

Spring Issue 2017

OREGON **Fish & Wildlife** JOURNAL



WHAT'S INSIDE...

My Voice... By Cristy Rein...5

**Forest History vs. Forest Science:
1993 Elliott Management Plan...** By Dr. Bob Zybach...7

**Elliott State Educational Forest:
The Giesey Plan Alternative...** By Dr. Bob Zybach...15

A Tale of Two Hunts... By Mickey Bellman...23

Enforce O&C Lands Act of 1937...33

**American Forest Resource Council
Challenges Illegal Monument Expansion...**35

Abusing The Antiquities Act...
By House Natural Resource Committee...37

**Oregon Governor Kate Brown & Attorney General Ellen
Rosenblum Blaze the Oregon Trail
of Political Patronage...** By Adam Andrzejewski...39

Kokanee!... By John L. Perry...43

**ESA Failures Shine Bright as Special Interests
Trump Species Protection in Wildflower Debacle...**
By House Natural Resource Committee...51

Bugged... By Mickey Bellman...52

OREGON **Fish&Wildlife** JOURNAL

Spring Issue 2017

Volume 39, Number 2



This issue's cover shows a dramatic sunset in Lincoln City, Oregon. Photograph by Cristy Rein, June 2016

PUBLISHER

EDITOR-IN-CHIEF

Cristy Rein

FORESTRY EDITOR

Mickey Bellman

OFFICE MANAGER

Nicole de Leon

ADVERTISING SALES

Nicole de Leon & Amy Stucks

CONTENT CONTRIBUTORS

Cristy Rein, Dr. Bob Zybach, Mickey Bellman,
Adam Andrzejewski, American
Forest Resource Council, John L. Perry,
House Committee On Natural Resources

We can be reached at (503) 657-6962

FAX (503) 657-3410 • P.O. Box 1325

Clackamas, Oregon 97015

email: RZPublish@aol.com

www.OregonFishAndWildlifeJournal.com

Oregon Fish & Wildlife Journal is published quarterly by R-Z Publishing, Inc. Unsolicited editorial contributions are welcome but should be accompanied by return postage.

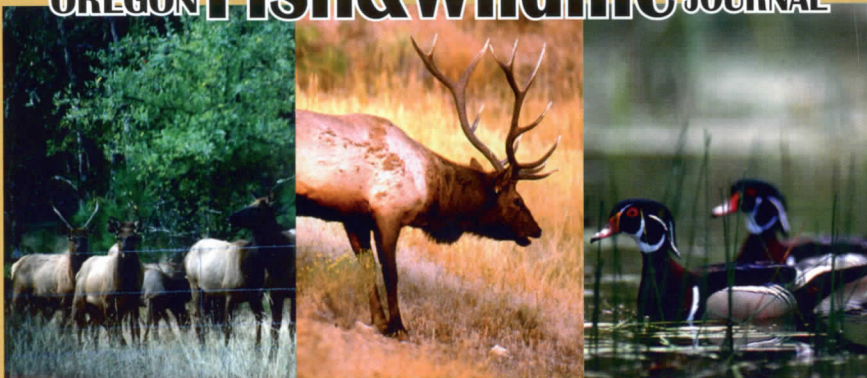
Editorial contributions will be handled with care; however, the Publisher assumes no responsibility for safety of artwork, manuscripts or photographs.

Publisher is not liable for any claim based on contents of published advertising.

Publisher is not liable for content supplied by contributing editors.

© Copyright 2017 Oregon Fish&Wildlife Journal

Subscribe Today!
OREGON **Fish&Wildlife** JOURNAL



To Subscribe: Send a check or money order to, P.O. Box 1325, Clackamas, Oregon 97015

To use your VISA/Mastercard call 503-657-6962 or fax information to 503-657-3410

or email to, RZPublish@aol.com • www.OregonFishAndWildlifeJournal.com

One Year (4 issues) \$24.95 • Two Years (8 issues) \$46.50 • Four Years (16 issues) \$83.95

Forest History vs. Forest Science

1993 Elliott Management Plan

Dr. Bob Zybach

In late 1993 the Oregon Department of Forestry (ODF) released a proposed management plan for the 93,000-acre state-owned Elliott State Forest for public comment.

This land had been originally deeded to the State by the US Forest Service in 1930 for the specific purpose of generating the maximum revenue possible for the Oregon School Fund – “consistent with sound techniques of land and timber management.”

For 40 years previous to 1993 the Elliott had done just that: averaging sales of nearly 50 million board feet (mmbf) of timber per year, providing thousands of good-paying local jobs, and generating tens of millions of dollars for Oregon schools.

Now it is being proposed to use much of this land to manage for spotted owl and marbled murrelet “critical habitat” instead, using new federal regulations as a guide. The “preferred alternative” for ODF was to reduce harvest levels (and thus school funding levels) nearly in half -- to only 28 mmbf/year.

The concern of agency and university wildlife biologists was that continued logging activities in the Elliott might harm spotted owl and marbled murrelet populations, both were on the federal endangered species list. Yet, their presence was contrary to biological theories that the species were “old-growth dependent”. Only 1/3 of 1% of the Elliott



Elk Creek landslide forming Gould's Lake in 1894.

