the Land Board) realize that embarking on an objective assessment of the relevant research needs would render the underlying “research plan” largely irrelevant. It would also delay implementation of your “research” (logging) plan - and the associated revenue.

OSU and DSL should have undertaken Dr Franklin's problem analysis as a first step in the process (more than six years ago). They didn't do that for a host of reasons (arrogance, lack of understanding of how to set up a truly world-class research entity, and STRONG timber-industry bias, among others). The evidence of procedural bias is everywhere you look, not just in the RFP and FMP (which were widely rejected by Oregonians), but throughout the Elliott process. It was evident in Director Walker's overt bias (in her selection of EAC members with a strong timber industry bias). It was clear from the many efforts directed at minimizing public participation (ranging from their stubborn refusal to provide video recordings of meetings, to their reluctance to share critical documents, to the refusal to provide contact information for their so-called "Scientific Advisory Panel"). It was abundantly evident in the early versions of OSU's Elliott plans (which presented a very simplistic set of three draconian harvest scenarios, developed by John Sessions, an OSU professor with a long history of pro-timber bias). It is also evident in the current Biennial Operations Plan (BOP), which was reportedly developed in collaboration with a staunch timber-industry ally.

On Page A-14 of the CER, Sierra Club Oregon Chapter correctly drew attention to the need for elected officials (NOT appointed bureaucrats) to establish the governance structure of the ESRF:

*"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: 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."*

DSL responded to the SCOC comment as follows:

*"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."*

While the Land Board may have the authority and responsibility to choose and appoint future ESRF board members, it is important to remember this was NOT the case in the past (when the DSL director advanced *her* candidates for the initial board – including two regressive members of the same Douglas County timber family). The DSL director has shown exceptional pro-timber bias time and time again (as anyone who has studied the details of her communications and decisions knows). She and her staff should absolutely not be allowed to further taint the process by, for example, choosing members of the so-called "Science Advisory Panel" for the ESRF! These kinds of decisions just don't pass the "smell test". It is up to our elected officials (the Land Board) to ensure that these processes are conducted with the utmost transparency and fairness. This precludes ALL DSL staff from choosing or appointing members of planning and oversight bodies. DSL is anything but an objective, neutral party (as demonstrated by their long history of pro-timber bias).

From the answers provided by DSL in various sections of the CER concerning which institution will play the lead research role in the ESRF, it appears that DSL is still considering having OSU (and, in particular, its College of Forestry) play a leading role in the ESRF. This would be an absolute disaster for the future of this public research forest! In its current, multi-year planning process for the McDonald-Dunn, the dean and his associate deans have squandered public trust. The dean violated the collaborative commitment for forest planning given by his predecessor by selecting members of his so-called "Stakeholder Advisory Committee" (SAC) behind closed doors. Members of the public were not allowed to apply to serve on the SAC, nor were we notified about the selection process. OSU's four public planning meetings were



characterized by inept, biased presentations and poor planning. You can read accounts of the public outrage (and the many lies promoted by the dean and his associates) in the following articles:

[OSU Feels the Heat of Mac-Dunn Forest Planning Ire](#)

[OSU Pummeled at Public Forest Input Session Because They Should Be](#)

The dean has also enraged the public by his many efforts at spreading false narratives about OSU's destructive logging, including last year's 'Woodpecker Harvest' (in which trees up to 150 years of age were cut in a popular recreation area near Corvallis). The dean and his marketing folks falsely tried to justify the cutting based on establishing oak savannah habitat and promoting Tribal values. His open disparagement of members of the public who were concerned about the logging reflected very poorly on OSU and the College. For a detailed analysis of the many lies and misleading statements provided by the dean and his marketing minions, refer to:

[Refuting OSU's Blatant Forestry Misinformation](#)

The dean and his staff were also complicit in the [secret 2023 sale of 176 acres of older public forest](#) to one of OSU's largest timber-industry donors (Starker Forests) for \$446,000 (a small fraction of its timber value). Neither the dean, his associate deans, nor OSU leaders, have not been willing to answer many basic questions surrounding this divestment of older public forests. Their utter lack of integrity and transparency shows that OSU and College leaders simply cannot be trusted.

I have included these references to the unscrupulous behavior of College of Forestry leaders and their mismanagement of our public research forests because I want you (and everyone involved with the ESRF) to understand that OSU's involvement in the management of the ESRF would irreparably poison it. While there are many great researchers and staff at OSU, the College of Forestry is rotten at the core. The 2019 old-growth cutting controversy, and the current dean's stubborn unwillingness to change the College's staunch pro-timber bias are permanent stains upon our public university.

Page A-34 of the CER contains SCOC's comments concerning changes to the "reserves" within the ESRF:

*"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."*

DSL responded as follows:

*"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 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."*

Page A-88 of the CER contains Cascadia Wildlands et. al.'s (CW's) comments concerning this same topic:

*"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.”*

I share the concerns expressed by both SCOC and CW, and I also find the DSL response utterly inadequate. As someone who sat through most of the EAC meetings and many of OSU's presentations over the past 6 years, I can state unequivocally that **the aggressive “restoration thinning” now planned for the Elliott reserves is completely inconsistent with what was routinely promised in the past.** Time and time again, we were told that any cutting would be done with a “light touch”. We were assured that the only reason for this would be ecological or habitat restoration, and that it would only occur ONCE within the first 20 years (and NEVER after that).

