# Appendix H: Public Comments

To: Oregon Department of Energy December 9, 2025

From: Irene Gilbert

Subject: COMME NTS REGARDING THE NATURAL CLIMATE SOLUTIONS DOCUMENT

The following comments identify limitations and forces which work against the goals of the above document and areas which require change if the stated goals are to be realized:

1. There is a lack of prioritizing the value of forests to sequester carbon. The value of the role of forests to address climate change is not addressed when developments remove forest land from LCDC jurisdiction and definition.
2. LCDC protections for forest land and the value it provides for carbon sequestration has been largely removed by two actions.:
    a. The list of exceptions to complying with the rules has become extensive with little justification.
    b. Oregon currently places little or no value on forest and farm lands that LCDC is charged with protecting . The value of this land, the cumulative impact of the amount of land being converted, and the failure to require compliance with LCDC rules make protections non-existent when energy development is concerned. The Oregon Department of Energy(ODOE) and Energy Facility Siting Council (EFSC) are not required to comply with County Rules or LCDC rules which define the requirements to comply with LCDC's broad goals. The Oregon Department of Energy and Energy Facility Siting council only have to comply with the broad goals and they define what the goals require. Even so, ODOE allows exceptions to the LCDC protections for virtually every facility they approve.

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c. Unless Oregon starts requiring energy developers to comply with state and federal laws (currently the only laws the developers must comply with are Oregon Department of Energy rules) the land being used to sequester carbon will continue to be reduced. Oregon needs to place a value on these lands that requires mitigation consistent with the loss of carbon sequestration during the time developments are in place, or the potential of any meaningful outcome from this plan will be null.

3. The Forest Protection Act (FPA) is not being followed for energy developments. For example:

   Requirements for Plans prior to construction of roads which impact Fisheries, habitat, wildlife, protected areas and other resources are not being required by the Oregon Forest Service. They appear to be deferring to the Site Certificates even though the conditions often conflict with FPA requirements.

   The FPA requires that conversion of forest land to another use which avoids reforestation requirements requires approval of an "Alternate Practice" prior to making the change. This includes payment to compensate for the removal of land from reforestation and the ability to provide future timber production. ODOE does not require developers of transmission lines to comply with athe FPA or to provide mitigation or payment to property owners for the value of the lost trees and future benefits of the forests land they remove. According to the Oregon Forest Service, even when land is taken through condemnation, the only party that can be held accountable is the property owner. There is no incentive to avoid these lands for energy developers.

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4. There are disincentives for property owners to grow trees.

I have grown, harvested and converted land to timber production. When considering the costs to harvest timber, replant areas logged, and pay for taxes related to the harvest there is little financial benefit from using land for timber production other than the satisfaction from the trees you grow.

Disincentives include Taxes leveraged against timber harvested. For example: Between 2020 and 2025 the Timber Harvest Tax per 1,000 board feet of timber harvested increased from $4,1322 to $6,2949. Given the previous comments regarding the lack of enforcement of the FPA for energy developers, it is worth noting that 40% of the budget for enforcing the FPA is paid by these funds. In addition, 50% of the Oregon Forest Protection Fund to fight wildfires is paid by the fund. Energy development increases the potential for wildfires both through equipment impacts, and also through providing access to areas along developments such as transmission lines for people to cause fires. In spite of this increased risk, The Oregon Department of Energy refused to implement site certificate conditions requested by the counties to address the increased fire risk due to construction of the Boardman to Hemingway Transmission line.

In addition, Small Woodland owners also charged a Severance Tax of $5.50 in Eastern Oregon and $7.10 in Western Oregon per 1,000 board feet of timber harvested.

5. The resistance of Oregon and the department to embrace small nuclear energy as a way to limit environmental damage should be addressed. This form of energy is no longer an experiment. It is being used across the country. Oregon is being left behind by supporting renewable energy development with much

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greater negative impacts on the resources this plan is supposed to encourage. Oregon's resistance to this clean renewable energy source will have no impact on it's use other than placing Oregon at a disadvantage in it's efforts to address Climate Change.

ODOE has demonstrated an unwillingness to seriously consider my comments in the past. I am, however, submitting this document to provide an opportunity for the agency to make some meaningful recommendations to address legislative concerns regarding climate change that do not place additional financial burdens on the citizens while addressing natural climate solutions.

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## Land-based Net Carbon Inventory – Forestry Specific Comments

1. The report clearly identifies Oregon's forests as the state's primary and overwhelmingly important tool for ongoing carbon stores and for carbon uptake potential. The amount of attention paid in the report should reflect the importance of the forests in the level of detail provided by available data.

2. The report makes generalizations from high-level sources of forest data and land coverage data and the report shows a very large reduction in the acreage of forests in Oregon and a concomitant reduction of the carbon storage and carbon uptake potential of our forests state-wide. Table 1 in Appendix F shows a loss of 3.5 million forest acres between 1990 and 2034, an approximate reduction of 16%. This loss has resulted in a reduction in CO2 removals from 104.5 million metric tons to 58.2 million metric tons between 1990 and 2024, an approximate reduction of 55%.

3. Given these extreme changes in our forest carbon states, it is imperative to return to the Forest Carbon Inventory and take a deeper dive into available information. The report itself, on Page 26, acknowledges that the authors recognize this need:
   *The decline in the contribution of Oregon's forests over the inventory period raises significant concerns and questions. This result could reflect a combination of overestimation of carbon stocks in the early part of the Inventory period, a loss of forest acres, increases in wildfire scale and severity, other climate related impacts to forest carbon, and changes in management of forests in Oregon. Given the significance of the change, evaluating the causes of this decline is a high priority. The Department of Forestry is nearly finished with a new assessment of forest carbon and ODOE will work closely with ODF to understand trends and future inventory improvements.*

4. As part of a deeper dive, we would like to recommend at least the following changes be made to build a more robust and meaningful Forest Carbon Inventory:

    a. Annual precipitation and soils have large effects on forest carbon storage and uptake, and any forest carbon inventory should reflect the significant differences in moisture and soils between the Coast Range and Western Cascades and the Eastern Cascades and other eastern Oregon forests. These data sets are well studied and should be incorporated into the

inventory.

b. The land coverage data does not distinguish the very different forest ownership categories and the very different management practices applied to each category: protected Wilderness and roadless lands, other US Forest Service lands, BLM lands, State Forest lands and private forest lands, each of which has a particular impact on existing carbon stocks and ongoing carbon uptake rates. The next iteration of the Inventory should break out the forest ownership and characterize the different management policies practiced by the different owners to better reflect carbon stocks and uptake potentials.

c. The forest species categories are from a national USFS Forest Inventory Analysis and do not reflect our unique, and very high, PNW forest carbon stock and uptake values. For example, Table 6 on page 19 shows Douglas-fir storage having only 77 tons of carbon per acre, whereas many sources indicate a range of 90-240 tons C per acre. The next iteration of the Inventory should use more relevant data for our coastal and western wet and moist forest conditions.

