The mission of the Olympic Forest Coalition is promoting the protection, conservation and restoration of natural forest ecosystems and their processes on the Olympic Peninsula, including fish and wildlife habitat, and surrounding ecosystems.

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We thank all our members and donors for their financial support. If you have not yet contributed, we hope you will become inspired to do so.

We are including a self-addressed envelope for your convenience or, if you prefer, you can donate to OFCO online on our website:

olympicforest.org.





Numbers matter!

President's Column



Fall 2017

OFCO's Fall newsletter is dedicated to the theme of "Challenges to our Forests." There is some good progress, reason for hope, and much inspiration to redouble our efforts to save the wildlife and habitats of the Olympic Peninsula. OFCO is announcing our "Forget-Me-Not Campaign to Save the OP!" Please consider helping to build our base of knowledgeable activists.

Nearly a year into the Trump Administration, key cabinet appointments mean policy changes for forests, wildlife and associated marine waters. A new Forest Chief is in place. Legislative proposals in the House and Senate—touted as responses to wildfire and declining forest health—threaten to eliminate environmental protections and allow logging on all federal lands while taking away judicial review and the right of legal challenge by citizens, while a measure for much-needed changes in funding fire control at the federal level has a champion in our Senator Maria Cantwell. Clearly we need to stay alert and engaged.

Meanwhile, the role of global climate change as a driver of more intensive fires is becoming more obvious, even as we spend more summer days breathing smoky air. Fayette Krause of OFCO reviews the work of a respected forest ecologist who examines this very disturbing connection and discusses management implications.

At the State level, our Public Lands Commissioner took office at a pivotal moment in a long-delayed decision process on protection for Marbled Murrelets, with preferred options too low to prevent extirpation on state DNR lands. Commissioner Hilary Franz is reshaping the process, but we need to ensure that the outcome follows the Conservation Alternative put forward by the Murrelet Survival Project. OFCO's new Wildlife Monitoring Project is already protecting streams and habitat on the West End in the day-to-day implementation of DNR timber sales. And our newest board member, Catharine Copass, has helped OFCO win a small but significant victory in a timber sale review on the OESF.

Commissioner Franz also temporarily banned all new salmon net-pen aquaculture permits but a permanent ban is needed.

The Forest Service has, once again, released a Public Notification of Comment Letter for the Calawah watershed. Its purpose is to develop an Off-Highway

continued on page 2

Vehicle (OHV) trail system and staging area in the Bonidu area within the North Fork Calawah watershed. The proposal would provide about 22 miles of interlinking trails and close/rehabilitate about 6 miles of user-created trails. OFCO submitted an objection letter in 2010, listing all the reasons why such a proposal should not be authorized. Research shows that OHV activities greatly harm the health of creeks, rivers and trails, in addition to causing accidents that often cause fatal injuries to humans. The North Fork Calawah is one of the rivers included in the Wild Olympics Wild & Scenic Rivers proposal.

OFCO and fellow conservation groups need your active participation. Engage on every level you can and keep going; it will be a long hike, but the pristine habitats of our OP are the prize.

OFCO Urges Ban on Salmon Farming

by Lorna Smith

On August 21, Cooke Aquaculture experienced a catastrophic failure of its salmon net-pen farm in the waters of the Salish Sea just off Cypress Island. The accident apparently was precipitated by lax maintenance and safety practices. (The coincidental solar eclipse that same day resulted in no discernible tidal abnormalities.)

Just how many Atlantic salmon were released is still not known, but the pens contained more than 300,000 nearly mature fish at the time. The majority of the fish in the pen escaped. Since that time, in spite of a massive fishing response by the Tribes and sports fishers, thousands of the fish dispersed to areas throughout the Salish Sea from Olympia to Canada, and were documented entering Northwest rivers, where native Chinook are now spawning. Many of the recovered fish were full of eggs.

In response to that catastrophe and because of the serious threats that salmon farming poses to the health of native salmon, to the health of the Salish Sea and to human health, OFCO has registered opposition to all salmon farming in the waters of Washington state.

