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**SIERRA CLUB**  
OREGON CHAPTER



To: Chair Kelly, Members of the Oregon Board of Forestry  
Cc: State Forester Mukumoto, State Forest Division Chief Michael Wilson  
Date: 5/31/2024  
Re: Implementation of the Climate Change and Carbon Plan

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Dear Chair Kelly and Members of the Board of Forestry:

On the behalf of the State Forest Coalition member groups, we thank you for managing state forests for the greatest permanent value for all Oregonians. We appreciate that you are moving forward to finalize the Habitat Conservation Plan for Western Oregon State Forests (HCP), as the best means of complying with the mandatory requirements of the federal Endangered Species Act (ESA). We also appreciate the approval of the Climate Change and Carbon Plan (CCCP) in November 2021. Recent draft documents of the Forest Management Plan, the Adaptive Management Plan, and the Vision for Oregon's Forest all mention implementing the CCCP. We urge the Board of Forestry and the Department of Forestry to publicly demonstrate meaningful, measurable progress on implementing the CCCP.

### 1) Carbon sequestration and storage targets

For the near future, 2030 to 2050, we urge you to ensure the state forests are managed for optimal carbon storage. Former Governor Brown's Executive Order 20-04 directed the Oregon Global Warming Commission, now renamed the Oregon Climate Action Commission, to set state goals for carbon sequestration and storage for Oregon's natural and working lands, including forests, in coordination with the Departments of Forestry and Agriculture and the Oregon Watershed Enhancement Board.

According to the CCCP:

"The Department has worked with the Oregon Global Warming Commission (OGWC) to establish a goal for natural working lands (i.e., forests, agriculture, tidal wetlands, etc.) as outlined in Executive Order 20-04. **The OGWC recommendation is an additional 5 MMTCO<sub>2</sub>e can be sequestered on an annual basis by 2030 and an additional 9.5 MMTCO<sub>2</sub>e annually by 2050.**"

**We ask the BOF to set targets for the contribution of state forests towards the additional sequestration goals for the target dates of 2030 and 2050.**

**2) Carbon inventory of state forests.**

In order to set targets for increased carbon sequestration and storage, we must have a baseline for the current status of carbon storage and rate of sequestration for state forests. HB 3409 requires the Oregon Climate Action Commission to develop a natural and working lands net biological carbon sequestration and storage inventory, allowing for a public comment process. HB 3409 set a deadline of 1/1/2025 for establishing biological carbon sequestration goals of Oregon's natural and working lands. The inventory must 1) Be based on the best available field-based and remote sensing data on biological carbon sequestration; 2) Be developed using methods consistent with methods used to assess greenhouse gas fluxes related to land use, land change and forestry for the United States Environmental Protection Agency's Inventory of U.S. Greenhouse Gas Emissions and Sinks.

While the CCCP has elements that affect forests in other ownership classes in Oregon and urban forestry, the Board of Forestry (BOF) and Oregon Department of Forestry (ODF) have direct control of state forests and should concentrate on establishing measurable carbon sinks in these forests. ODF must do its part to accurately provide the data necessary for developing an accurate carbon baseline.

What is the status of the current carbon inventory on state forests? The most recent update we could find that ODF presented to the BOF was September 7, 2022.

**3) Habitat Conservation Areas (HCAs) and Riparian Conservation Areas (RCAs) can and should be managed as carbon reserves.**

It would be helpful to have baseline carbon inventory for these conservation areas and a separate carbon inventory for production stands; inoperable stands (such as steep slopes) located outside of conservation areas could be assessed in either inventory. Since timber harvest within conservation areas is limited to actions that will benefit listed species habitat, we can expect significant increases in carbon sequestration and storage in these stands by 2050. There should be a projection of carbon storage in HCAs over the lifetime of the HCP. All management decisions within HCAs and RCAs need to first prioritize benefitting listed species, then ODF should manage for carbon storage. This would limit carbon losses from silvicultural treatments, avoid post-fire logging, and avoid impacts from road-building within HCAs.

Analyzing the carbon baseline in production stands should include not only the harvested timber, but the carbon emissions from logging, slash management, transport to the mill and milling waste, plus the positive contribution of long-lived wood products. The production stands should be at least carbon-neutral to be sustainable over time, and to be considered climate-smart forestry, a *carbon sink* by implementing longer harvest rotations, retention of more

older trees, snags, and downed woody debris during harvest, and possibly creating biochar as alternative slash management.

A time interval should be established for repeated carbon inventories in the state forests. We would recommend biennial inventories initially, so the BOF, ODF and the public can see if progress is being made to achieve the 2030 target. Following this there should be continued monitoring to determine if ODF is on a trajectory to meet the 2030-2050 higher target.

