DRAFT
ELLIOT STATE RESEARCH FOREST
FOREST MANAGEMENT PLAN
COMMUNITY ENGAGEMENT REPORT

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Introduction

This document is the Community Engagement and Outreach Report (Report) for the Oregon Department of State Lands (DSL) Elliot 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.

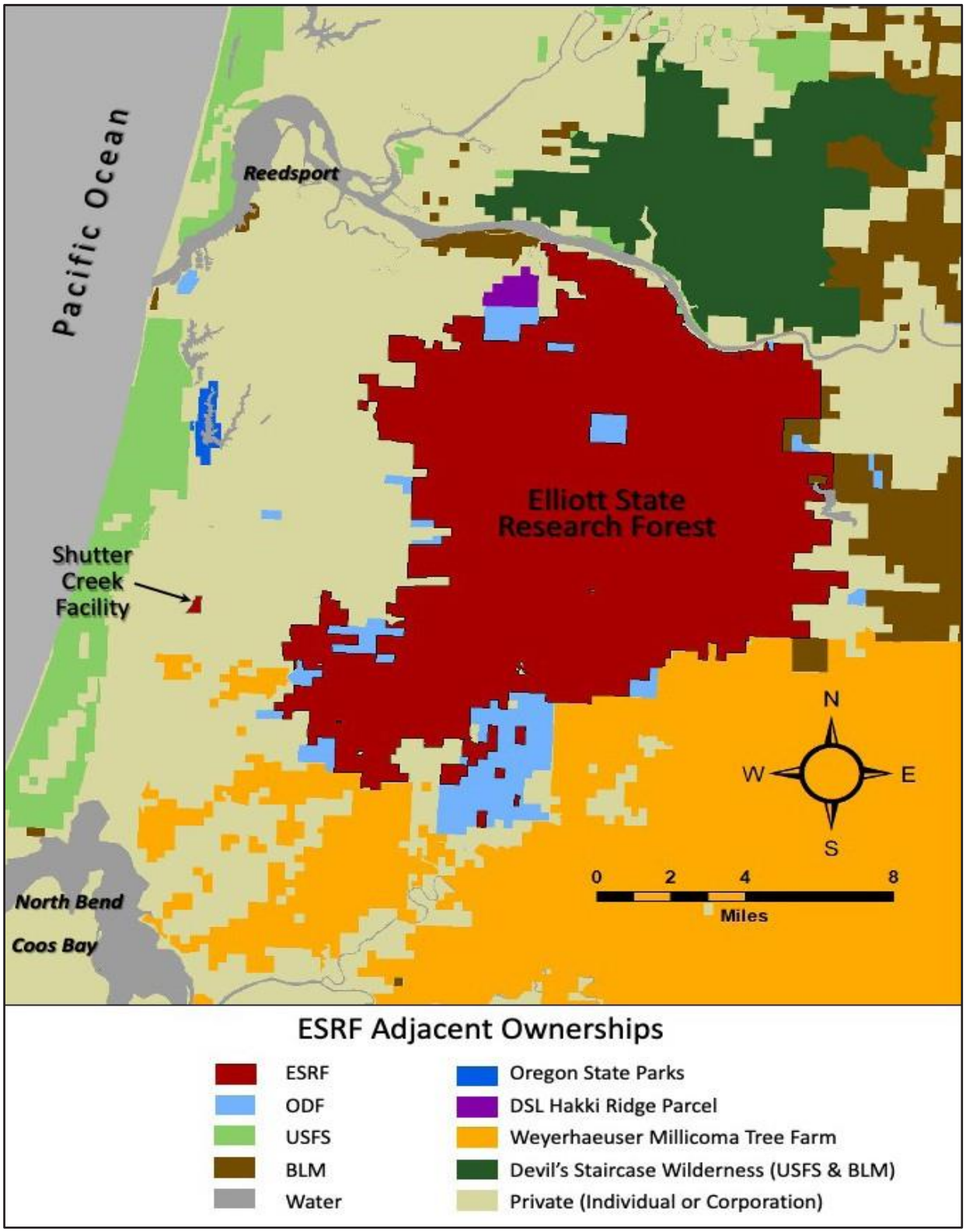

Figure 1. The Elliott State Research Forest and surrounding land ownership. The Shutter Creek Facility is currently being explored as a base of operations for the ESRF.