5. Miscellaneous Comments/Questions:
    a. The first entry in the upper left-hand corner of Table 1, page 3 of Appendix F seems to be missing a digit and should perhaps read 21,248,620 instead of 2,124,862.
    b. The total carbon stocks of Douglas-fir shown on Table 4, page 8 of Appendix F, are remarkably steady, given the huge loss of forest area and forest carbon stocks shown elsewhere in the report; is this erroneous?
    c. Table 11, page 17 of Appendix F, shows a huge loss of grasslands acreage in the Coast Range and Western Cascades with other areas remaining fairly steady. Is that really the case and what were the grasslands converted to?

COALITION OF OREGON LAND TRUSTS
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December 17th, 2025

To: Oregon Department of Energy and Oregon Climate Action Commission

From: The Coalition of Oregon Land Trusts

**RE: Draft Land-Based Net Carbon Inventory**

On behalf of the Coalition of Oregon Land Trusts (COLT), thank you for the opportunity to provide public comment on the recently released Draft Land-Based Net Carbon Inventory report. COLT is a network of 31 organizations working in Oregon to protect our natural world–our water, wildlife and open space–for all people, forever.

Our members include land trusts, soil and water conservation districts, and statewide conservation organizations working across Oregon to protect, restore and enhance private lands in partnership with communities and Tribes. Collectively, our members have protected over 780,000 acres of land.

We appreciate the incredible work that went into creating the Draft Land-Based Net Carbon Inventory, a first of its kind inventory to track greenhouse gas emissions on our landscapes and inform land use practices that help Oregon reach our greenhouse gas emissions reduction goals.

We wanted to highlight a specific finding from this report and recommend a slight amendment to the overall conclusions from this section. On page 33, the report states that "...land use in Oregon has stayed relatively consistent over the last 35 years, which is a testament to Oregon's land use system, " and "Continued protection of Oregon's landmark land use laws will be an important carbon reduction strategy into the future."

COLT and our members are strong supporters of Oregon's land use laws, which have helped prevent sprawl and development on prime farm and forestlands. **We would respectfully recommend an addition in this section emphasizing the role that *strategic land protection* will play in carbon reduction strategies for the future.**

Land trusts in Oregon are the boots on the ground entities working in partnership with their communities to protect, restore, and enhance ecosystems across the state. Their work helps our landscapes build resilience to the impacts of climate change and severe wildfire, restores wetlands and their ecosystem services, improves conservation management practices on working lands, and protects carbon stocks in old growth and mature forests.

- The Deschutes Land Trust's stream restoration projects at Whychus Canyon Preserve and Rimrock Ranch acted as a fire break when the Flat Fire raged through Sisters, OR earlier this year.
- Last year, Greenbelt Land Trust announced the permanent protection of 428 acres of prairie and forest habitat in the Coburg Hills through a conservation easement that protects 50 acres of high-quality prairie habitat, 148 acres of oak woodland and 230 acres of diverse forest habitat.
- The Wetlands Conservancy protects and restores wetlands in urban Portland, the Central Coast and lower Willamette Valley, providing green space for communities, restoring waterways and wetlands for fish and returning agricultural land to wetlands habitat.
- The North Coast Land Conservancy is working to rewild 3,500 acres of previous timber harvest land through the Rainforest Reserve project. In partnership with the Climate Trust, NCLC manages the property for mature forests, water quality, carbon sequestration, wildlife habitat and passive recreation.

These stories are just a small snapshot of the impact land trusts have in Oregon. They are strategic entities working to acquire and restore properties and habitats so they are functioning in ways that reduce carbon emissions and build resilience. We thank you for the time to comment and hope you will consider the addition of strategic land protection and its role in reducing carbon emissions.

Sincerely,

Joe Buttafuoco
Executive Director
Coalition of Oregon Land Trusts

OFIC
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December 17, 2025

Oregon Climate Action Commission
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VIA EMAIL: elizabeth.ruther@energy.oregon.gov

**RE: Draft Land-Based Net Carbon Inventory**

The Oregon Forest Industries Council (OFIC) is pleased to submit the following comments to the draft Land-Based Net Carbon Inventory (hereinafter the "Carbon Inventory" or the "Report") that was noticed for public comment earlier this month and was presented by webinar on December 5, 2025.

OFIC recognizes the magnitude of this task, and appreciates the work that has gone into developing the Carbon Inventory. We are convinced that it will prove to have tremendous utility both for technical planning purposes and as a tool to inform policy conversations. We are encouraged to see the report make use of the best available existing inventory data for each land use category rather than attempting to reinvent the wheel, and we are hopeful that this work will help to inform ways in which existing data sets can be enhanced and better leveraged going forward.

We do, however, have a few relatively minor comments for consideration. First, on p. 18 of the Carbon Inventory, the percentages of land type in each category do not reflect other published reports. The Carbon Inventory reports the percentage of Oregon's land base in forestland at 35%, whereas the US Department of Agriculture reported in 2019 that, as of 2017, of Oregon's 61 million acres, nearly 30 million (or 48%) constituted forestland.[1] The Oregon Forest Resources Institute (OFRI) similarly reports forestland acres as 47% of Oregon's land base.[2] It is not immediately clear where the figures in the Carbon Inventory are derived from, but this discrepancy should be addressed.

Similarly, on p. 34 of the Report, a comment is made regarding the decline in the contribution of Oregon's forests over the inventory period potentially being related to "a loss of forest acres" during that time. However, the USDA report cited, *supra* demonstrates that, between 2007 and 2017, Oregon had maintained 98.3% of its forested acres, and in 2017 actually had marginally *more* forestland than it did in both 1997 and 1987.[3] We recognize that the comment made in the Report

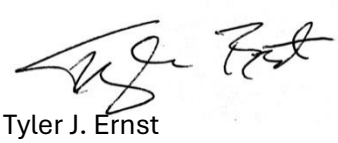
[1] *See,* Oswalt, Sonja, et al. "Forest Resources of the United States, 2017," *United States Dept. of Agriculture*, Gen. Tech Report WO-97, p. 72, March 2019. *Available at*, https://www.fs.usda.gov/research/publications/gtr/gtr_wo97.pdf.
[2] *See*, https://oregonforestfacts.org/#forestland-ownership.
[3] Oswalt, Gen. Tech Report WO-97 at 78.

was not attempting to attribute a given percentage of the decline to loss of forested acres, but if that loss has been marginal, at most, then the Carbon Inventory should not include it as a potential factor.

Finally, on p. 24 of the report, mention is made of the decline in forest carbon removal from 1990 levels, with the largest percent decline occurring in the harvested wood products carbon pool. Additional information is needed to explain and contextualize this observation. For example, it is not clear whether this decline is owing to a reduction in harvest thereby resulting in a concomitant reduction in harvested wood products produced, annually, or whether this is owing to a change in product mix from longer-lived harvested wood products (such as dimensional lumber) to shorter lived products such as pulp and paper and biofuel. We recognize that every statement cannot be fully fleshed out in a summary report of this nature, but we do believe that this particular observation would benefit from additional explanatory gloss.

Again, we appreciate the opportunity to provide comment and look forward to seeing the final report, hopefully with the matters highlighted above addressed and amended, where necessary.

