

APPENDIX H: PUBLIC COMMENT WORKFORCE STUDY

ODOE received the following comments during the draft Natural Climate Solutions Workforce Development Needs Study public comment period Dec. 8-22, 2025.



December 22, 2025

To: Oregon Department of Energy

From: Samuel Diaz, Executive Director, 1000 Friends of Oregon

Re: Support in Natural Climate Solutions Workforce Development and Training

For over 50 years, 1000 Friends of Oregon has worked with people from all over the state to improve the quality of life through land conservation and development efforts. 1000 Friends of Oregon is proud to have longstanding and new members and partners who are farmers, farmworkers, ranchers, forest land managers, and foresters. Our Forestry Agricultural Advisory Committee and statewide affiliate network provide our team with on-the-ground insight into their threats and opportunities. We then are able to co-create policy solutions, new funding and financing tools and resources, and partnerships.

We appreciate the vision outlined in the draft Natural Climate Solutions Workforce Development and Training Program Needs. Too often, the talent, hard work, and ingenuity of our state's stewards is overlooked in statewide economic development plans and discussions. We see the Oregon Department of Energy and Oregon Climate Action Commission's efforts helping to ensure we have a diversified economy of the future that offers high quality careers and financial agency to all Oregonians.

1000 Friends of Oregon is eager to learn more about these proposed efforts, identify tangible partnership opportunities with our members, and help connect new resources and opportunities that our state is creating for Oregonians. Please do not hesitate to reach out to us at Sam@friends.org along with one of our Staff Attorneys, Eve Goldman, Eve@friends.org.

We offer some friendly suggestions to speed up and scale out these efforts in partnership with the stewards of our lands:

- **Do not take the land base for granted.** Oregon's land use planning program offers protections for natural climate solutions to not only take place here in our state but to be a model example of stewardship for the world. But, this can only take place if we protect the land from runaway sprawl and fragmentation through proven tools like our urban growth boundary, exclusive farm and forest use zoning, main street revitalization funds, and policy and funding for restoration and redevelopment of lands inside our existing urban growth boundaries. We suggest adding a section in the report that describes this foundational action for ODOE and Oregon's Climate Action Commission to be successful.
- **Support Oregonians with early learning opportunities.** 1000 Friends of Oregon has had the privilege to be part of the Oregon State Fair for the last three years, connecting and supporting Oregon farmers and ranchers. Many students come to visit our booth who are competing as part of their Oregon FFA chapter. These FFA programs offer hands-on learning for animal science, agriculture, and natural resources. One would think that supporting these over 15,000 Oregon students would be a priority. But, just three days ago, [RFD TV](#) reported that lawmakers are gearing up to make a budget cut to these youth-serving programs. The State must understand

the importance of supporting all Oregon youth, the teachers who make this programming possible, and the maintenance and construction of farming and ranching educational facilities.

- **Expand Business Oregon’s partnership with the Oregon Department of Agriculture, Oregon Department of Forestry, and Oregon Department of Land Conservation and Development.** Business Oregon leads the state in grantmaking for research and development, workforce development, start-up ventures, and more. 1000 Friends of Oregon applauds the extensive work that Business Oregon does to help locally-created businesses call Oregon home. We see this draft unlocking new grant opportunities to fund the kind of locally-created businesses that are seeking to help us adapt to a changing climate, prepare for more frequent and severe natural disasters, reduce our carbon emissions in every sector, and store carbon. We also see this draft calling for an expanded eligibility pool for land readiness dollars: schools/community organizations. To build new facilities that offer hands-on learning like the student-managed [Falcon Farm and garden at Liberty High School](#) in Hillsboro, schools must be able to access some of the land readiness dollars from Business Oregon. Without this access, Oregon will continue to fall behind other states and lose its position in the global economy.
- **Begin the foundation for Oregon’s suite of climate ag programs.** California’s cap-and-trade funded programs offer all of us a blueprint for how we can measure avoided/reduced greenhouse gas emission and stored carbon. To do so, ODOE and Oregon Climate Action Commission can help speed up these efforts by working with the Oregon Department of Environmental Quality to build and finalize carbon calculators to verify these climate benefits, preparing for the framework of eligible activities that could be funded by public and private entities. From [SWEEP](#) to [Healthy Soils](#) to the Sustainable Agricultural Lands Conservation Program ([SALCP](#)), there is no shortage of creative, responsive, and practical solutions that not only help address our greenhouse gas emissions and carbon sequestration goals, but that place value on the stewardship hard-working Oregonians are doing in day-in and day-out.



December 22, 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 NCS Workforce Needs Report

We are submitting comment on the draft [NCS Workforce Development and Training Programs Needs Report](#).

