



The League of Women Voters of Oregon is a 100-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.

July 25, 2020

To: Board of Forestry, Tom Imeson, Chair
Email: BoardofForestry@oregon.gov

Re: Agenda Item 9 - ODF Response to EO 20-04 – Comments

The League of Women Voters of Oregon believes that climate change is a serious threat facing our planet and supports climate goals and policies that are consistent with the best available climate science that will ensure a stable climate system for future generations. The League also supports the state's 19 land use planning goals that promote both conservation and development of land as a natural resource. The Oregon Dept. of Forestry (ODF)'s charge is to manage state forestland to achieve the greatest permanent value (GPV) for the citizens of the state. Its responsibilities touch on six of these land use goals:

- Goal 4 Forest Lands**
- Goal 5 Natural Resources, Scenic and Historic Areas, and Open Spaces**
- Goal 6 Air, Water and Land Resources Quality**
- Goal 7 Areas Subject to Natural Hazards**
- Goal 8 Recreational Needs**
- Goal 9 Economic Development**

These goals require a balance among multiple and often competing resource needs. All of these resource goals are in jeopardy, however, if the climate emergency we are facing now is not addressed to limit and reduce greenhouse gas emissions. Our forests will be subject to severe drought, pests and diseases, diminished air, soil and water quality, and will be more at risk from frequent and more intensive wildfires and other hazards from rising temperatures due to climate change. The cost for the social impacts caused by climate disaster will be astronomical.

In light of the growing global climate crisis, perhaps Oregon has a duty to modify the Forestry Goal to also manage Oregon's forestland to maximize carbon sequestration that will be of benefit to the entire planet. As the first page of the Oregon Global Warming Commission's 2018 Forest Carbon Accounting Project Report states: "Oregon forests hold globally significant carbon stores in forests that... rival tropical rain forests for carbon density and quantity of stores."

Since the tipping point before irreversible damage to the global climate is less than 10 years away according to the [most recent studies](#), it is urgent that we not waste another year in gathering more and more research. The facts are already in, as this report made clear in 2018 and has only gathered more supporting data since then. "If Oregon wishes to realize increased carbon uptake and sequestration in its forests as a key part of global forest carbon sequestration strategies, it will have to develop goals, and ways and means for achieving those goals... and consider how forest management practices should interact with Oregon's carbon reduction goals to achieve the fullest possible contribution to global climate outcomes."

Governor Brown's March Executive Order 20-04 directed 16 state agencies to submit their plans by May 15th to reduce its GHG emissions by

- at least 45 percent below 1990 emissions levels by 2035; and
- at least 80 percent below 1990 emissions levels by 2050.

ODF's response outlined the steps that the department is now taking to minimize emissions, but it has provided no plans based on the science it has already received for how it would go about reducing emissions through carbon sequestration to achieve these goals. What are the specific concepts for meeting these targets in 15 years, 30 years?

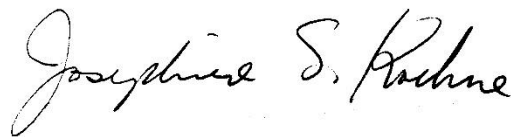
LWVOR acknowledges the difficulty ODF faces to meet these goals through carbon sequestration since it competes with the necessity of generating its own revenue through timber sales on state lands to fund its own department operations and to keep up its revenue payments to the counties. ODF is also under the additional cost burden posed by Covid, more frequent and intense wildfires and a lawsuit. The easiest, most cost-efficient way to harvest timber is clearcutting, but the science says clearcutting increases carbon dioxide to the atmosphere. The science is clear that older, mature trees 80, 100 and more years sequester significantly more carbon than 40-year old trees. Longer rotations and variable density thinning with light impact machinery is the way to reduce CO2e. But funding for department operations is an issue that must be solved. The Legislature, the Board of Forestry and Oregon citizens need to address this catch-22 situation so that global climate is not impacted by inaction and disfunction. Too much is at stake. A new funding mechanism for the department must be part of the conversation.

We urge ODF and the OGWC to make their priorities very clear about what must be done to increase carbon sequestration to reduce CO2 emissions, and suggest the changes to taxing timber and the rules and incentives needed that will result in the best possible outcomes for increasing sequestration, and clearly identify the law changes, including revisions to the Forest Practices Act that must be made to meet these targets. Requesting nine FTEs in a POP is not a plan—as suggested by your 2021-23 budget request. The business case needs to be made to fund the needed measures now, or pay the consequences in the near future. And it is up to us and the legislature to make this happen, but your leadership is needed now to start the ball rolling, not June 30th.

We appreciate the opportunity to submit our comments and hope they will be helpful.



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