Sincerely,



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OrCAN
Oregon Climate & Agriculture Network
Resilience through soil health

December 18, 2025

To: Oregon Climate Action Commission (OCAC) and Oregon Department of Energy (ODOE)
From: Megan Kemple and Sophie Els, Oregon Climate and Agriculture Network (OrCAN)
megan@oregonclimateag.org, sophie@oregonclimateag.org
Re: Draft Land-Based Net Carbon Inventory

We are submitting comment on the draft report for Oregon's first Land-Based Net Carbon Inventory.

We are pleased that this Inventory will continue to be developed and updated into the future. Oregon's first Land-Based Net Carbon Inventory is a significant accomplishment, but ongoing work is crucial to tracking the State's progress on climate and carbon sequestration goals. We appreciate the Inventory's thorough review of available data, and that the drafting of the Inventory is taking into account comments and concerns from the public.

Our comments are primarily related to the agriculture sector.

For future improvements to the Inventory, we are pleased to see, and support inclusion of, the following recommendations:

- "Collection of agricultural management data must be improved at regional and county levels, to ensure practices such as cover cropping and soil amendments are captured and represented accurately in the dataset."
- "Additional data collection on cropland management practices to be used as input into the COMET-Farm tool, such as planting of cover crops and use of reduced tillage."
- "Collection of regional- and county-level data on grassland management and grazing activities to better capture potential emissions and removals; and data to better distinguish between natural and working grasslands."

We applaud the Inventory's recognition of opportunities to change agricultural practices, and the specific focus on soil health: "There are several opportunities for deploying changes in crop practices, such as those the Natural Resource Conservation Service [NRCS] offers through technical assistance that promotes soil health." (p. 35). Please include this or similar language in the final Inventory. State investment in technical assistance and financial incentives for soil

health is crucial to implementation of soil health as a Natural Climate Solution (NCS). Soil health practices have the potential to reduce greenhouse gas emissions and store carbon in the soil.

We were surprised that Tier 2-level data could not be utilized for organic soils, which we understand to constitute a large percentage of agricultural soils in the Willamette Valley. We appreciate that Robert Parkhurst provided us with an explanation via email, explaining that the USDA has determined Tier 1 is the most scientifically accurate approach for soils with high organic matter content. Because others may have similar questions or concerns, it may be helpful to provide a brief explanation in the final Report of why Tier 2 could not be used for organic soils.

We would like to share our concerns regarding the Inventory's significant reliance on Environmental Protection Agency (EPA) and other federal data sources. While the use of established federal datasets such as the National Greenhouse Gas Inventory (NGHGI) methodologies ensures consistency and credibility, current political and policy uncertainties create risks regarding the continued availability and accessibility of these critical resources. Please see the Oregon Environmental Council's (OEC) public comment on the Draft Inventory for recommendations on how to address these concerns.

Thank you for your consideration of these comments.

Sincerely,

Megan Kemple
*Executive Director, Oregon Climate and Agriculture Network*
Sophie Els
*Policy Associate, Oregon Climate and Agriculture Network*

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December 19, 2025

Oregon Department of Energy
550 Capitol St NE
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VIA EMAIL: elizabeth.ruther@energy.oregon.gov

RE: Draft Land-Based Net Carbon Inventory

Thank you for the opportunity to provide comments on the draft *Land-Based Net Carbon Inventory* ("Report"). Established in 1942, Hampton Lumber is a fourth-generation, family-owned company headquartered in Portland, employing approximately 750 Oregonians. We own and operate three sawmills in the rural communities of Tillamook, Warrenton, and Willamina, along with roughly 130,000 acres of timberlands across northwest Oregon. Our mills produce dimensional lumber, supplying renewable building materials that support a sustainable built environment.

We appreciate the Report's recognition of forests and harvested wood products (HWP) as the leading source of carbon removals, as well as their importance to Oregon's economy and communities. We also note with appreciation the acknowledgment that Douglas fir forests account for the majority of carbon sequestration in Oregon. As our State Tree and a dominant species in west-side forests, Douglas fir provides profound ecological, cultural, and economic benefits both locally and beyond[1].

The Report references the risk of land conversion. While conversion from forestland to non-forestland could reduce carbon pools, it is important to recognize that overall forested acreage in Oregon has remained stable, with some studies indicating modest increases[2]. From our perspective, overly restrictive state and federal regulations may inadvertently increase conversion risk, as private landowners could be incentivized to develop their land if forest management and timber harvesting become prohibitively costly. We encourage policymakers to support measures that keep working forests active and productive, thereby reducing the likelihood of conversion.

We also note the Report's statements that "old growth and mature forests in the Pacific Northwest have the largest carbon densities in the U.S." and "protecting carbon stocks in remaining mature and old growth forests and managing mature forests to become old growth forests are important management strategies on some lands." It is equally important to recognize that wildfire is the primary threat to old-growth forests in the western U.S., surpassing insects, disease, and other disturbances[3]. Active forest management—including prescribed burning, fuel reduction, and

[1] https://www.oregon.gov/odf/Documents/forestbenefits/DouglasFir.pdf
[2] https://www.fs.usda.gov/research/publications/gtr/gtr_wo97.pdf
[3] https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/MOG-threat-analysis.pdf

timber harvesting—is essential to mitigating wildfire risk, and we encourage the Report to reflect the importance of these practices.

Figure 6 shows that overall carbon removals from forests appear to be declining compared to 1990 levels. While the Report notes that several factors may contribute to this trend, we would also consider that timber harvesting on federal lands declined sharply in the early 1990s. This reduction not only decreased HWP outputs but also coincided with an increase in wildfire activity. We appreciate that this data will continue to be analyzed and refined.

Finally, the Report briefly touches on harvest rotations, acknowledging the complexity of this topic. We ask that any future policy discussions on harvest rotations include industry representatives to ensure balanced and informed dialogue.

In closing, we thank you again for the opportunity to comment on the draft Report. We recognize that this is a living document that will continue to evolve. As stewards of forestland and producers of renewable wood products, Hampton Lumber remains committed to engaging in further conversations about how forests and HWP can continue to serve as vital tools for carbon reduction.

Sincerely,

Laura Wilkeson
Oregon Director of Government Affairs

The Nature Conservancy
Protecting nature. Preserving life.™

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December 19th, 2025

Oregon Department of Energy

Public Comment on the Draft Land-Based Net Carbon Inventory

Submitted by Lauren Link, TNC Oregon State Policy Advisor

Thank you for the opportunity to provide comments on the draft land-based net carbon inventory (Inventory). The Nature Conservancy in Oregon (TNC) is a science-based, non-partisan organization working with partners across the state on some of the most challenging conservation issues facing people and nature. Addressing the climate change crisis is a core component of TNC's work to create a world where people and nature can thrive, and Oregon's natural and working lands (NWL) contribution to sequestering and storing carbon is an important component to meeting the state's climate goals.