We appreciate all of the hard work and dedication that has gone into developing the Natural Climate Solutions Workforce Development and Training Programs Needs Draft study. We want to thank the staff at the Oregon Department of Energy (ODOE) and the Oregon Climate Action Commission (OCAC), along with their consultants, the Natural & Working Lands Advisory Committee, and the Interagency Work Group (IWG), for the considerable and commendable work undertaken to develop Oregon's first study of this kind.

OrCAN serves on the OCAC NWL Advisory Committee, which informs our comments on this report.

We are pleased to see that the Report recognizes the need to provide on-going technical assistance to support implementation of NCS in the farming sector, specifically:

- “Soil health programs that educate and support producers and farm service providers have lost federal funding in recent years, and their long-term outlook is uncertain. Resourcing organizations to do culturally competent, one-on-one consultation soil testing, technical assistance, and access to financial incentives and resources will help facilitate the implementation of sustainable land management practices. Supporting this work could create demand for contractors to help implement improvements or provide other technical expertise as needed.” (p. 64)

Farm service providers need training. Investing in technical assistance and soil health education for both producers and farm service providers is crucial to the implementation of NCS practices, and building resilience to the impacts of climate change. Soil health practices reduce toxic chemical inputs in agricultural production, while boosting resilience to drought, floods, extreme heat, pests, and diseases.

This study “assesses Oregon’s NCS workforce and related workforce development and training programs to identify gaps and opportunities for growing this workforce’s ability to meet Oregon’s climate goals.” (p. 1) We would also like to emphasize our support for the following:

- Successful NCS workforce development has many co-benefits beyond climate benefits. It is important that we highlight all the benefits from investing in NCS-specific jobs, including the economic, social, and health benefits to communities.
- NCS workforce demographics are shifting toward more gender and racial diversity and education, training programs, and workplace policies need to adapt to address those needs.
- The NCS workforce is also vulnerable to external factors such as shifts in federal funding and immigration enforcement.

We are also pleased to see that the Workforce Study includes the following policy and legislative recommendations:

- “Lead a regional, coordinated approach to NCS planning, implementation, and maintenance” (p. 3)
- “Coordinate braided funding and multi-year grant-making strategies” (p. 3)
 - This recommendation addresses the pervasive grant administration burden identified for Tribal Nations, SWCDs, and nonprofits (Finding #4). This would improve planning capacity and reduce administrative costs, and we think that it will be helpful for the State to coordinate different streams of funding to simplify these processes, and improve the efficiency of existing funds.
- “Review and revise evaluation criteria for contractor selection on NCS investments and projects” (p. 3)
 - We support this recommendation that State agencies review contractor selection criteria to award additional points to contractors that partner with indigenous experts or show knowledge and incorporation of traditional ecological and cultural knowledge (ITECK) into project planning and implementation. Lowering barriers for indigenous partnership and incorporating traditional knowledge is key to building climate resilience.

Additionally, as the state grapples with how to address economic and workforce challenges, bolster our communities’ resiliency in a changing climate, and try to meet our state’s climate goals, *we see opportunities and synergy with Governor Kotek’s recent [Executive Order No. 25-26](#) on climate resilience to identify and uplift recommendations from this NCS Workforce Report that align. We hope this opportunity can be named in the Report.*

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*



December 22, 2025

Comments on Draft Natural Climate Solutions Workforce Development And Training Programs Needs Study

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

As advocates for increasing investments in our natural and working lands and the people who work on them, our organizations represent conservation, climate, business, and practitioners across the state who care about advancing natural climate solutions (NCS) as well as equitable economic and workforce development opportunities.

We appreciate all of the hard work and dedication that has gone into developing the Natural Climate Solutions [Workforce Development and Training Programs Needs Draft study](#). We want to thank the staff at the Oregon Department of Energy (ODOE) and the Oregon Climate Action Commission (OCAC), along with their consultants, the Natural & Working Lands Advisory Committee, and the Interagency Work Group (IWG), for the considerable and commendable work undertaken to develop Oregon's first study of this kind. 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.

This study "assesses Oregon's NCS workforce and related workforce development and training programs to identify gaps and opportunities for growing this workforce's ability to meet Oregon's climate goals." (p. 1) We would like to emphasize our support for the following:

- There is high demand for restoration work in Oregon that not only provides employment opportunities for Oregonians, but also helps communities prepare for and mitigate climate impacts and improve their resiliency to natural disasters. It is important that we highlight all the benefits from investing in NCS-specific jobs, including the economic, social, and health benefits to communities.
- There are already successful youth training programs throughout the state that we can look to both expand or adapt to other sectors. Often these programs are supported or administered by non-profit partners that are applying to state programs for funding needs or match requirements from other grant opportunities
- NCS workforce demographics are shifting toward more gender and racial diversity. Education, training programs, and workplace policies need to adapt to address those

needs. Many sectors of the NCS workforce are vulnerable to external factors such as shifts in federal funding and immigration enforcement.

