

Appendix G — Responses to Public Comments on the Draft Carbon Sequestration and Storage Goal Setting for Natural and Working Lands

On June 12, 2026, the Oregon Climate Action Commission was briefed on potential options for updating the non-binding carbon sequestration and storage goal as directed by ORS 468A.193. Preceding the meeting, on June 8, 2026, the Oregon Department of Energy released a draft Goal Setting for Natural and Working Lands report that detailed three potential primary goal options, and the rationale and considerations associated with each option. ODOE sought public comment on the draft report through 5 p.m. on July 2, 2026. ODOE received 21 comments during this period. ODOE evaluated the comments and provides the responses below.

Comments Regarding the Voluntary and Nonbinding Nature of the Goal

Some comments emphasized the importance of the goal remaining voluntary, nonbinding, and non-regulatory. Commenters highlighted limitations with respect to available information, resources, and funding that could make mandatory actions in support of achieving the goal difficult and burdensome, especially for private sector entities. Additionally, comments noted that any new restrictions on working lands could impact the ability of private landowners to engage in certain practices, particularly in agricultural and forest land, that provide economic benefits.

In directing the Commission and ODOE to establish the goal, the legislature made clear through its description of the goal as “nonbinding” that setting and updating the goal would not itself impose any requirements on private sector entities. As stated in the report, the goal established by the Oregon Climate Action Commission and the Oregon Department of Energy is voluntary and non-binding.

Comments Regarding the Impact of Wildfires

Some comments highlighted the impact of severe wildfires on carbon sequestration and storage on Oregon’s natural and working lands. Commenters noted that wildfires have not made Oregon’s lands less capable of storing carbon or caused a sustained reduction in carbon storage capacity, though they have contributed to the overall decline in net sequestration over time. Some comments recommended that ODOE and the Commission focus on, and conduct additional analysis of, the impact of wildfires on carbon sequestration and storage and evaluate options to mitigate their severity and the attendant climate impacts. These comments noted that addressing wildfires should be the priority ahead of implementing other natural climate solutions given that they are responsible for the overall decline in net sequestration.

ODOE acknowledges that wildfires have a significant impact on the decline in land-based sequestration. The draft report, as well as the [Land-Based Net Carbon Inventory](#), highlights the fact that wildfires are a prominent cause of the decline. In response to the public comments recommending additional focus on the impact of wildfires, ODOE conducted additional analysis,

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which is available in the updated report. That analysis indicates that Oregon's net removal is declining over time with or without including wildfires (e.g., biomass burning). Additional data and analysis on trends are included in the section titled "Trends in Emissions and Removals on Oregon's Land" and in [Appendix B](#).

Addressing not just the carbon issues, but the deleterious impact of extreme wildfires on Oregonians' health, livelihoods, homes, businesses, and communities, is also important. The report notes that natural climate solutions, which can serve to reduce wildfire risk, improve forest resilience and community wellness, are part of the solution. Employing a diverse suite of NCS to reverse the downward trend in carbon sequestration and storage on Oregon's natural and working lands is prudent.

Comments Regarding the Feasibility of the Potential Goals

Some comments raised questions regarding the feasibility of goals, specifically Option 3 in the draft Report, which proposes achieving net sequestration of at least 57.6 MMTCO₂e per year across all land categories by 2035 and 62.4 MMTCO₂e by 2050. Comments pointed to the declining trend in net sequestration and questioned whether Oregon could realistically achieve those goals and questioned what actions would be necessary to do so. To the latter point, there were comments seeking additional analysis of the goals' feasibility and pathways to achieve them, noting that the draft report highlights that achieving the goal will require statewide reporting infrastructure that is not currently in place and additional modeling that has not yet occurred. Comments also sought additional evaluation of potential trade-offs and consequences associated with actions to achieve the goal.

Few, if any, goals that Oregon has established are based on complete information and a complete vision of how they are to be achieved. That is the nature of forward-looking goals. This is also true for these proposed goals. They are based on what science tells us is needed to help solve the climate crisis. Most of the time an established goal creates an impetus for creating an action plan that includes sufficient capacity and funding to achieve the goal over time. With this in mind, this report makes recommendations for the Commission's consideration that calls for additional funding and capacity to conduct modeling to identify nature-based action pathways for achieving the goal, and for a more robust workforce to support implementation.¹

Comments Regarding Carbon Storage

Some comments recommended additional consideration of carbon storage that occurs outside of natural and working lands, for example within harvested wood products. Comments suggested a greater focus on the carbon storage benefits that accrue as a result of harvesting trees. ODOE did assess harvested wood products in the Land-based Net Carbon Inventory and recognizes the complex role that harvest plays in storing carbon. The Inventory specifically provides a methodology for estimating emissions and removals ([Appendix E](#)) and provides estimates of emissions and removals ([Appendix F](#)) of harvested wood products after harvest.

¹ For more information on the natural climate solutions workforce, see the [Natural Climate Solutions Workforce Development and Training Programs Needs Study \(2025\)](#).

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ODOE will continue to collaborate with the Department of Forestry on refining the methodology for estimating harvested wood products' contributions, and a stocks assessment of the categories accounted for in the Inventory. While the act of harvesting trees intended to create harvested wood products is not a natural climate solution, natural climate solutions can be applied to any type of forest management to increase carbon sequestration and storage while also maintaining management objectives. Forestry operations contribute to Oregon's workforce, economy, and healthy and resilient communities. The report has been updated to reflect the role durable harvested wood products contribute to climate action (see the "Stocks" section of the report.)

Comments Regarding Goal Options

Some comments supported ODOE and the Commission adopting Option 3, which proposes achieving more ambitious net sequestration of at least 57.6 MMTCO₂e by 2035 and 62.4 MMTCO₂e by 2050. Comments highlighted the fact that this option represented the best available science and reflected the urgency of the need to address the climate crisis. They mentioned that this option also reflected the sequestration potential of Oregon's natural and working lands and conveys a commitment to the Oregon's leadership in the natural climate solutions space. Other comments recommended against the adoption of Option 3, largely citing concerns over the feasibility of implementation and the need for additional analysis. Taking into consideration both of these perspectives, ODOE finds either Option 2 or 3 acceptable.

The full text of all the comments received is included below.

From: [Patty Hine](#)
To: [OCAC Odoo * ODOE](#)
Subject: Public Comment on Natural and Working Lands Goal Setting Report
Date: Saturday, June 27, 2026 12:30:27 PM

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Dear Oregon Climate Action Commission chair and members,

I wish to thank the Oregon Department of Energy and the Oregon Climate Action Commission for your thoughtful approach to updating Oregon's net sequestration and storage goal for Oregon's natural and working lands. This is the single most important step you can do to address the worsening climate emergency.

I request you adopt Option 3.

Option 3 ensures our information is updated by the latest data from Oregon's first land-based net carbon inventory and the U.S. GHG inventory. This ensures decisions are based on the best available science.

Option 3 would require maximum sequestration. Our objectives should be ambitious so that our state can do its part to protect and preserve as much as we can for a climate-safe and sustainable future.

Option 3 would require industrial timber land owners to grow trees longer. Research shows this is by far the most effective climate solution. We need guidelines with incentives for private industrial timber land owners to harvest in longer rotations.

Option 3 would reflect carbon sequestration and storage potential on Oregon's natural and working lands, and this, combined with the newly released land-based net carbon inventory, would provide a compelling State strategy that will help Oregonians adapt to climate impacts, provide economic, health, and ecological benefits, across Oregon's landscapes.

Option 3 would enable a system that can track progress on sequestration goals across state agencies and model and recommend methods to achieve optimum natural and working lands carbon sequestration.

Thank you for conducting a robust public comment process. Your work is appreciated.

Sincerely,
Patricia Hine
Eugene, OR



Associated Oregon Loggers, Inc.

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Oregon Climate Action Commission
Oregon Department of Energy
550 Capitol Street NE
Salem, OR 97301

July 2, 2026

Submitted by email to OCAC@energy.oregon.gov

RE: Draft Goal Setting for Natural and Working Lands Report

Dear Chair Macdonald, Director Benner and Members of the Oregon Climate Action Commission,

Associated Oregon Loggers appreciates the opportunity to comment on the Draft Goal Setting for Natural and Working Lands Report. AOL represents about 900 member companies and the broader community of Oregon forest operators and loggers. Our members are small, family-owned businesses. They include logging contractors, wildland firefighters, reforestation crews, fuels contractors, road builders, log truckers, and other forest operators. Our member companies support about 23,000 working families and help care for Oregon's 30 million acres of forestland.

AOL supports healthy forests, resilient rural communities, clean water, wildfire risk reduction, and practical climate solutions. Oregon cannot reach its forest health, wildfire resilience, or carbon goals without the small businesses and skilled workers who do the work on the ground. AOL also supports the use of sound science. Good natural and working lands goals must measure real net carbon outcomes. They must also protect the forest operations workforce, keep timber and forest markets working, support active management, and avoid harm to rural communities.

For the reasons below, AOL cannot support Option 3 as drafted. AOL recommends the Commission either pause adoption of a new numeric goal until more analysis is complete or adopt only a cautious interim goal with clear limits. At a minimum, the final report must include strong guardrails, so the goal remains voluntary, non-regulatory, and not used to delay harvest, reduce fiber supply, or create new burdens for landowners and forest operators.

The goal must remain voluntary and non-regulatory

The draft report states the goal is non-binding, voluntary, and not intended to place burdens or new requirements on industry, landowners, or others who do not participate. AOL strongly supports this statement.

However, voluntary goals can still become de facto mandates. State agencies, grant programs, local plans, forest plans, permit processes, and procurement policies may begin to treat a voluntary goal as a required outcome. This could create pressure to delay harvest, extend rotation ages, increase set-asides, reduce working forest acres, or limit active management.

AOL asks the Commission to add clear language to the final report stating:

The natural and working lands goal shall not be used by state agencies to require delayed harvest, mandate longer rotations, reduce fiber supply, limit working forest acres, impose new permit conditions, or create new duties for landowners, operators, contractors, or non-participating businesses.

This guardrail is needed to keep the report aligned with statute and with ODOE's own description of the goal.

Oregon should focus on net carbon outcomes, not just carbon stored on the stump

The report should not treat carbon stored on the stump at one point in time as the only measure of climate success. Forest carbon is not static. It moves through forests, wood products, soils, residues, biomass markets, decay, fire emissions, and regrowth.

