

Oregon Board of Forestry
Oregon Department of Forestry
2600 State Street
Salem, Oregon 97310

submitted via email: boardofforestry@oregon.gov

24 January, 2022

Re: Jan. 5, 2022 meeting, agenda item 4: ODF Work Plans

Dear Chair Kelly and Members of the Board,

In November 2021, you unanimously adopted a Climate Change & Carbon Plan (CCCP) for Oregon's forests. The CCCP lays out a framework to implement much needed changes that would ensure Oregon's forests provide a full range of social, economic and environmental benefits to the people of Oregon. This plan rightly recognizes that, with respect to the state's public forest lands, responsible climate action is not just consistent with achieving greatest permanent value to the people of Oregon, but fundamental to it. And as to Oregon's forested landscape as a whole, the Plan represents a crucial first step in Oregon becoming a leader in climate-smart forestry, and creating a model for how to best use forests as a critical natural climate solution.

Adopting the CCCP was just the first step. The work now is to ensure the Plan's goals are well represented both in the Oregon Department of Forestry's 2022-24 work plans and budget. Since the Work Plans lay out the priorities for the department for the next two year, it must provide a road map for meeting the climate crisis that reflects the importance of this issue and the short timeline that we all face. Unfortunately, the draft work plan shared in the January 5th Board of Forestry meeting does not provide either urgency or specificity for implementing the CCCP. The undersigned organizations request that the final draft of the Climate Change and Forest Carbon work plan be significantly revised to include a framework for implementing the CCCP, including specific goals, actions and timelines.

To begin, the Overview for the Climate Change and Forest Carbon work plan focuses almost exclusively on the impacts of wildland fire. While our warming and drying climate is extending the fire season and impacting forests and communities across Oregon, the Overview should be far broader and reflect the principles of the CCCP. These principles recognize that:

- Climate change is a serious threat. We have less than a decade to alter behaviors if we want to avoid catastrophic impacts. We must be innovative, creative, and proactive in working towards solutions, not simply react to the results of climate change.
- Black, Indigenous, and People of Color (BIPOC) communities have been and continue to be some of the most climate-impacted communities. Forest policies will be shaped through the lens of social justice and equity. Actions will prioritize benefits to historically and currently underserved communities as they adapt to a changing climate.
- Oregon's forest sector offers opportunities for significant sequestration and storage both in the forest and in harvested wood products. As well as opportunities to promote clean

water and air, while preserving forest resilience in the form of flood control, biodiversity, thermal refugia, etc.

- As changing climates affect forests, incorporation of the best available science and practices will be key to adaptive management and planning across ownership type, size, and goals.

Incorporating these principles into the Overview for the Climate Change and Forest Carbon work plan will provide more context and ensure that ODF can assess its proposed work against these principles to ensure that all aspects of the issue are adequately addressed.

In its summary of work to date, the work plan addresses the CCCP and notes that “[i]ncorporation of the CCCP will take place in processes like the Forest Management Plan, Implementation Plans, and also provide a guiding path for the Forestry Program for Oregon revision (in the Overarching Issues workplan).” While we appreciate that tenets of the CCCP are being incorporated into the FMP and subsequent implementation plans, state forest management was only one section of the CCCP - its goals are far more comprehensive across jurisdictions. Also, upon cross-referencing with the Overarching Issues workplan, we note that the CCCP is only mentioned in the context of how it slowed down revising the Forestry Plan for Oregon (FPFO), accompanied by an implicit suggestion that the new FPFO will incorporate the CCCP. These mechanisms alone do not match either the scope or urgency laid out in the CCCP.

Next, the section titled Topic A: CCCP Tracking provides little information about how the CCCP will actually be implemented *or* tracked. We urge the agency to provide more specific information to accompany the first sentence, “With the approval of the Climate Change and Carbon Plan . . . various divisions, and programs have begun working on the implementation of the goals and supporting actions.” While we don’t doubt this is happening, we have scoured ODF’s work plans and find little across the various divisions and programs that explains how it is being implemented. It would deeply benefit the public’s ability to track implementation of the CCCP if ODF includes a more specific list connecting the goals and actions outlined in the CCCP with the divisions and programs tasked with achieving those goals.

For example, at the end of the CCCP there is a list of “Future Work Needs” including tasks such as “Request Department of Justice assessment of Measure 49 impact on implementation of climate goals”; “Integrate climate change in the complete and coordinated fire response strategy”; and “Align budget requests and priorities to cope with a changing climate.” There are also goals like “establishing a grant program of \$2 million per year to empower local communities to invest in urban canopy that meets their needs.” These are but a few of the specific actions and goals that we do not see reflected in ODF’s work plans.

Accomplishing these future work needs and goals will only be done when specific staff or departments are tasked with doing so. We acknowledge that the agency is in the midst of both a staff transition and shortage, and that it may be challenging to provide specificity as to who will be doing what, when. We also acknowledge that ODF needs more funding to implement these plans. However, given that this is a two-year work plan, we encourage ODF to include work that doesn’t yet have funding or staff but is likely to fall within the life of the work plan.

Adequately addressing the climate crisis requires bold action now. Adopting the CCCP was an important step, but providing a clear, actionable implementation plan is necessary to ensure ODF acts with the urgency this crisis demands.

We appreciate your consideration of these comments, and all the work you do on behalf of Oregon's forests.

Sincerely,

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