

**From:** Good Rain Farm <farmer@goodrainfarm.com>  
**Sent:** Thursday, January 11, 2024 1:14 PM  
**To:** Oregon GWC \* ODOE <Oregon.GWC@oregon.gov>  
**Subject:** Oregon's Natural & Working Lands Fund Public Comment

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Members of the Oregon Climate Action Commission,

I am writing today to share my thoughts and experience around how funds are utilized to support Oregon's Agriculture specifically through the Natural & Working Lands Fund.

My name is Michelle Week, I own and operate a 2 acre mixed vegetable farm in the Portland metropolitan area. Good Rain Farm is led by and in service of Native people. I serve 150 CSA members, attend markets, and have donated 5,000# of produce to regional food banks, pantries and kitchens this year alone. After 6 years in operation and having interacted with the ODA, USDA, FSA & NRCS and having attended countless educational opportunities I can conclusively share the little value I see in increasing Technical Assistance funding.

Within the Natural & Working Lands Fund proposals I am frustrated to see so much of the funding be diverted into Admin and Technical Assistance. I, like many of my peers, am a college educated entrepreneur. The Technical Assistance is extremely unhelpful and frequently patronizing. Very few farmers need to be convinced that climate smart practices are best, we need financial and physical support. Farms that are choosing to utilize more conventional techniques are doing so out of financial necessity rather than a lack of understanding or caring about the environmental impact. I don't blame them, I understand why folks turn to less labor intensive farming practices. I have utilized cost share and grant programs such as the NRCS EQUIPS programs and though helpful I would rather not go through that process again. It didn't come close to covering labor costs.

Farmers know what and how to approach our changing climate, as an Indigenous farmer I personally am aware and witness communities of color drawing on traditional knowledge with little recognition. Too much of the funding specifically within the OWEB & ODA proposals of the Natural &

Working Lands Fund are being diverted into Administration and Technical Assistance. Our society undervalues food, the only tangible product farmers can produce to generate financial income. Farmers do more than produce a product for sale, we safeguard healthy, viable and productive soils for time immemorial, we support clean water and contribute to the recharge of underground aquifers, we reduce air pollution and enhance biodiversity that builds resilience toward pest plagues and strengthen our food systems.

*More of the funding allocation should be redirected towards the payment-for-practice programs.* These programs are proven Nationally and Regionally to have high returns on investment programs. Farmers need consistent compensation for the impactful non-tangible benefits they continue to provide our society, including carbon sequestration. Reduce funding towards Administration and TA, thereby forcing innovation and efficiencies within and redirect those savings as direct payments to farmers to fairly compensate them for the knowledge and labor they provide to our communities.

Limlmt (Thank you in the Sinixt Language),  
From your farmer,  
Michelle Week [ m ih - sh EH I ] [ wēk ]

Pronouns She/Her/Hers  
[www.goodrainfarm.com](http://www.goodrainfarm.com)

**From:** Andrea Kreiner <[andrea.kreiner@oacd.org](mailto:andrea.kreiner@oacd.org)>  
**Sent:** Friday, January 12, 2024 5:07 PM  
**To:** Oregon GWC \* ODOE <[Oregon.GWC@Oregon.gov](mailto:Oregon.GWC@Oregon.gov)>  
**Subject:** Public Comments for OCAC 1/26/24 meeting

You don't often get email from [andrea.kreiner@oacd.org](mailto:andrea.kreiner@oacd.org). [Learn why this is important](#)

Good afternoon,

Please find attached the Oregon Association of Conservation District's public comments for the Commission meeting on January 26.

Thank you,  
Andrea Kreiner

Andrea Kreiner  
Executive Director  
OACD  
P.O.Box 10527  
Portland, OR 97296  
[andrea.kreiner@oacd.org](mailto:andrea.kreiner@oacd.org)



January 12, 2024

To: Oregon Climate Action Commission  
Re: Natural Working Lands Fund Proposal from Agencies

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Dear Chair Macdonald and members of the Oregon Climate Action Commission,

We thank the Commission for recognizing the importance and urgency of getting the moneys in the Natural and Working Lands Fund (Fund) allocated and working on the ground.