The issue likely is be taken up in Olympia this coming session; legislators including Rep. Mike Chapman from the Peninsula's 24th District and Sen. Kevin Ranker from Orcas Island have already come forward to take on salmon farms. Although Governor Inslee has declared a temporary ban on the issuance of further permits while the cause of the net-pen failure is investigated, that step is not permanent.

OFCO has sent a <u>letter</u> to the Governor urging a total ban on salmon farming, citing the imperative to protect native species and explaining that escaped exotic fish are likely to spread disease and deprive native fish of food sources, compounding other growing threats to their health and survival (including overharvest, pollution, warming seas and habitat degradation).

OFCO is asking its members to contact the Governor, DNR Commissioner of Public Lands Hilary Franz, and their own representatives to demand a permanent ban on Washington's waters.

Recommended for viewing to learn more about the issue: <u>Salmon Confidential</u>, a documentary about net pens in Canada.

A Path to Recovery for Murrelets?

This fall, the Washington State Dept. of Natural Resources (DNR) proposed to the Board of Natural Resources (BNR) three options for its decision on a "preferred alternative" to meet its obligation to protect Marbled Murrelets.

None of these passes muster. Clearly, DNR's current focus on only minimizing and mitigating incidental take is *insufficient* to comply with its Habitat Conservation Plan (HCP). Unfortunately, DNR is characterizing the Endangered Species Act (ESA) mitigation requirement for the Long-term Conservation Strategy (LTCS) as equal only to the take of birds plus a little more habitat set aside for uncertainty.

In 1997, the U.S. Fish and Wildlife Service (USFWS) set its recovery objectives for the Marbled Murrelets: "... to stabilize and then increase the population size, changing the current downward trend to an upward (improving) trend throughout the listing range." DNR committed to "help meet the recovery objectives of the USFWS, contribute to the conservation efforts of the President's Northwest Forest Plan, and make a significant contribution to maintaining and protecting marbled murrelet populations in western Washington over the life of the HCP." The DNR HCP is a legally binding contract adopted by BNR to ensure compliance with the ESA on DNR-managed lands over the long term.

The current LTCS options are reformulations of alternatives that raised serious concerns for both the Washington Dept. of Fish and Wildlife and the EPA.

The Murrelet Survival Project coalition, of which OFCO is a member, proposed a "conservation alternative" for the LTCS that would meet the State's HCP obligations and support recovery of the murrelets. According to Dr. Kara Whittaker, Senior Scientist & Policy Analyst at the Washington Forest Law Center, "The science shows that significantly greater conservation opportunities are available on DNR-managed lands than the DEIS analyzed and murrelets are at risk of extirpation within the next several decades under the options being proposed. Mitigation must make a significant contribution to recovery and result in improved conditions for the murrelet over time, best measured against the biological goals for the population. A net loss in the population size on DNR-managed lands after 50 years is unacceptable. The BNR has the responsibility to help meet federal recovery objectives and to implement programs and policies that ameliorate economic impacts to the trust beneficiaries."

OFCO and coalition partners are advocating that BNR analyze a true conservation option that fully meets the HCP obligations and will lead to the recovery of Marbled Murrelets. BNR will select a preferred alternative, DNR will complete a Supplemental assessment on the alternative, and then USFWS will review the Final Environmental Impact Statement (anticipated in May 2019). We must ensure that the analysis includes a significant contribution to recovery.

Forget-Me-Not: OFCO Campaign to Save the OP! (Get Ready to Jump In!)



and restoration of natural forest ecosystems and their processes on the Olympic Peninsula, including fish and wildlife habitat, and surrounding ecosystems

lympic Forest Coalition

OFCO is launching an outreach and information campaign to bring our members and the public the best available science, policy analysis, and opportunities for action on issues affecting the Olympic Peninsula. Thoughtful actions directed toward reasonable, science-based solutions to the challenges of our times are needed now! We must find ways to confront climate change and habitat-degrading activities—including misconceived forest practices and militarization of Olympic Peninsula's places—that risk the sustainability of ecosystems and ride roughshod over needs of local communities and listed indicator species. (Also check here for a KCTS-TV clip on the human toll.)

