

Feb 03, 2023

Dear State Legislature and Chief sponsor Senator Beyer, I am in opposition to SB-1546-1.

SB1546-1 for it's majority may still heavily rely on reference to Dec 8, 2020 Research proposal which is out of date. April 2021 version is newer. SB1548 may be invalid based in the use of Dec. 8 2020 OSU COF research model.

### **“OREGON STATE UNIVERSITY ELLIOTT STATE RESEARCH FOREST PROPOSAL**

**“SECTION 4. (1) The Legislative Assembly finds and declares that Oregon State University’s Elliott State Research Forest Proposal was accepted by the State Land Board in December 2020 and amended in April 2021.”**

SB1546-1 use of TRIAD Experimental Research Platform on which OSU COF has designed various Draft research forestry proposals was critiqued in public comment during 2020 to the SLB by Dr. Johnson and Dr. Franklin. They clearly stated in their comments that the selection of TRIAD is not the correct research framework system to apply in this unique marine climate Coast Range forest setting.

The public sent in 100's of comments to State Land Board in 2020, with the majority in opposition to OSU COF managing ESF. Additionally, public comments to OSU COF and SLB during design phase of Research Plan where never incorporated into COF OSU ESF research management plan.

### **Section 7**

**“(L) Promote transparency around decisions concerning the forest,**

141 Million dollar payment to Common School Fund, valued against long term carbon credit monetary income, as long term investment valuation has a potential worth of billions of dollars from the ESF. ESF could become an ongoing carbon storehouse which under this SB, will not be used for Carbon credit banking. Global climate change models do not take into account thawing of the permafrost and release of unknown amount of Methane gas. Global climate tipping points may be eminent with permafrost melting and global environment ecosystem failure world wide.

This SB and support TRIAD Forest Research Mg. Plan fails to acknowledge this impending disaster.

Cutting **Section 2(operational-scale research)** under TRIAD and Forest Management Plan/Research Management Plan/Business Economic Analysis Plan of 1000's of acres of naturally regenerated and uncut old growth coast range forests, points to future massive losses of potential carbon credit investment and revenue generation for future to the State Of Oregon under this Senate Bill.

## Section 2

*“(d) Advance long-term, **operational-scale research**, in partnership with the university, on issues including forest management practices, ecosystem function, biodiversity, habitat conservation, water quality and quantity, carbon sequestration, rural livelihoods and the resilience of forests to the impacts of climate change.”*

Carbon Credit banking valuation is increasingly profitable. Allowing OSU COF to apply TRIAD to watershed to remove 14,000 acres old growth trees over 150 years old, decreases carbon storage potential along with thinning in x miles of riparian corridors, clearcutting 3000 acres, thinning in old growth forest in x acres. Global warming is increasing, escalating and may go off the charts with Methane Gas Release from the Arctic regions. Riparian corridors need to remain in place especially in the Coast Range with industrial forestry dominating this forest province region, under Oregon Forest Practices Act. Elliott SF with the last remaining native fish runs connected Pacific Ocean carbon cycle exchange into it, within the entire coast range must be conserved and honored ecologically.

Global Climate Change and ongoing destabilization of climate are not addressed clearly in SB1546.

The ESForest is positioned within private forest plantations in Coast Range and this provides SLB with opportunity for innovative forestry management to occur while the forest is still held in public ownership. OSU is not a public entity. Executive Order(EO) 20-44 ORS 468A.215(1)(c) GHG Emission Reduction Goals (2) 80% below 1990 emission levels by 2050 ESF - ESRF under Oregon Forest Practices Act should not be except from EO 20-04. Carbon credit banking here is a billion dollar value which under this bill is going undisclosed, undiscussed. Research applied in ESF has possibly already been completed and new findings here may be repeats of previous research projects. Proposal described in section 4 of this 2022 Act.

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**“(G) Any sale of carbon credits or entry into easements or other encumbrances of lands in the forest.”**

Section (G) needs to be clarified.

## Section 7

ESFRABoard can deny any amendment in the HCP

**“(I) Any amendments to a habitat conservation plan related to the forest, after receiving input and approval from the State Land Board.**

**The amendments must be consistent with the mission and management policies described in section 2 of this 2022 Act.**

Will this denial right under Section 7 (I) work to over the long term destabilize the ESF ecosystem by undermining the legal applicability of HCP over fifty years and use of Take over fifty years for Endangered Species conservation for the implement TRIAD?

SB1546-1 is in need of clarification and providing content evaluation to share clearly, what it will be allowed legally to accomplish for the State Of Oregon, OSU COF and the public. More work to daylight the factual and legally binding direction and long term financial intent of SB1546-1 should be part of the development of this SB. The current process is occurring at a rapid pace, without full public understanding or involvement, as this bill is rushed to completion during this State Legislative Session 2022. The public stands to loose out in this deal, and State Of Oregon may also have lost out on Billions of Dollars in revenue, that it could have made by considering carbon credit banking to be applied to the ESF. Thanks, R.Foster Corvallis, Oregon.