This photo clearly illustrates the size of trees and snags burned during the 1868 and 1880s fires, as well as the regeneration of Douglas Fir seedlings that was taking place following those fires. Landslides are fairly common on the Elliott, given its steep hillsides and proximity to Pacific Ocean storms.

(307 acres) was older than 155 years. Everything else was second-growth or young plantations.

Forest Industry Response

The Elliott plan was open to public comment until February 1994. The state's forest industry submitted a unified response in the form of a seven-part report assembled by Greg Miller, Director of the State Timber Purchasers Division, Oregon Forest Industries Council (OFIC). Associated Oregon Loggers (AOL), Douglas Timber Operators (DTO), and Northwest Forestry Association (presently AFRC) also joined in this effort.

I was hired by Miller to write part seven of the report: an analysis of the plan's use of documented fire and reforestation history in developing its proposed alternatives.

With my part completed, the OFIC report was submitted on February 20. The first six sections regarded Oregon

state law, economics, timber management, streambanks, and marbled murrelets. The three appendices focused on spotted owls. All were summarized in the Executive Summary, but particular attention and several direct quotes were taken from my section on forest history and management options: part seven.

ODF's preferred Alternative #6 divided the Elliott into 17 subbasins for more efficient planning and management purposes but, according to the OFIC report, it also: minimized management successes of the previous 40 years; relied upon outdated spotted owl research; used highly speculative marbled murrelets data; and relied upon controversial and untested "conservation biology" theories in order to unduly (and possibly illegally) restrict timber harvesting.

The "biodiversity" concepts guiding the plan discounted human activities in the Elliott, stating that such actions could "move away from natural patterns" that apparently might otherwise favor the listed birds. However, historical research documented that human actions had likely been a large part of the Elliott's "natural patterns" for thousands of years, would likely continue to be so into the foreseeable future, and birds were nesting there anyway.

My assignment was to compare actual fire and regeneration history of the Elliott with the mathematical computer models being used to generate each of the proposed management options. I had also been given three questions to answer in order to focus my response. The Executive Summary further concluded with the statements that: Moreover, the fire history perspective and conclusions provided by Mr. Zybach stands in stark contrast to the description of landscape diversity and biodiversity contained in the Draft Plan . . . This preliminary review of the Elliott's fire history should be the foundation for the retrospective study of the Elliott . . . Mr. Zybach's information

should be considered in the evaluation and formulation of a final recommendation."

Fire History

The history of catastrophic Oregon Coast Range forest fires is one of incredible, nearly instantaneous changes to vast areas of the physical and biological environment.

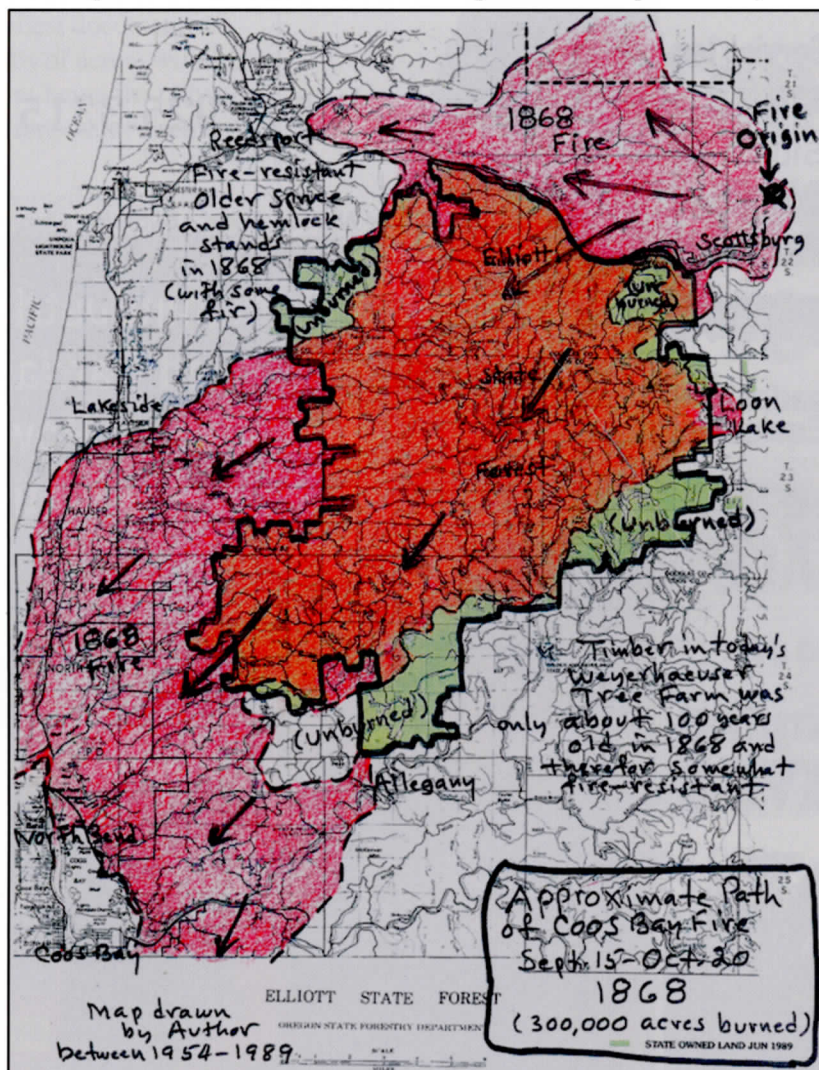
The 1993 plan clearly acknowledged that "fire is a basic element that shapes the forest ecosystem," however, noted fire ecologist James Agee is quoted as saying: "there is no evidence that [Indians] purposely burned upland forests such as the Elliott," and it is therefore concluded that "wildfires started by lightning have affected forests in the Elliott area for thousands of years."