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, 202,4 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 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. Appendix A 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
- Skye Decker
- Carla Grant
- Jon Haynes
- Linda Hartling
- Michael Heumann
- Carolyn Hinds
- Albert LePage
- Maude Levesque
- Linda Parmer
- Ken Rawles
- Jill Riebesehl
- Gail Sabbadini
- Barb Shamet
- Caroline Skinner
- David Stone
- Rob Taylor
- Kent Tresidder
- Carol Valentine
- Valerie Vashon
- William Wagner
- Beverlie Woodsong
- Bob Zybach

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.

Appendix A 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 CBMA 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 sunsetting 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 Elliot 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 CBMA.

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 unlined 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 CO2 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 Owns, 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 hone 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 Appendix A. 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

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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

Appendix A – Comments by Topic Area and Current Proposed Responses

This appendix 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	Current Status of Proposed Response (as of 9.04.24)
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.	
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.	
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.	

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.	
53	Gail Sabbadini	I like the idea of creating a climate and biodiversity reserve. The more of the Elliot State Research Forest protected in this way, the better. Anything that can be done to protect more of this forest, should be done.	
83	Carla Grant	I'm in favor of MAXIMUM protections and MAXIMUM conservation. The climate crisis is real. And I'm attached to biodiversity. Do what you can to make this the strongest plan to date.	

Table A-2. General Opposition for the Proposed Plan

Letter Number	**Commenter Name**	**Comment**	**Current Status of Proposed Response (as of 9.04.24)**

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.)	
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.	

Table A-3. Background, Setting, Overarching Direction

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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.	
07	Kent Tresidder	General Background Summary of the Elliott 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	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
		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. 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.	
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.	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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.	
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.	
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.”	
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	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
		(which it replaces). We appreciate DSL's leadership in bringing about this positive change.	
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 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.	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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.	
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.	
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 wildlife, and will be unlikely to produce scientific information of particular value to Oregon landowners, resource managers, students, and taxpayers.	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
78	Bob Zybach	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). 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."	
78	Bob Zybach	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: "A diversity of seral stages will be sought through restoration that reflect emerging fire history data on the Elliott (see Appendix J) and support culturally important flora and fauna, Indigenous Knowledge, and educational accessibility." "Appendix J" is discussed in the Wildfire Risk section of this review and Indigenous Knowledge is discussed above. "Seral stages" typically don't exist	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
		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).	
78	Bob Zybach	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): "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?" 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):	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
		"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)."	
78	Bob Zybach	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.	

Table A-4. Governance

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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.	
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: 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.	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
78	Bob Zybach	When the Oregon legislature approved creation of an Elliott State Research Forest, it was on the basis of six criteria being met by January 1, 2024: I) payment to the Common School Fund of $220.8 million in exchange for ending the Elliott's legal obligation to create income on behalf of Oregon schools ; 2) the State Land Board voted to "decouple" (sell) the Elliott from its historical obligation to Oregon schools: 3) a final HCP was published; 4) a third party was hired to conduct an independent analysis of financial viability: 5) the State Land Board approved an Elliott forest management plan, and 6) the OSU Board Trustees authorized the university to participate in the ESRF's management (Zybach 2024a: 16).	
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.	

Table A-5. Partnership and Management

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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.	
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 conduced 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.	
07	Kent Tresidder	Appoint some professional foresters (with extensive experience) to The Board of Directors of the Authority and DSL staff.	
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.	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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 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.	
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.	
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	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
		restoration projects within the bounds of the ESRF, and hope that we can be a partner and resource moving forward.	
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	
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.	
54	Rod Krahmer, Oregon Department of Fish and Wildlife	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: Research and Partnership 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: Section 1.1.2 (page 1-3) Guiding Principles â€“ 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	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
		the Recreation, Educational Partnerships, and Conservation categories of this section.	
54	Rod Krahmer, Oregon Department of Fish and Wildlife	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: Research and Partnership 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: Section 2.3.1 (page 2-9) Structure for Decision-Making on New Research and Integration with Existing Projects â€“ 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.	
54	Rod Krahmer, Oregon Department of Fish and Wildlife	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: Research and Partnership 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: 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	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
		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 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 .	
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	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
		significant millions of foregone income, and at a level unlikely to sustain economic viability. Without comprehensive economic analyses, the plan fails to provide a clear picture of the forest's economic potential and management implications.	
78	Bob Zybach	The review is organized in eight sections, with each focused on a key topic in the FMP: 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.	
84	Beverlie Woodsong	Our forest management practices need to follow in step with Menominee Tribe Enterprise’s 150 year record of sustainable forest management.	