A resilient forest is one actively managed, supported by a working market, and served by skilled forest operators. It has people in it. It has vigorous trees growing at strong rates. It is adapted to fire. It is replanted after harvest or disturbance. It moves carbon into long-lived wood products, then grows again.

Oregon should not try to saturate the sponge. Forests soak up carbon as trees grow. Active management can wring carbon into the harvested wood products pool, then replant and let the forest soak up carbon again. This cycle supports carbon storage, carbon sequestration, jobs, mills, rural economies, healthy forests, and strong communities.

- The final report should place more weight on sequestration rates, durability, wildfire risk, harvested wood products, and full net carbon outcomes. It should not rely only on standing carbon stocks.

Wildfire emissions must be separated from biological sequestration capacity

AOL shares the concern raised by other natural resource partners about the report's treatment of declining sequestration. A decline in net sequestration does not always mean Oregon's forests are less able to grow trees or store carbon. Net sequestration reflects both removals and emissions.

The draft report acknowledges wildfire is a major driver of recent declines. It also states other causes of decline are less clear. This distinction matters.

If recent declines are mainly driven by large wildfire events, then the main policy answer is wildfire resilience, fuels work, active forest management, reforestation, salvage where appropriate, road access, and protection of existing carbon stocks. Raising a statewide annual sequestration target will not solve the main problem if the problem is catastrophic carbon loss from wildfire.

AOL asks the Commission to require ODOE to complete and publish an analysis separating wildfire-related emissions from other drivers of net sequestration change before relying on the declining-trend narrative to support higher targets.

The final report should also recognize carbon permanence. Carbon stored in an unmanaged or overstocked forest is not permanent if it burns, dies from insects or disease, or fails to regenerate after wildfire. Carbon accounting should include wildfire emissions, decomposition, decay, and other biogenic emissions.

Active management and markets are climate infrastructure

AOL urges the Commission to treat markets and workforce capacity as core climate infrastructure.

A well-functioning forest market helps make climate-smart work possible. Markets are needed for logs, small-diameter material, biomass, pulp, chips, residuals, biochar, mass timber, and other wood products. Without markets, material removed through thinning and fuels work may be left to decay or burn. When markets fail, forest resilience work slows down or stops.

The same is true for the workforce. Oregon needs logging contractors, road builders, truckers, equipment operators, mechanics, reforestation crews, and fuels contractors to carry out natural climate solutions at any meaningful scale. If policies reduce steady work, contractors cannot retain crews, train new workers, or maintain costly equipment. Once this capacity is lost, it is hard to rebuild.

- The final report should state the success of any natural and working lands goal depends on maintaining a strong forest operations workforce and a strong forest products market.

Delayed harvest and longer rotations can harm small businesses

AOL is concerned the goals could lead to actions with real harm for forest contracting small businesses.

Delayed harvest, extended rotations, or reduced working forest acres can create gaps in work availability. Forest operators depend on steady project flow to keep workers employed and equipment financed. Work gaps can lead to layoffs, loss of trained workers, higher costs, fewer contractors, and less capacity for future restoration or wildfire work.

Longer rotations can also create a mismatch between tree size, available equipment, mill specifications, and market demand. Many forest operators and mills are built around certain log sizes and stand conditions. If policy pushes more timber into larger size classes, existing equipment may not match the work. This can strand past investments and raise costs for landowners, mills, and contractors.

- AOL asks the Commission to evaluate these small business impacts before adopting or implementing any goal in a way that could change harvest timing, rotation length, fiber supply, or stand structure.

Harvested wood products must be counted

The final report should include full and fair carbon accounting for harvested wood products.

Oregon grows some of the best wood in the world. When timber is harvested and turned into lumber, plywood, mass timber, and other durable products, carbon can remain stored for many years. Wood products can also replace higher-emission materials in buildings and other uses.

AOL asks ODOE and the Commission to include harvested wood products, product substitution, biomass use, biochar, recycling, mill residues, and market leakage in future modeling. Without these elements, the state will undercount the climate value of active forest management and Oregon's forest products sector.

Feasibility work is needed before adoption or change

Option 3 sets a much higher target. Yet the draft report acknowledges key gaps. Oregon does not yet have complete activity baselines, full implementation modeling, statewide reporting systems, pathway analysis, or a clear understanding of incentives needed for adoption at scale.

A science-based goal should also be achievable. A goal with no clear path can become an aspiration instead of a useful guide. It can also create pressure for agencies to fill the gap with restrictions instead of practical tools.

I AOL recommends the Commission not adopt Option 3 at this time.

If the Commission chooses to adopt a numeric goal now, AOL recommends it be treated as an interim guidepost only. It should be paired with clear findings stating the goal may not be used for regulatory actions, harvest restrictions, permit limits, or agency decisions affecting non-participants until further analysis is complete.

Needed analysis before future goal updates

Before any future goal update, AOL asks ODOE and the Commission to complete the following:

1. Separate wildfire-driven emissions from other drivers of net sequestration change.
2. Analyze carbon permanence, including wildfire, insects, disease, drought, decomposition, and post-fire regeneration.
3. Include harvested wood products, wood product substitution, biomass, biochar, residues, and leakage.
4. Model active forest management scenarios, including thinning, fuels reduction, reforestation, salvage and road access.

5. Analyze impacts to fiber supply, mill infrastructure, forest contractors, log truckers, reforestation crews, and rural jobs.
6. Evaluate equipment and market impacts from delayed harvest or longer rotations.
7. Identify how the goal will maintain or increase short-term, mid-term, and long-term fiber supplies.
8. Build a reporting system that tracks real net carbon outcomes without creating new burdens for non-participants.
9. Include forest operators and small businesses in future modeling, policy design, and implementation planning.

Federal lands must be part of the answer

The draft report notes federal lands make up a large share of Oregon's natural and working lands. Many of Oregon's highest wildfire risks and largest carbon losses occur across landscapes where federal management decisions matter.

Oregon's natural and working lands goal should not place pressure on private working lands while failing to address federal land conditions. AOL urges the Commission to focus on federal partnership, faster project delivery, fuels reduction, reforestation, road access, and active management across federal forests.

Private forest owners and forest operators should not be expected to offset carbon losses from unmanaged or undermanaged federal lands.

Conclusion

AOL supports resilient forests and practical climate solutions. Our members are ready to help Oregon reduce wildfire risk, reforest disturbed lands, maintain roads, harvest and deliver renewable wood products, and keep forests growing. But natural and working lands goals must not become a tool to delay harvest, reduce fiber supply, shrink working forest acres, or weaken the small businesses needed to manage Oregon's forests and respond to disasters.

A strong goal should keep the whole carbon cycle in view. It should focus on net carbon outcomes, wildfire resilience, active management, harvested wood products, strong markets, and the skilled workforce needed to do the work.

AOL respectfully asks the Commission to pause adoption of Option 3, complete the needed feasibility and wildfire analysis, and add clear guardrails to ensure the goal remains voluntary, non-regulatory, and supportive of Oregon's forest operators and rural communities.

Sincerely,



Amanda Sullivan-Astor, CF
Forest Policy Manager
Associated Oregon Loggers
aastor@oregonloggers.org

From: [Carolynn Kohout](#)
To: [OCAC Odoe * ODOE](#)
Subject: OR's Climate Action Commission's Natural and Working Lands Goal Setting Report
Date: Monday, June 29, 2026 5:51:56 PM

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Attn: Oregon Department of Energy ("ODOE")

Oregon Climate Action Commission ("OCAC")

Re: Oregon Climate Action Commission's Natural and Working Lands Goal Setting Report

Dear Reader(s):

Thank you for your thoughtful approach to updating Oregon's net sequestration and storage goals for Oregon's natural and working lands.

I recommend the OCAC adopt Option 3: **achieve net sequestration of at least 57.5 MMTCO₂e per year across all land categories by 2050**, an update of our current goal (informed by new data from Oregon's first land-based net carbon inventory (LCI)) and the U.S. National Greenhouse Gas Inventory.

This goal

- 1- accurately reflects the sequestration potential within Oregon's natural and working lands;
- 2- conveys strong State leadership supporting investments in our natural and working lands; and
- 3- highlights the important role land management strategies play in climate action.

Focus needs to be on "growing trees longer" on private industrial timber lands. The older a tree is the better it collects and holds carbon to enable carbon sequestration and storage potential on Oregon's natural and working lands – our most effective natural climate solution.

There is an updated, newly released land-based net-carbon inventory, which provides a compelling State strategy that will both help Oregonians adapt to climate impacts, and provide economic, health, and ecological benefits across Oregon's landscapes.

Option 3 is aligned with Governor Kotek's Executive Order No. 25-26 for climate resilience, identifying information needs and gaps to accompany the updated sequestration and storage goals.

It would be wise for the OCAC to be grounded by the best available science as they respond to the potential challenges and opportunities which can arise as they implement the updated plan.

Over the next three to five years the state must allocate funding and build capacity to: 1- Develop a cross-agency reporting infrastructure crafted to track activity-based progress towards meeting the sequestration goals;

2- conduct Natural Climate Solutions modeling to identify nature-based pathways to achieve natural and working lands net sequestration goals;

3- recommend activity targets for natural lands, forest, agriculture, and developed areas for

Oregon Climate Action Commission to consider;

4- conduct a study to identify and review the incentives and policies currently and potentially available to support implementation of natural climate solutions.

Respectfully,

Carolynn Kohout

Mobilizing Climate Action Together member

From: [Patty Hine & Deb McGee](#)
To: [OCAC Odoe * ODOE](#)
Subject: Public Comment Natural and Working Lands Goal Setting Report
Date: Thursday, July 2, 2026 9:29:55 AM

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Dear Chairman MacDonald and OCAC Members,

Appreciation to both the ODOE and the OCAC for the public process you are using to update our state's net sequestration and storage goal for Oregon's natural and working lands.

I urge you to approve Option 3.

Option 3 is grounded in the best available science and most accurately reflects sequestration potential. This ambitious goal reflects a serious, climate-safe land management strategy, which has been lacking for industrial timber lands and will further signal that there is strong leadership in this area.

Option 3 addresses the too early harvest of trees on private industrial lands, which is harmful for a variety of reasons, but particularly because it negates the ability of these young trees to contribute to the sequestration and storage of carbon. Research is clear: letting trees grow longer is the most effective climate strategy we have. We'll need incentives for the private landowners during this transition.