In fact, there is not a single record of a large-scale wildfire (1,000s of acres) ever being caused by lightning in the region during the last 200 years of written history. When lightning does occur some years, it is typically accompanied by drenching fire-suppressing rains and "thunder showers."

More importantly, the northern, western, and southern perimeters of present-day Elliott Forest were peopled

by communities of Kelawatset, Hanis, and Miluk families, while Yoncalla Kalapuyans – renowned for their ability to use fire to shape and manage their vast homeland camas prairies and oak savannahs -- lived upstream to the east and northeast. It is important to consider that all of the catastrophic-scale (100,000s of acres) Coast Range wildfires on record took place during late summer/early fall east winds from the east and northeast, a time of year when Kalapuyans did most of their landscape-scale burning.

These people, on all sides of the forest and like people everywhere, used fire on a daily basis to cook, heat, and provide light. They also used it seasonally to hunt, clear fields and trails, and rejuvenate favored plants. Woody fuels were gathered



Phillips' Map of 1868 Coos Fire and Elliott State Forest. Green areas to the east and southeast are most likely buffers resulting from the ca. 1770 Millicoma Fire(s).

and stored constantly, whenever and wherever they became available. "Large, woody debris" did not exist over a large portion of the environment; it quickly became fuel or was used for tools, construction materials, carvings, or other purpose. The same with accessible dead trees.

In the late 1800s and early 1900s some of the largest and most destructive forest fires in US history took place on the western slopes of the Coast Range, including the area of Elliott Forest. These fires gained international attention and were known collectively as the "Great Fires."

The earliest known "Great Fire" was the ca. 1770 Millicoma Fire [see map], separately described and mapped by ODF Forester Jerry Phillips [see insert] and by Weyerhaeuser Forester Arthur "Smitty" Smyth; both having written books documenting this event, or series of events.

The Millicoma Fire burned to the eastern and southern boundaries of the Elliott, apparently buffered by ridgelines of mature, even-aged, second-growth Douglas Fir. It is significant as being the earliest documented catastrophic-scale (100,000s of acres) wildfire in Oregon history, as well as being the only one on record that occurred before white discovery and exploration.

The 1868 Coos Fire burned 90% of the remainder of the Elliott, by which time many of the trees that survived the Millicoma Fire became young old-growth; with "some" of the trees "estimated to have been about 300 years old." Fires in the 1880s burned through the deadened snags and few remaining living trees.

By 1900, most of the burn had reforested to stands of 10 to 30-year old Douglas Fir trees. ODF timber cruises in 1922 noted that many of these stands were now "eight to twelve inches in diameter on the stump."

The 1962 Columbus Day Storm blew down 100 mmbf of timber on the western slope of the Elliott, resulting in a major extension of the existing road system and the removal of an additional 200 mmbf of trees during salvage operations. Today this area contains most of the "critical habitat" for marbled murrelets on the Elliott.

In the 20 years between 1972 and 1992 over one billion feet of timber was logged from about 40% of the forest's total area, but less than 33% of the commercial timber volume that had seeded in and grown since the fires. Today the Elliott contains more than two billion feet of mature timber, the majority of which is contained in the 120-150 year old stands resulting from the 1868 fire.

This history likely reflects most of the "natural pattern" of the western slope of the Oregon Coast Range during the past several thousand years: large extents of second-growth even-aged Douglas Fir representing past wildfire and windstorm events, interspersed with patches of old-growth and of newer burns and windthrow that had yet to develop a stand of mature trees. This remains a characteristic pattern for much of the western Coast Range, and one to which our native animal populations have adapted over the past several thousand years.

3 Questions

In addition to assembling a documented fire history of the Elliott in order to compare with ODF's use of such data dur-

We Specialize in Douglas Fir No. 1 FOHC Large and Long Length Timbers



Treatments

ACZA (Chemonite), CA-C, Outdoor Wood, Borates (Sillbor), Bluwood, Heavy Treatments Available with BMP's and H2O Block Applied as Needed, Interior & Exterior Fire Retardants

Products

Poles, Pilings, Cribbing, Shoring, Railroad Ties, Boards, Dimension, Timbers, Guardrail, Plywood, Glulams, Agricultural Products including Grape Stakes and Hop Poles.