Table A-6. Research Forest Design

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
02	David Stone	Research must be done by - non-partisan - Independent - Scientists qualified in the specialty they are researching - No conflict of interest - No financial interest or investment in the timber industry or timber related - business - Logging - Mills - Equipment - Trucking - Road building - Logging machinery - Not sponsored or working for private interests looking to justify their preferred outcome - Peer reviewed	
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.	
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.	

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.	
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.	

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 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.	
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.	

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).	
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 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.	
25	Skye Decker	Please consider Bird Alliance of Oregon's asks regarding conserving the full 10,000 acres under consideration for habitat protection.	
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.	

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.	
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.	
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.	

Table A-7. Research, Planning, and Implementation

Letter Number	**Commenter Name**	**Comment**	**Current Status of Proposed Response (as of 9.04.24)**
02	David Stone	Research must test - Traditional logging methods - Clearcutting - Selective harvest - Shelterwood - Pre-commercial - Commercial - "restoration"	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
		- Stream buffering - Leaving or removing living trees of various heights - Leaving or removing living trees at various distances - removal of logs and woody debris in streams - Placement of logs and woody debris in streams	
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 - Uncut parcels - Old clearcuts - Recent harvests - Plantations - Streams	
08	Mark Trenholm, Wild Salmon Center	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	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
		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.	
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.	
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 by the Habitat Conservation Plan or otherwise required by state or federal law.	
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	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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.	
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.	
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	
02	David Stone	Research proposals must be approved by independent panels.	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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 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.	
12	Ken Rawles	I am writing to express my concern regarding the draft Forest Management Plan for the Elliott State Research Forest, specifically the proposed reduction in protections for the already designated 33,000-acre Conservation Management Area (CMA) located on the west side of the forest.	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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.	
58	Michael Heumann	Hello. I am writing to voice my support for strong protections for the Climate and Biodiversity Management Area in the Elliot 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 Elliot 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.	
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.	
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	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
		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.	
78	Bob Zybach	3. Triad Research Design 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). 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).	
78	Bob Zybach	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). Rather than consider whether the vision for research on the Elliott is too	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
		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.	
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 (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. 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). 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.	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
78	Bob Zybach	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 .	
78	Bob Zybach	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): 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): ". . . 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 . . . "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." 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	

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
		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).	

Table A-8. Aquatic and Riparian Systems

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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.	
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.	
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.	
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.	
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.	
Form Letter 1	Form Letter 1	The plan should include specific strategies to address temperature-impaired streams.	
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.	
08	Mark Trenholm, Wild Salmon Center	We strongly recommend that DSL develop a restoration strategy for inclusion in the FMP that considers the following: 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.	
08	Mark Trenholm, Wild Salmon Center	We strongly recommend that DSL develop a restoration strategy for inclusion in the FMP that considers the following: 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. 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.	

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.	
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.	
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 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.	
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 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.	
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.	
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.	
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.	
48	Albert LePage	The plan should commit to aggressively reducing the overall road network, especially near fish-bearing streams. Roads can significantly impact watershed health and aquatic ecosystems. Prioritizing road removal or decommissioning, particularly those within 100 feet of fish-bearing streams, can improve habitat for species like the Coast Coho salmon. Research supports the importance of maintaining healthy riparian zones to protect aquatic habitats and water quality [5].	
48	Albert LePage	Specific strategies to address temperature-impaired streams should be included. Climate change is exacerbating stream temperature issues, which can be detrimental to cold-water species like salmon. Implementing riparian buffers and other cooling strategies based on current scientific research is crucial, to potentially enhance species survival and adaptation to climate-	

		related warming.[6] Studies have shown that riparian vegetation can significantly reduce stream temperatures and improve habitat quality for fish.	
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 and perenniality 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.	
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 from sections where canopy is thinned. The department recommends considering the value of these ephemeral streams and affording some RCA protections in harvest areas.	
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.	
54	Rod Krahmer, Oregon Department of	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	

	Fish and Wildlife	objectives and should be considered when evaluating and discussing results, when applicable.	
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Unaddressed Comments 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: 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.	