The development of Oregon's first Inventory is a significant step for the state and its ability to track greenhouse gas emissions and removals from Oregon's diverse landscapes. We applaud Oregon Department of Energy's (ODOE) commitment to scientific rigor through adherence to internationally recognized Intergovernmental Panel on Climate Change standards and proven carbon measurement methodology. As a NWL Advisory Committee member, we want to thank ODOE staff for their extensive work on not only developing the Inventory, but providing several opportunities for members to provide feedback, ask questions, and learn more about the Inventory.

As we begin to understand emissions and removals associated with the land sector and how land use changes impact carbon stores, **we are hopeful that this Inventory and subsequent updates will inform policy that drives strategic land protection and increases the pace and scale of land management strategies that reduce or avoid land-based emissions and increase natural sequestration.**

The following are our recommendations on how to address data limitations and reliability in this draft Inventory and subsequent inventories and the need for continued investments in state agencies to maintain and update the Inventory.

**Data limitations and improvements**

- In the draft Inventory (page 31) refers to “The Nature Conservancy’s restored lands map”. To clarify and make this reference more specific, we recommend that it be changed to “The Nature Conservancy’s Estuary Restoration Inventory.” The Estuary Restoration Inventories will be a key spatial data tool for improving greenhouse gas (GHG) accounting for tidal wetlands.
- In the draft Inventory, carbon stocks (e.g., of forests, Table 6; Total GHG emissions/removals, Table 9) are presented with no uncertainty estimates/error bars. Acknowledging and providing estimates of uncertainty would improve the scientific robustness of the Inventory.
- We are encouraged to see ODOE recognize the limitations of the National Land Cover Dataset (NLCD) for land classification, especially as it relates to wetlands and forestland classification. Identifying the best spatial datasets for forests, which can capture the harvest and regrowth dynamics characteristic of many of Oregon’s forests, should be a priority improvement for the NWL inventory. TNC supports improving estimates of forest growth rates through targeted forest inventory and analysis improvements/studies.
- As mentioned in the Inventory, “availability of data should not be confused with quality of data”. Increasing data quality (e.g., spatial data to assess land use as well as land cover transitions and empirical data, for example, relating C fluxes to management changes) in understudied systems (e.g., Oregon’s rangelands) would improve the Inventory.
- Regarding the additional research needs and forthcoming data sets on estuary restoration, TNC recommends the following language to provide more clarity on the specific data gaps and additional research needs:
    - “Wetlands: Improving wetland emissions estimates in future inventories will require higher resolution spatial data, refined biogeochemical inputs, and a more consistent mapping framework. Several forthcoming datasets—including the Wetland Intrinsic Potential tool, The Nature Conservancy’s Estuary Restoration Inventories ~~restored lands maps~~, and a statewide salinity map—will help clarify wetland extent, drained organic soils, restoration benefits, and methane dynamics. In addition, there are ~~while also addressing~~ current gaps such as inland wetland variability and omitted coastal habitats like eelgrass, mudflats, and kelp forests that require additional spatial data and research.
- Regarding data gaps on kelp forests, we want to highlight the 2024 Oregon Kelp Alliance report that includes spatial data for bull kelp.

**Resourcing for maintenance/improvements to the Inventory**

As mentioned, the Inventory is iterative and will continue to be updated to reflect the changes on Oregon’s natural and working lands and evolving best available science and data. It is critical that not only ODOE, but the other state agencies identified in Appendix D are resourced

adequately, both in funding and staff capacity, to do the maintenance and improvements identified in the report.

We are encouraged to see the state using NLCD data and then supplementing it with state-level data sets for more accurate info. In addition, there are more datasets that were identified and could be used, but this will require additional state investment. Maintaining and updating state-level data takes time, effort, and resources - and an evaluation of the advantages and disadvantages of investing in the state data sets could be a key next step.

Improvements identified in the Inventory are essential for strengthening the accuracy, transparency, and credibility of the Inventory over time and highlight the importance of state investments. **TNC supports dedicated, ongoing funding for Inventory maintenance and improvement for ODOE and supporting agencies.** The Inventory is an important component of the broader Natural Climate Solutions state policy as it sets a baseline and continued updates to track Oregon's progress toward our state's climate goals, **which we are hopeful can inform and support robust policy decisions on land management strategies and mitigation planning, and drive data-informed investments to our state's Natural and Working Lands (NWL) Fund as well as investments in activities that protect and enhance carbon stores throughout the state.**

**Land Use Considerations**

The Inventory report highlights the important role that Oregon's land use system has played in protecting Oregon's landscapes over the last 35 years and calls for continued protection of Oregon's land use laws as an emissions reduction strategy.

As a landowner and manager in Oregon, TNC has seen firsthand how protection of Oregon's diverse landscapes provides health, social, and economic benefits to Oregonians while also providing critical habitat for wildlife. As the climate changes and Oregon experiences increasing heat, drought, and extreme weather events, we must consider how best to balance our varying land use needs while also reducing emissions by transitioning to clean energy sources, which may require land conversion or modification.

We encourage the state to think critically and creatively as they work to meet both our state's climate goals and protect our natural and working lands. We recommend the state strategically protect lands that are significant carbon stores, have high levels of biodiversity, and are critical for climate resilience and adaptation as well as identify and incentivize management practices and multi land uses that reduce emissions and provide co-benefits to Oregonians.

# OEC Comments on ODOE Natural Climate Solutions Draft Land-Based Net Carbon Inventory Report

**December 19, 2025**

Founded in 1968, the Oregon Environmental Council (OEC) is a nonprofit, nonpartisan, membership-based organization. We advance equitable, innovative, and collaborative solutions to Oregon's environmental challenges for today and future generations.

Dear Governor Kotek, OCAC Commissioners, and Oregon State Legislators,

Oregon Environmental Council (OEC) and its thousands of members throughout the state appreciate the opportunity to comment on the Natural Climate Solutions Draft Land-Based Net Carbon Inventory. We want to thank the staff at the Oregon Department of Energy (ODOE) and the Oregon Climate Action Commission (OCAC), along with their consultants and the Natural & Working Lands Advisory Committee, for the considerable and commendable work undertaken to develop Oregon's first Land-based Net Carbon Inventory. This monumental effort establishes Oregon's first comprehensive land-based carbon accounting system and represents a critical step toward tracking greenhouse gas emissions and removals across our state's diverse landscapes. We hope this report's Executive Summary and Overview become available in other languages, such as Spanish; many land managers are native Spanish speakers, and we believe they would find this information valuable.

The Inventory's adherence to internationally recognized IPCC standards, its transparent tiered methodology, and the inclusion of a Roadmap for Inventory Improvement demonstrate a commitment to scientific rigor and continuous enhancement. The extensive engagement process—including coordination with seven land managing agencies, consultation with diverse stakeholders, and the careful review of over 30 state-level datasets—reflects a thorough and inclusive approach to this complex challenge.

## I. Data Source Resilience and Federal Dependency

We wish to highlight concerns regarding the Inventory's significant reliance on the Environmental Protection Agency (EPA) and other federal data sources. While the use of established federal datasets such as the National Greenhouse Gas Inventory (NGHGI) methodologies ensures consistency and credibility, current political and policy uncertainties create risks regarding the continued availability, accessibility, and accuracy of these critical resources.