We now see that logging in the reserves will be allowed for the first 30 YEARS. We also see varying amounts of thinning, ranging from 20 to 80% retention. In addition, the “Biennial Operating Plan” (BOP) for the ESRF (AppendixC\_TimberSaleVolume\_Revenue\_Summary.pdf) shows 741 acres of “Rest. Thin.” (which appear to be “restoration thinning”, though it is unclear if these are in the CRW areas). These restoration thins list a retention rate of 50%. All of this is the OPPOSITE of “light touch” and the very idea of a “reserve”!

The dictionary defines “reserve” as follows:

***“Reserve: an area of land set aside and protected for the conservation of wildlife and natural features, essentially a protected area where animals and plants are given special protection.”***

Contrary to DSL's assertions, these extensive “restoration thinnings” are COMPLETELY INCONSISTENT with the common understanding of a forested “reserve”! They are also contrary to the *“best available science related to conversion of younger plantation stands to beneficial habitat conditions”* you refer to! How do you define “beneficial habitat conditions”? Which species benefit and which are adversely impacted? It is well understood that extensive thinning (even 30-40%) has a considerable drying effect. It greatly increases evaporation (and heat) due to increased air flow, sunlight, and the albedo effect. This radically changes the conditions of the forest and soil microbiome. The extensive thinning you are now endorsing in the reserves will also increase predation for endangered species (like northern spotted owls, marbled murrelet, and red tree voles) which depend on a closed canopy or thicker forest for their protection. This is important even though these younger stands in the reserves may not qualify as NSO or MAMU habitat (as the birds don't stay within their officially designated habitat!).

For DSL to insist that these “restoration thinning treatments” were somehow “allowed” as part of the CRW and MRW reserves from the inception of the ESRF design is completely disingenuous! The public and conservation community were never told that such extensive logging would occur within the reserves – in fact, it was quite the opposite! You are completely betraying public trust by now ramming through this radical change. If Bob Sallinger were still with us, he'd be reading you all the riot act! The fundamental agreement and support of the conservation groups that were party to the Elliott proceedings was based on the understanding of a large portion of the Elliott being placed in a reserve. The same holds for the public at large (who were assured that roughly 40% of the Elliott would be “off limits to logging”). It is really unconscionable of DSL to now maintain these extensive thinning projects were part of the plan from the start. This is clearly an attempt to impose an antiquated “active management regime” (courtesy of OSU and their timber-industry allies) upon the Elliott Reserves. Shame on you for supporting it! Your statement that, *“Treatments in these areas must be 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.”* is both hypocritical and absurd. You've clearly been drinking the “College of Forestry Kool-aid”!

One aspect of the FMP which I do see addressed in the CER concerns limitations on steep-slope logging. Much of the ESRF is composed of relatively steep slopes which really should not be logged at all (at least if you care about preventing landslides and protecting watersheds). The extreme rain events of 1996 caused unprecedented landslides throughout the Oregon Coast Range. A subsequent [study](#) by the Oregon Department of Forestry found up to 24 landslides PER SQUARE MILE! At roughly 144 square miles in area, this would equate to 3,456 landslides in the ESRF. With climate change, there is every reason to expect similar (or worse) events in the future. I struggle to understand how a “world-class public research forest” in an area with heavy rain and steep slopes (and a history of severe landslides) can essentially ignore the impacts of steep-slope logging. This is not consistent with the vision for the ESRF!

I have similar concerns about the lack of focus in the FMP concerning the adverse impacts of slash-burning and herbicides – both of which expose the public to substantial, long-term health impacts. Slash-burning is generally NOT necessary in the relatively moist conditions of the ESRF. It is also at odds with the health of the soil. Herbicide spraying should be avoided at all cost in the ESRF. Peter Hayes (ESRF board member and president of Hyla Woods) has led his company's extraordinary efforts to reduce herbicide use. His expertise in this and other aspects of ecological forestry should be welcomed and embraced. The FMP should make a firm commitment to eliminating slash-burning and herbicide use.

In closing, I would like to state that the public employees involved in this process (whether they be elected officials or employees of DSL and OSU) must remember that the lack of public input does NOT equate to public acceptance of either their processes or the end results! Very few people are willing to subject themselves to the demeaning, dehumanizing, and biased processes that we've seen throughout the Elliott saga. The bureaucratic proceduralism fundamentally serves to disenfranchise citizens – who, nonetheless, care deeply about our public lands. While those in charge may succeed in imposing an extractive model on this “world-class public research forest”, the public will not ultimately support it.

**Respectfully,**

**Doug Pollock (founder, Friends of OSU Old Growth – [www.friendsofosuoldgrowth.org](http://www.friendsofosuoldgrowth.org))**