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.	
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.	
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 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	Current Status of Proposed Response (as of 9.04.24)

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.	
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	
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.	
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.	
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 that carbon credits will not interfere with harvest targets or science goals (2.5.1).	
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?	
09	Cascadia Wildlands et al.	Is DSL going to protect one area in the name of sequestering carbon only to hit other areas harder to compensate for those protections?	
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.	
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.	
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.	

41	William Wagner	Society needs to determine a way to deal with the landscape as a whole in this era of changing climate trends so that its manipulative and technical effects will not outrun its understanding of the interactions and impacts of change.	
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	
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.	
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 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.	
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.	
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	
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 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.	

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.	
78	Bob Zybach	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" 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). 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).	
78	Bob Zybach	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): "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." 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 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., ibid.: 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**)."	
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).	
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 (ibid.: 172).	
78	Bob Zybach	An example of the ephemeral nature of carbon sequestration related to the sale of carbon credits is shown by the active Shelly Fire in northern California. A July 19 report includes a map of the fire, and clearly outlines 11,000 acres of burned forest that is owned by Ecotrust Forest Management (EFM) and used to sell carbon offset credits (Pera 2024). EFM was recently sold to its "management team" by its parent registered-nonprofit company, Ecotrust, who founded EFM in 2004 and contracted the first carbon analysis on the Elliott in 2011 (Davies, et al. 2011).	
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.	

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 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).	
78	Bob Zybach	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. 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): "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 . . ." Hansen's pioneer regional pollen studies included at least two key research 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): "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." 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): "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." 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 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."	

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

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)

02	Stone	- Cumulative impacts of timber harvests
		- Impact of logging on recreational activities
		  - Hiking
		  - Fishing
		  - Hunting
		  - Camping
		  - Dispersed camping
		- Impact on soils by
		  - Harvest method
		  - Logging equipment
		  - Hauling equipment
		  - Season of logging
		- Impact of logging on climate change
		- Demand for logs per
		  - Size of logs
		  - Quantity of lumber offered by unit, timber sale
		  - Jobs supported in	

		- Traditional mills
		- Automated mills
		- Associated businesses
		  - Logging
		  - Tourism	

07	Kent Tresidder	Four Recommendations 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 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 (http ://www.orww. erg/Elliott Forest/Research/Giesy Plan/index.html).	
78	Bob Zybach	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): "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."	
78	Bob Zybach	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 & Zybach 2017a: 3): "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."	

Table A-11. Species Conservation

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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.	
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”.	
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 "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). 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. 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).	

		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. 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." 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): "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). 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.	
Form Letter 2	Form Letter 2	I share the same concerns as others about the Elliot 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.	
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	
Form Letter 1	Form Letter 1	The plan should clearly address buffers for occupied Marbled Murrelet habitat.	
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.	
02	David Stone	Impact of barred owl Impact of Predators - Crows - Ravens	
02	David Stone	Prey base - Red backed voles - Flying squirrels - Etc.	
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.	
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.	
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 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.	
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.	
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 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.	
09	Cascadia Wildlands et al.	Recommendation for inclusion in the FMP for beaver management: 1. Prohibit hunting and trapping of beaver in the ESRF. 2. Early assessment of beaver presence and vacant potential habitat for beaver. This is most likely in the southern streams in the ESRF, where the topography is less steep. 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. 4. If unoccupied beaver habitat is identified, investigate offering recipient sites for relocation of beaver for non-lethal beaver management programs. 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.	
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 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.	
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].	
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.	
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.	
54	Rod Krahmer, Oregon Department of	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	

	Fish and Wildlife	listing concerns, so incorporating monitoring methods such as the Motus Wildlife Tracking System (MOTUS, https://motus.org/) to support research efforts and contribute to baseline data for tagged wildlife species that can fly.	
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.	
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.	
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).	
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Unaddressed Comments Section 9.4.1 (page 9-32) Coastal Marten (Martes caurina humboldtensis) - 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.	
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.	
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.	
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.	

