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Catherine Macdonald, Chair
Oregon Global Warming Commission
550 Capitol St. NE
Salem, Oregon 97301

Chair Macdonald and Members of the Oregon Global Warming Commission:

Thank you for the opportunity to provide comments on the implementation of Governor Brown's Executive Order 20-04 to reduce and regulate greenhouse gas emissions. We appreciate the Commission for creating the space for public input and dialogue on this important body of work.

The Nature Conservancy in Oregon is a non-partisan, science-based organization that works in communities across the state, manages lands and waters in varied ecosystems, and partners with ranchers, farmers, fishers, timber and environmental interests on some of the most challenging conservation issues facing people and nature.

We strongly believe that Oregonians have a responsibility to enact policies to address our contributions and enable the necessary responses to climate change. While climate change is a global challenge, within Oregon the impacts are already driving shifts in ecological processes and hydrological cycles with negative impacts to biodiversity. These shifts are also already negatively influencing human well-being across our state, and it is the most vulnerable members of our society who will bear the greatest burdens of climate change.

Natural Resource Agencies Reports on Proposed Actions

The reports delivered by the broad group of agencies tasked with reducing emissions and mitigating climate change within their current statutory authority are an important start to this work. We note the great variety in response to this task, yet see some common themes:

- The reports tend to exhibit a recap of current actions and procedures over an evaluation of additional opportunities and efforts the agencies could undertake within existing authority. In particular, the Oregon Department of Forestry's report was largely restricted to current practice and could be expanded. We appreciate the Governor's additional direction to this agency to revisit their report and produce a more robust plan.
- We support the use of agencies adopting a climate nexus in guiding daily efforts, and note that the Oregon Department of Fish and Wildlife has been working for over a year to integrate climate action into their operations, as can be seen in the climate plan adopted by

its commission just this month. Other agencies more recently coming to the work can learn from their example.

- Pertaining to the Natural and Working Lands goals, we notice that the Department of Agriculture's report is largely silent on its plans to engage in that work and urge them to actively participate in the process put forward by the Commission to develop strong targets for the land sector in the coming year.
- We also encourage all agencies to ensure that an environmental justice overlay is applied to this entire program of work.

Development of Natural and Working Lands Goal

We are pleased that the Executive Order guides Oregon to act on climate mitigation and that the Executive Order and the OGWC recognize the importance of natural and working lands in meeting our state's climate mitigation targets. In conjunction with the reduction of fossil fuel-based emissions, "natural climate solutions" must be part of our approach to climate mitigation. Natural Climate Solutions are conservation actions, such as protecting and restoring ecosystems and improving land management practices, which in turn protect and restore the ability of our natural ecosystems to sequester and store carbon in addition to enhancing habitats and protecting other ecosystem services. Recent research conducted by The Nature Conservancy and Portland State University scientists (Graves et al. 2020) demonstrate that natural climate solutions within Oregon could contribute annual GHG reductions of 2.7 to 8.3MMT CO₂e by 2035 and 2.9 to 9.8MMT CO₂e by 2050 compared to a present day business-as-usual baseline.

We appreciate that in addition to Graves et al. 2020, the OGWC recognizes several other recent national and Oregon specific studies that will help to develop appropriate GHG baselines and reduction targets for natural and working lands. There will always be room for refinement and improvements to Oregon's GHG inventories and projections for natural and working lands, and we therefore need to use the best available science to both set targets and develop policies and programs to meet them.

As the Commission works with ODA, ODF and OWEB to develop a natural and working lands goal, we encourage you to proceed with ambition, informed by scientific data, to set strong targets and plans that utilize natural and working lands' capability to sequester carbon.

The actions needed to reach the Executive Order's Greenhouse Gas emissions reduction goals will require significant investment and are not to be taken lightly. As the legislature prepares to rebalance the state's budget during dire financial times, and the coming biennium's fiscal realities may be even more difficult, achieving the goals listed in these reports may become a greater challenge in some agencies. Though limited funding is certainly a concern, we urge that financial restraints not be an excuse for inaction. We encourage agencies to take the opportunity afforded by the Executive Order - and forced on all of us during the pandemic - to reevaluate and reprioritize current practices and existing resources. Without ambitious plans, additional funding could merely cement current practice.

Now is not the time to underperform. Climate action must remain a priority, embedded in the daily work of each of the state's agencies. If Oregon is to meet our goals, the state must work aspirationally and creatively, utilize the best available science, and collaborate with a wide variety of stakeholders. The Nature Conservancy looks forward to working alongside you to position our state for a stronger climate tomorrow.

Thank you for your consideration.

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