Services

End Trimming, P.E.T., Drilling and Countersink, Korbles, Net Slizing, Planing, Prefabrication, Container Loading, Export Services and Shipping

Head Office

800-356-7146 • North Bend, Oregon

Sales

800-499-2662 • Ceres, California

Plant Locations

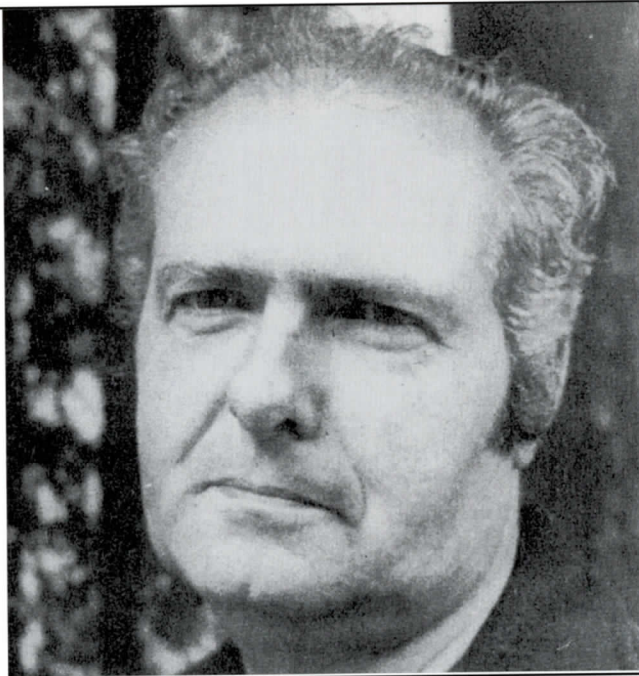
Rainier, Oregon • North Bend, Oregon • Arbuckle, California

All Products Available Treated or Untreated

Design/Build and TurnKey Projects Available Upon Request

www.ConradFP.com

Jerry Phillips spent almost his entire career involved in the management of the Elliott State Forest. He has written and documented the definitive 414-page history of the Elliott – “Caulked Boots and Cheese Sandwiches: A Forester’s History of Oregon’s First State Forest, “The Elliott” (1912-1996),” and describes the Forest during the late 1940s “in [OSU Forestry] college literature” as “an undeveloped State-owned forest . . . dedicated to educational purposes.” His book ends in 1996 with the observation “that this Forest is at once both aesthetically pleasing to most all visitors and economically very productive.”



declining, even-flow, naturally functioning ecosystem” -- in history, and is highly unlikely to ever take place in the future. The principal problem with fire cycle models is they are based in large part upon the faulty historical assumption that precontact Indian communities were only capable of iso-

ing the planning process, I was also tasked by OFIC to answer three specific questions regarding this information as part of my analysis:

1) What was the extent of ODF’s “use of fire history for developing their recommended alternative” (#6)?

ODF apparently did not use the detailed 1770 to 1951 fire history provided by Phillips in its development of plan alternatives, including alternative #6. Rather, a 150-year fire cycle model seems to have been used to help justify the recent change in management focus from timber production to creation of older forest conditions.

If the available historical information had been used as the basis for regarding the Elliott’s past and present, a much broader range of alternatives could have been developed for its possible and desired futures. A fire history perspective would have allowed far greater latitude in the spatial and temporal designing of logging plans, wildlife habitat creation and maintenance strategies, and net income production.

2) “How has the natural fire cycle shaped” the Elliott?

The “shaping” of Elliott State Forest by fire can be technically characterized as the result of a long-term series of botanical responses to constant and cumulative human disturbances caused by daily, seasonal, and episodic fires of varying size and intensity.

The so-called “natural fire cycle” of the Elliott supposes a mathematical predictive model that is biased against human activity (including hunting, fishing, logging, burning, fuel gathering, and road building) and toward “average” decadent stand conditions, numerous older trees, spatially distributed dead trees, and random lightning strikes.

This condition has never occurred – at least never in the form of a “non-

lated and localized impacts on “natural” forest conditions.

3) By “using an accepted fire history or fire cycle predictive model: What is the potential for shorter rotations to obtain the same wildlife objectives for spotted owls and marbled murrelets,” as given in alternative #6?

If the “wildlife objectives” in #6 are interpreted to mean population maintenance or increase over time, the mobility of owls and murrelets and their proven resiliency to catastrophic fires and windstorms would indicate that historical rates of clearcutting can probably be maintained indefinitely.

If the “wildlife objectives” are to simply create or maintain certain structural stand characteristics (“desired or required” habitat) within the forest, then these human definitions of desired future conditions would include (and require) an alternative #6-type approach.

Again, the difference in these two positions is the difference between mathematical projections based upon perceived “averages” of “natural” events and assuming a meaningful absence of people; in contrast to interpretive projections based upon personal experience and documented evidence of cumulative human actions, landscape-scale disturbances, and resilient plant and animal recovery.