Option 3 will further align Gov. Kotek's climate resilience priorities and compel the state to help Oregonians adapt to economic and health impacts due to climate change.

Option 3 maximizes the use of recent science so we can adapt to challenges on the horizon and builds capacity for the collective tracking, reporting, study and review necessary to judge maximum progress.

Thank you for considering my public comment.

Sincerely,
Debra E McGee
Eugene, OR

From: [Gene Griffith](#)
To: [OCAC Odoe * ODOE](#)
Subject: My Comment: I Support Option 3, But Here's What I Don't Get
Date: Monday, June 8, 2026 9:53:44 PM

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Dear Oregon Department of Energy,

I am writing as a resident of Gold Beach to provide public comment on the June 8, 2026, draft report regarding carbon sequestration goals for Oregon's lands. Living in a community where the threat of wildfire is a constant reality, I strongly support the adoption of Option 3.

Option 3 is the only proposal that reflects the urgency of the climate crisis. By setting an ambitious target for 2035, it recognizes that we cannot afford to wait for the worst impacts of fire and drought to intensify. It is also the only option that realistically accounts for the fact that Oregon's lands are currently sequestering less carbon due to increasing wildfires.

While I support the ambition of Option 3, I have several critical questions regarding the implementation of this rule:

Funding and Implementation

- What is the specific plan to address "practical constraints" such as labor shortages and permitting delays? Is there a strategy to secure legislative funding or grants?
- How will the state incentivize private landowners to participate in these voluntary goals? What specific financial or tax-based "offers" are being considered?
- Without penalties for missing targets, how will the public be informed of progress or lack thereof?

Measurement and Accuracy

- How will the state track progress toward the 2035 goal given the current lack of monitoring infrastructure? When will a reliable tracking system be established, and how will it be funded?
- How will "additionality" be determined? Without a clear baseline, how will the state ensure it is not counting activities that would have occurred anyway?
- What is the margin of error for the current estimate of 48 million tons sequestered per year?

Partnerships and External Factors

- Have Tribal Nations formally agreed to the specific targets assigned to their lands?
- Given that the federal government manages over half of Oregon's forests, what formal agreements are in place with the U.S. Forest Service and the BLM to ensure these goals are achievable?
- Is there a contingency plan for significant carbon losses resulting from catastrophic wildfire seasons?
- To what extent does the report distinguish between carbon decline caused by climate change versus logging or development?

I urge the Department to adopt Option 3 but request that these questions be addressed in plain language before the rule is finalized. A goal without a clear plan for funding, measurement,

and partnership risks being ineffective.

Thank you for your time and for considering the safety and future of communities like Gold Beach.

Sincerely,

Gene Griffith
Gold Beach, Oregon
genegr2022@gmail.com



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July 2, 2026

Via Email: ocac@energy.oregon.gov

Oregon Climate Action Commission
550 Capitol St. NE
Salem, OR 97301

RE: Goal Setting for Natural and Working Lands Report

Dear Chair Macdonald and Commission Members,

On behalf of Hampton Lumber, thank you for the opportunity to comment on the draft *Goal Setting for Natural and Working Lands Report*. Hampton Lumber is a fourth-generation, family-owned company headquartered in Portland, Oregon. In Oregon, we own and operate three sawmills located in the rural communities of Tillamook, Warrenton, and Willamina, as well as approximately 130,000 acres of timberland that actively sequester and store carbon. Our mills produce dimensional lumber, providing renewable, carbon-storing building materials that support a more sustainable built environment.

General Comments and Considerations

We appreciate the draft report's clear description of its purpose, statutory requirements, and the voluntary nature of the proposed goals. This clarity helps readers understand expectations while also reminding decision-makers of the parameters within which they are working. Such transparency is especially important when addressing complex and nuanced issues like carbon sequestration and climate change.

We also appreciate the report's acknowledgment that Oregon has long been a leader in land-based carbon sequestration and continues to sequester more carbon on its lands than most other states. As the report notes, "Oregon's land-based net sequestration of carbon ranks seventh highest in the nation according to the national greenhouse gas inventory." As decision-makers consider goals and recommend policies intended to achieve them, we encourage them to recognize Oregon's existing leadership and success in this area.

It is important to remember, as the report states, that the proposed goal is "voluntary, rather than regulatory." Equally important is the report's further clarification that the goal "is not intended to pose any type of burden or additional requirements on industry, landowners, or others if they do not participate."

This distinction is critical. Natural resource industries and the rural communities that depend on them already face significant pressures from a growing number of Oregon laws, regulations, and policy requirements. The forestry sector is currently navigating a challenging period as multiple state policies

impose additional restrictions on timberlands, reducing harvest opportunities and affecting the economic viability of forest operations. Any additional burdens would further strain these industries and the communities that rely on them, creating additional economic and social challenges across rural Oregon.

It is also important to highlight the limitations acknowledged in the report. The challenges associated with agency capacity and coordination, data gaps, workforce development, partnership building, project permitting, and securing adequate investment are all appropriately recognized as factors that may affect the ability to achieve these goals, particularly where the goals are aspirational in nature.

Given these constraints, feasibility must remain a central consideration throughout the goal-setting process. The statute only requires that new information be considered when goals are updated. Considering the challenges identified in the report, we encourage the Commission to prioritize achievable outcomes and carefully consider the real-world implications. The statute also directs the state to leverage existing programs to implement natural climate solutions. Decision-makers should start with this directive when considering policies to achieve goals.

Declining Net Removals

The report describes the recent decline in net carbon removals over the past five years and largely attributes that trend to large wildfires, particularly the historic fires of 2020. While these declines may be concerning, it is important to recognize that they were driven by extraordinary disturbance events rather than a sustained reduction in the underlying carbon sequestration capacity of Oregon's forests. Prior to the 2020 fires, these lands were sequestering carbon at rates consistent with long-term trends. In other words, absent those unprecedented wildfire events, Oregon's sequestration trajectory may look markedly different today. It's ill-advised to craft policy around anomalous events like the 2020 Labor Day fires.

Given this context, a more effective response would be to address the underlying drivers of catastrophic wildfire rather than establish goals that may not be achievable under current conditions. The data suggest that the challenge is not a lack of sequestration potential, but the increasing impacts of large-scale forest disturbances. Efforts to improve forest health and resilience, particularly through active management and more effective wildfire prevention and suppression strategies on federal lands, should be a top priority for decision-makers seeking to increase carbon sequestration and avoid future declines. Addressing forest conditions that contribute to severe wildfires will do more to sustain and enhance long-term carbon storage than setting goals that do not adequately account for these realities.

Forestry as a Solution

Decision-makers should carefully consider the potential unintended consequences of additional restrictions on private forestlands. If the regulatory environment becomes so burdensome that forest management is no longer economically viable, some landowners may be forced to sell or convert their properties to non-forest uses. Such conversions would reduce or eliminate the carbon sequestration benefits provided by those acres and work against the objectives this Commission is seeking to achieve.

Maintaining the economic viability of working forests is essential to preserving Oregon's carbon sequestration capacity. Private forestland owners play a significant role in keeping forests as forests, and policies that support active forest management can help ensure these lands continue to sequester and store carbon over the long term. Allowing landowners to sustainably manage their forests while producing long-lived wood products provides both ongoing carbon benefits on the landscape and durable carbon storage in the built environment.

Moreover, forest treatments are only feasible if there is manufacturing capacity to support them. In substantial regions of Oregon, we are already at risk of losing the infrastructure required to complete needed work in the forest. The alternative to anthropogenic forest treatments is wildfire, which, as discussed in the report, runs in tension with the Commission's objectives. If there are no mills, Oregon will not be able to meet its climate goals.

Finally, it's worth noting that forest sequestration rates naturally slow as forests age. This is well established in the literature. Though the report fails to grapple with the issue, it's quite likely that the declining net removals discussed above are a product of the aging federal forests after the imposition of the Northwest Forest Plan. If these forests are going to continue to sequester carbon, they will need to transition to active management and sequestration in harvested wood products. Otherwise, they will stagnate and become vulnerable to stochastic losses as we saw on Labor Day in 2020.

ORS 468A.185 (3)(d)(F) provides a list of benefits from natural climate solutions implementation, which includes improving wildfire resilience and community protection, maintaining or increasing short-term, mid-term and long-term fiber supplies, and improving public health. Improving the health of federal forests, expanding wildfire mitigation and suppression efforts, keeping working forests as working forests, and increasing the use of carbon-storing wood products would provide the greatest benefits for enhancing carbon sequestration across Oregon's natural and working lands.

Conclusion

With these considerations in mind, we do not believe Option 3 is a viable choice for establishing a new goal. The report itself notes that "intense implementation in the next nine years would be required to provide ecosystems time to become established and increase the resilience and durability of those gains." Given the limitations acknowledged throughout the report, the Commission should carefully consider whether such a level of implementation is realistic and achievable.

Landowners and other stakeholders are more likely to support and participate in natural climate solutions when the goals being proposed are grounded in practical realities and have a reasonable likelihood of success. As the report states, a good goal should be:

- Science-based
- Understandable
- Measurable
- Ambitious, yet achievable
- Multi-benefit

The report further notes that “goals are successful when the trade-offs are understood, negative consequences minimized or mitigated, and it is believed that the collective benefits outweigh the consequences.” We agree with this principle and encourage the Commission to carefully evaluate potential trade-offs, unintended consequences, and overall feasibility when selecting a new goal. While we question the policy rationale for a natural lands sequestration target in the first instance, given the above, we do not believe there’s any merit in setting an even less attainable goal than that set by the Commission in 2021.

Thank you again for the opportunity to provide comments on the draft report. We appreciate your time, consideration, and commitment to thoughtful decision-making on this important issue.

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

From: [John Livingston](#)
To: [OCAC Odoe](#) * [ODOE](#)
Subject: DRAFT Goal Setting for Natural & Working Lands Comment
Date: Friday, June 26, 2026 2:44:02 PM

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I live in Salem and have visited many areas of Oregon. I strongly support carbon sequestration of all forms and Option 3 sets the goal as the highest in the report. I think our goals are far too lenient, and we need more programs and definable metrics and penalties for not achieving these goals. We have so many natural vegetation resources that Oregon should be looking much deeper for ways to sequester much more carbon and bring our carbon footprint down. Please dig deeper to find ways to stop producing so much CO2. I am doing all that I can with no natural gas, solar panels and electric car. Please find ways to make all our citizens aware of what they should be doing.

