submission from Keep Oregon Cool

Name: Janet Unruh

Email Address: unruh.janet@yahoo.com

Subject: Yes, let's keep our cool!

Message: Keep me in touch with what you're doing. I would like to see a lot more trees being planted and a lot more being done to ward off wildfires!

from <u>Keep Oregon Cool</u>

Name: Kathleen Worley

Email Address: worleyk@reed.edu

Subject: Management of Natural and Working Lands

Message: As you set management goals for these lands, I strongly urge you to consider how your decisions will affect climate changes. Our few remaining old growth forests are both superb at storing carbon and most resilient to change due to their diversity of plant, animal and soil communities. Having worked on trails in fire-damaged areas of the Gorge, seeing how the forest regenerates if left to its own devices, I am particularly concerned about post-fire salvage logging in the Cascades. Such logging leaves damaged soils, releases carbon, pollutes water and, if replanted, usually results in single-species, evenaged forests designed for future logging. While I understand cutting hazard trees along highways, there is no need to log along miles of abandoned logging roads. Let the forests restore themselves, which they have done expertly for centuries. And protect the remaining ancient forests!

submission from Keep Oregon Cool

Name: Elizabeth Dix

Email Address: elizabethcdix@gmail.com

Subject: Climate-smart forestry

Message: The Governor's Executive Order (20-04) charges a 45% reduction in emissions by 2035 and an 80% reduction by 2050. A parallel effort in forest carbon storage and sequestration could be a 20% increase in carbon storage over 1990 levels by 2035, and an 50% increase by 2050. This level of ambition is achievable according to recent studies (Law et al 2018), but would still require significant modernization of Oregon's forest policies. Further, we should seek to reduce emissions in the forestry sector by at least 15% by 2030.

Climate-smart forestry offers a unique opportunity to both sequester carbon and reduce greenhouse gas emissions in our state.

Our forests are huge stores of carbon, both in the standing biomass (trees and other vegetation) and the soils. Unfortunately, current timber management results in soil degradation (particularly as a result of clearcutting) as well as reduction in the above-ground biomass as a result of short rotation harvests. By extending the harvest rotation and placing more value on protecting mature and intact old growth forests so that they can continue to store and sequester carbon, we can substantially increase the carbon sequestration capacity of our forests.

Unfortunately, the Oregon Forest Practices Act appears to be barrier as it fails to encourage carbon storage and sequestration on nearly 10 million acres of Oregon forests and may need to be updated or revised to reflect the climate crisis we face right now.

This is a huge job and I thank you for taking the time and effort to take steps in making a difference here in Oregon.

Thank you! Elizabeth

from Keep Oregon Cool

Name: Fergus Mclean

Email Address: willamettedams@Q.com

Subject: Forestry Policy

Message: GWC should build on the Forest Carbon Accounting Project report by investigating and supporting research on carbon assessment technology to provide more accurate monitoring of existing forest carbon as well as changes from management practices and other impacts. With some of the densest carbon ecosystems, Oregon should lead the quest for accurate carbon assessment, which should become a state priority because of its promise for bringing revenue to smaller landowners who wish to maintain their forests in carbon reserves. A world-class research institute devoted to climate-smart and ecological forest management should be established in an Elliott Forest Research Institute operating within the Common School Fund, administered by DSL under the direction of the Land Board.

submission from Keep Oregon Cool

Name: Mark McLeod

Email Address: SustainableMcLeod@gmail.com

Subject: Promote climate-smart forestry

Message: Mark McLeod 2602 SE 28th Pl. Portland, OR 97202 510-757-4954 SustainableMcLeod@gmail.com

April 26, 2021

To: The Oregon Global Warming Commission

I am aware that the Commission is currently considering what goal to set with respect to Oregon's Natural and Working Lands.