78	Bob Zybach	Wildlife populations and habitats are dynamic and constantly changing. As a forested area burns, is buffeted by wind, snow, or ice storms, or subjected to landslides and flooding, logging or harvesting, hunting or fishing, and animal populations either adapt, relocate, or die. That process is well known and has been documented throughout historical time. In the Elliott, principal changes during historical time have included catastrophic wildfires, windstorms, ice storms, landslides, snowstorms, hunting, fishing, trapping, logging, roadbuilding, and tree planting, among other changes. Another significant change has involved government regulations, the listing of spotted owls, marbled murrelets, and coho as "endangered species," and the related efforts to file lawsuits and create HCPs and "critical habitat" reserves (Phillips 1998; Zybach 2024a). The primary problem with attempting to manage forest vegetation and animal populations with regulations that include 80-year and 100-year timeframes is that they can never be successfully completed. This is because of the dynamic nature of both forests and politics. Both have always continuously changed over time, and both will always continue to do so for as long as they exist. In our opinion, annual and decadal planning timeframes should first be considered for their more practical likelihoods and more successful histories.	

Table A-12. Monitoring

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
02	David Stone	Wildlife surveys - Before - After - Immediately	

		- 1 year - 5 years - 20 years	
02	David Stone	Research must be monitored for compliance to approved projects.	
02	David Stone	Results of approved projects must be evaluated - [After] 2 year - 5 years - 20 years	
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 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 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.	
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 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.	
54	Rod Krahmer, Oregon Department of Fish and Wildlife	Streams, Designations, and Treatments The department recommends that stream temperatures be monitored downstream of RCA treatment study areas as proposed actions above 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.	
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.	

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

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
08	Mark Trenholm, Wild Salmon Center	Restoration treatments in Riparian Conservation Areas (RCAs): The draft FMP describes proposed experimental thinning in RCAs in current plantation stands less than 65 years old as of 2020 “to restore or enhance recovery of riparian forest communities” (p. 7-16). Specifically, Section 7.4.1 describes the goal of this research to better understand whether thinning in RCA buffers can improve aquatic, riparian, and terrestrial habitat for salmonids and salamanders (e.g., by increasing downed wood or diversifying tree communities). The proposed research will occur under a phased approach, with an initial pilot phase that could expand into a larger experiment that would encompass 1.4%of the total area of RCA in the Management Research Watersheds (MRW) and a total of 0.6% of RCA area across the entire ESRF.	
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.	

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 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.	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: Examples of attributes that would not characterize an extensive treatment: • Conversion of a forest from a diverse to a less-diverse condition by not retaining key existing legacies • 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 • Establishing merchantable volume as the primary or dominant management	

		objective • Routine or pervasive use of herbicide • No plan for or monitoring of desired forest, riparian or wildlife attributes • No landscape level plan	
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.	
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	

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

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
07	Kent Tresidder	Consequences of Inaction 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 remain in a predominantly unmanaged condition is not only dangerous but is wrong.	
09	Cascadia Wildlands et al.	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.	
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.	
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.	
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.	
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 reserve areas and use intensive management areas to explore strategies to minimize the use of herbicides	
48	Albert LePage	I am concerned about potential weakening of protections in the 33,000-acre Conservation Management Area (CMA). Restoration harvests in the CMA should be minimal and focused on creating older, more complex forests. Prioritizing areas near intact, high-integrity forests for restoration efforts, aligns with the idea of focusing on creating older, more complex forests in the CMA. [3]	

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.	
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.	
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 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.	
63	Rob Taylor	Landscape scale (subbasins) needed for disturbance, wildlife population monitoring, fire management, and meaningful research.	
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 managed reserves and the retention of snags increase this risk, threatening surrounding communities to the west.	
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.	

		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. 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 seedlings (Phillips 1998: 278, 326, 345). 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. 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.	