Recommendations:

- *Develop Contingency Plans*: ODOE should proactively identify alternative data pathways and methodologies that state agencies could employ should federal data sources become unavailable, restricted, or fundamentally altered. This includes evaluating state-collected data, academic research partnerships, and even emerging remote sensing technologies as backup systems.

- *Enhance State Capacity:* We strongly encourage investment in building Oregon's own data collection and management infrastructure to reduce dependency on federal sources. This could include expanding partnerships with Oregon State University, other in-state or out-of-state research institutions, and regional groups to develop state-specific emission factors and carbon density measurements.

- *Document Alternative Approaches:* The Technical Manual and future Inventory Improvement Plans should explicitly document alternative methodologies and data sources that could maintain inventory continuity during any federal data disruptions. The goal is to build redundancy into these resources.

The resilience of Oregon's carbon accounting system is fundamental to tracking progress toward climate goals and informing policy decisions. Ensuring multiple pathways for data acquisition will safeguard this critical tool against external uncertainties.

**II. Focus on Forest Carbon Dynamics and Climate Change Impacts**

The Inventory reveals alarming trends in Oregon's forest carbon that demand urgent attention and sustained focus. The documented **44 percent decline in Oregon's forest carbon removal between 1990 and 2024—from 104.5 MMTCO2e to 58.62 MMTCO2e—raises significant concerns** about the trajectory of our state's most important carbon pool.

The draft report importantly notes: "Acres affected by wildfire across many land categories have increased over the inventory period. It has affected above-ground carbon stores and, when fires are severe enough, soil carbon as well." This finding underscores the compounding climate feedback loop we face: climate change drives increased wildfire frequency and severity, which in turn releases stored carbon, further accelerating climate change while simultaneously reducing the landscape's capacity to sequester future emissions.

Recommendations:

- *Prioritize Forest Carbon Research:* We strongly support the report's identification of evaluating drivers behind forest carbon decline as a "high priority." This analysis must comprehensively examine the relative contributions of wildfire scale and severity, climate impacts (including drought stress, pest infestations, and disease), harvest patterns, and forest management practices.

- *Improve Wildfire Data Integration:* Given the critical role of wildfire in carbon dynamics, the Inventory should continue refining its integration of wildfire burn severity data, post-fire carbon recovery trajectories, and the distinction between natural carbon cycling from fire and permanent carbon stock losses.

- *Enhanced Forest Monitoring:* We support the recommendation to identify the "best available forest mask GIS layer" to prevent misclassification of recently harvested forest land as grassland. Accurate tracking of forest land is essential for understanding true carbon flux dynamics.

- *Management Strategy Evaluation:* Future inventory cycles should include explicit analysis of how different forest management strategies—including conservation of mature and old-growth forests, dry and wet forests, modified harvest rotations on working forests, and active fuel reduction treatments—affect net carbon sequestration while meeting other ecological and economic objectives.

The resilience of Oregon's forests - and soil biota - to increased climate change impacts and wildfire threats will determine whether our lands continue to serve as net carbon sinks or become net sources. This category merits the highest priority in future inventory refinements and policy development.

**III. Ensuring Resources for Data Improvement Amid Budget Constraints**

The Roadmap for Inventory Improvement outlines 17 critical areas requiring enhancement, from land classification accuracy to wetland monitoring systems. However, the successful actualization of these improvements depends fundamentally on adequate resources, staff capacity, and sustained institutional commitment—requirements that face significant headwinds as state agencies navigate budget cuts and resource constraints.

Key Concerns:

- *Implementation Capacity:* The Technical Manual identifies essential roles, including data collection, model development, research/analysis, technical review, and expert judgment provision. Without secure and dedicated funding and staffing, these inventory improvement priorities risk remaining aspirational rather than operational.

- *Cross-Agency Coordination:* The report correctly identifies the need for "formal institutional arrangements between ODOE and the seven land managing agencies" to ensure consistent tracking and updating of critical datasets. These arrangements require not only an administrative framework but also the financial resources to support the necessary staff time and technical infrastructure across multiple agencies. ODOE can look to examples of cross-agency coordination in other agencies like OWRD's Integrated Water Resources Strategy or the "natural resource interagency team" under development as part of Executive Order 25-26.

- *Data Gap Resolution:* Many of the 17 identified improvement areas—including systematic grassland management data collection, enhanced forest monitoring, high-resolution wetland mapping, and refined cropland practice tracking—may require substantial new investments in field monitoring, remote sensing analysis, and database development.

Recommendations:

- *Dedicated Inventory Funding:* The Legislature should support a dedicated, ongoing funding stream specifically for land-based carbon inventory maintenance and improvement, protected from general budget fluctuations. **This investment should be a component of re-capitalizing the Natural Working Lands Fund, and is essential infrastructure for climate policy development and progress tracking.**

- *Prioritized Resource Allocation:* Given resource constraints, ODOE and the OCAC should develop a tiered priority system for inventory improvements using the Key Category Analysis framework, focusing initial resources on categories with the largest GHG contributions and highest rates of change (particularly forests, cropland organic soils, and wetlands).

- *Leverage Federal and Foundation Support:* ODOE should actively pursue any available federal grants, foundation funding, and research partnerships to supplement state resources for inventory improvement activities, particularly for pilot projects developing new methodologies and datasets.

The Inventory itself acknowledges that "the ability to quantify emissions and removals is constrained by the availability of data and calculation methods." Without adequate resources to address these constraints, Oregon's capacity to track progress toward climate goals and inform evidence-based policy will remain fundamentally limited.

**IV. Land Use Law Protection and Clean Energy Development: A Critical Tension**

The report states: "First, land use in Oregon has stayed relatively consistent over the last 35 years, which is a testament to Oregon's land use system. Even so, Oregon has experienced change throughout the last three decades in both land use and management practices, which the Inventory results reflect. Continued protection of Oregon's landmark land use laws will be an important carbon reduction strategy into the future."

While we recognize and support the carbon sequestration benefits of Oregon's land use planning system in limiting sprawl and protecting working lands, we must also acknowledge a significant tension with the state's urgent need to accelerate clean energy development. Oregon's ambitious climate goals require rapid deployment of renewable energy infrastructure—solar arrays, wind farms, transmission corridors, and energy storage facilities—much of which requires land conversion or modification.

Key Considerations:

- Solar and wind energy facilities may require conversion of forest land, grassland, or agricultural land, resulting in carbon stock losses reflected in this Inventory even as they displace fossil fuel emissions reflected in the sector-based inventory.

- Land use restrictions can create barriers to renewable energy siting, potentially slowing Oregon's clean energy transition and overall emissions reductions.

- The Inventory currently does not account for the net climate benefit of renewable energy deployment (emissions avoided) against the carbon costs of land conversion—creating an incomplete picture for decision-making.