I suggest that the Commission promote "climate-smart forestry." This would include:

a. Practicing "forest stewardship" that increases carbon storage across the forest landscape.

b. Recognizing the need to increase "forest resilience." Keep the forests of the Pacific Northwest standing for 80 or more years, which will provide good timber production while increasing stored carbon.

c. Keeping more diverse species of trees – especially mature and old growth trees – on the land. As you know, this will increase stored carbon, promote biodiversity, and protect our drinking water.

I recently drove from Bend to Eugene, and much of the route followed the path of the magnificent McKenzie River. This was one of the many areas that was devastated by the wildfires of early September, 2020. It was heartbreaking and shocking to see the amount of destruction that that fire unleashed in a few brief days. As a state, we need to do everything we can to protect forests like those along the McKenzie by rigorously practicing "climate-smart forestry." Now that we are, by necessity, going to be growing new forests to replace those that burned in 2020, we have the opportunity and the responsibility to embrace "climate-smart forestry" best practices.

Mark McLeod

from <u>Keep Oregon Cool</u>

Name: MAGGIE ONEAL

Email Address: maggieact@fastmail.com

Subject: climate smart forestry

Message: When I first visited Oregon decades ago, I remember being most impressed by the trees: their age, beauty, and extensiveness. Ten years ago, I became a resident of Oregon and have since felt a more personal relationship with its trees. Because of that, I'm writing to support climate smart forestry. As a research scientist in another field, I value what research can tell us about how best to manage resources. From what I understand, one of the most viable options for preserving Oregon's forests is to allow trees to remain standing longer before they are logged. Apparently, permitting trees to stand 80 years or more increases stored carbon and provides good timber production. Besides sequestering carbon, wise forest stewardship would protect our drinking water supply and promote biodiversity. In sum, I'd really like to see Oregon embrace climate smart forestry.

Margaret F. O'Neal, Ph.D.

from Keep Oregon Cool

Name: Judy Wilder

Email Address: j.earthlover@gmail.com

Subject: Forests

Message: This is to urge you to provide for climate smart forestry/stewardship of the forest that increases carbon storage while also recognizing the need to increase forest resilience. Research shows that the biggest bang for the buck from natural climate solutions is to keep trees in Pacific Northwest forests standing longer before logging them – 80 years or more can provide good timber production while increasing stored carbon. We also need to keep more diverse species of trees - especially mature and old growth trees - on the land to increase stored carbon, promote biodiversity and protect our drinking water supplies.

I'm particularly concerned about:

1. diversity, which makes us all more resilient

2. drinking water, because the majority of drinking water sourced in Oregon is filtered through forests. Thank-you

from Keep Oregon Cool

Name: Teresa McFarland

Email Address: terefar@mykolab.com

Subject: Climate smart forestry

Message: Please promote climate smart forestry! It's crucial for the health of our people and environment.

We can leave trees growing for much longer to increase carbon storage and forest resilience. We also need to keep more diverse species of trees - especially mature and old growth trees - on the land. If we do this, we increase stored carbon, promote biodiversity and protect our drinking water supplies. Please, this is important!

from Keep Oregon Cool

Name: Emily Polanshek

Email Address: emilypolanshek@msn.com

Subject: Forestry

Message: Esteemed OGWC members:

I urge you to adopt stringent goals for Oregon's Natural and Working Lands to increase carbon capture through climate-smart forestry practices.

Climate smart forestry relies on forest stewardship that increases carbon storage across the forest landscape while also recognizing the need to increase forest resilience. Research shows that the biggest benefit of natural climate solutions is to keep trees in Pacific Northwest forests standing longer before logging them – 80 years or more can provide good timber production while increasing stored carbon. We also need to keep more diverse species of trees - especially mature and old growth trees - on the land. If we do this, we increase stored carbon, promote biodiversity and protect our drinking water supplies.

Storing more carbon for longer periods will benefit the entire planet as well as Oregonians. I have read that the Oregon Forest Practices Act fails to encourage carbon storage and sequestration on nearly 10 million acres of Oregon forests and badly needs to be updated and revised to reflect the climate crisis we face.