The Oregon Association of Conservation Districts (OACD) represents Oregon's 45 Soil and Water Conservation Districts, special districts governed by elected boards. The Districts protect and enhance soil quality, water quality and quantity, and habitat by supporting voluntary conservation in partnership with private landowners and managers as well as federal, state, and nonprofit partners.

Soil and Water Conservation Districts are some of the key organizations that work with landowners and managers on implementing carbon sequestration practices and will be key in effective implementation of grant projects supported by the Fund as well as guiding and assisting landowners in accessing federal funding for their projects.

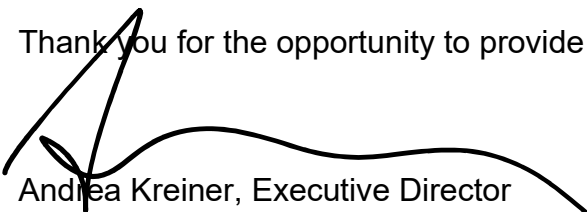
Our greatest concern with the proposal is that there is no discussion of or plans to create a soil carbon baseline so that the carbon sequestration impact of the projects implemented through the Fund can be measured over time. This would be a great missed opportunity. We suggest that every grant or project funded should incorporate (and fund) the taking of baseline carbon measurements. The cost of running samples is approximately \$40 per sample; with an average of 5 samples per project site, this is not an overwhelming burden. Soil and Water Conservation District staff and OSU Extension agents can assist in sample taking. This will enable long term measurement of carbon sequestration and further development of a statewide database, filling in the gaps in actual carbon measurements.

We have specific comments regarding the OWEB proposal:

- Since some of the most effective actions to increase Oregon's carbon sequestration are implementing farm practices (e.g., cover crops), the list of eligible projects for Open Solicitation should be expanded to include projects providing technical assistance to implement these farm practices.
- Since the criteria and potentially eligible projects will be different from the standard OWEB Open Solicitation grant factors, we suggest that a process with separate factors be offered for projects seeking grants through this Fund.

Finally, regarding the ODA Invasive Annual Grasses proposal, this is a good investment and will address carbon sequestration in areas where carbon can be stored and where removing invasives and planting deep-rooted native bunch grass would lead to carbon sequestration.

Thank you for the opportunity to provide input into your decision-making process.



Andrea Kreiner, Executive Director  
Oregon Association of Conservation Districts  
[Andrea.Kreiner@OACD.org](mailto:Andrea.Kreiner@OACD.org)

**From:** jeffrey.baldwin@sonoma.edu <jeffrey.baldwin@sonoma.edu>  
**Sent:** Wednesday, January 10, 2024 9:01 PM  
**To:** Oregon GWC \* ODOE <oregon.gwc@energy.oregon.gov>  
**Subject:** Comments on Natural and Working Lands Fund Proposal

You don't often get email from [jeffrey.baldwin@sonoma.edu](mailto:jeffrey.baldwin@sonoma.edu). [Learn why this is important](#)

Greetings and thank you for your efforts here. If possible, I strongly encourage the inclusion of explicit encouragement of process based restoration, particularly for stream system restoration and to build resilience against climate shocks. (see Beechie et al 2010 @ [https://www.fs.usda.gov/rm/pubs\\_other/rmrs\\_2010\\_beechie\\_t001.pdf](https://www.fs.usda.gov/rm/pubs_other/rmrs_2010_beechie_t001.pdf)). These methods of restoration help return streams to their pre-contact function and serve environmental justice communities by working to restore the world their cultures co-adapted to and were significantly degraded by Euro-American colonization.

