



*The League of Women Voters of Oregon is a 101-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.*

August 4, 2021

To: Oregon Global Warming Commission, Catherine MacDonald, Chair

Email: [Oregon.GWC@Oregon.gov](mailto:Oregon.GWC@Oregon.gov); [cmacdonald@tnc.org](mailto:cmacdonald@tnc.org)

Re: OGWC final draft of Natural and Working Lands Proposal – **Support with comments**

The League of Women Voters of Oregon's expectation was that the Oregon Department of Forestry (ODF) and other agencies specified in Governor Brown's [EO 20-04](#) would be presenting their final plans to meet the Governor's climate goals on June 30 (now extended to August 4). ODF has not yet provided its final plan.

Each agency called out in the Executive order was directed to provide their agency's plan towards meeting these specific targets collectively to "reduce its GHG emissions by: (1) at least 45 percent below 1990 emissions levels by 2035; and (2) at least 80 percent below 1990 emissions levels by 2050." In 1990, there were **56 million metric tons of CO<sub>2</sub>e** emitted annually in Oregon.

The unfunded Oregon Global Warming Commission was charged by the Governor to develop and submit a **proposal for setting a carbon sequestration goal** for Oregon's natural and working lands, working in conjunction with ODF, Oregon Dept. of Agriculture (ODA) and the Oregon Watershed Enhancement Board (OWEB). The OGWC proposal points out that this carbon sequestration "equates to a **reduction to 32 million metric tons CO<sub>2</sub>e (MMTCO<sub>2</sub>e) in 2035 and 12 MMTCO<sub>2</sub>e in 2050**. Aligning with the new federal economy-wide goal of reducing in-state emissions by at least 50 percent by 2030, Oregon would need to reduce net emissions to at least 32 MMTCO<sub>2</sub>e by 2030. Assuming a constant level of emissions reduction from 2019 to 2050, our current emissions target for 2030 is approximately **40 MMTCO<sub>2</sub>e**."

The LWVOR's new forestry positions adopted this summer state: *"all benefits of the forests—ecological, human and economic—are inextricably interconnected. Healthy forests are essential to habitat for a diversity of plant and animal life, to the hydrologic cycle, and to carbon storage to mitigate global warming. In addition, healthy forests are essential to a forest products industry with the jobs and goods they provide, and to the economic and aesthetic values of their recreational opportunities. Therefore, The League of Women Voters of Oregon supports laws and policies to ensure that forest management (for timber extraction, recreation or any other activity) is carried out in a manner that will sustain healthy forests, streams and habitats." In addition, one of our forestry positions says "Full accounting of all costs, including cumulative ecological impacts, of timber harvests and other forest uses must be considered in forest activity decisions."*

We are delighted to see that the OGWC also recognizes these values in their current proposal, released on July 19<sup>th</sup>. We are glad to see the commission has incorporated the many hours of

public testimony and scientific research that they solicited in coming up with their recommendations. They affirmed that natural and working lands can play a significant role in reducing atmospheric CO<sub>2</sub>e carbon emissions.

They state that as of 2019 data, Oregon's trees currently sequester 12% of US emissions annually, but this figure could be increased by 10-20% by sequestering **an additional 4 to 7 MMTCO<sub>2</sub>e per year** in Oregon's natural and working lands and waters **by 2030**, and 5 to 8 MMTCO<sub>2</sub>e relative to a 2010 to 2020 net carbon sequestration business-as-usual baseline. This is their Outcome-based Goal which can be achieved through "climate smart forestry practices." The OGWC recommends that ODF evaluate a bold set of scenarios including: **"lengthening harvest rotations on state and private forest lands; increasing protections for mature and old growth forests on state and federal lands as well as areas with high carbon storage potential and co-benefits for threatened and endangered species and improved water quality; implementing forest resilience treatments in fire-prone forests; and reforesting understocked stands and riparian floodplain habitats,"** which are the recommendations of the Oregon Climate Action Plan Natural and Working Lands Table in which the League participated, as well as those of many other conservation groups and climate scientists. We support these recommendations.

Another recommendation we heartily support is to **adopt revisions to the Oregon Forest Practices Act to improve climate mitigation and adaptation outcomes on private lands in Oregon**. Although the Private Forest Accord (MOU) is expected to make recommendations on the Forest Practices Act this fall for adoption in the next session, there is no way to know which climate issues are being considered or are beyond the scope of the MOU.

**What we had hoped to see is a plan coming from the OGWC with target reductions starting immediately.** Instead of recommending suggested metrics and specific goals for sequestration to start the process going, with actionable plans for increasing tree seedling development, their final recommendation is to start yet another funded committee, the **Natural and Working Lands Council**, to make metrics decisions! We had high hopes that this commission would be doing this work, working in conjunction with climate and technical experts at ODF and ODA! The OGWC knows the annual increases in sequestration capacity needed to meet the CO<sub>2</sub>e 20-04 emission reduction goals, yet you defer the decision-making to a newly created and paid committee without scientific expertise to work out the details of OGWC's goals, and that will result at the least another year of delay. **Why not start with assigning a number of acres for afforestation and reforestation this coming year, and then add or decrease these acres as needed, as future research comes in and the wildfire losses are calculated?** There will never be enough research, but action must get started today! ODF could be tasked with locating these added acres. We simply cannot wait for more federal guidance, legislation and funding before we start. The emissions we could be reducing can't wait another minute. The planet is burning up while we delay and delay, with only a handful of years left to stop irreversible damage.