Please take a bold stand in favor of a livable planet and clean drinking water for Oregonians through the goals you set for smart forest management.

Thank you. Sincerely, Emily Polanshek of SW Portand, 97219

from <u>Keep Oregon Cool</u>

Name: Joseph Stenger

Email Address: joseph.stenger@gmail.com

Subject: Forestry practices

Message: Oregon's forests are a precious resource, and a powerful asset in slowing climate chaos. With proper stewardship, our forests can become more diversified, more resilient against drought, fire and disease, and increase as a much- needed carbon sink. These principles should be central to forest policy: maximize community benefits through good jobs that promote fire-resistance through strongest ecological health, that promote sequestration of carbon, that promote hardy wildlife, that promote equity for impacted communities, and that support bringing in recreation dollars. Both we and the opossums will thank you!

from Keep Oregon Cool

Name: Peggy Harkins

Email Address: fiberalchemy@comcast.net

Subject: Oregon's Natural and Working Lands

Message: As an Oregon resident I have been a enthusiast of our forests not just for the beauty they provide but because they can be real work-horses in protecting us from the damage of man-made climate change.

We need climate-smart forestry practices to include keeping the trees in our forest for a minimum of 80 years and to have our forests diverse. These types of practices capture the excess CO2 in our environment, slowing the affects of climate changes due to a warming planet. Please promote climate smart forestry! Thank you!

from Keep Oregon Cool

Name: Nyla Jebousek

Email Address: nljebousek@gmail.com

Subject: Climate Smart Forestry

Message: I support climate smart forestry. Climate smart forestry relies on 'forest stewardship' that increases carbon storage across the forest landscape while also recognizing the need to increase *forest resilience*. Research shows that the biggest bang for the buck from natural climate solutions is to keep trees in Pacific Northwest forests standing longer before logging them – 80 years or more can provide

good timber production while increasing stored carbon. We also need to keep more diverse species of trees - especially mature and old growth trees - on the land. If we do this, we increase stored carbon, promote biodiversity and protect our drinking water supplies.

from Keep Oregon Cool

Name: Kristin Guest

Email Address: kguest@seattleu.edu

Subject: Promote Climate Smart Forestry

Message: To whom it may concern:

I love Oregon's forests and relatively clean air, and think it is vital that we protect these in the face of urgent threats from climate change. So I urge you to promote the climate smart forestry practices that will allow us to meet the Governor's goals to reduce greenhouse gas emissions in Oregon. This means keeping trees longer before logging them (and this can also yield good timber production!), and keeping more diverse species of trees -- especially old growth and mature trees -- in our forests. Please work toward these practices before it is too late!

from Keep Oregon Cool

Name: David DeVore

Email Address: the2devores@gmail.com

Subject: Use forests to combat climate change

Message: When working on legislation please consider these concepts. Smart forestry that increases sequestration of carbon needs to be a major goal. Letting forests grow longer before any logging (at least 80 years). Nature is diverse so we need diversity in tree species. Mature and old growth are essential for maintain ecosystems and protecting water for wildlife and people. Oregon can be a leader in combating climate change and a model.

Promote climate smart forestry in Oregon's Natural and Working Lands

Dear Oregon Global Warming Commission,

I am writing in support of climate smart forestry - which provides a unique opportunity to both sequester carbon and reduce greenhouse gas emissions in our state. Climate smart forestry relies on forest stewardship that increases carbon storage across the forest landscape while also recognizing the need to increase forest resilience. Research shows that the best value

from natural climate solutions is to keep trees in Oregon forests standing longer before logging them – 80 years or more can provide good timber production while increasing stored carbon. We also need to keep more diverse species of trees - especially mature and old growth trees - on the land. If we do this, we increase stored carbon, promote biodiversity and protect our drinking water supplies.