- This workforce study is a microcosm of workforce challenges in rural communities in Oregon, which have a smaller pool of candidates for NCS project design, planning, and management roles due to the limited training and educational resources available in those regions.
- As we look at constrained state agency budgets, we recognize a real need to support and fund not only state-funded workforce programs, but also federal, Tribal, and private workforce initiatives to meet the NCS demand and increase hiring in rural areas of the state.
- As the state grapples with how to address economic and workforce challenges, bolster our communities' resiliency in a changing climate, and try to meet our state's climate goals, we see opportunities and synergy with Governor Kotek's recent Executive Order 25-26 on climate resilience as well as the Governor's Prosperity Roadmap to identify and uplift recommendations from this NCS workforce report that align with those broader initiatives.

We strongly support many of the policy and legislative recommendations and know it is challenging to prioritize one recommendation over another. That being said, we recognize the state's limited resources and we want to see targeted investments that can have the greatest impact.

We recommend the state undertake a prioritization exercise to rank recommendations based on near-term and long-term needs as well as feasibility of implementation to identify where to best invest existing resources, where are low cost policy changes or expansion of an existing program, and to also think creatively on how best to work with and uplift non-profit and academic partners. We have done our best to start this prioritization exercise and welcome additional conversations.

Coordination, Contracting, and Procurement Prioritized Recommendations

1. **Create a statewide NCS workforce strategy (Rec #1)** - This is foundational and would align multiple stakeholders, define competency standards, and provide a coordinated framework for all other efforts. The report clearly identifies fragmentation as a major challenge, making this high-impact despite requiring significant coordination.
2. **Align multiple NCS projects into year-round employment contracts (Rec #3)** - The seasonality of many NCS-specific jobs makes it difficult for employees to have consistent work and for employers to have the workers when they need them (Finding #13).
 - a. Bundling projects would improve job quality, reduce turnover, and is fiscally feasible within existing contracting authority. This recommendation would have a high impact on worker retention and increases the potential that workers will be able to live and work in their communities.
3. **Coordinate braided funding and multi-year grant-making strategies (Rec #4)** - Addresses the pervasive grant administration burden identified for Tribal Nations, Soil

and Water Conservation Districts (SWCD), and non-profits (Finding #4). This recommendation would improve efficiency of existing funds through enhanced planning capacity and reduced administrative costs.

Recruitment and Hiring Prioritized Recommendations:

1. **Develop model hiring language allowing equivalent experience (Rec #13)** - Low cost, high impact, and directly addresses multiple barriers identified (Findings #8, #19, #30). This recommendation can be implemented quickly through administrative action and improves equity for candidates with practical knowledge.
2. **Explore scaling reciprocity agreements between conservation programs and public sector jobs (Rec #14)** - Builds on successful existing models (like Federal Pathways), addresses the field experience gap (Finding #19), and creates clear career pathways by leveraging existing programs.

Training and Advancement Prioritized Recommendations:

1. **Expand and scale existing NCS-related training programs, especially for rural communities, youth, and Tribal Nations (Rec #15)** - Addresses multiple critical findings (#2, #14, #22) about youth interest and rural workforce needs. Building on successful existing programs is both feasible and high-impact.
 - a. An example of a successful program that addresses workforce gaps and helps train the next generation of NCS workers is The Nature Conservancy's (TNC) Oregon Fire Partnership. The Partnership supports healthy and resilient ecosystems and fire-adapted communities by creating, training, and deploying inter-organizational, place-based prescribed fire capacity. Consistent, predictable funding and capacity support from the state would be helpful in expanding this program (and similar programs) statewide.
 - b. In addition, supporting and funding the Higher Education Coordinating Commission (HECC) would strengthen alignment between colleges, training programs, and NCS employers.
2. **Develop NCS-related credentialing for workers and contractors (Rec #16)** - Directly addresses the credential gap (Finding #21) and would improve both workforce quality and advancement prospects. Sub-recommendation on ITECK certification aligns with Tribal engagement priorities.

