



July 22, 2020

Oregon Global Warming Commission  
550 Capitol St NE  
Salem, OR 97301

Dear Commission Members,

Sustainable Northwest appreciates the opportunity to provide comment on natural resource agency climate implementation plans as required in Executive Order 20-04. We also commend the efforts of the Oregon Global Warming Commission to provide a public venue for review and revision of these plans as part of its final reporting obligations by June 30, 2021. In doing so, we encourage natural resource agencies referenced within Executive Order 20-04 to coordinate with the Oregon Global Warming Commission and adhere to four principles in the development and revision of these plans:

1. Identify existing agency programs that should be prioritized for funding to increase carbon sequestration and climate mitigation and adaptation.
2. Add climate/carbon preference criteria in agency programs and grant-making to prioritize climate response and assess agency actions through a "climate lens".
3. Use regulatory oversight and authority to shift priorities and points of emphasis in future management planning.
4. Improve interagency coordination at the state level and with federal counterpart agencies to target resources more effectively, secure additional funding, and clearly articulate state climate priorities and all lands management for scaled outcomes.

#### **Recommendations for the Oregon Department of Forestry**

Sustainable Northwest appreciates the efforts of the Oregon Department of Forestry (ODF) to develop an initial response plan by the May 15, 2020 deadline. While we support several actions identified within the plan, the initial submission omits additional opportunities and needs that the agency should consider in the planning phase. We encourage ODF to work in coordination with the Governor's Office, Oregon Global Warming Commission, natural resource-based organizations and businesses, and the public to review and revise their initial submission to better account for agency opportunities and resources to meet the intent of Executive Order 20-04.

As part of this process, we believe ODF should include and prioritize the following activities in a revision and expansion of its implementation plan:

- A) Include a detailed list and explanation of existing agency programs that should be prioritized for funding or amended to increase carbon sequestration and achieve climate mitigation and adaptation.** Despite current funding limitations, a review and recommendation for preferred programs will provide important guidance to agency leadership, the Board of Forestry, and state decision-makers in the development of future agency workplans and budget-making. As a starting point, we recommend referring to the list of programs identified in the 2018 Governor's Natural and Working Lands Work Group coordinated by the Carbon Policy Office.

- B) Complete the Scenario Planning and Management Projections as part of the carbon accounting analysis ODF was assigned in 2018.** The agency references completion of the Forest Carbon Sequestration and Flux analysis and Wood Product Carbon Flux analysis, and their intent to complete this third phase of work. However, the timeframe of several years for completion is problematic and there is no mention of public engagement and review in the scenario modeling, as was the case for the first two phases. We strongly encourage the agency to expedite this scenario modeling process and institute a robust public review and engagement component to establish a critical scientific and policy baseline for future forest management decision-making.
- C) Invest adequately in the development of a Habitat Conservation Plan on private forestlands in Oregon.** The potential development of a Habitat Conservation Plan on private forestlands in Oregon as detailed in the recently passed SB 1602 provides one of the most significant opportunities in decades for incorporation of climate-based considerations in private forest management. ODF should allocate appropriate staff and scientific resources to this effort to ensure that climate change considerations and their impacts on fish and wildlife habitat are given robust consideration and review in the development of the plan.
- D) Develop a shared stewardship strategy with the USDA Forest Service, USDOJ Bureau of Land Management, and diverse stakeholders for interagency partnership and strategic planning to capture and leverage public funding for improved climate outcomes.** We support ODF's efforts to advance shared stewardship and encourage them to appoint staff to expedite these efforts. Doing so provides the best near-term opportunities for increased investments in forest and wildfire management activities and improved climate change outcomes in a severe state level budget reduction scenario.
- E) Define the role and potential of Oregon's offset authority as a tool for compliance with the Executive Order's emissions reductions mandates.** We support the agency's recognition of the potential for this currently underutilized authority in the final adopted program. Appropriate staff support should be allocated to coordinate with the Department of Environmental Quality in review of the authority and synergy with greenhouse gas reduction policies and regulations.
- F) Clearly articulate and implement a role for the Board of Forestry to engage in development and implementation of the revised agency implementation plan.** This effort should identify a long-term oversight function for the Board to ensure that ODF is fulfilling its plan commitments, as well as adequately accounting and budgeting for corresponding activities in agency budget and workplan development, as well as key performance measures.

Sustainable Northwest looks forward to coordinating with the Oregon Global Warming Commission, Oregon Department of Forestry, and other interested parties in the coming months to review and expand upon this initial climate change implementation plan. We are eager to provide additional comment and technical support as needed. For questions, please contact Dylan Kruse at [dkruse@sustainablenorthwest.org](mailto:dkruse@sustainablenorthwest.org) or (303) 328-7524.

Thank you for your consideration.

Dylan Kruse  
Director of Government Affairs and Program Strategy  
Sustainable Northwest