Recommendations:

- *Integrated Climate Analysis:* Future iterations of the Inventory or supplementary analyses should attempt to quantify the net climate impact of land use changes for clean energy development by comparing land-based carbon losses against avoided fossil fuel emissions over project lifetimes. This same approach should be used for other non-energy land use and NCS applications, such as quantifying the net climate impact provided by artificial wetlands used as natural infrastructure by wastewater utilities.

- *Land Use System Evolution:* Rather than viewing land use law protection and clean energy development as binary choices, Oregon should explore targeted reforms that maintain core protections against sprawl while creating streamlined pathways for renewable energy projects that demonstrate net climate benefits.

- *Leveraging Inventory for Strategic Land Development or Protection:* This Inventory analysis can be used to inform renewable energy buildout, to ensure that the state is working to avoid lands that sequester and store the most carbon – or have the potential to. We have data to inform these decisions and should be connecting the dots to thoughtfully build out the energy system that works for Oregonians.

This tension is not insurmountable, but it requires honest acknowledgment and thoughtful policy development that recognizes both the carbon value of intact landscapes and the essential role of renewable energy in meeting our climate commitments.

**V. Conclusion**

Oregon's first Land-based Net Carbon Inventory provides an invaluable foundation for understanding how our landscapes contribute to climate mitigation. The findings—from the concerning decline in forest carbon removal to the persistent emissions from drained organic soils—will inform critical policy decisions for years to come.

We urge ODOE, the OCAC, and the Legislature to:

1. Ensure the inventory's resilience against federal data source disruptions
2. Prioritize forest carbon dynamics given alarming decline trends and wildfire impacts
3. Provide adequate resources for inventory improvement despite budget pressures
4. Thoughtfully address the tension between land use protection, natural carbon pools, and clean energy deployment

With continued investment, refinement, and thoughtful application, this Inventory can serve as a powerful tool for achieving Oregon's climate goals while protecting the multiple values our lands provide. Thank you for the opportunity to weigh in on this important draft report, and we look forward to remaining engaged in this process.

Sincerely,

Ben Brint
Senior Climate Program Director
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benb@oeconline.org

ORBIC and INR Comments

12_19_25

Dear Elizabeth,

Thank you for the opportunity to comment on the December 2025 draft Land-Based Net Carbon Inventory report. Recognizing the limitations of time and funding in developing Oregon's first land-based net carbon inventory, this report is an important step in moving Oregon's technical knowledge and management of carbon forward. Our primary concerns fall in three broad categories, and we submit them in hope of improving the current and future inventories.

**Data** - The draft report acknowledges significant data gaps that should be addressed to vastly improve the inventory. We agree in general with the acknowledgement of significant data gaps, and in particular with the need for better base vegetation mapping. Better base vegetation mapping will improve the accuracy and precision of carbon estimates and provide locally-relevant information to policy makers and land managers. Also, key existing Oregon-specific data sets were either not considered or rejected. For instance, we did not find reference to Gradient Nearest Neighbor (GNN) maps from the Landscape Ecology, Modeling, Mapping and Analysis project for forests (LEMMA), and the Department of State Lands' composite wetlands layer was rejected. These existing data layers would greatly improve the inventory's accuracy and precision, especially if the inventory worked with the teams who build and maintain these datasets.

The prioritization of the National Land Cover Dataset (NLCD) over more nuanced ecological classifications introduces important and insufficiently acknowledged errors and uncertainty. The broad NLCD classes obscure important carbon dynamics within sectors because they combine distinct ecosystems with very different carbon storage structures and dynamics. For example, the NLCD shrubland class encompasses naturally-occurring shrublands, woodlands, and newly created clearcuts, while the woody wetlands class contains shrub-dominated and forested wetlands.

The report does not discuss its conclusions in the context of existing and carbon estimates within the State of Oregon. For example, the report's carbon estimates for forests are quite different from Oregon Department of Forestry's most recent (2024) estimates, but this discrepancy is not discussed. Given the importance of forests in Oregon's carbon budget, this inconsistency is concerning and could be addressed by incorporating local data sources.

Finally, citations for datasets and method descriptions are incomplete, making it difficult to ascertain which data sets were considered, which data sets were used, and how each data set contributed to the reported results.

**Uncertainty** – All data have a degree of uncertainty. The authors of this report did not address uncertainties inherent in the base data and analytical choices and are not sufficiently addressed in the report or appendices. We suggest quantifying and/or discussing the uncertainties of each

included data set and relative impact on the inventory's conclusions as well as for major data gaps. As an example, the report's core assumptions about carbon sequestration dynamics in wetlands and rangeland systems could be large enough to undermine its conclusions.

The decision to estimate greenhouse gas emissions and removals via change detection in land use categories constrains the analysis by excluding datasets with higher resolution, greater accuracy and more detailed attributes (e.g., the National Wetlands Inventory). Before quantifying *change* in greenhouse gas emissions or removals, these variables need to be estimated accurately in the first place.

The report refers to the Rangeland Analysis Platform (RAP), which maps estimates of net primary productivity (NPP) to generate estimates of carbon storage and fluxes. However, RAP has not yet provided the accuracy assessments for their NPP layers that would allow Oregon to estimate the likely impact of this type of bias on the conclusions in the report. Also, specifically, RAP NPP maps may contain significant attenuation bias as their fractional cover maps do. The (possibly large) impact of these issues will be difficult to address within Oregon's report without accuracy assessments of the NPP layers. Also, RAP's biomass estimates are uncritically assumed to capture belowground biomass dynamics. Thus, important sources of uncertainty are not addressed in the report.

**Lack of ecological nuance** – The future of carbon in Oregon is more nuanced than the report assumptions imply. More information about local ecology, management concerns, and discourse may provide a more robust report useful to policy makers and land managers. For instance, the report's merging of juniper woodlands, sagebrush shrublands, and annual grasslands into a single class for change detection bypasses most land management priorities on Oregon's east-side. The conclusion of no change in grassland extent either reflects conflation of data types or is in conflict with known trends of shrubland conversion to annual grasslands via wildfire. The interaction between fast and slow carbon cycles is so critical to Oregon's carbon future that it should be addressed in this report. Additionally soil carbon is the largest terrestrial carbon pool, yet the report combines soil carbon and belowground biomass; topics that should be discussed separately.

We also question why there is little acknowledgement of ongoing and forecasted climate change in this report - feedbacks between climate, plant productivity, and fire are key factors to consider. In particular, ecological feedbacks that drive greenhouse gas emissions and sequestration by wetlands and in juniper and sagebrush ecosystems were not taken into account.

Going forward, as Oregon works to improve this first inventory, the state in addition to using existing data sets, the state should consider ongoing work and development of appropriate data sets and long-term predictive models that incorporate climatic shifts and vegetation response needs a robust and updatable carbon inventory, which will require a commitment to. Thank you for this opportunity to comment.