Metrics, Monitoring, and Accountability Prioritized Recommendations

1. **Track jobs created through state-funded NCS investments and report publicly (Rec #19)** - High feasibility as grantmaking entities can require this reporting. Creates accountability and demonstrates return on investment, which supports continued funding. This recommendation can be implemented relatively quickly as there is an existing Natural and Working Lands (NWL) Fund that could identify projects and grantees who have received funds.
1. **Track data on NCS training placements and retention (Rec #20)** - Essential for understanding training effectiveness (addresses limitation of "anecdotal evidence")

mentioned in Finding #14). HECC already has expertise in workforce data collection, making this feasible.

2. **Assess future demand for NCS projects (Rec #21)** - While requiring additional resources, this is foundational for right-sizing workforce development investments. Report notes current lack of demand data makes workforce planning difficult. High long-term impact for strategic planning.
 - a. Are there opportunities to identify NCS-specific jobs via the upcoming development of the activity metrics, where ODOE will estimate the net carbon flux from NCS activities and evaluate the positive and negative effects of NCS practices on local communities and economies? Are there other opportunities to identify NCS workforce demand through recent initiatives (Governor Kotek's Executive Order 25-26 which calls for increased need for climate resilient lands and waters by investing in restoration and land management activities and her Roadmap to Prosperity, which emphasizes job growth and retention)?

In conclusion, we greatly appreciate the opportunity to comment on this draft report. We believe this is a significant first step to identifying workforce development and training needs to build a robust NCS workforce. We look forward to supporting the implementation of these recommendations and remaining engaged in this effort.

Sincerely,

Ben Brint
Senior Climate Program Director
Oregon Environmental Council

Andrea Kreiner
Executive Director
Oregon Association of Conservation Districts

Lauren Link
State Policy Advisor
The Nature Conservancy Oregon

Tim Miller
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Executive Director
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December 17, 2025

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

RE: Draft Natural Climate Solutions Workforce Development and Training Programs

The Oregon Forest Industries Council (OFIC) is pleased to submit the following comments to the draft Natural Climate Solutions Workforce report (hereinafter the “Report”) that was noticed for public comment earlier this month and was presented by webinar on December 5, 2025.

OFIC appreciates the work that has gone into this Report and the responsiveness of staff to the feedback of the advisory committee members during its development. As is the case in many sectors, workforce development is recognized as a matter of paramount importance for the future viability of the natural resource sector, and we are hopeful that this work will serve to help surface solutions for the growing problem of attracting the talent that is needed to advance this essential work.

That being said, one of our primary concerns with the Report as presently drafted is that it leaves out key parts of the value chain that support land management activities and thereby advance natural climate solutions. In the forest sector, specifically, a comprehensive workforce evaluation should include a survey of employment within primary and secondary wood products manufacturing facilities and recommendations for growth and recruitment to local mills. To the extent that promotion of low-embodied carbon building materials is one of the key strategies that the state pursues for leveraging the climate benefits of natural and working lands, a workforce study should account for opportunities and barriers to growth within that part of the sector.

Likewise, the Report should include those engaged in wildfire response, prevention, and recovery. A marked increase in manpower is needed to carry out the work that is needed to restore healthy fire regimes across our state’s forested landscape. The Report should consider those positions that are necessary for conducting forest health treatments (both via commercial and pre-commercial thinning as well as prescribed fire projects), those needed to maintain a robust wildfire response system, and those that are needed to engage in post-fire restoration activities. Some of this work will be performed by individuals that have already been identified in the Report (such as loggers and planting crews), but the Report leaves out other key pieces such as wildland firefighters and project managers.

Finally, other support roles within the larger forest industry should be included in the Report, as well, such as policy development and public relations, as these are essential for promoting the



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work that the industry is engaged in. The Report includes other policy-related positions through its inclusion of workers within conservation organizations. The same considerations that would lead to inclusion of these roles should likewise justify inclusion of roles within organizations that promote forestry and the wood products sector.

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

Sincerely,

Tyler J. Ernst

General Counsel and Director of Regulatory Affairs

Oregon Forest Industries Council

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**Submission on behalf of the Oregon and Southern Idaho District Council of Laborers
to the Oregon Department of Energy**

Comments regarding Natural Climate Solutions Workforce

On behalf of the Oregon and Southern Idaho District Council, Laborers International Union of America (LIUNA), we want to thank you for the opportunity to provide comments on the report for the Natural Climate Solutions Workforce Development and Training Programs Needs study. LIUNA appreciates the report's examination and analysis of the training, skills, education, and potential resource needs that could help best prepare the Oregon workforce to meet future demands for natural climate solution implementation.