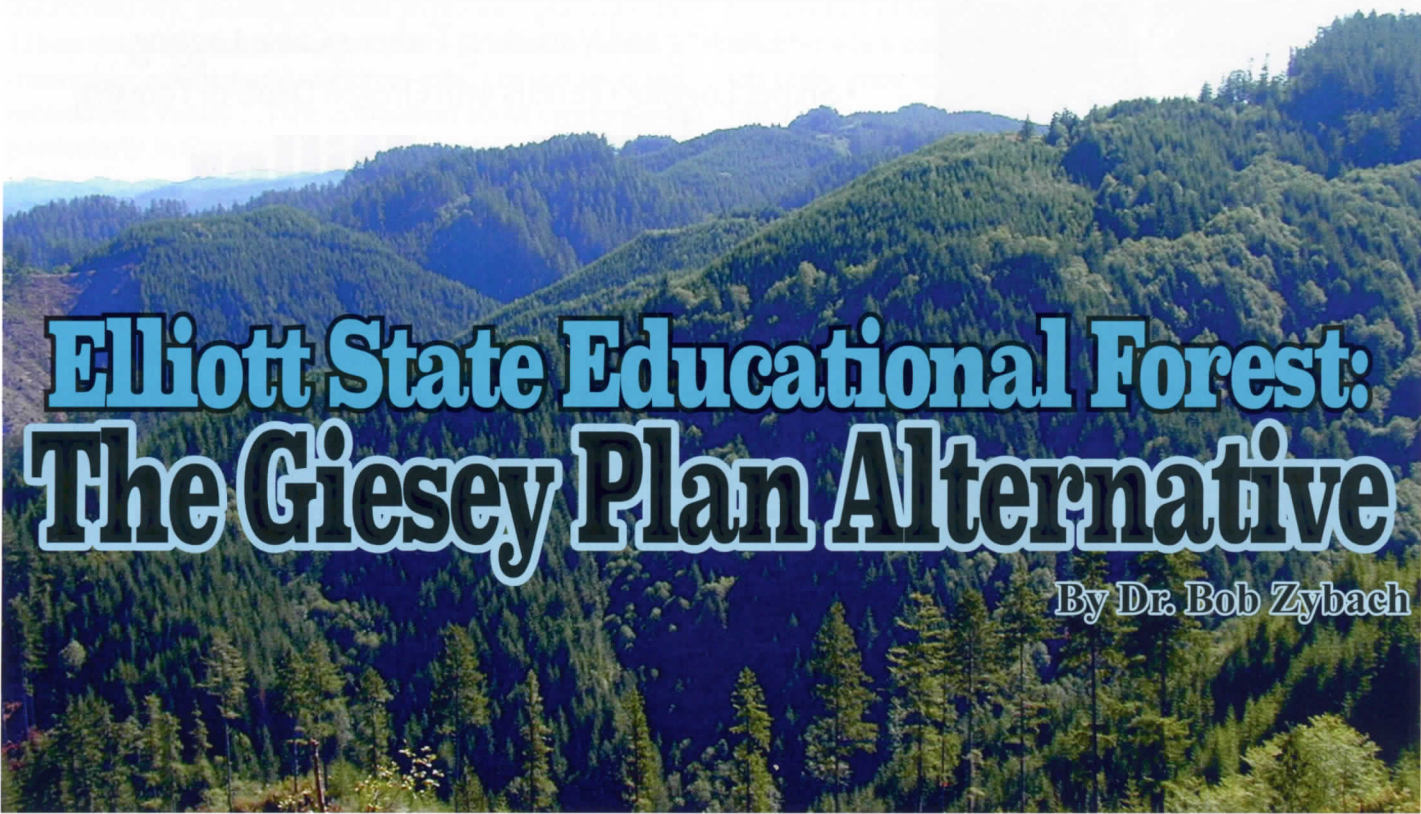


KH₂A ENGINEERING, INC.

Consultants and Engineers for the Forest Products Industry

- Feasibility Studies
- Cost Estimates
- Complete Project Design
- Structural
- Civil
- Mechanical and Electrical Design

5515 S.E. Milwaukie Ave., Portland, Oregon 97202, (503) 230-9348, Fax (503) 233-2051



Elliott State Educational Forest: The Giesey Plan Alternative

By Dr. Bob Zybach

During the February 14, 2017 meeting of the Oregon State Land Board (OLB) – a three-member organization formed on the same date in 1859 to manage Oregon’s state-owned “school lands” – a 2-1 majority voted to sell the 83,000-acre Elliott State Forest for \$220 million.

Many members of the audience appeared shocked: most had apparently expected the State to back down from the proposed sale and decide to keep the Forest in State hands. The two newest members of OLB, State Treasurer Tobias Read and Secretary of State Dennis Richardson, had only recently been elected to their positions and were attending their first OLB meeting. Both voted to continue the sale.

The third member of the OLB, Governor Kate Brown, who had originally supported the sale the previous year, now voted against it and proposed a \$100 million bond sale instead: to compensate the Common School Fund for recent management losses and to allow for proposed further reductions in Elliott timber sales. This latter condition was in deference to managing habitat for spotted owls and marbled murrelets; both listed as endangered by the federal Endangered Species Act (ESA).

During the previous public OLB meeting, on December 12, 2016 and the last meeting attended by the outgoing State Treasurer and Secretary, the Governor had stated: “it is appropriate for the Board to have another option . . . she calls upon the public to use



Map of proposed management subbasins and four primary coho runs of the Elliott State Forest, including early historical foot trails connecting local Kelawatset, Hanis, and Miluk families and communities. Submitted to Oregon Lands Board with proposed Giesey Plan Alternative on February 14, 2017.

their creativity, passion and time to pursue options for the Elliott that will craft a solution that will balance public ownership, rural natural resources jobs, conservation and recreational values . . . she is adamant about creating jobs, particularly in Coos and Douglas Counties, maintaining public access and preserving endangered species and their habitat. She told the audience that this is their opportunity to bring another option forward . . .”