Sincerely, John Livingston, Salem.

“Climate change is going to change everything, but the problem has always been that it is happening cataclysmically fast on a geological scale and far too slowly on a human perception scale.”

David Wallace-Wells, The Uninhabitable Earth: Life After Warming

From: info@brightpathvideo.com
To: [OCAC Odoe](#) * [ODOE](#); [john.parulis](#)
Subject: Natural Working Lands Goal
Date: Thursday, July 2, 2026 9:28:40 AM

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I am an Oregonian writing to comment on the Oregon Climate Action Commission's draft Natural and Working Lands Goal Setting Report. I support Option 3, net sequestration of at least 57.5 MMTCO₂e per year across all land categories by 2050, as the most ambitious of the three goals. Oregon's forests are being clear cut at an alarming rate. The planted and re-planted forests that take the place of once healthy forests are producing lumber that is decreasing in quality with each successive harvest. This effects carbon sequestration on a great scale. I say this as a licensed contractor in the state (234078). I also urge the Commission and the Legislature to fully fund the natural-resource agencies that do this work, since monitoring and conservation programs are too often the first to be cut in the budget process. Thank you for considering my comment.

Sincerely,

John Parulis

1709 NW Oceania Dr.

Waldport, OR 97394

From: [Krimson3](#)
To: [OCAC Odoo * ODOE](#)
Subject: Oregon fake climate reduction efforts
Date: Monday, June 29, 2026 9:30:20 AM

You don't often get email from krimson3@protonmail.com. [Learn why this is important](#)

To: OCAC@energy.Oregon.Gov

To whom it may concern...

What part of stupid do you people fall in? Climate change is not scientifically a fact, it is a political agenda created by you stupid and ignorant power hungry toxic Liberals that have cheated your way into control. If you were honest your whole Administrative" department would be disbanded and you would listen to the voice of the people. You are pretend Kings/dictators out to destroy and manipulate Oregon into being a state controlled state where the people have no freedom other than what you little insecure morons thing we should have. Oregon is a republic, it is not a dictatorship and it is not a communist democracy, a socialist democracy, or any other type of democracy. If you had bothered to read the admissions act, Oregon is a Constitutional republic... You can no longer depend upon the corrupt government controlled vote fraud... We the people are Pissed and are taking back Oregon.

Sent from [ProtonMail](#), encrypted email based in Switzerland.

Natural and Working Lands Goal Setting Report

From Elizabeth Graser-Lindsey <eaglsing@gmail.com>
Date Wed 7/1/2026 10:32 AM
To OCAC Odoe * ODOE <OCAC@energy.oregon.gov>

You don't often get email from eaglsing@gmail.com. [Learn why this is important](#)

OCAC:

Because climate stability is essential to Oregon and the global future, I support your Option 3 for your Natural and Working Lands Goal Setting Report. The natural resource monitoring agencies need to be fully funded to aid this progress.

Elizabeth Graser-Lindsey
Lindsey Farm
Beavercreek, OR

June 30th, 2026

Comments on Draft Goal Setting for Natural and Working Lands

Dear Oregon Department of Energy and the Oregon Climate Action Commission,

On behalf of the Natural Climate Solutions (NCS) Coalition, we would like to thank the Oregon Department of Energy (ODOE) and the Oregon Climate Action Commission (OCAC) for their thoughtful approach to updating Oregon's non-binding net sequestration and storage goal for Oregon's natural and working lands. The NCS Coalition is a group of climate, conservation, and working lands focused organizations, committed to helping increase the pace and scale of natural climate solutions (NCS) and increasing investments in our natural and working lands as well as equitable economic and workforce opportunities. Coalition members work directly with farmers, ranchers, forest owners, and land managers to implement these nature-based practices.

The NCS Coalition recommends that the OCAC adopt Option 3, which updates the current goal informed by new data from Oregon's first land-based net carbon inventory (LCI) and the U.S. National Greenhouse Gas Inventory. This option is grounded in the best available science and more accurately reflects the sequestration potential on Oregon's natural and working lands. While voluntary, **we believe that setting an ambitious goal conveys strong State leadership in support of investments in our natural and working lands** and highlights the important role land management strategies play in climate action.

The adoption of Option 3 will further align the net carbon and sequestration goals with the Governor's priorities for climate resilience, as outlined in Executive Order No. 25-26 Resilient Lands and Waters. These goals, once adopted, could be incorporated into the metrics being developed by the interagency team to track implementation of EO 25-26.

An updated goal reflective of the carbon sequestration and storage potential of Oregon's natural and working lands, combined with the newly released land-based net carbon inventory, NCS workforce recommendations, and forthcoming NCS activity-based and community-impact metrics, as well as alignment with the Governor's EO 25-26, **provides a compelling State strategy that will not only help Oregonians adapt to climate impacts, but also provide economic, health, and ecological benefits across Oregon's landscapes.**

We recommend the OCAC revisit the goals as needed to reflect the best available science and to be responsive to the potential challenges and opportunities that arise through implementation. We would also like ODOE and OCAC to consider the breadth and diversity of strategies across sectors that the State has available to address climate change impacts and to think holistically on strategic approaches to reduce emissions – both through land management strategies and through decarbonization initiatives.

It will be critical to adopt policies to accompany updated sequestration and storage goals to address critical information needs and gaps. In the next three to five years, we recommend the State allocate funding and build capacity to the following:

- Develop a cross-agency reporting infrastructure that is crafted to track activity-based progress towards meeting the sequestration goal
 - Increase investments to build agency capacity to monitor progress, compile and synthesize data to inform metrics, and develop cross agency reporting structure that provides consistency across datasets.
 - This cross-agency reporting infrastructure should be in collaboration with data collection and reporting requirements identified in Governor Kotek's EO 25-26 to ensure consistency across efforts.
- Conduct NCS modeling in the next three years to identify nature-based action pathways for achieving natural and working lands net sequestration goal and recommend voluntary activity targets for natural lands, forest, agriculture, and developed areas for OCAC consideration.
- Conduct a study to identify and review on the incentives currently and potentially available to support uptake and transitioning to NCS actions as well as policy changes that could support action on local and private lands.

In conclusion, we greatly appreciate the opportunity to comment on the draft goal setting for Oregon's natural and working lands. We look forward to working with ODOE and the OCAC to identify pathways to meet our sequestration and storage goals.

Sincerely,

Lauren Link
Oregon Climate Program Director
The Nature Conservancy

Sophie Els
Policy Coordinator
Oregon Climate and Agriculture Network

Andrea Kreiner
Executive Director
Oregon Association of Conservation Districts

Cameron La Follette
Executive Director
Oregon Coast Alliance

Joe Liebezeit
Statewide Conservation Director
Bird Alliance of Oregon



Director Benner, Oregon Department of Energy

June 26, 2026

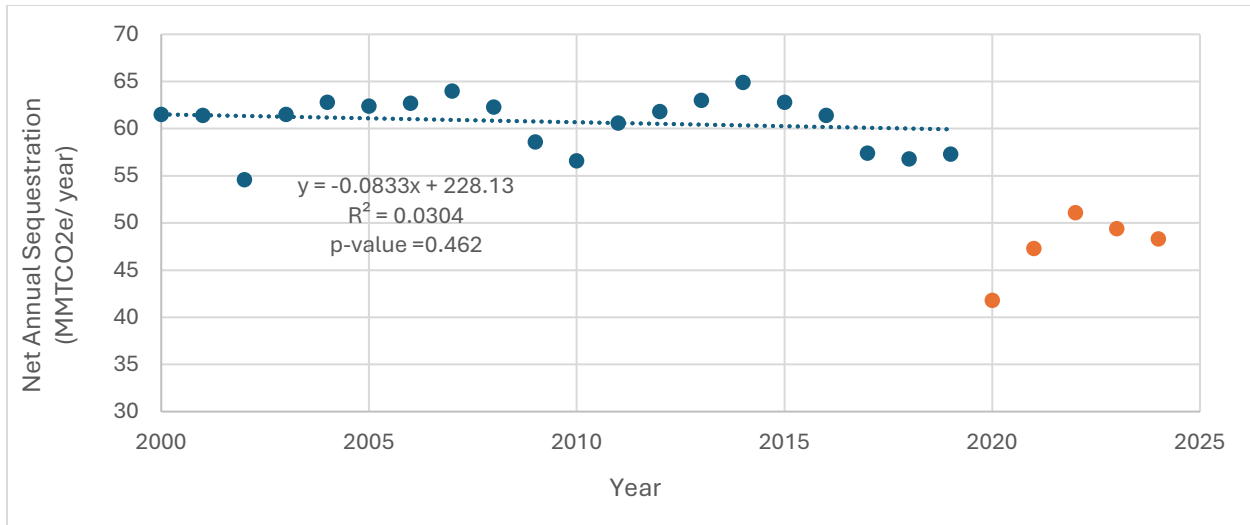
Re: Draft Goal Setting for Natural & Working Lands

On behalf of the undersigned organizations representing Oregon's agriculture, forestry, and natural resource industries, we appreciate the opportunity to comment on the Draft Goal Setting for Natural and Working Lands. Our members are both primary stakeholders in the protection of Oregon's environment, as well as key managers of lands that serve as Natural Climate Solutions.

We have several concerns regarding the report's treatment of declining sequestration trends, wildfire impacts, and the relationship between scientific ambition and practical implementation.

First, the report appears to conflate declining net sequestration with declining sequestration capacity. The document repeatedly refers to a "declining trend of removals" and uses that trend as a primary justification for modifying the goal structure from the 2021 recommendations and increasing future targets. However, net sequestration reflects both carbon removals and carbon emissions from natural and human-caused disturbances. A decline in net sequestration does not necessarily indicate that Oregon's working and natural lands have become less capable of or have adopted management approaches that are less effective at carbon sequestration.

The report acknowledges that one prominent cause of the observed decline in net sequestration is increased wildfire activity and specifically notes the impact of the 2020 wildfire season. However, the data do not demonstrate that Oregon experienced a statistically meaningful decline in net annual sequestration prior to the recent era of megafires. If the Land-based Net Carbon Inventory data are examined separately for the period before widespread megafire activity (2000–2019), there is not a statistically significant downward trend in net annual sequestration. Rather, the decrease in net sequestration started in 2020, likely driven in large part by substantial carbon emissions associated with large wildfire footprints.



