To: Chair Macdonald and Members of the Commission

Re: INR Report on Natural and Working Lands (Forest Recommendations)

Date: November 17th, 2023

Dear Chair Macdonald and Members of the Commission,

Thank you for the opportunity to provide feedback on the recent Institute for Natural Resources (INR) Final Report: *Foundational Elements to Advance the Oregon Global Warming Commission’s Natural and Working Lands Proposal*. It is encouraging to see the Commission prioritize natural climate solutions as a core strategy of addressing the climate crisis in Oregon, however there are several elements of the report’s section on forests that could benefit from a more up to date and detailed assessment of forest climate science and practices. The recommendations for the following practices are too broad to properly account for the complexity of using forests as a natural climate solution, and risk undermining the state’s climate adaptation and mitigation strategies:

* Improved forest management
* Reduce wildfire risks
* Increase utilization of discarded forest biomass (slash material)

We encourage you to incorporate a more comprehensive assessment of climate science around these topics. Please consider the following points as you review the reports recommendations:

1. **Do not treat public lands the same as tree plantations on private lands** (see **“**improved forest management” recommendation in report)**.** In terms of what practices are appropriate as a climate strategy for forests, we encourage you to distinguish between different land use types. What is appropriate for plantations on private industrial lands is not appropriate for public forests that are managed for multiple use and held in trust for the public. For example, lengthened logging rotations on private lands is an excellent climate strategy, however on public lands, mature and old growth forests should be preserved for their carbon and biodiversity benefit (not treated as a crop to be harvested).
2. **Include mature and old-growth forest preservation on public lands as a climate strategy** (see **“**improved forest management” recommendation in report)**.** As a tree ages and grows larger, research indicates that it will continue to absorb carbon at an increasing rate. As it develops, a tree’s total leaf area increases, which means more light can be intercepted, which, through photosynthesis, means more atmospheric carbon is absorbed. Moreover, the increase in the rate of carbon accumulation continues even as a tree’s overall growth rate per unit leaf area declines. Older, larger trees thus hold significantly more carbon than their younger counterparts in the forest, and the older stands that these trees dominate hold a substantial and disproportionate portion of a forest’s carbon.
3. **Account for risk of maladaptation** (see **“**manage wildfire risk” recommendation in report).The recommendations for wildfire management should also underscore the need to retain the oldest, largest trees on public lands, and focus restoration efforts on younger, small-diameter trees that are in overly dense forests due to past fire suppression and logging practices. There is a deficit of mature and old-growth trees on the landscape, and these bigger, older trees tend to be the most fire resistant — their protection and recovery must be encouraged as part of any wildfire strategy. Removing these trees from the landscape will only hinder climate adaptation efforts in forests. Further, the report fails to account for the need to treat different forest types with different forest management practices. Wet temperate rainforests should not be treated in the same manner as dry, fire-adapted forests in Eastern Oregon.
4. **Do not treat burning of woody biomass as a climate solution**  — Woody biomass can emit significant amounts of carbon when burned to produce energy. A detailed analysis of biomass energy generation commissioned by Massachusetts (the Manomet Study) compared the lifetime greenhouse gas effects of a continuous harvesting and replanting scenario to burning natural gas to generate the same energy. This analysis showed that, considering the first 35 years of operation, the biomass plant would have one and a half times the net CO2 emissions of a natural gas plant generating the same amount of energy.  Based on this study and many others, incentivizing biomass energy generation will put Oregon *further behind* on its current 2050 greenhouse gas goals, which aim to reduce greenhouse gas emissions in the state by at least 45 percent below 1990 levels by the year 2035, and by 80 percent by 2050. It should also be noted that there are also significant, potential environmental justice concerns associated with biomass burning facilities and their placement in vulnerable communities.

Add conclusion: capture ecological values alongside social and environmental justice co-benefits.

Sincerely,

Lauren Anderson

Climate Forests Program Manager

Oregon Wild

Teryn Yazdani

Staff Attorney and Climate Policy Manager

Beyond Toxics

Alan Journet

Co-facilitator

Southern Oregon Climate Action Now (SOCAN)

Rand Schenck

Forestry and Natural Lands Lead

Mobilizing Climate Action Together ( MCAT)

Brenna Bell

Forest Climate Manager

350PDX