

**Cascadia Wildlands • Center for Biological Diversity • Coast Range Association  
• Coast Range Forest Watch • Forest Web of Cottage Grove • Oregon Chapter  
Sierra Club • Oregon Coast Alliance • Oregon League of Conservation Voters •  
Oregon Wild • The Larch Company**

2 December 2019

Anthony Davis, Acting Dean  
School of Forestry  
Oregon State University  
Corvallis, OR 97331

Dear Dean Davis,

The undersigned wish to share our views regarding the Elliott State Forest (ESF) becoming an Oregon State University College of Forestry (OSUCF) research forest. While we are supportive in concept, we have some concerns that need to be adequately addressed and integrated before we could support an OSUCF Elliott State Research Forest (ESRF).

**1. Purposes.** The primary purpose of the Elliott State Forest as a state research forest must continue to be for the "greatest benefit of the people of this state, consistent with the conservation of this resource under sound techniques of land management." (Article VIII, Section 5(2) of the Oregon Constitution). The public has made it clear to the State Land Board (SLB) that the conservation and restoration of the forest, watersheds and species would provide the greatest benefit for this and future generations. This could include utilizing the forest to store and sequester carbon and researching ways to optimize such carbon management for the benefit of the forest and the climate.

**2. Ownership.** To maintain public accountability and oversight, fee title ownership must remain fully public. If ownership does leave the trusteeship of the SLB, a revisionary clause should be included in the event that management or administration go awry.

**3. Transparency.** The entity that administers the ESRF should be fully transparent and be bound to following all the state requirements for public records, open meetings, etc. as is the Department of State Lands.

**4. Honoring the 2016 Appraisal.** The 2016 appraisal correctly priced out the value as \$0 of the timber stands identified by the appraisers' biological consultants as those likely to be unavailable for harvest under a habitat conservation plan (due to providing suitable habitat for Endangered Species Act-listed species). An ESRF must begin with a comparable level of conservation, which should be required by the SLB as a condition for the potential new owner in the form of an enforceable conservation mechanism.

**5. \$100 Million of Non-Economic Benefits.** The SLB should, by conservation easement or otherwise, specifically attach \$100 million dollars of—in the words of the legislative language authorizing the expenditure—"noneconomic benefits of the forest for the public, including recreation, aesthetics, wildlife or habitat preservation or other environmental and quality of life considerations" to particular parcels of forest, with priority given to the oldest stands not otherwise off-limits to logging according to the 2016 appraisal. Timber harvest or research involving timber harvest are not non-economic benefits.

**6. Conservation and Research.** Conservation of forests, watersheds and species must come first. Any research must be compatible with the primary purpose of conservation.

**7. Research Protocol.** The fundamental research question proposed: *“How can we balance conservation, production and livelihood objectives on a forested landscape within a changing world?”* is less relevant in the context of today’s climate crisis. Today, a more appropriate question is this: *“How can we achieve the conservation of nature and ameliorate climate change on a forested landscape while achieving fiber needs within a changing world?”*

**8. Native Forest.** Naturally regenerated forested stands (generally seen as those 80 years old and greater) on the ESF should not be managed. Research design should prioritize carbon storage and sequestration, ecology, biodiversity and restoration of tree plantations.

**9. Industrial Logging.** Most of Oregon’s forests—as are most of OSUCF’s other research forests—are heavily logged. It is not necessary to conduct yet another experiment involving industrial-scale (“intensive”) logging on public lands that includes large amounts of older native forests, which are now rare. “Extensive” forestry experiments should be limited to previously managed stands (generally seen as stands under 80 years old). In addition, rodenticides, herbicides and other pesticides should not be applied (with rare and targeted exceptions to combat harmful invasive plant species), nor should new roads be built.

**10. Riparian Protection.** Minimal compliance with the Endangered Species Act should not be the goal, but rather the conservation and restoration of not only the ESA-listed coho salmon but all native aquatic species. While large wood recruitment is an essential component for fish habitat, riparian management must consider other benefits of non fish-bearing/headwater streams to water quality (sedimentation and temperature) and quantity. Leaf-litter inputs should be factored into buffer decisions as trophic inputs to macroinvertebrates and therefore fish. Small streams and transitions zones can also be biological hotspots for non-fish, aquatic and semi-aquatic organisms. Designation and prescription for riparian management areas should reflect these ecological values and be comparable to proven and accepted models such as the Northwest Forest Plan or the 2016 Bureau of Land Management Western Oregon Resource Management Plan.

**11. Appropriate Logging.** Restoration-driven logging should be limited to plantations (generally seen as human-created stands under 80 years old), and silvicultural research should be focused on: (1) practices to accelerate late-successional characteristics, (2) practices to provide diverse pre-forest (early seral) habitat, and (3) long-term high-levels of carbon storage and sequestration—while minimizing fragmentation of and edge effects to native forest stands. “Extensive” forestry should include varying retention rates and not be practiced on existing habitat of or near ESA-listed species.

**12. Net Revenues.** So as to reduce even the appearance of research projects being designed to generate timber revenues to fund its or future research, timber revenues should not be fully available for research.

In addition to these concerns, we have these related requests that we feel need to be acted upon:

**A. Broadening the Pool of Experts Consulted.** There are several experts within the OSUCF, as well as elsewhere at OSU and beyond, that have yet to be consulted on the proposed research protocol, carbon modeling, and other matters. Experts in the severity of the climate crisis and how forests can mitigate climate change, in imperiled terrestrial species protection, and in aquatic and forest ecology should be consulted.

**B. Using the Best Available Information.** With regard to known occupied marbled murrelet areas on the ESF, it appears that OSUCF is relying on outdated and incomplete information, when newer and more complete information is readily available. This is also true in other data categories, such as current road inventories.

**C. Sale of the Carbon Storage and Sequestration Benefits.** We would like OSUCF to model maximum carbon storage and sequestration to see how much revenue could be generated in the carbon

compliance market. We know saw logs currently generate more revenue than carbon, but the primary goal is not profit, rather fully decoupling the ESF from the Common School Fund.

**D. Model a Stronger Conservation Management Scenario.** We would like to see a management scenario modeled that maintains native forest (over 80 years old should be used as a benchmark), assumes an HCP comparable to the 2016 appraisal estimates for ESA species protection, and practices ecological forestry (with variable density thinning) on plantation stands in the Management Research Watersheds (MRW).

Sincerely,

Josh Laughlin  
Executive Director  
Cascadia Wildlands

Rhett Lawrence  
Conservation Director  
Oregon Chapter Sierra Club

Noah Greenwald  
Endangered Species Program Director  
Center for Biological Diversity

Cameron La Follette  
Executive Director  
Oregon Coast Alliance

Chuck Willer  
Executive Director  
Coast Range Association

Doug Moore  
Executive Director  
Oregon League of Conservation Voters

Teresa Bird  
Co-Director  
Coast Range Forest Watch

Steve Pedery  
Conservation Director  
Oregon Wild

Cristina Hubbard  
Executive Director  
Forest Web of Cottage Grove

Andy Kerr  
Czar  
The Larch Company

cc: Governor Kate Brown  
Secretary of State Bev Clarno  
State Treasurer Tobias Read  
Vicki Walker, Oregon Department of State Lands  
Paul Henson, US Fish and Wildlife Service  
Kim Kratz, NOAA Fisheries  
Peter Harkema, National Policy Consensus Center  
Geoff Huntington, Oregon State University College of Forestry  
Katy Kavanagh, Oregon State University College of Forestry