Net annual sequestration does not have a statistically significant decline between 2000 and 2019. Instead, there is a distinct break between pre-2020 and post-2020 sequestration which may be largely driven by the new era of mega-wildfires.

This distinction is key because the policy implications are fundamentally different. If recent declines in net sequestration are primarily the result of episodic disturbance events rather than declining ecosystem productivity or management effectiveness, then increasing annual sequestration targets will not address the underlying cause of the problem. In that case, wildfire resilience, fuels management, and protection of existing carbon stocks would be the key drivers of Oregon's ability to meet future sequestration goals rather than the additional incremental sequestration activities emphasized elsewhere in the report.

Because the report acknowledges that other causes of decline remain unclear, we encourage ODOE and the Commission to conduct and publish an analysis that accurately analyzes data trends and separates wildfire-related emissions from other drivers of net sequestration change before relying on the declining-trend narrative as a central justification for revised goal structures. Without such analysis, it is difficult to determine whether Oregon is observing a long-term reduction in sequestration capacity or the effects of a relatively small number of extreme disturbance years.

This distinction also has important implications for achieving any future goal. The report's own findings suggest that wildfire management, fuels reduction, forest resilience, and protection of existing carbon stocks may have a much larger influence on future net sequestration than many of the individual natural climate solution activities discussed elsewhere in the document. A single severe wildfire season can offset years of incremental sequestration gains. As a result, the feasibility of meeting any statewide sequestration goal will likely depend much more on reducing catastrophic carbon losses than on incremental increases in annual carbon uptake.

We are also concerned that the report recommends increasingly ambitious targets while simultaneously acknowledging that the state currently lacks many of the analytical tools needed to evaluate whether those targets are achievable. The report states that Oregon does not yet have activity baselines, comprehensive implementation modeling, statewide reporting infrastructure, pathway analysis, or a clear understanding of the incentives necessary to drive adoption at the required scale. The report further notes that additional studies, funding, and capacity will be necessary to develop these capabilities. A science-based goal-setting exercise should not only reflect climate ambition but should also be grounded in a realistic understanding of how that goal can be achieved. Establishing increasingly ambitious targets before completing the analyses needed to determine their feasibility risks creating goals that function primarily as aspirations rather than actionable policy. While ambition is important, effective policy requires a credible pathway between present conditions and desired outcomes.

Finally, we encourage the Commission to place greater emphasis on wildfire resilience. The report repeatedly highlights the importance of protecting existing carbon stocks and acknowledges that climate change and wildfire threaten the durability of stored carbon. Yet the proposed goals focus exclusively on annual net sequestration rates. This creates a disconnect between what is measured and what may ultimately matter most for meeting Oregon's climate targets.

Projects that substantially reduce wildfire risk and protect large existing carbon stocks will likely provide greater long-term climate benefits than projects that produce modest increases in annual sequestration rates. With wildfire as a major driver of declining net sequestration, resilience and stock protection should be treated as central components of Oregon's climate strategy rather than secondary considerations.

For these reasons, we recommend that the Commission request additional analysis of wildfire-driven emissions and their influence on statewide sequestration trends, further evaluate the feasibility of proposed targets before adoption, and give greater weight to carbon-stock protection and wildfire resilience before adopting the ambitious goals presented as options in this draft report.

Sincerely,

Dani Lightle, Oregonians for Food & Shelter; dani@ofsonline.org

Tyler Ernst, Oregon Forest Industries Council; tyler@ofic.com

Ryan Krabill, Oregon Farm Bureau; ryan@oregonfb.org



June 29, 2026

Oregon Department of Energy
Oregon Climate Action Commission
550 NE Capitol Street, NE
Salem, OR 97301

Comments submitted electronically via OCAC@energy.oregon.gov

RE: Draft Goal Setting for Natural and Working Lands Report

Dear Oregon Climate Action Commission Members:

On behalf of Oregon Farm Bureau (OFB), thank you for the opportunity to provide comments on the Draft Goal Setting for Natural and Working Lands Report.

OFB is the state's largest general agricultural organization, representing farm and ranch families in every county across Oregon. Our members manage working lands that produce food, fiber, livestock, nursery products, seed, timber, and more than 220 agricultural commodities. These same working lands also provide open space, soil stewardship, wildlife habitat, water stewardship, and carbon sequestration among other benefits.

These comments supplement the broader natural resource sector letter submitted by Oregonians for Food and Shelter, which OFB also signed. That letter raises important concerns about the report's treatment of declining net sequestration trends, wildfire-related emissions, carbon stock protection, and the need for additional feasibility analysis before the Commission adopts increasingly ambitious targets. OFB supports those concerns and incorporates them by reference. Here, we identify additional concepts of importance.

First, any final natural and working lands goal must remain voluntary, non-regulatory, and incentive-based as required by statute (ORS 468A.193). The draft report correctly states that the goal is non-binding and voluntary. That point should be carried forward clearly in

the final report and in any subsequent implementation, metrics, or reporting work. A voluntary guidepost can support collaboration. On the contrary, a goal that later becomes the basis for mandates, permit conditions, land use restrictions, farm practice limitations, or producer-level reporting would not be acceptable to OFB.

This is a central distinction. OFB supports the continuation of agricultural and related industries and the prosperity of Oregon farmers and ranchers. Our view is that property rights are foundational, and we support privately owned farms and ranches managed and operated for the benefit of farmers and ranchers, which adds further benefits to the state.

Second, private property rights are essential to any natural and working lands strategy. Oregon's natural and working lands include significant private farm, ranch, and forest lands. Those lands are not simply carbon assets. They are homes, businesses, retirement plans, family legacies, and the foundation of rural economies.

Private ownership of real property is the foundation of Oregon's economic system, and statutes and regulations should be applied to private property in the least restrictive manner possible. We support incentive-driven and cooperative programs when accomplishing statewide land use policies. Further, we support full and fair compensation to landowners for loss of use, the taking of land for public purposes, or any alteration of private property without the owner's permission.

For that reason, any future implementation pathway must be landowner-led. Participation by private agricultural producers should require affirmative consent, fair compensation where appropriate, and protection against regulatory consequences for nonparticipation.

Third, the Commission should expressly recognize food and fiber production as a core public benefit of working lands. Oregon farms and ranches already deliver climate, conservation, and community benefits. However, their first public function is to produce food and fiber. Carbon goals should not be structured in a way that reduces agricultural productivity, weakens the agricultural land base, or encourages conversion of productive land away from agriculture.

OFB supports protecting the resources, agricultural environment, and infrastructure needed for farmers and ranchers to produce and market food and fiber for current and future generations in a profitable manner. Practices that appear beneficial in a carbon model may be unworkable if they reduce yields, restrict grazing, impair irrigation, increase pest or weed pressure, complicate harvest, reduce flexibility, or make farm operations less economically viable.

Future modeling, metrics, or implementation work should include agricultural producers. The draft report discusses future needs for activity baselines, implementation modeling, reporting systems, pathway analysis, and incentive analysis. Those efforts should not be

developed solely within state agencies or technical work groups. They must include farmers, ranchers, foresters, irrigation districts, other producer-facing partners.

Additionally, OFB supports Oregon Department of Agriculture (ODA) oversight of agencies or interactions between state agencies that may impact the use of agricultural land. At a minimum, ODA and agricultural stakeholders should have a formal role in any future natural and working lands implementation process.

The Commission should prioritize incentives, including but not limited to technical assistance, tax credits, grants, and cost-share programs over mandates. Farmers and ranchers are willing partners in conservation when programs are practical, voluntary, and economically workable. However, even beneficial practices can impose costs, labor demands, management risk, and opportunity costs. Those costs cannot simply be shifted to producers. Downstream natural and working lands policies should embrace local control, sound science, incentivization, and encourage private property and economic viability.

Any reporting system must avoid mandatory producer-level reporting and must protect confidential farm and ranch information. OFB is concerned that future carbon accounting, natural climate solution metrics, or cross-agency reporting systems could create new administrative burdens for producers or expose sensitive business information. If the state develops metrics, they should rely on aggregated data, existing public datasets where appropriate, and voluntary participation from private landowners.

We also have serious concerns with government entities using, or even requesting, private financial or tax records to prove compliance with existing laws. Further, agencies must consider economic and non-economic impacts on private property rights before adopting laws, rules, or regulations. Any future carbon-related data system should be designed with those protections in mind from the outset.

The final report should not become a backdoor land use policy. Oregon's land use system has helped maintain the state's agricultural and forest land base. While the OCAC draft report recognizes Oregon's land use system as an important factor in limiting land conversion and maintaining land-based carbon removal, carbon goals should not be used to create new restrictions on agricultural land, redefine agricultural land, discourage accepted farm practices, or pressure landowners into management changes unrelated to agricultural production. The final report should expressly recognize that natural and working lands policies must not interfere with accepted farm and ranch practices.

Finally, the Commission should avoid adopting a goal that implies future obligations before Oregon has the necessary information, capacity, and funding to support implementation. OFB shares the coalition's concern that the state should not set increasingly ambitious numerical targets without a credible understanding of feasibility, cost, available incentives,

workforce needs, landowner impacts, and the interaction with water, land use, wildfire, and agricultural production.

Oregon farmers and ranchers are already part of the solution. They steward land, soil, water, crops, livestock, and habitat every day while producing the food and fiber Oregon depends on. A successful natural and working lands strategy must support that work, not burden it.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ryan J. Krabill', with a long horizontal flourish extending to the right.

Ryan J. Krabill
Oregon Farm Bureau

From: [Jennifer Hamaker](#)
To: [OCAC Odor * ODOE](#)
Subject: Public Comment on Draft Goal Setting for Oregon's Natural & Working Lands
Date: Sunday, June 28, 2026 1:05:14 AM

You don't often get email from jenhamaker1@gmail.com. [Learn why this is important](#)

Public Comment on Draft Goal Setting for Oregon's Natural & Working Lands

To the Oregon Climate Action Commission:

ONRI opposes the proposed statewide carbon sequestration goals.

The premise of this report is fundamentally backwards.

The report correctly identifies the primary reason Oregon's net carbon sequestration has declined since 2000: catastrophic wildfire. Yet instead of making wildfire prevention and active forest management the foundation of Oregon's climate strategy, the Commission proposes increasing statewide carbon sequestration targets while leaving the underlying problem largely unaddressed.