#### **4) Climate-smart Forestry.**

The CCCP and other documents include an aspiration for the ODF to be a national model of climate-smart forestry. We support the following definition of climate-smart forestry:

"Climate smart forestry optimizes forest carbon sequestration, carbon storage and forest resilience while minimizing greenhouse gas emissions. Practices include longer harvest rotations, protecting old growth and mature forests, and maintaining a diversity of species, ages, and structure." *MCAT, Mobilizing Climate Action Together*

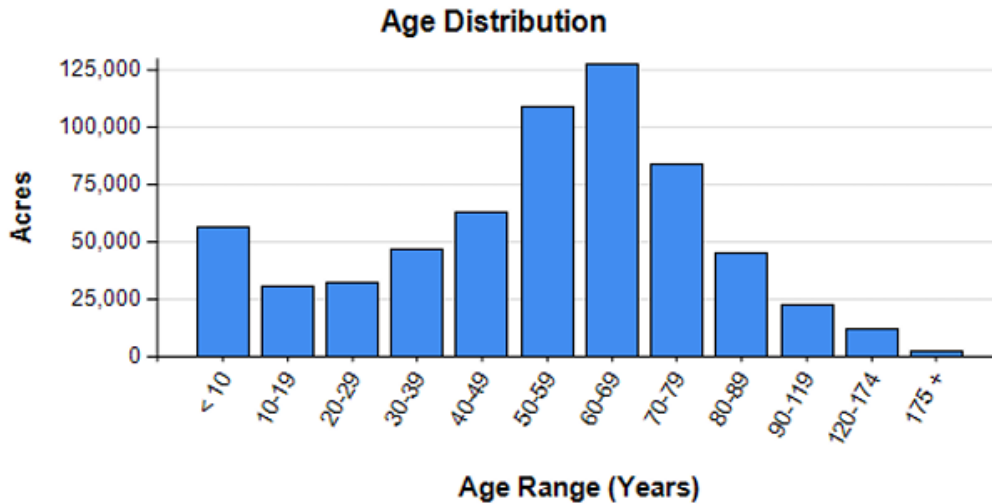
Climate mitigation is the core principle of climate smart forestry. As stated in the CCCP:

"Oregon's forests, particularly those in the western Cascade Mountains and the Oregon Coast Range, have the potential for some of the highest rates of carbon sequestration and storage in the world. Therefore, Oregon's forest productivity has potential for significant climate mitigation benefits."

As we stated above, we support managing conservation areas as carbon reserves in addition to their habitat value for listed species covered by the HCP.

Extended harvest rotations cannot be achieved on a sustainable, climate smart basis by simply cutting older stands. The majority of stands proposed for timber harvest in the AOP 2025 are over 55 years of age, with many in the 80-100 year range. According to the 2020 Western Oregon Forest Management Plan, the current age structure on state forest lands is relatively lacking in stands greater than 80-years old and scarce in stands exceeding 100-years old.

**As these older trees store the most carbon, are most fire resistant, and provide habitat for terrestrial listed species (such as Northern Spotted Owl and Marbled Murrelet), they should be preserved and not harvested.** See the age distribution table from the draft HCP:



According to the ODF’s proposed HCP, “[s]tand age is a major indicator of current forest condition and this non-uniform age distribution has significant implications related to forest management planning.” (see Public Draft W. OR State Forests HCP, .2-35).

**Thus, harvest rotation planning should combine age at harvest with preservation of trees 80 years in age and older, and enough younger trees that can grow into future old growth.** Mature and old-growth trees and forests store the vast majority of carbon in forests. Due to past management activities, there is a deficit of old-growth in Oregon, and especially on state forest lands. We encourage the protection and recovery of mature and old-growth forests as a climate-smart management strategy.

#### 5) Forest Carbon Finance and Markets.

The CCCP discusses the possible implementation of a forest carbon offset market, if resources were available for its development. The BOF and ODF should explore carbon projects *within* the state forests. These could be in areas of high risk—such as unstable slopes that can be logged, but might have higher risks of landslides and higher costs to harvest. An excellent carbon project area would be sites proposed for harvest within the Cook Creek Aquatic Anchor. The Coalition is particularly concerned about proposed timber sales in the AOP 2025 in this watershed, Tin Pants and Cook Creek Overlook, totaling 858 acres. Harvesting these could pose a direct threat to Cook Creek and its tributaries. See the Coalition letter, Comments of Oregon Department of Forestry’s FY 2025 Annual Operating Plans (AOPS), dated May 17, 2024.

The State Lands Commission and Department of State Lands are planning a carbon project in the Elliott State Research Forest for additional income to manage the forest without increasing proposed harvest levels. The ODF could collaborate with the DSL in developing carbon projects.

Nationally, there are forest carbon offsets for biochar. As an alternative slash management technique, biochar can be created in portable forest kilns, where slash is burned in a low-oxygen environment to create a stable form of soil carbon. This can reduce greenhouse gas emissions and provide funding for the higher labor costs of this management technique. The BLM and USFS are piloting a project on Holiday Farm Fire sites on BLM land, utilizing a CharBoss, to manage burned debris from the fire. This could be investigated for potential application in state forest harvest projects.

**We ask the Board of Forestry and Department of Forestry to act with urgency to implement the Climate Change and Carbon Plan that was approved by the BOF 2 ½ years ago.** The “Revision Timeline” section of the CCCP states, “[t]o achieve adaptive management and the goals in this plan, agency staff will periodically bring progress assessments to the Board.” This is a good time to do so. The CCCP is mentioned in all the current plans, but true implementation requires measurable baseline forest carbon inventory, measurable targets for increasing the carbon sequestration and storage on state forests and scheduled re-inventories to assess progress to meet these targets.

Thank you for your consideration of these recommendations.

Sincerely,

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