Unfortunately, the Oregon Forest Practices Act is a barrier as it fails to encourage carbon storage and sequestration on nearly 10 million acres of Oregon forests and badly needs to be updated and revised to reflect the climate crisis we face. The Governor's Executive Order (20-04) sets a 45% reduction in emissions by 2035 and an 80% reduction by 2050. A parallel effort in forest carbon storage and sequestration could be a 20% increase in carbon storage over 1990 levels by 2035, and an 50% increase by 2050. This level of ambition is achievable according to recent studies (Law et al 2018), but would still require significant modernization of Oregon's forest policies. Further, we should seek to reduce emissions in the forestry sector by at least 15% by 2030.

Please consider this as you set your goal for Oregon's natural and working lands.

Sincerely,

Jane Comeault

2905 NE Schuyler St

Portland OR 97212

from Keep Oregon Cool

Name: Garlynn Woodsong

Email Address: garlynn@woodsongassociates.com

Subject: We need rapid action on climate and forests

Message: Oregon is way behind the curve. We're now seeing peer states and countries set aggressive goals for climate action, like the EU's 78% below 1990 emissions by 2035, and California's 30 by 30 goal to restore 30% of the state's lands for conservation by 2030.

Oregon needs new goals. We should seek an 80% reduction in emissions below 1990 by 2035. We should set a goal to preserve 30% of the state for conservation by 2030, but go further, and also set a goal of preserving 40% by 2040, and 50% by 2050.

We must immediately ban the practice of clear-cutting statewide, and along with it, aerial spraying.

Indeed, we must ban the use of bee-killing pesticides statewide, except when in special instances when it is hand-applied for the purposes of restoring native species and NO OTHER ALTERNATIVE IS AVAILABLE; in these cases, it should only be legal to use with an annual permit, to allow for the possibility that technology will quickly deliver an alternative to bee-killing pesticides for these

applications.

We must replace clear-cutting with selective harvest as the only acceptably forestry practice anywhere in the State of Oregon, whether on private or public lands. This will help to grow our rural economies, as well as to reduce carbon emissions, increase carbon sequestration, increase the yield per acre from forest lands, and increase the habitat value of those lands.

In short, we must make an immediate statewide transition to climate smart forestry. Climate smart forestry relies on forest stewardship that increases carbon storage across the forest landscape while also recognizing the need to increase forest resilience. Research shows that the biggest bang for the buck from natural climate solutions is to keep trees in Pacific Northwest forests standing longer before logging them – 80 years or more can provide good timber production while increasing stored carbon. We also need to keep more diverse species of trees - especially mature and old growth trees - on the land. If we do this, we increase stored carbon, promote biodiversity and protect our drinking water supplies.

from Keep Oregon Cool

Name: Pat DeLaquil

Email Address: pdelaquil@gmail.com

Subject: Comments to the April 16 Meeting – Climate Goals for Oregon's Natural and Working Lands

Message: The Governor's Executive Order (20-04) charges a 45% reduction in emissions by 2035 and an 80% reduction by 2050. A parallel effort in forest carbon storage and sequestration could be a 20% increase in carbon storage over 1990 levels by 2035, and a 50% increase by 2050. This level of ambition is achievable according to recent studies (Law et al 2018), but would still require significant modernization of Oregon's forest policies. Further, we should seek to reduce emissions in the forestry sector by at least 15% by 2030.

Climate-smart forestry offers a unique opportunity to both sequester carbon and reduce greenhouse gas emissions in our state. Climate smart forestry relies on forest stewardship that increases carbon storage across the forest landscape while also recognizing the need to increase forest resilience. Research shows that the biggest bang for the buck from natural climate solutions is to keep trees in Pacific Northwest forests standing longer before logging them – 80 years or more can provide good timber production while increasing stored carbon. We also need to keep more diverse species of trees - especially mature and old growth trees - on the land. If we do this, we increase stored carbon, promote biodiversity and protect our drinking water supplies.