This proposal treats the symptom rather than the cause.

Oregon does not have a carbon sequestration problem. Oregon has a forest management problem.

Our forests already remove more carbon from the atmosphere than Oregon emits from fossil fuels. Oregon is one of the nation's leading carbon-sequestering states. Oregon emits approximately 0.14% of global greenhouse gas emissions, and former Oregon Department of Environmental Quality Director Richard Whitman has acknowledged that even eliminating Oregon's emissions entirely would have only a minuscule effect on the global climate.

Oregon's forests and harvested wood products sequester approximately 49.5 million metric tons of carbon dioxide equivalent each year, while Oregon emits approximately 37.9 million metric tons from fossil fuels. The estimated net sequestration of Oregon's natural and working lands is approximately 30.9 million metric tons

annually. Oregon is already a national leader in carbon sequestration.

The question is not whether Oregon can sequester carbon.

The question is whether Oregon can keep that carbon from going up in smoke.

Every catastrophic wildfire erases decades of carbon storage in a matter of days.

The most effective way to increase carbon sequestration is not by creating larger numerical goals. It is by preventing catastrophic wildfire through active forest management.

Yet Oregon continues moving in the opposite direction.

The State Habitat Conservation Plan significantly reduces active management across much of Oregon's state forests for decades. More than 90,000 acres of the Elliott State Forest have been removed from active timber management under a long-term conservation strategy. The Private Forest Accord has also imposed significant restrictions across millions of acres of privately owned working forests.

Each of these decisions reduces opportunities for thinning, harvesting, fuel reduction, road maintenance, and active stewardship—the very practices that keep forests healthy, resilient, and capable of storing carbon over the long term.

The contradiction is striking.

At the same time Oregon is restricting active forest management, the State is attempting to market carbon credits from forests such as the Elliott State Forest.

Carbon credits only have value if the carbon remains stored.

If those forests burn, decades of stored carbon are released into the atmosphere while taxpayers, rural communities, and future generations bear the enormous environmental and economic costs.

The report also overlooks one of Oregon's greatest climate assets: harvested wood products.

Half the dry weight of wood is carbon.

Every tree converted into lumber continues storing carbon for decades while replacing more carbon-intensive building materials such as concrete and steel. Oregon mills manufacture millions of tons of long-term carbon storage every year.

What happens to all of that carbon storage when the mills no longer have logs to process?

What happens to Oregon's ability to manufacture long-lived carbon storage when forest infrastructure disappears?

When mills close because timber supplies decline, that carbon storage capacity disappears along with family-wage jobs, rural tax revenue, logging contractors, trucking companies, reforestation capacity, and the very infrastructure needed to restore forests after wildfire.

Healthy forests require healthy forest industries.

The report repeatedly recommends additional reporting systems, modeling, monitoring, funding, staffing, capacity building, cross-agency coordination, and future policy development before these goals can even be implemented. While described as voluntary today, this proposal clearly lays the groundwork for future expansion of state programs, reporting requirements, and additional policy actions.

Before establishing new statewide sequestration goals, the Commission should first answer several fundamental questions:

- How will additional restrictions increase carbon storage if forests continue burning?
- How much carbon has Oregon lost to catastrophic wildfire compared to reductions achieved through fossil fuel policies?
- What is the carbon cost of reducing active forest management?
- What is the carbon cost of closing sawmills and reducing the

- production of long-lived wood products?
- What economic impacts will these policies have on rural communities that depend upon working forests?
- Why is protecting existing carbon stocks not the central objective of this proposal?

Perhaps the most significant omission in this report is that it never evaluates the carbon consequences of the State's own forest management decisions.

Before establishing higher statewide sequestration goals, the Commission should evaluate how policies such as the State Habitat Conservation Plan, the Elliott State Forest management strategy, and the Private Forest Accord affect long-term carbon storage, wildfire risk, harvested wood products, rural economies, and overall net carbon sequestration.

Setting increasingly ambitious sequestration goals while simultaneously restricting the very tools needed to achieve those goals is inconsistent public policy.

If Oregon is serious about increasing long-term carbon sequestration, then protecting existing carbon stocks from catastrophic wildfire should be the State's highest priority.

The cheapest carbon is the carbon we never release.

The most effective climate policy Oregon can adopt is not another statewide carbon target.

It is restoring active forest management, reducing catastrophic wildfire, supporting sustainable timber harvest, maintaining Oregon's forest infrastructure, protecting existing carbon stocks, and ensuring our forests remain healthy enough to continue doing what they already do exceptionally well—store carbon.

Stewardship is not measured by the number of goals we adopt. Stewardship is measured by the condition of the forests we leave to the next generation.

Until this proposal places protecting existing forests ahead of

creating new numerical goals, it should be rejected.

Sincerely,
Jen Hamaker
President
Oregon Natural Resource Industries

Sent from my treehouse made of renewable and sustainable wood.



June 30, 2026

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: Voluntary Goal Setting for Natural and Working Lands

We are submitting comment on the [Draft Goal Setting for Oregon's Natural and Working Lands Report](#), as presented to the Oregon Climate Action Commission (OCAC) by the Oregon Department of Energy (ODOE).

We recommend that the Commission adopt **Option 3**, which updates the current goal informed by new data from Oregon's first Land-Based Net Carbon Inventory (LCI) and the U.S. National Greenhouse Gas Inventory. Option 3 is grounded in the best available science and more accurately reflects the sequestration potential on Oregon's natural and working lands. While voluntary, *we believe that setting an ambitious goal demonstrates strong State leadership in support of climate action and investments in our natural and working lands.*

Additionally, Option 3 aligns the net carbon and sequestration goals with the Governor's priorities for climate resilience, as outlined in [Executive Order No. 25-26](#) (Climate Resilience for Oregon's Lands and Waters). The new goals and activity-based metrics currently being developed could be incorporated into, or aligned with, the resilience attributes metrics that EO No. 25-26 has directed an interagency team to develop.

In order to achieve the goals of Option 3, the Commission and ODOE, ideally with executive and legislative leadership from the State, should support further development of the Net Carbon Inventory and investment in natural climate solutions (NCS) like those listed in Appendix D of the draft Report.

Regarding the Optional Policy, Capacity, and Analysis Goals on page 17, we agree that the State should include additional goals that address capacity building, but they need to be focused on action rather than time-consuming and resource intensive modeling and studies.

We support inclusion of this capacity goal because it is focused on activity-based progress:

“1. Develop a cross-agency reporting infrastructure that is crafted to track activity-based progress toward meeting the sequestration goal.”

We support inclusion of this capacity goal as well:

“3. Conduct a study on the incentives available to support uptake and transitioning to NCS actions as well as policy changes that could support action on local and private lands.”

However, this needs to happen quickly and efficiently.

We have concerns about the inclusion of this capacity focused goal because it is focused on modeling over three years and we need action sooner than that:

“2. Conduct NCS modeling in the next three years to identify nature-based action pathways for achieving the natural and working lands net sequestration goal and recommend voluntary activity targets for natural lands, forest, agriculture, and developed areas for Commission consideration.”

There has already been an analysis of the readiness of NCS activity based metrics, which could be used to identify priority pathways and recommend activity targets.

We recommend inclusion of this goal language, or something similar, to build capacity:

- Fund programs that incentivize and otherwise support implementation of NCS actions on local and private lands.

Overall, we recognize that the directives in HB 3409 (2023) or the NWL Bill, including the inventory, activity-based and community impact metrics, as well as the workforce study, have been time consuming and resource intensive. We believe we are ready to move forward with investments and other policy solutions to move the State toward its goals.

Thank you for your consideration of these comments.

Sincerely,

Megan Kemple

Executive Director, Oregon Climate and Agriculture Network

Sophie Els

Policy Coordinator, Oregon Climate and Agriculture Network

From: [Heather Rockwell](#)
To: [OCAC Odoe](#) * [ODOE](#)
Cc: [Nellie McAdams](#)
Subject: Public Comments from Oregon Ag Trust: Draft Goal Setting for Natural and Working Lands Report
Date: Tuesday, June 30, 2026 5:16:37 PM
Attachments: [ATT00001.png](#)
[ATT00002.png](#)
[ATT00003.png](#)
[ATT00004.png](#)
[ATT00005.png](#)

You don't often get email from heather@oregonagtrust.org. [Learn why this is important](#)

To: Oregon Department of Energy and the Oregon Climate Action Commission

Re: Public Comments on Draft Goal Setting for Natural and Working Lands Report

From: Oregon Agricultural Trust

June 30, 2026

Oregon Agricultural Trust is a statewide, accredited land trust that partners with farmers and ranchers to protect working lands for the benefit of Oregon's economy, communities, and landscapes.

As such, we know first-hand the important role that Oregon's land use planning program plays in protecting our natural and working lands from fragmentation and development. We're grateful to see your draft report identify land conversion as a major driver of carbon emissions, and the critical role that Oregon's land use planning program plays in meeting our carbon sequestration goals through conservation.

We wholeheartedly agree with the declaration on Page 8 that continued protection of Oregon's landmark land use laws is absolutely vital to meeting our carbon sequestration goals. Land protection has proven to be one of the most effective and cost-effective strategies to mitigating climate change across the globe.

We know from your Land-Based Net Carbon Inventory and recent studies that land conversions and developments lead to emissions, and that conservation of our natural and working lands is the answer:

"When we conserve lands, we're doing more than saving precious natural areas. Each acre helps address the climate crisis, as trees, plants, and soils act as a carbon reservoir. Permanently protected lands also support community resilience to climate change: improving water and air quality; protecting essential water supplies that communities depend on; and preserving biodiversity," (Schottland, T., et al. The Power of Land Conservation to Address the Climate Crisis. San

Francisco: Trust for Public Land, 2024. <https://www.tpl.org/climate-and-land-conservation-report>).

While we commend the work of Oregon's land use planning program in safeguarding Oregon's natural and working lands over the past 50+ years, we also know that these laws are often circumvented and under constant attack, and that conversions have continued despite the protections this program provides. Oregon lost over 4% of its farmland between the years 2017-2022 alone (<https://extension.oregonstate.edu/catalog/oregon-agriculture-numbers-part-1-total-farms-farmland-acres-sales>). This loss not only impacts our agricultural economy, but our climate mitigation efforts.