How you can help: Send us an email and request OFCO Forget-me-not Bookmarks to share at your organizational meetings, coffee hours at your faith institution, with your book club, families and friends. Encourage your contacts to join OFCO and receive the OFCO Newsletter and action alerts! Share OFCO web articles and encourage them to take action! Invite OFCO to set up a table or make a presentation to your group or coffee hour. Introduce our recommended books to your book club with OFCO materials—like Maria Ruth's book on murrelets, Rare Bird, or Gordon Hempton's One Square Inch of Silence, or the poetry, essays and natural history writings of Tim McNulty. Help us to build a strong grassroots movement focused on local Olympic Peninsula issues. And please support OFCO with your financial contributions. Thank you!

Paying for Firefighting: Senator Cantwell Champions Needed Reform

Joining a bipartisan group of western senators, Maria Cantwell cosponsored the Wildfire Disaster Funding Act (S.1842 – 2017) to change how we fund firefighting. This past summer, Western Washington residents suffered from dangerous air quality from fires in Oregon, Southeastern Washington and Canada. Not surprisingly, 2017 broke records for acres burned across the U.S. Cantwell noted, as she introduced the bill in September, that already this year, 50 percent more acres burned than in a normal year, adding that "... the trends of the last few years suggest this will likely be our new normal."

While other federal agencies can draw from an emergency fund to respond to tornadoes, hurricanes and floods, the U.S. Forest Service and Interior Department have no such access and are forced to use money from other important programs to cover firefighting. As fire seasons grow longer and wildfires larger, more numerous and costlier to fight, this measure would streamline the budgeting process and put it at parity with other emergency funding.

Senator Cantwell needs to hear from us that we support her efforts to provide adequate funding while avoiding mandates to expand logging and road construction in the name of "fire prevention." The science does not support the premise that these types of activities help save forests, reduce or prevent fires, or assist firefighting efforts.



-U.S. Forest Service

Misnamed House and Senate Bills Would Permit Lawless Logging, Not Fund Firefighting

Resilient Federal Forest Act (H.R.2936 - 2017)

This fall, Congress will vote on legislative proposals said to fund firefighting, but actually serving a very different agenda. Several months back, Rep. Westerman (R-AZ) reintroduced the so-called "Resilient Federal Forest Act." It would increase timber production on federal lands and overturn key environmental laws. But it would **not** fix the firefighting funding problem; it would neither source additional funds nor control expenses. Firefighting funds would still come out of the Forest Service budget.

Here's what it would do: overrule the Roadless Areas Conservation Rule of 2001, opening millions of protected areas to road building and logging; sweep away vital wildlife habitat and ecologically sensitive areas; and eliminate NEPA assessment requirements and environmental impact statements through blanket exemptions or categorical exclusions. Tens of thousands of acres would green-light activities to "reduce hazardous fuels" or "produce timber," expedite salvage logging, and facilitate roadside projects. Further, it would eliminate the requirement that the Forest Service and BLM consult with the Fish and Wildlife Service on possible damage to listed species or critical habitat.

As for legal challenges from citizens, this bill would prohibit restraining orders, preliminary injunctions, or injunctions pending appeals on some projects, and eliminate judicial review of post-fire projects that could undermine drinking-water supplies, habitat recovery and recreation use.

This bill, as a whole or in part, may be attached to "must pass" legislation, such as a budget measure. On a

moment's notice, we may need to raise our voices to stop this type of legislative maneuver.

Forest Management Improvement Act (S.1731- 2017)

Senator Thune (R-SD) introduced this act in August, stating that he intends to work with other members of the Committee on Agriculture, Nutrition & Forestry to incorporate the bill into a forestry title of the 2018 Farm Bill for passage next spring. The bill has provisions similar to Westerman's, including dramatic increases in logging on public lands (citing "fire prevention" as a rationale); categorical exclusions from environmental laws such as NEPA; increased construction of permanent roads; and limits on judicial review. The bill also would allow logging on multiple 10,000-acre parcels without analyzing cumulative impacts on water sources, species or the forest.