Unfortunately, current timber management results in soil degradation (particularly as a result of clearcutting) as well as reduction in the above-ground biomass as a result of short rotation harvests. By extending the harvest rotation and placing more value on protecting mature and intact old growth forests so that they can continue to store and sequester carbon, we can substantially increase the carbon sequestration capacity of our forests. Unfortunately, the Oregon Forest Practices Act is a barrier as it fails to encourage carbon storage and sequestration on nearly 10 million acres of Oregon forests and badly needs to be updated and revised to reflect the climate crisis we face.

I urge the OGWC to research and recognize these facts in its report and urge that SCC calculations use a

discount rate no greater than zero. Sincerely, Dr. Pat DeLaquil !55 SE 16th Ct Gresham, OR 97080

Dear Oregon Global Warming Commission,

Please accept this letter signed by 24 organizations representing thousands of Oregonians supporting inclusion of Blue Carbon in recommendations to the Governor's Office regarding the Natural and Working Lands Sequestration Goals.

Also, what is the protocol for signing up to provide oral testimony at the Commission meeting this coming Friday? I couldn't find any info on that on the website.

Thank you,

Joe Liebezeit

Staff Scientist & Avian Conservation Manager

Portland Audubon

Office: 971-222-6121

Letter below

Bonneville Environmental Foundation Columbia Land Trust Environment Oregon Friends of South Slough Reserve Haystack Rock Awareness Program, City of Cannon Beach League of Women Voters of Clackamas County League of Women Voters of Oregon MidCoast Watersheds Council North Coast Rocky Habitats Coalition Northwest Guides and Anglers Association Northwest Steelheaders Oregon Association of Conservation Districts Oregon Boating Foundation Portland Audubon Robertson Environmental LLC Sierra Club Oregon Chapter The Wetlands Conservancy Tillamook Estuaries Partnership Wild Salmon Center

Local, coastal and statewide organizations support action by Oregon Global Warming Commission to protect blue carbon habitat Dear Chair Macdonald and Commissioners:

On behalf of our organizations across Oregon, we write to encourage the Oregon Global Warming Commission to ensure that tidal marshes, eelgrass beds, and forested tidal wetlands – collectively known as "blue carbon" for their ability to store greenhouse gases – are included in its proposal to the Governor for consideration of adoption of new state goals for carbon sequestration and storage by Oregon's natural and working landscapes (re: Executive Order 20-04). Oregon's coastline is blessed with 22 major estuaries from the mighty Columbia River Estuary that separates Washington and Oregon to the small Winchuck River Estuary near the California border. Where Oregon's forests and rivers meet the ocean, estuaries are the engines that power salmon, water birds, Dungeness crab, oysters, forage fish, cultural resources and jobs for many walks of life in coastal communities. Estuaries are also key to the calculus of climate change in the region: accounting and seeking protection for estuaries and other blue carbon habitats will help increase greenhouse gas storage while providing numerous co-benefits: helping to mitigate ocean acidification, supporting ocean, bay and river fisheries, and safeguarding coastal communities from increased storms and floods. Though small in size, conserved and restored tidal marshes, eelgrass beds, and forested tidal wetlands on our coast can play an outsized role helping Oregon reduce its carbon footprint while building resilience in the face of inevitable changes being brought about by a warming planet. Oregon's Global Warming Commission will incentivize and advance greater conservation and restoration efforts by accounting for blue carbon captured and stored in coastal habitats through inventories, and then by proposing goals and pathways to maintain and increase this critical habitat. Oregon's people and special coastal places will benefit from this important inclusion in how the state addresses the climate challenge.