We recommend addressing this rapid loss directly in the final report, to better illustrate how crucial and time-sensitive it is to protect Oregon's land use laws, and to reduce the loopholes that exist to circumvent them. We also recommend calling out the need for continued state investment in conservation and mitigation programs that add an additional and important layer of protection for working lands, such as the Oregon Agricultural Heritage Program.

We would also recommend more directly highlighting the role that farmland in particular plays in mitigating climate change, as different types of working lands offer unique benefits to our ecosystems. In addition to helping us achieve our carbon sequestration goals, farmland plays an important role in watersheds and flood control, in protecting water quality, and in maintaining soil biodiversity (<https://www.oregonagtrust.org/blog/2026/2/23/protecting-farmland-for-the-planet-and-our-communities>).

Is it critical that agricultural lands are not left out of our state's climate and economic goals — especially as these lands face unprecedented threats of large-scale conversion with the emergence of data centers, and the ongoing attacks on our UGBs.

Thank you for taking up this important issue in your report and for the opportunity to provide public comment!

Sincerely,

Heather Rockwell, on behalf of Oregon Agricultural Trust



Heather Rockwell (she/her)
Communications and Advocacy Director

(541) 852-1523



heather@oregonagtrust.org
www.oregonagtrust.org



PO Box 7359
Salem, OR 97303



Cathy Macdonald
Commission Chair, Oregon Climate Action Commission

July 2, 2026

Janine Benner
Director, Oregon Department of Energy

Re: Comments on the Draft Goal Setting for Natural and Working Lands Report

Dear Chair Macdonald, Director Benner, and Members of the Oregon Climate Action Commission,

Thank you for the opportunity to comment on the draft goal-setting report for Oregon's natural and working lands. Pacific Forest Trust strongly supports the Commission's effort to establish an ambitious net sequestration goal and the recognition that forests are central to achieving it.

We write to flag an important gap in the current report. The draft does not currently model reduced harvest intensity, extended rotations, mature-tree retention, or reduced post-fire salvage logging as natural climate solutions pathways. While these practices could arguably fall within the existing "forest conservation, protection, and reduced deforestation" category, they are not currently modeled as such, and as a result their substantial potential carbon benefits are not reflected in the report's estimates.

This omission is significant. Our rough modeling based on FIA PNW East data found that a 33% decrease in planned timber harvest increases carbon retained by an average of 11 tons per acre after 10 years across common Pacific Northwest stand types, with Douglas-fir stands retaining as much as 15 tons of carbon per acre over the same period. Gains in western Douglas-fir forests are notably higher. Reduced post-fire salvage shows even greater potential: a 50% reduction in salvage logging on the east side results in average increased retention of 17 tons of carbon per acre over 10 years, rising to 24 tons per acre in Douglas-fir stands. External research has also shown that lengthening harvest rotations in the Pacific Northwest is among the most effective land-based carbon sequestration strategies available¹.

The increase in carbon retention from these practices represents a significant unaccounted for potential contribution to Oregon's net sequestration goal that could meaningfully close the gap between current sequestration rates and the more ambitious targets under Options 2 and 3. We therefore recommend that these four practices be explicitly incorporated both within the report and in the NCS and Metrics Analysis currently underway with RTI International. Doing so would ensure that the full carbon potential of Oregon's forests is reflected in the state's sequestration accounting.

Thank you for your consideration. We look forward to continued engagement as this report develops.

Sincerely,

Laurie A. Wayburn
President and Co-founder

¹ Law BE, Hudiburg TW, Berner LT, Kent JJ, Buotte PC, Harmon ME (2018) Land use strategies to mitigate climate change in carbon dense temperate forests. Proceedings of the National Academy of Sciences 115(14): 3663-3668. <https://doi.org/10.1073/pnas.1720064115>

From: [Ripudaman Malhotra](#)
To: [OCAC Odor * ODOE](#)
Subject: Durable carbon removal
Date: Wednesday, June 10, 2026 2:25:49 PM

You don't often get email from ripudaman.malhotra@gmail.com. [Learn why this is important](#)

Climate crisis is real but reducing greenhouse gas emissions to zero will not be sufficient. We also have to drawdown the carbon dioxide in the atmosphere back to pre-industrial levels, or at least down to about 300 ppm. Strategies that can achieve that goal, durable carbon removal, should be treated as an Exemption so as to differentiate it from "offsets" like forest and soil credits which involve temporary biological storage.

Thank you for your consideration.

Ripudaman

Ripudaman Malhotra

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Oregon's Carbon Lands: The Goal That Must Not Blink

ODOE's draft NWL sequestration goal picks the right number. Now Oregon must build the infrastructure to reach that number.

Oregon ranks seventh in the nation in land-based carbon sequestration. That statistic lands like a credential. The state's forests, grasslands, wetlands, and working lands pull approximately 48 million metric tons of CO₂ equivalent from the atmosphere each year — enough to offset roughly 14 percent of U.S. sector-based emissions at the national scale.

Read only the ranking, and the credential holds. Read the trend line, and the picture darkens.

Since 2000, Oregon's annual sequestration rate declined. The decline carries statistical significance. In 2014, Oregon's lands removed 64.9 MMTCO₂e — the highest point in the recorded inventory. A decade later, the five-year average settled at 48 MMTCO₂e. Wildfire drove the sharpest drops, particularly the catastrophic 2020 fire season across the Cascades and the Coast Range. But wildfire alone does not explain the full slope. The Oregon Department of Energy's Land-based Net Carbon Inventory documents a long, steady erosion that predates the megafire era.

That declining trend frames everything the Oregon Climate Action Commission must decide before July 2, 2026.

The Document on the Table

ODOE released a 38-page draft goal-setting report for public comment on June 8, presenting three options for a voluntary, non-binding net carbon sequestration goal on Oregon's natural and working lands. The commission must select one.

Option 1 holds the 2021 goals intact: an additional 5 MMTCO₂e per year by 2030, and an additional 9.5 MMTCO₂e per year by 2050.

Option 2 modifies the framing without raising the ceiling: achieve 53 MMTCO₂e per year by 2035 and 57.5 MMTCO₂e per year by 2050.

Option 3 raises the ambition to match the science: 57.6 MMTCO₂e per year by 2035 and 62.4 MMTCO₂e per year by 2050.

ODOE recommends Option 2 or Option 3. This analysis makes the case for Option 3 — and explains why the real test begins the day after the commission votes.

The Stellaris Framework Reads the Trend

The Stellaris Meta-Framework¹ analyzes technology adoption and economic transformation through the lens of cost curves, thresholds, and generational cycles. Most published frameworks focus on energy systems: solar PV, BESS, EV fleets, grid infrastructure. But the framework's core logic applies wherever compounding investment and delayed returns define the strategic picture.

Natural and working lands carbon sequestration fits that profile exactly.

Douglas-fir — the dominant forest type across Oregon's Cascades and Coast Range — does not reach peak biomass accumulation until the tree reaches 40 to 80 years of age. Riparian plantings begin sequestering carbon immediately but require decades to approach their maximum rate. Restored coastal wetlands plateau relatively quickly but build soil carbon stocks over centuries.

The adoption curve logic governs: early action compounds. Late action loses the compounding window and never recovers the foregone benefit. Sanderson and O'Neill (2020) demonstrated that the cost of historical climate inaction multiplies by orders of magnitude over a 30-year horizon. ODOE cites this finding in the draft report. The commission should take the citation seriously when weighing Option 2 against Option 3.

Option 2 targets 53 MMTCO₂e per year by 2035 — an increase of 5 MMTCO₂e over the current five-year average. Option 3 targets 57.6 MMTCO₂e per year by 2035 — an increase of 9.6 MMTCO₂e. The difference between those two numbers, compounded across decades of biological growth, represents a sequestration gap that no subsequent policy can close. Trees planted in 2026 approach peak sequestration capacity in 2066 or 2106. Trees not planted in 2026 offer no equivalent benefit at any future date.

Option 3 frames the goal correctly. The commission should adopt Option 3.

The Federal Land Problem

The report acknowledges a structural reality that no state goal can resolve on Oregon's behalf: just over half of Oregon's natural and working lands fall under federal ownership. The U.S. Forest Service and the Bureau of Land Management together control roughly 94 percent of that federal acreage, concentrated in forest land and grassland across eastern and western Oregon.

¹ Citation: Turnock, Richard (2026). "The Stellaris Meta-Framework: Wright's Law, the Fourth Turning, and the Architecture of the Coming Order." SSRN Working Paper No. 6692598. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=6692598

Federal forest management policy shifted sharply under the current administration. The Biden-era Long-Term Strategy proposed increasing national land-based removals by 200 MMTCO₂e per year by 2050. That framework no longer stands. The current administration rejected the strategy and produced no guidance for state contributions.

ODOE notes this without dwelling on the political dimension. The commission should dwell on that dimension.

Oregon's sequestration goal, whether Option 2 or Option 3, requires collaboration with federal land managers to achieve any of the proposed rates. The U.S. Forest Service and Bureau of Land Management steward the carbon-richest acres in the state. Without partnership with those agencies — and without federal policy alignment — Oregon's state land managers face the equivalent of filling a bathtub while the federal tap runs cold.

The forthcoming Natural Climate Solutions and Metrics Analysis must address federal land management as a primary variable, not a footnote about partnership opportunities. The commission should request explicit scenario analysis of federal management decisions and their sequestration consequences before adopting a final goal.

The Carbon Stocks Gap

The three goal options focus on sequestration rates — how much carbon Oregon's lands remove from the atmosphere each year. ODOE acknowledges, and then largely tables, a parallel question: how much carbon do Oregon's existing land-based stocks hold, and what policy protects those stocks?

This represents the missing half of the equation.

Oregon's old-growth forests and intact wetlands hold carbon stocks built across centuries and millennia. A single severe fire season can release in weeks what Douglas-fir forests accumulated across generations. Oregon wetlands may carry lower annual sequestration rates than forests, but the soil carbon stocks beneath those wetlands dwarf what the sequestration rate number suggests.

California moved first on this dimension. The California Air Resources Board established goals focused on maintaining and increasing carbon stocks, not only tracking sequestration rates. The two approaches complement each other: sequestration rates measure the pace of new carbon removal; stock protection measures the defense of what already exists.

Oregon should pursue both tracks. ODOE defers the stock protection goal pending a land-based stock assessment — a reasonable sequencing given the data gaps. But the commission should include the stock assessment as a funded, time-bound commitment in the policy goals adopted alongside the sequestration target. A stock assessment that requires future appropriation without a legislative mandate will slip indefinitely.