Thank you,  
Jeff Baldwin PhD  
Geography, Environment and Planning (Emeritus)  
Sonoma State University  
Eugene, Oregon

**From:** Ellen Hammond <ellen.hammond@jeffswcd.org>  
**Sent:** Wednesday, January 17, 2024 9:39 AM  
**To:** Oregon GWC \* ODOE <oregon.gwc@energy.oregon.gov>  
**Subject:** Comments on Natural and Working Lands Fund Proposal

To whom it may concern:

Jefferson County SWCD has already provided some comments on the Funding Proposal. I would like to formally add the following:

Jefferson County is one of the poorer counties in Oregon and also one of its most diverse. Its economy is driven by agriculture, especially on irrigated croplands. Due to drought, these irrigators are having to fallow fields and creating an economic disaster for the county. They need help with soil health practices such as cover cropping.

1. There is an unfortunate lack of support for working lands that are cropped. For instance, the proposal text lists recommended practices for OWEB's Restoration Grants (Attachment 1) that are focused on range and forest lands.

"Many of the recommended activities to capture and store more carbon and reduce greenhouse gases in Oregon's natural and working lands sector (i.e., those natural climate solution activities found in Institute for Natural Resources, 2023) are eligible for OWEB grants, including:

- Tidal wetland conservation and restoration
- Restore perennial grasses and riparian areas on rangelands
- Prevent conversion to invasive annual plant dominated systems on rangelands
- Prevent conversion of existing grasslands, shrublands, and savannas to juniper woodlands
- Reduce wildfire risks on forestlands"

2. We do appreciate the funding going to OAHF, as that appears to be the only pot of funding that will help our irrigators improve soil health.

"OWEB will use the funds to support projects that have carbon sequestration and greenhouse gas emissions reduction benefits. Funding will be prioritized for the following OAHF components: development of conservation management plans, implementation of conservation management plans via a payment-for-climate-smart-practices approach, and technical assistance projects."

--

Ellen Hammond, Conservation Specialist  
Jefferson County SWCD  
625 SE Salmon Ave, Ste 6 Redmond, OR 97756  
Mobile: 541-771-8258  
[ellen.hammond@jeffswcd.org](mailto:ellen.hammond@jeffswcd.org)



**From:** Megan Kemple <megan@oregonclimateag.org>  
**Sent:** Wednesday, January 17, 2024 11:52 AM  
**To:** Oregon GWC \* ODOE <oregon.gwc@energy.oregon.gov>  
**Subject:** Comments on Natural and Working Lands Fund Proposal

Please accept the attached Public Comment on the Natural and Working Lands Fund Proposal from the Oregon Climate and Agriculture Network.

Thank you,

Megan Kemple (she/her)  
Executive Director  
[Oregon Climate and Agriculture Network \(OrCAN\)](#)  
541-225-8807 (cell)





January 17, 2024

To: Chair Macdonald and members of the Oregon Climate Action Commission

Re: Public Comment on the [NWL Fund Proposal](#)

Oregon Climate and Agriculture Network (OrCAN) was a strong advocate for the Natural Climate Solutions Bill, along with the farmers and ranchers in our network, we are invested in the effectiveness of the \$10 million Natural and Working Lands Fund. Below is OrCAN's feedback on the [NWL Fund Proposal](#).

**Adequately fund financial incentives for agricultural practices**

The purpose of the NWL Fund in section 56(3) of [HB 3409](#) is to establish and implement programs to:

- (a) Provide incentives to help landowners, Indian tribes, land managers and environmental justice communities adopt practices that support natural climate solutions; and
- (b) Provide financial assistance for technical support for landowners, Indian tribes, land managers and environmental justice communities for the adoption of natural climate solutions.

OrCAN and the farmers we work with who have reviewed the Proposal, are concerned that *the Proposal doesn't include adequate funding for financial incentives for farmers and ranchers.*

There is a small portion of the Proposed use of the funds (\$750,000) by OWEB for the Oregon Agricultural Heritage Program for payment for conservation practices on agricultural land. However, that funding would not go directly to farmers, but rather to other eligible entities such as Soil and Water Conservation Districts, Land Trusts and non-profits to distribute to producers and to manage the projects and provide technical assistance. And there is \$100,000 in ODA's proposed Native Seed Strategy for financial assistance for Tribal farmers, Tribal nurseries and Tribal native plant programs.