Sincerely, Todd Reeve, CEO Bonneville Environmental Foundation Corvallis, Oregon

Harv Schubothe President Cape Arago Audubon Society Bandon, Oregon

Andrew Collins-Anderson Communications Director Coast Range Association Corvallis, Oregon

Dan Roix, Conservation Director Columbia Land Trust Portland, Oregon

Celeste Meiffren-Swango State Director Environment Oregon Portland, Oregon

Christine Moffitt President Friends of South Slough Reserve Coos Bay, Oregon

Kelli Ennis Director Haystack Rock Awareness Program, City of Cannon Beach Cannon Beach, Oregon

Carol Loesche President League of Women Voters of Deschutes County Bend, Oregon

Rebecca Gladstone President League of Women Voters of Oregon Salem, OR

Debbie Kaye President League of Women Voters of Portland Portland, Oregon

Nancy Murray Treasurer, Board Member League of Women Voters of Clackamas Co. Portland, Oregon

Michael Broili Board Member/Vice Chair MidCoast Watersheds Council South Beach, Oregon

Margaret Treadwell Coordinator North Coast Rocky Habitats Coalition Astoria, Oregon

Chris Hager Executive Director Northwest Steelheaders Portland, Oregon

Bob Rees Executive Director Northwest Guides and Anglers Association Clackamas, Oregon Jan Lee Executive Director Oregon Association of Conservation Districts Sandy, Oregon Brian Getting Executive Director Oregon Boating Foundation Newport, Oregon Phillip Johnson Executive Director Oregon Shores Conservation Coalition Seal Rock, Oregon Joe Liebezeit Staff Scientist Portland Audubon Portland, Oregon Paul Engelmeyer Ten Mile Creek Sanctuary Manager Portland Audubon Yachats, Oregon Paul Robertson Environmental Scientist \ Owner Robertson Environmental LLC Lincoln City, Oregon Debra Higbee-Sudyka Vice-Chair Conservation Committee Sierra Club Oregon Chapter Portland, Oregon Katie Ryan Executive Director The Wetlands Conservancy Portland, Oregon Mark Trenholm Coast Program Director Wild Salmon Center Portland, Oregon

COMMENTS TO OREGON GLOBAL WARMING COMMISSION re: CLIMATE SMART FORESTRY

My name is Mark Buckbee.

I am a professional forester who worked for the Bureau of Land Management in Western Oregon for 34 years. I am now retired but am active in the Society of American Foresters. Before getting into my points, I want to recommend that your committee draw information from the *Forest Climate Working Group Report*. It is a well prepared and comprehensive report, co-signed by dozens of forest sector organizations.

https://forestclimateworkinggroup.org/wp-content/uploads/2020/04/FCWG-Policy-Platform-V11.pdf

My comments to the Oregon Global Warming Commission are my own:

Setting minimum rotation age

Industrial forest owners have largely moved to a short rotation for their plantations. This was driven by multiple economic factors. Their mills are now tooled to handle certain size logs. Their forest stands are managed more or less on a sustainable flow basis. If companies are required to defer harvest of stands due to sequestration mandates, that will lead to a reduced log flow in the short to medium term. This is truly problematic and could lead to perturbations in the industry. I think that any program to lengthen stand rotations should be a voluntary system with incentives.

Loss of forestland to wildfire

The fires of 2020 highlighted the problem of wildfire in Oregon. CO2 emissions from these fires was immense, surpassing emissions from our Energy and Transportation sectors. Oregon needs to better manage its forests for resiliency and resistance to destructive wildfire. This includes fuel reduction through thinning and prescribed fire. This is particularly a problem on Federal and State Forests where forest management is increasingly constrained. You should encourage public land managers to manage their forest for fire resistance and resiliency.

Failure to harvest and replant all lands on public forests

Almost 2/3 of Oregons forestlands are public, mostly USFS and BLM. Management plans for both of these organizations includes the majority of forests being in reserves. Increasingly, these reserves are being burned in wildfires. Post fire, these stands are left to rot and over several decades, contribute enormous CO2 loads into the atmosphere. It makes much more sense to sequester that carbon in long-lived wood products. Additionally, neither the USFS nor the BLM are required to reforest reserve status stands burned in wildfires. This can delay reforestation by many decades, and meanwhile we lose the opportunity to sequester carbon in trees. You should pressure the public land manager to reforest all land, irrespective of Land Use Allocation.