During the course of the February 14 public comment period I was able to voice support for retaining the Elliott Forest in public ownership by implementing an alternative management strategy based on the Giesy Plan. No bond would be needed. I also submitted an outline of the proposal and supportive attachments to each of the OLB members on behalf of Wayne Giesy (who had a scheduling conflict and was unable to attend), www.ORWW.org, and myself.

At the end of the meeting, after losing the vote to sell the Elliott, Governor Brown directed Department of State Lands (DSL) director Jim Paul to “investigate public ownership options for the forest, and report back to the Land Board at a future public meeting.” To that point the Governor’s proposed bond sale and the Giesy Plan alternative were the only public ownership options on the table.

The next public meeting on the issue is April 11.

Elliott Sales Background

During the past several years the Oregon Department of Forestry’s (ODF) management of the Elliott State Forest has resulted in significant financial losses -- rather than mandated profits -- in the wake of reduced sales volume and increased litigation costs related to federal regulations regarding spotted owls, marbled murrelets, and their habitat.

These problems had been predicted and were clearly spelled out by forest management experts in 1994, in response to proposed Elliott Forest management plans being developed at that time.

It is conservatively 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, fixed, sales price — based on arbitrary evaluation restrictions by the OLB — is only \$220 million.

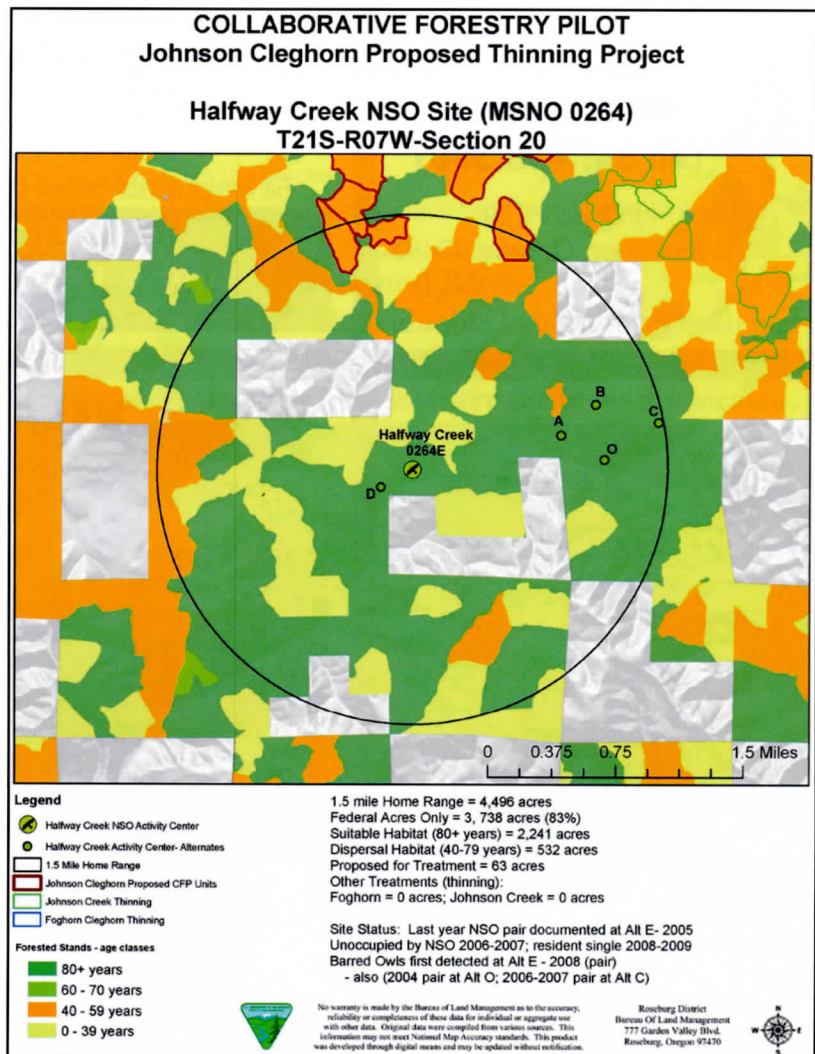
If this sale is allowed to be completed, there will be a permanent loss in value to the Oregon School Fund of at least \$380 million, and possibly much more over time. There should be less cause for alarm. Although the direct and indirect costs of ESA-related litigation have been very high, the recent reduction in profitable harvests

has resulted in larger trees of greater value -- and even more so when considering their size and rate of growth in ten years when several sales management constraints are lifted.

The potential loss of income and market value experienced by selling the Elliott would be in addition to lost opportunities, via the Giesy Plan alternative, for significant short- and long-term Oregon student and public research and education benefits.

The Giesy Plan Alternative

During the past three decades the Pacific Northwest has been involved in the “Timber Wars”: pitting loggers, their families, and traditional forestry practices against lawyers, biologists, federal agencies, and the Endangered Species Act (ESA) near its center. In that time the Elliott State Forest has become a victim of this conflict, having



Typical computerized model-based map of spotted owl “critical habitat” circle in the Douglas Fir Region. This map and “NSO” research were produced by the federal Bureau of Land Management, for a minor timber sale in Douglas County. This is the type of information represented by the dark blue “spotted owl circles” on the Elliott Forest shown in the map on page 25.

gone from a forest successfully managed for decades to generate annual income for the Oregon School Fund, to an unprofitable holding on the verge of being sold.