As negotiations unfold, we need to stay vigilant. Both Washington senators, Cantwell and Murray, are public forest advocates and will need to hear from us on the need for responsible changes before this flawed proposal reaches the floor.

Please respond right away to action alerts when they drop into your email and pass them along to your contacts. <u>Sign up</u> for legislative updates on the Library of Congress site.

<u>Learn the details</u>; see fact sheets and links to policy analysis by leading national conservation organizations.

A Forest Ecologist Looks at Climate Change and Forest Fires

by Fayette Krause

Dominick DellaSala may not be a household name, but for those concerned with climate change and forest fire ecology, he will become increasingly important. He is president and co-founder (2006) of the Geos Institute of Ashland, Ore., and his goal is leaving a livable world to his daughter and to children everywhere. For this alone, and for his willingness to speak openly and clearly about forests and climate change, he has become a science-based hero for many conservationists in the Pacific Northwest.

In a recent exchange with conservationists, DellaSala made the following important points:

First, climate change plays a role in many, if not all, of the extreme weather events we have experienced. Whether or not intensifying forest fires, floods,

hurricanes, drought, sea level rise and ocean acidification—and the ensuing social injustice associated with them—can be attributed to climate change, all are potentially worsened by the underlying fact that the Earth is warming. Weather will always be with us, but climate change, exacerbated by human inputs, is the new kid on the block.

For the forests, DellaSala notes that we cannot log our way out of the predicament in which we find ourselves. With climate change (and worldwide warmer weather) we have increased the fire season in temperate and boreal forests by two months. It's a long time to be vigilant given hotter, drier weather. Moreover, we are frequently our own worst enemy. The huge fire in the Great Smoky Mountains several years ago, initiated by humans, seems but a precursor to the Columbia River Gorge conflagration of 2017, again set by people. The tinder is there, thanks to a warming world, and the human factor plays an important role in many fires by initiating the flames.

Can we do anything to lessen the impact of forest fires, which likely will increase so long as the warmer, drier climate prevails? First, if we decide to thin, we should thin in the overstocked plantations of 40-to-70-year-old trees, not in older forests. A simplified plantation forest burns more easily once fire gets into even-aged boughs and branches.

Second, where saving structures is an issue, secure them by creating a safety perimeter, not by thinning or logging from the forest toward the structures or towns.

Third, make certain people who build on the forest interface, or actually within the forest, realize fully the risk they are taking. Their building in this zone is analogous to folks who build in the floodplain. Eventually, they may get flooded (or burned) out.

DellaSala makes the point that, with the exception of chaparral fires in southern Calif., forests in the coastal West are actually burning less acreage than 100 years ago. We are, however, rapidly approaching the apex of Anglo-period forest fires and, with a warming climate, we may surpass even the epic fires of the early 1900s. We have put our toe in a new paradigm—a warming Earth. We can listen to our scientists' warnings, or—as some politicians and citizens would have it—we can suppress science. Whether suppressed or not, accurate science remains valid. We owe it to DellaSala's daughter and the children of the world to remember this.

Olympic Peninsula Forest Collaborative Visits Big Creek

In August, the OPFC conducted a site visit to the Big Creek unit in the Skokomish River watershed in the Olympic National Forest (ONF). The group walked over fairly rough terrain, viewing a number of sites with different proposed prescriptions for harvest and non-harvest areas.

The Collaborative is a multi-stakeholder effort with the goal of sustainably managing forests by balancing the needs to improve forest health and protect and restore wildlife habitat, by thinning of younger stands to restore diversity and generate income, ideally using Forest Service Stewardship rules. Stewardship projects return a percentage of the proceeds from the thinning sale to the forest, to be invested in projects such as culvert removal or repair to benefit fish and other aquatic species and improve water quality, road decommissioning, and invasive plant abatement.