Keeping forest lands in production

97% of Oregons non-federal forest land in 1974 is still forestland. Conversion of forestland to other uses is twice that rate in Washington. This is because of our Statewide Planning Goals and our Forest Practices Act makes it profitable to manage forests for commodities. State rules and regulations which make it more difficult or expensive to manage private forestlands will result in increased forest conversion, less management and less carbon sequestration. Do not disincentivize active forest management.

annamorrison55@aol.com

Oregon's Forest Products industry is already contributing to capturing and storing human-caused emissions. I am adamant that you not decide to implement more regulations that will hinder our industry from it's ability to continue to contribute to the carbon solution.

Instead the commission should be focusing on incentive-based mechanisms that encourage maintaining Oregon's timber lands and stop anymore unnecessary regulations that hinder small timber businesses

from being operational. What you are considering will create a potential 60,000 carbon neutral jobs loss in rural communities.

Also, the demand for all types of wood products is higher than ever. Due to the sky high price of lumber, the cost of a new house has increased approximately \$40,000 in some areas. Reducing timber harvest will only increase net emissions depending on what products are used instead of wood or worse shift demand for wood products to some other area with likely weaker or no environmental laws.

In 2007 and 2008, the International Panel on Climate Change determined that in "the long term, a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, *while producing an annual sustained yield of timber, fiber or energy from the forest, will generate the largest sustained mitigation benefit".*

Wood buildings produce less air and water pollution, require less energy and generate less carbondioxide emissions than other building materials. In fact, building with wood instead of steel and concrete would reduce CO2 emissions by 20 percent.

If the state truly wants to pursue a meaningful carbon mitigation policy for working forests, it should be leaning hard on the federal government to re-open federal forests to harvest.

Please make my testimony part of the hearing record.

Thank you.

Oregon Small Woodlands Association

187 High Street NE, Suite 208, Salem, OR 97301

Chair McDonald and Members of the Commission,

My name is Amy Jahnke and I am the Executive Director of Oregon Small Woodlands Association, or OSWA. I represent the diverse values and perspectives of more than 3500 family forest owners across the state of Oregon owning 2 to 5000 acres of forestland. Thank you for the opportunity to share our comments regarding the Memorandum on Natural and Working Lands Sequestration Goals that include Recommendations. There are many other sentiments expressed by organizations like Oregon Farm Bureau in their testimony that we agree with, including incentivizing landowners to voluntarily undertake carbon-friendly agriculture practices (and we would include forestry in that), and aligning those ag and forestry goals to ensure clarity for landowners in both land sectors.

However, I'm here to discuss the recommendation that Oregon should set an emissions reduction outcome-based goal and an activity-based goal. For small private forest landowners, an outcome-based emissions reduction goal is a challenging concept to grasp and measure. It's unclear from the recommendations what that looks like and how it would impact the way forest landowners manage their land. If we were to set an outcome of added sequestration, for example, how is a forest landowner going to know they achieved the goal? There is not a clear definition yet of how that could be measured. An activity-based goal, like focusing on acres of reforested land, is a much clearer goal and easier for a forest landowner to know they can accomplish and contribute toward. If we want landowners to participate, first, we need to make it easy for them. An activity-based target that uses acres as a measurement unit would help accomplish that.

Mandates and regulation often do not work out fairly for everyone, so an approach that is voluntary and incentive-based would encourage behavior change and ease adoption of activities by a broader range of landowners. If we want landowners to participate, secondly, we need to make it fair. A voluntary, incentive-based model would make it fair and ease adoption.

We urge you to consider making changes to these recommendations to ensure clarity in the objectives and actions, as well as measurement of those actions, and to encourage voluntary behavior change through positive approaches like incentives, as opposed to mandates and regulation.

Thank you again for the opportunity to share these comments about the recommendations with you.

Sincerely,

Amy D. Jahnke, PhD Executive Director,

Oregon Small Woodlands Association