LIUNA is a workforce development training partner in the state. We operate the largest state registered apprenticeship program for Construction Craft Laborers in Oregon, where our certified instructors provide rigorous classroom instruction to our members and apprentices in a wide range of scopes, including restoration, conservation, demolition, remediation, hazardous waste removal, landscaping, and land-based climate solution projects. Along with the on-the-job training that our employer partners provide, this combination fosters a safe and highly skilled work environment, ensuring that projects are performed and completed on time.

We would respectfully like to urge caution around the concept of creating new workforce training programs and rather to explore possible partnerships with existing accredited Registered Apprenticeship programs with longstanding outcomes for completion of journey-level workers. There are skilled and dedicated contractors and workforces who are already positioned to do this work throughout the state. Furthermore, LIUNA has the wherewithal to expand and/or augment our apprenticeship offerings throughout Oregon, in order to meet specific natural climate project demands where they are located.

We applaud the draft report's recommendation regarding exploration of wider use of project labor agreements being attached to projects above a certain size in this space, as there are a community benefit and shared prosperity by all who perform work on these projects through PLAs. Furthermore, PLA's support Oregon's workforce to better meet future demands for natural climate solution implementation, while also ensuring the hiring of local workers and contractors.

LIUNA commends this study for identifying the need to increase the pace and scale of workforce development, training, and technical assistance for natural climate solutions across Oregon. Investing in the NCS workforce is crucial for maximizing the benefits of natural climate solutions. Thank you for your consideration of my comments.

Sincerely,

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Mike McCarthy, PhD
McCarthy Family Farm, LLC

- Under Weaknesses bullet point two, I think it is overly negative about farm work. Because of the shortage of farm workers in Oregon the jobs are not precarious. Workers are needed and valued by employers. Workers in most cases have opportunities for upward progress into supervisory or management roles, many starting their own businesses; some leasing farm properties and some purchasing farms.
- Many farm workers are provided housing free of charge (not taxed) which in many cases is a value of \$24,000 a year. DOL says the prevailing wage in Oregon is \$19.82. Including the housing value this puts full time farm worker households in the \$100,000 per year range. It would be great if farm worker wages could be higher but with low farm profits throughout Oregon and the US, the food system can not support higher wages.
- The farm worker workforce could be a valuable source of NCS work either on their resident farms or other farms in the area and could be a great additional source of work and income for them.
- In several appendices Farm Workers are not listed as a category.
- The wages of farmers are overstated in Appendix F (see USDA Ag Census). Wages and income are often stated as Farm Household income which includes off farm income by one or more members of the family and the Farm Household income does not relate to farm income. The figures also do not include non-paid work by family members. Averaging non-paid hours by some family members into the total income would reduce individual farm family member incomes.



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December 19, 2025

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VIA EMAIL: elizabeth.ruther@energy.oregon.gov

RE: Draft Natural Climate Solutions Workforce Development and Training Programs Report

Thank you for the opportunity to provide comments on the draft *Natural Climate Solutions Workforce Development and Training Programs Needs Report* (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 inclusion of our industry and the acknowledgment that forestry and logging are part of Oregon's natural climate solutions. However, it is not clear whether the full value chain is represented. Generic job codes for forestry and logging risk overlooking critical segments of the workforce that support our industry. We encourage continued refinement of the datasets used in studies like this to ensure a more complete picture.

We would highlight several specific omissions for consideration in the final report:

- **Mill workers:** The workforce in our mills was not included. Mill workers process harvested timber into long-lived wood products that society depends on. Without these products, climate-friendly building options would be limited, forcing reliance on higher-carbon alternatives. Mill workers are essential to addressing climate change and increasing carbon storage.
- **Post-wildfire restoration:** The Report does not acknowledge the climate benefits of restoration work following wildfire. This omission is significant, as harvesting dead and dying trees and replanting after disturbance accelerates forest recovery. Dead trees that are left on the landscape after fire decay and release carbon into the atmosphere, whereas utilizing them in durable wood products stores that carbon in the built environment, while replanting restores the land to a healthier state.
- **Road-building and maintenance:** It is unclear whether road-building companies and workers were included. A functional and well-designed road system within forestlands is vital to natural climate solutions, enabling access for restoration, management, and wildfire mitigation. These workforces should be recognized and supported as part of the broader effort.

Finally, it is important to note that private industry supports the vast majority of the workforces represented in this Report. As policymakers consider regulations affecting private companies, we urge caution against imposing additional regulatory or financial burdens that could undermine the very workforce needed to expand natural climate solutions in Oregon.

Thank you again for the opportunity to provide comments. As a company employing a workforce that delivers natural climate solutions every day, Hampton Lumber remains available to provide further input on these important issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Wilkeson", with a long horizontal flourish extending to the right.

Laura Wilkeson
Oregon Director of Government Affairs