The Collaborative visit was aimed at viewing the project, discussing options for prescriptions (leave-trees and harvest methods), and identifying Stewardship projects that could benefit the Skokomish Watershed Action Plan. The sale could generate up to \$400,000 for

restoration projects.

OFCO Board members Jill Silver (ecologist, plant expert) and Toby Thaler (environmental lawyer, forest law and policy expert) participate in the OPFC on behalf of OFCO.

The delegation visited Big Creek. Aides to Rep. Derek Kilmer and Sen. Patty Murray participated, along with ONF silviculturist Mark Sanger, ONF



- Patricia Jones

Natural Resources Staff Officer Tim Davis, and ONF Hood Canal District Ranger Yewah Lau. Mike Anderson and Bob Metzger of the Skokomish Watershed Action Team presented ideas for Stewardship projects in the watershed.

Derek Churchill of Stewardship Forestry, a consultant for the Collaborative, bridges innovative harvest continued on page 6

techniques and environmental protection to ensure that diverse species of trees, plants and wildlife are protected. Dave Marshall, representing industry, worked with Jill, Toby and Derek to evaluate the methodology for thinning the stand, the protections needed, and its economic value to make sure the project would be viable for all involved.



- Patricia Iones

Tooke Picked as Chief of Forest Service

In mid-August, U.S. Secretary of Agriculture Sonny Purdue appointed Tony Tooke as the new Chief of the U.S. Forest Service.

Tooke began working for the Forest Service when he was 18 years old, with all his field experience in the southeastern United States. His prior post was as Regional Forester for the Southern Region.

He also served as Associate Deputy Chief, being the Forest Service Executive Lead for Environmental Justice and oversaw implementation of a new planning rule for the National Forest System. Tooke served as Deputy Forest Supervisor for the National Forests in Florida as well as District Ranger at the Talladega NF in Alabama, the Oconee NF in Georgia, and the DeSoto NF in Mississippi. His other field assignments were on six Ranger Districts in Mississippi and Kentucky.

Residents of our region are concerned that Agriculture Secretary Purdue, a former Georgia governor, and Tooke, also rooted in the southeastern U.S., may not fully appreciate the unique qualities of the Pacific Northwest forests. We all should be vigilant to make sure appropriate decisions by forest managers on the Peninsula are heard and respected by top Forest Service management.

Anatomy of a Timber Sale Review

by Catharine Copass

Editor's note: Our newest board member, Dr. Catharine Copass, is a Port Angeles-based ecologist with exceptional expertise in monitoring and mapping landscape changes. She has worked extensively in national parks in Washington, and is now working with OFCO to bring these skills to bear on state forest lands. Here she describes this work and how it has caught significant errors already in two sales in the Olympic Experimental State Forest (OESF).

OFCO reviews timber sales on state lands in the OESF. The review process begins when we receive notification from the state, including a long SEPA checklist. Detailed timber sale maps show the location of the sale and the outlines of each unit, along with features such as streams, wetlands and roads.

First we overlap the sale with a variety of spatial data in GIS, including aerial imagery, LIDAR (Light Detection and Ranging, a remote-sensing method which generates detailed ground surface maps), stream type location, and forest stand age and condition. When possible, we also try to review the sale in the field. Our review focuses on riparian buffers, unstable slopes, roads, and habitat for Northern Spotted Owls and Marbled Murrelets.

The widths of riparian buffers vary with stream type, with bigger streams requiring wider buffers. Each stream type should be verified by the foresters who lay out the sale, but this is an area where both errors and differences in methodology can lead to very different views of appropriate buffering and sale boundaries. The accuracy of stream typing can be checked by taking direct measurements in the field of the channel banks and other indicators of "ordinary high water." When we can't field review a sale, indirect evidence of stream type can be evaluated using GIS.