But overall, we see at most \$850,000 of the \$10 million proposed for financial incentives for farmers and ranchers from the state, with the likelihood of leveraging some federal funding.

We recommend allocating, or explicitly providing flexibility for OWEB to allocate, at least \$1.5 million to the Oregon Agricultural Heritage Program (OAHP) for payment for conservation practices on agricultural land. OAHP is the best fit, of any existing state agency program, for providing payment-for-practice to farmers and ranchers. And these grants can be used to leverage federal funding, such as the NRCS's Conservation Stewardship Program. OWEB has not yet distributed grant funding via the Conservation Management Plan Implementation Grant Program, so we recognize that it may take the agency some time to stand-up that Program and award grants.

## **Other concerns**

OWEB's Project Purpose for conservation management planning, technical assistance, and payment for practices in their Spend Plan Summary at the top of page 26 in the Proposal reads: "Conservation management planning, technical assistance, payment for practices, *and (possibly) conservation easements and covenants.*" (emphasis added). We are not seeing language about conservation easements and covenants elsewhere in OWEB's Proposal and don't support use of the NWL fund for conservation easements and covenants. Although we value farmland preservation through easements and covenants, we don't see a direct carbon sequestration benefit there, nor an opportunity for payment-for-practice, and use of the Fund on easements and covenants could easily use up the entire \$750,000 with just one or two projects.

ODA's Proposal for use of the Fund for the Oregon Native Seed Strategy Implementation, appears to leverage existing partnerships and support growers and processors of native seed crop. The Proposal states "With existing program staff and through agreements with partners, ODA will also collect, clean and bank priority native species". We have heard concern from a Tribal seed producer in OrCAN's network who is concerned about ODA cleaning or banking their seed. We recommend modifying this language to something like: "ODA and project partners will also collect, clean and bank priority native species." This may be consistent with the intent, but a modification of that language would be appreciated, to clarify that ODA will not clean or bank all seed.

## **Public Engagement and Prioritizing Environmental Justice Communities**

The Fund will only be effective if it is accessible to landowners and land managers. Input from landowners and land managers, and organizations supporting them, will be critical as any grant programs or other incentive programs are developed, to ensure they are structured in a way that is accessible. Landowners and land managers, and organizations supporting them, should be given the opportunity to provide input on the structure of any grant programs or other incentive programs, with a process for considering and incorporating that feedback. OWEB has demonstrated a solid engagement plan described here: "Prior to any grant solicitation release, OWEB plans to conduct a public engagement process with our traditional partners, tribes, environmental justice communities, and others to identify priorities for the funding. ... OWEB will apply additional review criteria in consultation with subject matter experts to select projects that provide carbon and resilience benefits and include engagement with and input from local communities disproportionately impacted by climate change."

## Ensure the fund is equitable

In section 4 of HB 3409 the Commission was directed to apply an environmental justice lens to Fund allocation. Priority should be given to "*technical assistance for environmental justice communities or Indian tribes; and incentives for programs or activities supported by an environmental justice community or supported by a resolution of an Indian tribe, with priority given to those projects or activities administered or proposed by an environmental justice community or an Indian tribe.*" We're pleased to see in OWEB's and ODA's proposed use of the funds that priority will be given to those projects or activities administered or proposed by an environmental justice community or tribe, as required in HB 3409.