Sincerely,

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INSTITUTE FOR NATURAL RESOURCES

Pew

December 19, 2025

Elizabeth Ruther
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Oregon Department of Energy
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**Comments on Oregon's Draft Land-Based Net Carbon Inventory – Wetland & Blue Carbon Recommendations** *(Submitted via email)*

Dear Ms. Ruther:

On behalf of The Pew Charitable Trusts (Pew), thank you for the opportunity to comment on Oregon's Draft Land-Based Net Carbon Inventory (Inventory). We commend the Oregon Department of Energy (ODOE) and the Oregon Climate Action Commission (OCAC) for developing a comprehensive, first-generation inventory that elevates wetlands (coastal, inland, and aquaculture) as a core part of the land sector. This work lays a strong foundation for tracking greenhouse gas (GHG) emissions and removals and for guiding nature-based climate solutions and adaptation strategies that benefit communities and ecosystems across Oregon.

Pew's U.S. Conservation program advances commonsense solutions that address the impacts of a changing environment on nature and communities, in collaboration with policy makers, Tribes, and stakeholders. Our interest in the Inventory is to support the accurate accounting, protection, and restoration of Oregon's vital wetland ecosystems to mitigate the impacts of climate change on people and nature. Accordingly, our comments focus on the application of the wetlands carbon inventory for nature-based climate mitigation, as well as how insights from the inventory can support resilience efforts within Oregon, as described in Executive Order 25-26.

Wetlands are among Oregon's most important carbon reservoirs, with wetland soils storing the most carbon per acre statewide. The Inventory's data show that tidal wetland emissions have been declining, reflecting Oregon's successful efforts to protect these "blue carbon" habitats and invest in restoration. In contrast, freshwater wetlands and drained organic soils (areas where wetlands have been converted to other land uses, such agriculture or development) remain sources of GHG, particularly methane and carbon dioxide. These findings underscore the value of using Inventory data to prioritize wetland restoration and adjust land-use practices, where feasible, to help Oregon maintain carbon stocks and reduce future emissions.

## 1.1 Roadmap for Inventory Improvement Recommendations

**Wetland Mapping and Data Quality**

Pew strongly supports the Inventory Roadmap's commitment to move beyond national datasets and to develop a spatially explicit Tier 3–ready, state-led wetland mapping framework.

Integrating advanced tools such as the Wetland Intrinsic Potential (WIP) tool, statewide salinity maps, and The Nature Conservancy's restored land maps will enable Oregon to better identify, classify, and track priority wetland habitats, including high-carbon forested wetlands that are often missed by older mapping methods.

For example, the WIP tool combines elevation, satellite, hydrology, and vegetation data to identify key freshwater wetlands, including those hidden beneath dense canopies. Similarly, Massachusetts serves as a strong example, showing how updating statewide wetland maps and applying standardized metrics with modern imagery, machine learning, and field verification can improve accuracy and establish a reliable baseline.

Pew also encourages the state to incorporate coastal habitats, such as eelgrass, mudflats, and kelp, into future mapping and carbon accounting efforts where relevant datasets exist. Recent assessments show these habitats, including unvegetated mudflats and submerged aquatic vegetation, contribute meaningfully to long-term carbon sequestration. For example, regional studies estimate that seagrass meadows in Oregon store about 27.5 tonnes of carbon per acre in their sediments to a depth of one meter and accumulate new carbon at a rate of roughly 0.11 metric tonnes carbon per acre each year. Including these habitats will help Oregon's climate strategies reflect the full scope of blue carbon and strengthen efforts to track, protect, and restore these vital ecosystems. Together, these advanced mapping resources can help ensure that wetland protection and restoration efforts are targeted and effective.

Additionally, we support inclusion of a peatland sub-section within the inland wetlands category that explicitly accounts for rare high-carbon fens and bogs. This will ensure the carbon released and captured by these high-carbon ecosystems are measured accurately. We recommend using the WIP tool to reveal hidden peatlands, including forested or degraded sites, and incorporating the new PeatRestore National Condition Map to improve peatland identification, assessment, and restoration planning statewide.

**Methane and Drained Soil Accounting**

Pew recommends that Oregon refine methane accounting by incorporating specific wetland characteristics—such as impounded vs. reconnected, water level, and temperature conditions—to reduce uncertainty and highlight the climate benefits of restoring tidal flow, especially in impounded wetlands that have been artificially freshened and emit more methane than their saline counterparts. Additionally, we suggest using Mean Higher High Water (MHHW) as a geospatial metric within the inventory to further refine methane emission estimates, facilitating more precise, location-based analysis of wetland methane dynamics.

Pew also urges the state to track drainage status and soil oxidation depth in former wetlands now classified as cropland or developed land, and to quantify the GHG reductions achieved through hydrologic restoration. This will improve estimates of emissions from drained soils and quantify the avoided emissions from rewetting projects.

To support these improvements, Oregon should leverage the Pacific Northwest Regional Blue Carbon Calculator, which is calibrated for Oregon and estimates GHG gains and losses from land-use change. This tool enables modeling over a 1–100 year range for specific land

management actions, helping inform policy choices and track progress toward nature-based climate goals.

### 1.2 Institutional Arrangements: Incorporating Input from Tribal Nations and Local Governments

Pew encourages Oregon to adopt a collaborative, co-development approach with Tribal Nations and local governments, aligned with the OCAC/ODOE draft Tribal Engagement Strategy, to ensure Indigenous knowledge is meaningfully incorporated into inventory improvements and implementation.

To sustain Tier upgrades and routine updates to the Inventory, Pew recommends clarifying roles and data flows among land-managing agencies, as outlined in the Inventory's Institutional Arrangements section. This will help ensure that wetland data collection, analysis, and reporting are consistent and transparent across agencies. We also urge the state to build long-term capacity with the Inventory Program through innovative partnerships (e.g., universities) to incorporate new science, improved methods, and emerging datasets as they become available.

Finally, Pew supports efforts to share the Inventory's advances broadly, both within Oregon and with external partners, to highlight the importance of wetland and blue carbon accounting and foster continued learning across the region.

## 2. Nature-based Climate Mitigation Targets

The Inventory provides Oregon with a baseline that can now be used to improve management of natural and working lands for climate mitigation. Toward this end, Pew encourages the state to adopt land category-specific activity-based targets, including protection and restoration targets for wetlands. Activity-based targets (e.g., number of acres restored or annual acres of tidal reconnection) provide clear, measurable goals that drive accountability, guide policy and investment decisions, and enable tracking of progress toward reducing GHG emissions and building climate resilience.

Examples from other states that have established forward-looking goals and employed standardized metrics for natural and working lands (wetlands) include:

- **California**: California released its Natural and Working Lands Climate Smart Strategy in 2022, followed by Nature-based Solutions (NBS) targets in 2024. The Strategy outlines major initiatives while the NBS targets include specific actions and associated acreage amounts that provide a basis for the state to model, analyze and measure climate action on its lands. For wetlands, the state established targets to protect, restore and build resilience on more than 233,000 acres of wetlands.

- **New Jersey**: In 2024, New Jersey released its Natural and Working Lands (NWLs) Strategy that includes conservation, restoration and management targets across NWLs for 2030 and 2050, covering over 25,000 acres of wetlands.

- **Maine**: In 2024, Maine released its updated "Maine Won't Wait" sector-wide climate plan, which includes a goal for the NWL sector to increase the total acreage of conserved natural and working lands in the state to 30 percent by 2030.