Unstable slopes can deliver sediment to streams and rivers. Slope stability integrates geology, soil type, hydrology, and landscape history and disturbances such as previous harvests or road building. DNR relies on a map of potential landslide hazard zones, verified in the field by the forester—sometimes in combination with further site visits or analysis by a licensed geologist. We assess the maps of unstable slopes in order to check that "rule defined" landscape hazards have been excluded from the sale, and type 5 (intermittent small streams) on unstable slopes have adequate buffers.

Road development in the OESF has created a dense network, with many more miles of roads being built than decommissioned. We review the road plan for each sale, and we track the total miles of maintenance or recommissioning of old roads, new access roads and new spur roads within the sale. We also check whether culverts and bridges are sized appropriately for the streams they cross.

With the oldest and most structurally complex forests generally deferred from harvest, most proposed timber sales appear to correctly follow the HCP implementation checklist for both Northern Spotted Owls and Marbled Murrelets. Our review, however, serves several purposes: 1) checking for impacts on older, complex stands and 2) developing data to show the cumulative impacts of the non-zoned approach to managing habitat for these two endangered species.

Our review work has benefits on several scales, the first being the immediate impact of catching significant errors in a proposed sale, such as Bear Lines and 9596. In both cases type 2 streams were mapped as type 3 streams and therefore given much smaller buffers than required. In both cases, the sales were significantly revised, leading to better protection for the steelhead and salmon that rely on these waters. In the longer term, our scrutiny and feedback drive improvements in the forest practice documentation system, and—we hope—in the management of our state trust lands.

Case Update: OFCO v. Coast Seafoods

OFCO attorney Paul Kampmeier will argue OFCO's case against Coast Seafoods in the Ninth Circuit Court of Appeals in Portland, Ore., on November 8 (Case 16-35957, Olympic Forest Coalition v. Coast Seafoods Company).

Coast Seafoods is appealing the judge's decision not to dismiss OFCO's case under the Clean Water Act. Coast is arguing that its Quilcene Seafood operation is not required to apply for a permit to dump unfiltered effluent from its operations directly into marine waters.

OFCO's case, if won, will require the firm to apply for a permit, which will include disclosure of effluents that affect fisheries in Quilcene Bay and associated watersheds. The oral arguments will be video archived available for viewing here.

Navy Expanding Military Operations Again

by Karen Sullivan

In announcing yet another expansion of activities, the Navy is preparing a Supplemental EIS (SEIS) for the Northwest Training and Testing Range (NWTT), which includes all of Puget Sound, the Strait of Juan de Fuca, and coastal and offshore waters from Washington to Northern California. They held no public meetings during the scoping process. What we had thought previously was a Final EIS for NWTT, detailing the levels of activity for the next 20 years, was just "Phase 1." It was published in October 2015 and described extraordinary increases—more than 1,000 percent, for example—on some underwater torpedo/explosive exercises. Unfortunately, when that EIS was published, none of the required endangered species and historic preservation consultations from USFWS, NOAA and the State were complete, which meant the public could not comment on the true scope of impacts before a final decision was made.

In this upcoming SEIS, the Navy will also analyze Growler impacts over the Olympic Peninsula. OFCO has requested this repeatedly. In our comment letter to the Navy, we also requested that they analyze noise for all 157 Growlers, not just the 36 covered in the most recent EIS. We asked for a cumulative impacts analysis, consideration of chronic as well as acute noise, adequate time to read and comment, and for the Navy to upgrade its methodology for measuring noise impacts. The current software they use is woefully outdated and does not account for the low-frequency noise made by Growlers; a Dept. of Defense research committee concluded that their noise analyses may not be legally defensible.

We also asked the Navy to stop using a 28-year-old scientific literature review to support their claims of no significant impacts, and to use more recent scientific research. Most crucially, we asked all of the agencies whose activities impact Marbled Murrelets to coordinate with each other; currently, this is not happening.

The SEIS is in addition to 36 major projects listed in a spreadsheet for 2016–2018, whose Environmental Impact Statements represent major increases in impacts on human health, threatened and endangered species and their habitats, and the economic health of communities. We hope the Navy hears our concerns.

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