78	Bob Zybach	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?" 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 (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). 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).	
78	Bob Zybach	Additionally, the FMP calls for the artificial creation of more snags despite their recognized flammability and historical role in worsening wildfires: "Create snags and downed wood of various sizes and decay classes to encourage habitat heterogeneity and wildlife diversity" (DSL 2024: 6-36). These snags, coupled with other naturally occurring ones, further elevate wildfire risk and severity (ibid.: 12-35): "Under the longer (100-year average) return intervals in Extensive research treatments, native tree insects and diseases can be expected to infest a percentage of trees, which could then decline and eventually die to become snags. This	

		will provide opportunities to increase diversity in stand structure and wildlife habitat during harvests by leaving such trees in place."	
78	Bob Zybach	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." 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 employed by OSU College of Forestry, yet this misleading rationale for poor scholarship somehow persists. 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).	

Table A-15. Anti-Timber Industry

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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.	
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.	

Table A-16. Preservation of Old Growth Forests

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
01	Valerie Vashon	Please protect this crucial habitat. Too many green spaces are being destroyed.	
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!	

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.	
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.	
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.	
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	
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.	
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.	
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 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.	
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.	
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.	

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 Sate of Oregon look forward to your continued and valued work for the Elliot. 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.	
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.	
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.	
74	Lindsay Bishop	I would like to reach out to express my support for protecting the areas of the Elliot 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.	
81	Linda Hartling	It also breaks my heart that Oregonians have to continue to beg our state government to protect the Elliot 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. 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!	
82	Linda Palmer	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. Please adopt policies to preserve the forests. waters and inhabitants in as whole and pristine a state as possible.	

Table A-17. Enforceability

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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.	
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.	

Table A-18. Anti-Experimental Harvesting

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
Form Letter 1	Form Letter 1	Any reference to experimental harvest in occupied Marbled Murrelet habitat must be removed	

Table A-19. Scenic Resources

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
Form Letter 1	Form Letter 1	The plan should provide a clear list of scenic resources and strategies for protecting these resource	
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.	

Table A-20. Plan Budget/Funding

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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.	
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).	

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.	
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 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.	
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 harvest levels will be based upon appropriate and approved management objectives, and not upon realizing future budget amounts	
54	Rod Krahmer, Oregon Department of	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:	

	Fish and Wildlife	Research and Partnership 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: 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.	
55	Sierra Club Oregon Chapter	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 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.	

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.	
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.	
78	Bob Zybach	The sections in this review on HCPs and carbon credits will add more details to these concerns. Two key concerns are the appraisal methods and loss of School Fund income associated with the $220.8 million sales price, and the arbitrary establishment of a 17 mmbf annual timber sales restriction.	
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 the meantime, it has not developed an operating income the entire time. According to Walker (2023): "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." 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/mbf 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 Zybach 2017b). Newton used a figure of $675/mbf 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). These reduced evaluations and funding strategies are what caused Murthy to conclude: “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 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	Carbon Credits 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). 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).	
78	Bob Zybach	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."	

Table A-21. Community Involvement

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
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.	
02	David Stone	Transparency - Public notification of - Proposed projects - Follow NEPA process even though this is a state forest - Scoping - Comment period - Draft decision with comment period - Record of decision - Approved projects - Conclusions of projects - Monitoring reports	

		- Active distribution - No FOIA needed	
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 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.	

07	Kent Tresidder	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?	
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.	
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	
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?	

Table A-22. Recreation

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
06	Jon Haynes	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.	
06	Jon Haynes	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 riding system. The State has done this up in the Tlllamook 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.	
06	Jon Haynes	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.	

Table A-23. Taxes/Common School Fund

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
07	Kent Tresidder	All Land Pays Dues 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.	
07	Kent Tresidder	Senate Bill 1546 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.	
07	Kent Tresidder	Transformation 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 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.	

07	Kent Tresidder	Go back to the legislature and point out to them the flaws and failures I have highlighted in Senate Bill 1546.	
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.	

Table A-24. Water Quality

Letter Number	Commenter Name	Comment	Current Status of Proposed Response (as of 9.04.24)
09	Cascadia Wildlands et al.	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.	
12	Ken Rawles	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.	
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 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.	