In the Spring 2014 issue of this magazine I wrote an article regarding the history and intent of Wayne Giesy's efforts to create jobs and healthy forests once again on federal timber lands: "'The Oregon Plan: An Oregonian's Solution to the Ongoing Forest Wars of the Western United States.'" At that time the "Giesy Plan" was still being promoted as the "Oregon Plan"; in years since it has reverted to its original name.

This proposal is to consider implementing a slightly modified version of the "Giesy Plan" in order to transparently – and profitably -- demonstrate the value of such an approach in managing public forestlands. In this proposal the Elliott State Forest would continue in State ownership; it would be actively managed for a minimum 20-year period for Common School Fund income; for spotted owl and marbled murrelets habitat; for local jobs and recreation; and also for important short- and long-term forest research and education opportunities for Oregon students and educators, with significant national forest management implications.

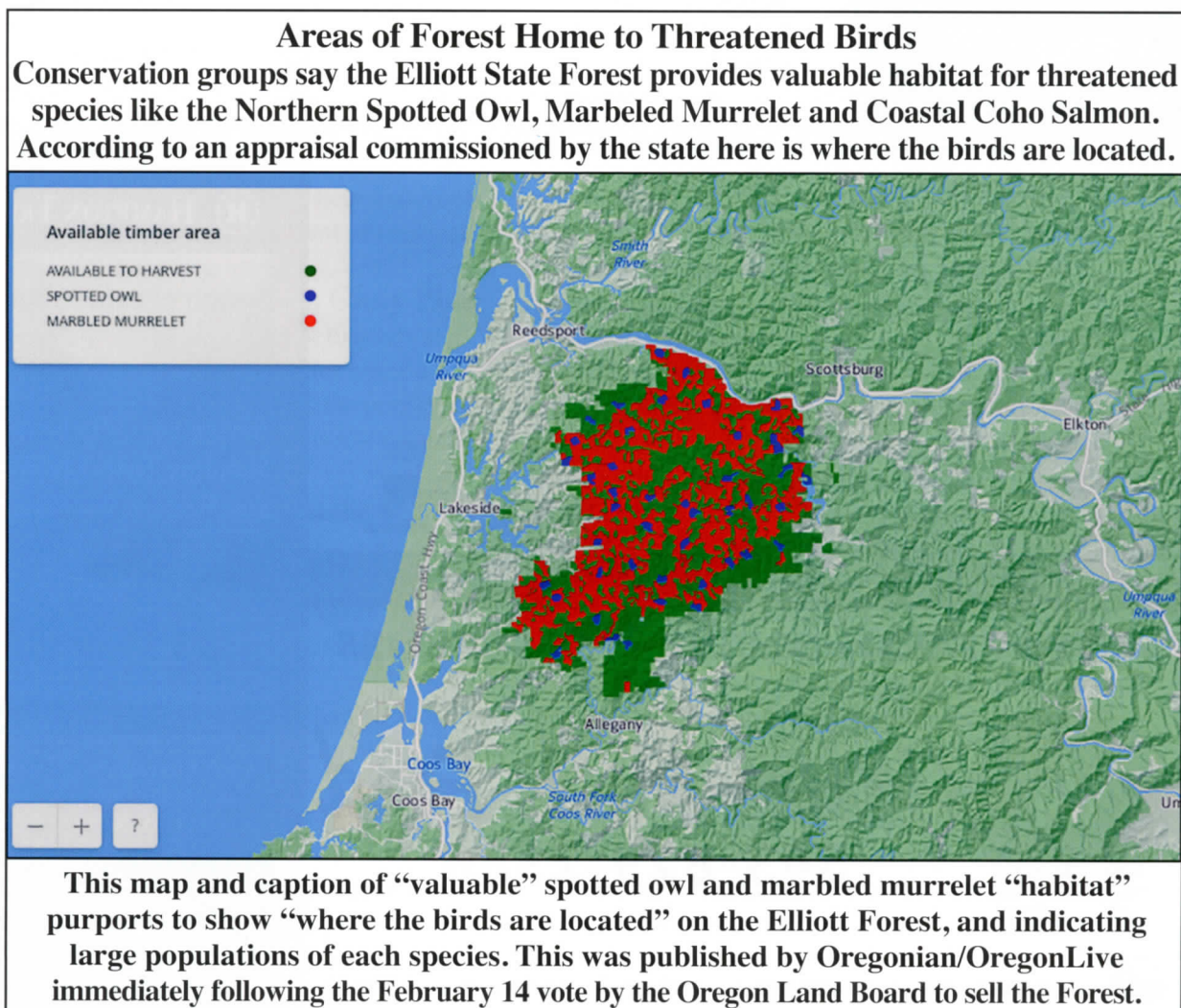
DSL
 Director Paul has been quoted as saying: "The debate is by no means over, there's a real conflict here that's hard to reconcile." We believe this proposal directly addresses this conflict in a scientific manner that directly benefits Oregon citizens, its schools and schoolchildren – and will, for an entire next generation.