We understand that the OGWC is requesting quite a bit more funding to support these goal recommendations. LWVOR supported funding for OGWC in the 2021 session. However, we are concerned with the request to fund another new group, recommending that "the Legislature should fund and the state should convene a blue-ribbon panel to develop a strategic plan for how to best facilitate adoption of the climate-smart forest management strategies..." Yet another

funding request is for commissioning a study to evaluate the feasibility of potential funding mechanisms the state could establish to support natural and working lands sequestration strategies. A third request is for “strategic investment of state funds in the capacity to take advantage of new federal opportunities.” And “The Legislature should fund and direct DLCD to conduct an analysis of Oregon’s Statewide Planning Goals.” Other recommendations are funding for incentives and for OWEB (Oregon Agricultural Heritage Program), forestry, agriculture, and blue carbon.

And the final large funding request: “In order to continue to advance a natural and working lands sequestration goal and strategies, the Legislature should fund and create a Natural and Working Lands Council. The Council should be charged with establishing a baseline for the outcome-based goal and the activity and community impact metrics within a year of its establishment. To ensure that the metrics put the most vulnerable communities at the forefront of the potential benefits of increasing carbon sequestration, the Natural and Working Lands Council should be composed of a diverse group of council members, including BIPOC and Tribal representatives, as well as land managers, technical experts, conservation interests, and technical assistance providers.” Although LWVOR believes the OGWC certainly needs funding for this work, we are concerned that this funding discussion will take the place of action and add to delays—action that is needed NOW!

Given that climate change is already devastating the planet and forestry and certain agricultural practices can play a huge role in reducing emissions and keeping the planet cool, the lack of specific, quantifiable, measurable steps to be taken in this document is a disappointment, especially as it relies on voluntary participation exclusively, with monetary incentives and “recognition events” rather than regulation, although the Dept. of Justice (DOJ) has clearly established that ODF, (along with ODA and OWEB and DEQ) already have the regulatory authority to develop carbon offsets, and make much-needed reforms to the Forest Practices Act. We think the OGWC should be funded to continue the work they are recommending. We were very disappointed that Ways and Means included only minimal funding (.5 to 1 FTE) for ODF’s POP 160 this session, to staff the agency’s work on addressing our dire climate emergency. Clearly, addressing climate issues is a high priority of Board of Forestry members as well as the general public and certainly for LWVOR. We think that you are in the best position to make tough decisions and create these metrics yourselves in consultation with ODF’s and OSU’s climate scientists and technical staff, based on current best science, climate-smart forest practices and the existing FIA inventory already at hand. This includes defining “the number of acres with adoption of soil health practices, acres of maintained resource lands, acres of riparian reforestation, and acres of urban forest canopy expansion, etc.”

The work is outlined in ODF’s Climate Change and Carbon Draft Plan:

- “Slowly extend harvest rotations to increase storage while maintaining wood fiberflow to the forest industry.
- Identify areas particularly susceptible to the deleterious effects of climate change and work to conserve them. This includes climate-sensitive habitats, areas of high conservation value, and areas of cultural significance that may become threatened by climate change...with input from tribal and community-based organizations.

- Explore aspects of community forests and operationalize these interests and facets to the extent practical... Public-private partnerships may provide communities with a greater ability to successfully manage the forests that surround and support them.
- Restore insect and disease impacted areas to productive forests through removal of susceptible species and use of site appropriate species and...managed to restore ecosystem services, including carbon sequestration, through the use of appropriate alternative species and stand management.
- Identify areas that have high carbon storage potential, especially for those that can provide benefits for threatened and endangered species habitat, water quality, and educational and recreation opportunities for Oregonians.
- Identify and operationalize carbon storage in harvest operations. Establish a mechanism to maintain forest carbon on the site when stands are harvested by increasing soil carbon with woody debris, utilization of biochar ... and additional alternatives to burning biomass in the forest.”

The metrics should include a prioritized list with dates identified to meet specified target goals that relate to the amount of MMT of CO<sub>2</sub>e to be reduced, and the number of acres that will be treated for adaptation (prescribed fire, thinning, afforestation and reforestation) and the regions identified where this treatment work will be done. **Some of this work is included in the recently passed SB 762 (2021).** Carbon accounting must also include fossil fuel emissions from all forestry operations, including the transportation of logs and wood products, which currently is not included in forest carbon calculations, which some scientists calculate produces greater emissions than the transportation sector.

The OGWC and ODF might consider creative options, other than relying on funding by the Legislature. Is there a way to combine [forest easements](#) with a commercial [forest offset market, consolidated and managed by a state or federal agency](#)? ODF could set standards similar to the [Forest Stewardship Council \(FSC\)](#) requirements for these easements and create a competitive [reverse auction](#) that would compensate private forestland owners willing to preserve their mature and natural mixed forests, and harvest on longer rotations.

To help increase the tree nursery supply, small and large forest owners could be encouraged and advised on how to collect and plant a variety of tree seeds from their own properties for sale. These seedlings would be suited to the local weather conditions, soils and elevations, thereby increasing diversity to meet changed climate conditions. Other potential creative solutions to assure longer rotations and better climate-smart forestry practices can be found [here](#). We hope the OGWC consider other creative options.

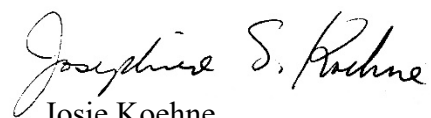
We appreciate all the work that has been done on this plan but believe more can be done to address the urgency of our climate emergency. We look forward to working with you to address this urgency. Thank you for the opportunity to provide public input on this draft document.



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