- *North Carolina:* Former Governor Roy Cooper issued Executive Order 305 in 2024 for the state's natural and working lands, including ambitious conservation and restoration targets for one million acres of forests and wetlands. This Executive Order remains in effect with the new administration under Governor Stein.

## 3. Resilience Planning

In addition to comments specific to the Inventory, we offer recommendations on how the Inventory can be leveraged for state resilience efforts, as described in Executive Order 25-26 and other existing state and local initiatives. By documenting the significant carbon losses from 1990 to the present, the Inventory shows that climate change is impacting the state's natural and working lands. Accordingly, we encourage the state to explicitly connect its nature-based climate mitigation work with its resilience efforts, as detailed below.

- *EO 25-26 Section I.1 - Key Resilience Attributes*: Landscape Categories in the Inventory, especially wetlands in estuaries and inland floodplains, are proven anchors of community and ecological resilience, offering durable benefits such as increased carbon sequestration, reduced flood and fire risk, improved water quality, and enhanced biodiversity. The Oregon Watershed Enhancement Board (OWEB) and Oregon Department of Fish and Wildlife – the agencies directed to "define key resilience attributes" per EO 25-26 – should consider carbon sequestration and storage capacity as it works to determine "key resilience attribute for land and waters" per the executive order.

- *EO 25-26 Section I.3 - Conserve Natural Lands and Waters to Act as Resilience Anchors:* Given their outsized ability to sequester and storing carbon while providing multiple resilience benefits, agencies should prioritize tidal wetlands when implementing the specific directive to "protect, conserve, connect or restore ten percent of lands and waters in Oregon within ten years as compared to baseline conditions established for 2025." As Oregon adapts to sea-level rise, healthy tidal swamps and estuaries will become increasingly critical for protecting coastal communities by absorbing floodwaters and buffering storm impacts.

- *EO 25-26 Section I.5 - Plan for a Resilient Oregon (PRO):* Wetland projects should also be featured in Oregon's Plan for a Resilient Oregon, with community-level indicators that track flood risk reduction, heat refugia, and cultural benefits alongside climate metrics informed by the Inventory.

- *Coastal Resilience: Estuary and Coastal Shorelands Management (Statewide Planning Goals 16 and 17):* on the Oregon coast, cities and counties control the bulk of Estuary Management Planning updates that help coastal residents effectively plan for a resilient future and help determine the fate of coastal carbon sinks like tidal wetlands that are highlighted by the Inventory. These municipalities should be better resourced to inventory estuary resources as part of updating their Estuary Management Plans, Comprehensive Plans, and associated zoning maps and ordinances, as this is required by Oregon Statewide Planning Goal 16 and guidelines. Similarly, Oregon's Department of Land Conservation and Development, the agency in charge of acknowledging or

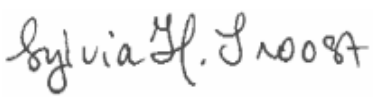
appealing Estuary Management Plans, and its associated Land Conservation and Development Commission, should ensure it has the rules and resources to accelerate coastal wetland conservation as it is a determining factor in smart economic development and community safety on the coast.

- *Estuarine Resilience Action Plans*: ODOE/OCAC should review DLCD / Oregon Coastal Management Program county-based Estuarine Resilience Action Plans (ERAPs)– see ERAPs for Coos, Tillamook, Lane, and Lincoln Counties – that articulate projects identified by coastal residents. These projects could be matched with the existing and future iterations of the Inventory to prioritize actions that cover multiple forms of resilience.

## Conclusion

The Inventory underscores the importance of safeguarding and restoring wetlands as a powerful strategy for protecting carbon stocks, reducing emissions, and building resilience. Pew commends Oregon's leadership and commitment to measuring its natural and working lands and elevating their role in addressing climate mitigation. We look forward to working with the state to advance healthy, resilient ecosystems that support Oregon's climate goals and provide lasting benefits for its residents, local economies, and ecosystems. Please do not hesitate to reach out to me or Jazmin Dagostino, zdagostino@pewtrusts.org, if we can provide additional information.

Sincerely,



Sylvia Troost
Project Director, U.S. Conservation
The Pew Charitable Trusts

**Location** • 671 Kingwood Drive NW, Salem, OR, 97304

December 19, 2025

Oregon Climate Action Commission
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Salem, OR 97301
VIA EMAIL: elizabeth.ruther@energy.oregon.gov

**Subject: Weyerhaeuser Comments on Draft Land-Based Net Carbon Inventory**

Thank you for the opportunity to comment on the draft Land-Based Net Carbon Inventory (the Report). Weyerhaeuser appreciates the Commission's efforts to compile and analyze complex data across Oregon's diverse landscapes, and we recognize the value this work brings to both technical planning and policy development.

## Recognition of Forests and Wood Products

The Report's acknowledgment of forests and harvested wood products as Oregon's primary source of carbon removals is important. Forests, particularly Douglas fir stands, play a critical role in carbon sequestration and provide substantial ecological, economic, and cultural benefits to the state. Additionally, the industry's harvested wood products provide an critical source of carbon storage.

## Land Base and Forest Conversion

I would like to highlight a discrepancy in the reported percentage of Oregon's land base classified as forestland. The Report cites a figure of 35%, while other sources, including the U.S. Department of Agriculture and the Oregon Forest Resources Institute, report closer to 47–48%. For example, USDA data from 2017 indicates that nearly 30 million of Oregon's 61 million acres are forestland.

Appendix E of the draft report notes that the report data is based on the NLCD classification, which excludes data sets from the USDA NRI and USDA/USFS FIA program. This appendix, along with discussions in the Natural and Working Lands Advisory Committee, offers a solid justification for relying on NLCD data. Nevertheless, Oregonians have long relied on the more familiar data from USDA, which indicates that the state's forest cover is nearly 50%.

**A clarification about the differing data sets is needed in the body of the report to prevent lawmakers and others from thinking Oregon's forestland cover has suddenly decreased from ~50% to 35%.**

## Decline in Carbon Removals

The observed decline in overall carbon removals (p. 24) from forests since 1990 warrants additional explanation in the final report.

When this decline was discussed in the Natural and Working Lands Advisory Committee, consultants explained that they used data from the Forest Inventory Analysis program from the US Forest Service. They went on to say that the data and methodology the USFS uses started in 2000, so "*we don't know what the carbon densities were prior to that because the data was compiled using different methodology . . . there's an overestimation in the early part of the time series in terms of the amount of removals because harvesting and reforms related to restrictions that occurred in the 90's probably mean there was less carbon stock and accumulation by forests than we were able to estimate*."

**We would appreciate a notation of this changed methodology in the final version of the report.**

Thank you again for the opportunity to provide feedback. The final Report will be a useful resource, and we look forward to its continued refinement. As a stakeholder committed to sustainable forest management and the production of renewable wood products, Weyerhaeuser welcomes further engagement on ways that Oregon's forests and wood products can continue to contribute to the state's climate goals.

Regards,

/s/ Betsy Earls

Government Affairs Manager
Weyerhaeuser NR