Basic Giesy Plan Proposal

Divide 80,000+ acres of the Elliott State Forest into 24-30 forested subbasins of 1,000 to 5,000 acres each, with contiguous polygons outlining the fish-bearing streams, floodplains, and riparian roads as a separate consideration. The forested subbasins would be evenly divided by acreage into two categories: 1) active forest management for maximum Common School Fund income, as originally described by law; and 2) old-growth wildlife habitat, with a focus on listed ESA species. The excluded riparian areas would be managed separately, as a third category, for native fish, freshwater, recreation, and public access.

Each of these three divisions would be closely monitored by Oregon students and educators for a 20-year period, with specific focuses on economics, aesthetics, wildlife populations, recreational uses, and wildfire mitigation. Field trips and student research projects would be encouraged, and the entire forest and these topics would be closely monitored and documented by modern technical means with all observations and findings transparently shared via Internet.

1) All existing ridgeline and riparian roads would



remain open to public access, with some daily and/or seasonal restrictions due to maintenance, repair, recreational events, or harvesting actions;

2) More than 40% of the land would be dedicated to old-growth forest habitat, and the entire Forest would be monitored for a wide range of native forest wildlife species;

3) More than 40% of the land would be managed for maximum short-term and long-term revenue to the Common School Fund, with a planned harvest schedule of 50 mmbf/year for 20 years;

4) All of the Forests' subbasins would be scientifically and transparently monitored so that the general public, in addition to Oregon students and teachers, could directly participate in -- and benefit by -- comprehensive economic and ecological analysis of the differing management approaches and results;

5) Litigation regarding the management of the Forest would be banned for 20 years, by legal and political agreement, while this educational management experiment takes place. Assuming this proposal is adopted, at the end of 20 years Oregon would have a very well informed citizenry: capable of making expert decisions regarding Elliott Forest management in following years, as well as help make better informed decisions regarding management of regional federal forests almost from the beginning.

Assuming this proposal is adopted, at the end of 20 years Oregon would have a very well informed citizenry: capable of making expert decisions regarding Elliott Forest management in following years, as well as, help make better informed decisions regarding management of regional federal forests almost from the beginning.

Public Benefits: Sales Proposal vs. Giesy Plan

The Giesy Plan proposal easily meets or exceeds all of the four "public benefit requirements" sales criteria established by the OLB and greatly exceeds the public and School Fund benefits to be derived from a fixed-rate sale to a single bidder:

1) The buyer of the property has to allow public access to one-half of the land.

--The Giesy Plan proposal would maintain existing riparian & ridgeline roads for public access to the entire forest.

2) Buyer must maintain at least 25 percent of "older forest stands."

--The Giesy Plan would result in more than 40% of the land dedicated to growing and maintaining old-growth trees and habitat.

3) Buyer must "preserve" riparian areas with arbitrary "buffers."

--The Giesy Plan would actively manage riparian areas for native fish, water quality, recreation, and public access.

4) Buyer must agree to provide 40 direct and indirect full-time jobs for 10 years.

--The Giesy Plan would provide far more than 40 direct and indirect full-time jobs in perpetuity.

Summary and Recommendations

Under the Giesy Plan proposal, the Elliott State Forest would remain in public ownership and be renamed the "Elliott State Educational Forest" for a 20-year period for the specific purposes of: producing maximum sustainable income for the Common School Fund with active management of 1/2 of the Elliott; producing dozens of full-time direct and indirect local jobs; conducting a long-term public experiment to test and compare competing methods of forest management; focusing on recovery and enhancement of four major coho runs in the Elliott subbasins; maintaining water quality of Elliott streams; improving forest-based educational and recreational opportunities for Oregon citizens; and maintaining and improving old-growth habitat conditions for marbled murrelets and spotted owls on 1/2 of the Elliott.

Riparian Lands.

Under the Giesy Plan, riparian areas could be actively managed by local Tribes with a specific focus on coho recovery -- particularly Tenmile Lakes coho -- water quality, public access, research, education, and potential development of commercial recreational uses.

School Fund Lands.

Similarly, the economic-based management of select forested subbasins and ridgeline roads could be transparently and profitably managed for purposes of public access, recreation, research, education, and generating revenues for Oregon Schools.

Old-Growth Lands.

Subbasins dedicated to old-growth habitat could be collaboratively managed by a coalition of organizations who have engaged in litigation during the recent past regarding Elliott Forest management for marbled murrelets and spotted owls. The opportunity to clearly and openly demonstrate -- and transparently and scientifically compare -- their desired management approaches and outcomes would be in exchange for agreeing not to file any additional legal actions regarding the Elliott during this 20-year public management experiment.

The timber wars have dragged on for far too long and have left billions of wasted dollars, ruined families, damaged forests, degraded infrastructures, bankrupt counties, catastrophic wildfires, and millions of dead wildlife in their wake. Now is a real opportunity to scientifically address these differences, and to the immediate benefit of Oregon schools, students, teachers, and taxpayers in the process.

The Giesy Plan alternative to the management of the Elliott State Educational Forest would be a benefit to all and could provide much needed direction toward the management of our State's federal lands as well.