The Data Infrastructure Problem

The report reads, at moments, like a candid confession of institutional unreadiness. ODOE estimates that approximately 106 state and local agency programs currently implement or support natural climate solutions across Oregon. The state lacks a cross-agency reporting infrastructure to track what any of those programs actually accomplish in sequestration terms.

The statute directs ODOE, the commission, and the agencies to identify metrics and track progress toward a statewide goal. The statute does not provide the funding, staff capacity, or data systems to accomplish that task. ODOE flags the gap directly.

This matters for a specific reason. A voluntary, non-binding goal without measurement infrastructure reduces to aspiration. Oregon's landmark land use system works precisely because land conversion decisions require permits, reviews, and documented justification. The report rightly identifies that system as possibly the largest single statewide policy lever for carbon sequestration. The accountability framework produces durable outcomes. A sequestration goal untethered from equivalent accountability infrastructure produces intention, not results.

The Stellaris Meta-Framework identifies measurement, monitoring, reporting, and verification as the critical infrastructure layer in any technology deployment at scale. MMRV answers whether deployment performs as designed — or whether cost curves, degradation, and failure modes erode the projected benefit. Natural climate solutions require the same rigor. Riparian plantings that survive to maturity sequester carbon. Riparian plantings lost to drought, grazing pressure, or invasive species do not.

Cross-agency reporting infrastructure, NCS pathway modeling, an incentives study, and a land-based stock assessment — ODOE frames all four as optional. The commission should treat all four as mandatory. Without that foundation, the commission cannot evaluate whether Oregon actually delivers what the sequestration goal declares.

What Option 3 Actually Demands

Option 3 targets 57.6 MMTCO₂e per year by 2035 and 62.4 MMTCO₂e per year by 2050. Those numbers require Oregon to add 9.6 MMTCO₂e of annual sequestration above the current five-year average by 2035 — and to accomplish that against a declining trend driven by wildfire, drought, and climate-amplified disturbance.

The report's own draft mitigation potential data (Appendix D) suggests that three NCS activities alone — riparian plantings, afforestation/reforestation, and grassland restoration — carry median annual mitigation potential well above the 9.6 MMTCO₂e target. But median mitigation potential and actual achieved sequestration diverge sharply in practice. Implementation constraints, land ownership fragmentation, permitting timelines, workforce limits, native seed supply chains, and capital availability all compress realized outcomes below theoretical potential.

ODOE addresses this honestly: an activity-specific target requires modeling, engagement, and baseline establishment that current infrastructure cannot support. The commission should adopt Option 3's ambitious rate as the guiding ceiling, pair that number with the four policy goals as mandatory infrastructure investment, and establish a review cycle tied to LCI publication; ODOE updates the LCI every two years under legislative mandate.

The goal without the infrastructure review cycle becomes a decorative number. Oregon deserves better.

A Constructive Assessment

ODOE's draft report represents serious, rigorous work. The goal-setting methodology — drawing on IPCC frameworks, the national greenhouse gas inventory, Oregon's own Land-based Net Carbon Inventory, and NCS mitigation literature — exceeds what most state agencies produce. The decision to present three clearly differentiated options, with explicit reasoning for each, gives the commission genuine analytical material to work with.

Three observations stand as the commission deliberates.

First, adopt Option 3. The adoption curve logic, the carbon cost of delay, and the statutory directive to use the best available science, they all point in the same direction. Option 2 represents the politically easier path. Option 3 represents the scientifically defensible one. A voluntary goal that selects a lower ambition level than the science supports undermines the credibility of the goal-setting process.

Second, fund the infrastructure. Oregon cannot manage a sequestration goal that agencies cannot measure. Cross-agency reporting infrastructure, NCS pathway modeling, and the land-based stock assessment should carry dedicated appropriations, not aspirational language.

Third, address the federal land variable explicitly. The commission cannot control federal forest management policy. But the commission can formally document Oregon's sequestration exposure to federal management decisions and communicate that exposure to the legislature and to federal partners. Silence on the federal variable does not make the risk disappear.

Oregon holds a rare asset in a warming world: 62 million acres of forest, grassland, wetland, and working land that already remove carbon from the atmosphere at significant scale. The commission must protect that asset, expand the asset's capacity, and build the institutional infrastructure to verify that Oregon delivers what the goal declares.

The comment window closes July 2. The biological window for maximum impact closes every day that passes without action.

ODOE accepts public comments on the Draft Goal Setting for Natural and Working Lands report through July 2, 2026. Submit comments to askenergy@oregon.gov or at www.oregon.gov/energy.

Submitted by R. Turnock

From: [randy wolfer](#)
To: [OCAC Odoe * ODOE](#)
Subject: Goals comments
Date: Sunday, June 28, 2026 7:49:38 AM

You don't often get email from randy.wolfer@gmail.com. [Learn why this is important](#)

The “goals” don’t acknowledge that wildfires have increased and affect the data being used.

Therefore the goals should be reduced not increased as proposed.

Reality has shown people voted for people who supported these goals, example switching to electric vehicles, while at the same time not switching to electric vehicles.

The phenomenon has been studied, example people voted for HOV lanes, but did not drive in them because they assumed everyone else would switch and allow their driving speed to increase while continuing as a single driver/ passenger.

Their vote does not reflect reality.

Reduce the goals because they do not reflect the reality of wildfires nor the peoples true wishes.

Signed, born in Oregon, family of farmers

Randy Wolfer
1218 Astor Way, Woodburn 97071

Oregon Climate Action Commission
550 Capitol St. NE
Salem, OR 97301
Via Email: OCAC@energy.oregon.gov
Re: Comments on Draft Goal Setting for Natural and Working Land

Overview

Thank you for the opportunity to comment on the draft Natural & Working Lands goal-setting report.

The document clearly lays out the statutory framework and summarizes the available data. It also presents the three goal options in a way that makes the tradeoffs visible.

At the same time, several aspects of the analysis need to be more explicit—particularly how the state moves from current conditions to the proposed targets, and whether those targets reflect outcomes that are both meaningful and achievable in Oregon.

Weyerhaeuser's comments focus on the decision between Options 2 and 3 and the assumptions that underlie that choice.

Sequestration and storage are not being treated consistently

The report (and the underlying statutory framework) talks about both sequestration and carbon storage, but the goals themselves are based entirely on annual sequestration rates.

Both matter. You can increase sequestration, but if that carbon isn't stored in a durable way, it doesn't change the overall outcome for the climate. And where it's stored—on the landscape or in other long-lived pools—is driven by forest management decisions.

The report does recognize the importance of protecting existing carbon stocks, especially given wildfire risk, and notes that more work on that is coming in a future phase. That's important.

But protecting carbon that's already on the landscape is not the same as treating ALL storage as part of the current framework. As written, storage shows up mostly as avoiding loss, while this report's goals only measure sequestration.

That creates a gap. The analysis is limited to carbon remaining on the landscape and does not reflect the full carbon consequences of all management decisions. It excludes carbon that is transferred into other durable storage pools over time, including harvested wood products, leading to an incomplete accounting of total system benefits.

The result is a framework that favors keeping carbon on the landscape, undervaluing systems where carbon is stored across different pools over longer periods.

If the framework looked at sequestration and storage as separate but equal components of a goal framework, that issue would largely resolve itself. The full range of carbon outcomes—including harvested wood products—would show up in the analysis.

For example, stands harvested at a younger age have higher sequestration rates, lower in- woods storage, and high harvested wood product storage when evaluated over many rotation cycles. Stands harvested at older ages have lower sequestration rates, higher in woods storage, and more moderate harvested wood product storage when evaluated over

the same time horizon. And a forest left to mature without any harvest will have much lower sequestration, much higher in woods storage, and no storage in harvested wood products. Each of these management examples and all others that nest between them contribute to lowering atmospheric green house gasses. State policies must support all types of forest management choices. What matters most is keeping forests of all types on the landscape.

Declining sequestration must be reconciled with higher targets

The report identifies a clear decline in net sequestration over time, driven largely by wildfire (see figure 3, including the drop in 2020–2021). At the same time, all goal options assume increasing sequestration in the future.

The issue is not just that those trends move in opposite directions—it is that the report does not explain what factors are expected to change in order to reverse that trajectory.

As written, it is unclear whether the proposed increases in sequestration are expected to come from: changes in land management practices; changes in disturbance regimes (e.g., reduced wildfire impacts); or the regrowth that will come from the millions of trees landowners planted after the 2020 fires.

Without that clarity, it is difficult to evaluate whether the targets are achievable or what actions are intended to drive them.

At a minimum, the analysis should:

- distinguish between outcomes driven by management and those driven by external factors; and
- include forward-looking analysis or modeling to demonstrate how the stated targets can be reached.

The shift from baseline-based targets to absolute targets needs more explanation

Options 2 and 3 move away from a baseline approach and instead set targets based on total statewide net sequestration. That is a significant change with real implications: performance is no longer measured relative to real, underlying conditions. External drivers such as wildfire and drought are not fully accounted for, and changes in sequestration rates may reflect factors outside the control of land managers.

The report acknowledges these dynamics but does not connect them back to the structure of the goal. If total statewide targets are used, the framework should explicitly account for external factors and explain how progress will be measured based on the reality that those drivers are actually out there and will inevitably occur. Without addressing those two issues, the goal will not be achievable from a practical standpoint.

Time horizon matters and is not currently addressed

The framework evaluates outcomes against a fixed future date but does not reflect the true forest carbon cycle.

Sequestration and storage vary over time based on stand age and growth cycles, disturbance, and management approach over multiple rotations.

Evaluating outcomes at a single point in time can favor certain approaches while underrepresenting others, not because they are less effective, but because their benefits accrue differently over time.

If the goal is intended to inform policy decisions, the analysis should:

- acknowledge the role of time horizon; and

- avoid drawing conclusions about relative effectiveness without considering how the carbon cycle plays out over longer time periods.

Conclusion

The draft does not yet provide a clear justification for selecting the more ambitious goal option.

It presents a policy choice but does not identify the criteria for resolving it.

Before recommending Option 3, the report should clarify how the targets relate to a declining baseline, explain how the state will measure progress in the presence of wildfire and other disturbances, and treat sequestration and storage within a consistent framework.

Without that clarity, it is unlikely that the recommended approach will produce meaningful or durable outcomes.