## Monitoring

OrCAN has heard an interest from some organizations in adding a requirement for monitoring and verification of the carbon sequestration benefits of all projects funded by the NWL Fund. We would recommend against that at this point for a number of reasons 1) this monitoring and measurement of carbon sequestration will be accomplished through the Natural and Working Lands Inventory as required in HB 3409 2) USDA is also tasked with quantifying and tracking carbon sequestration and greenhouse gas emissions and gathering field-based data to evaluate the effectiveness of climate-smart mitigation practices in reducing these emissions 3) we don't think landowners and land managers should be responsible for that this monitoring and technical assistance providers don't currently have this capacity (although the NWL Fund could provide that capacity) and 4) some landowners, and organizations representing them, have concerns about the public availability of data related to practices, crops and soils, so there will likely be concerns about collection of data which would be publicly available. We recommend the NWL Inventory be used for this purpose rather than specific projects.

We think it is unlikely that farmers and ranchers will advocate for renewal of this funding if their needs aren't met/addressed by it. We respectfully request that more funding be allocated to financial incentives for agricultural practices, with at least \$1.5 million allocated to OWEB for payment for conservation practices on agricultural land, through OAHP's Conservation Management Plan Grants, or the flexibility for OWEB to reallocate funding to that Program.

Thank you so much for your consideration of these comments.

A handwritten signature in black ink that reads "Megan Kemple". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Megan Kemple, Executive Director  
Oregon Climate and Agriculture Network (OrCAN)

**From:** Lauren Link <lauren.link@TNC.ORG>  
**Sent:** Wednesday, January 17, 2024 12:37 PM  
**To:** Oregon GWC \* ODOE <oregon.gwc@energy.oregon.gov>  
**Cc:** Laura Tabor <laura.tabor@TNC.ORG>  
**Subject:** Comments on Natural and Working Lands Fund Proposal

You don't often get email from [lauren.link@tnc.org](mailto:lauren.link@tnc.org). [Learn why this is important](#)

Hello,

Please find attached comments on behalf of The Nature Conservancy for the Natural and Working Lands Fund Proposal. We appreciate the opportunity to provide comments. Please let us know if you have any questions!

Thank you,  
Lauren

**Lauren Link**  
*(she/her/hers)*  
*External Affairs*  
*Policy Associate*  
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**The Nature Conservancy in**  
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January 17, 2024

Oregon Climate Action Commission

Public Comment on proposed allocation of Natural and Working Lands Fund

Submitted by Laura Tabor, Climate Action Director

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Chair Macdonald and Members of the Commission,

Thank you for the opportunity to provide comments on the proposed allocation of the new Natural and Working Lands fund. This fund is a significant step towards ensuring that Oregon's natural and working lands continue and increase their contributions to climate change mitigation and we appreciate the efforts of state agencies and Governor Kotek's office to compile this proposal with limited time and capacity.

The Nature Conservancy in Oregon (TNC) is a science-based, non-partisan organization with 80,000 supporters and members in every county. Based in communities around the state, we manage lands and waters in varied ecosystems and partner with Tribes, ranchers, farmers, fishers, timber, and environmental interests on some of the most challenging conservation issues facing people and nature. Addressing the climate change crisis is a core component of TNC's work to create a world where people and nature can thrive, and we strongly believe that Oregonians have a responsibility to enact policies to reduce greenhouse gas emissions and help our communities adapt to climate change.

Given the many co-benefits of natural climate solutions and legislative direction to meet multiple objectives, we find this first fund allocation proposal broadly aligned with the policy of the state regarding natural climate solutions as outlined in HB 3409: investments in on-the-ground projects as well as financial and technical support for land managers and organizations in a variety of sectors and landscapes. As such, these comments are primarily focused on important considerations for how agencies proceed with the proposed funding as opposed to recommendations for changes to the allocations.

**Natural Climate Solutions Practices.** We appreciate that the proposal seeks to align with the report produced by the Institute for Natural Resources (INR) in fall 2023 as an effort to build on OCAC's previous work in this sector. However, this report is a snapshot of ongoing work the OCAC will need to continue to better define NCS practices and metrics moving forward. We urge agencies to review public comments the OCAC received in December 2023 regarding this report for important caveats on its conclusions. In particular, TNC's comments noted the unfortunate omission of riparian reforestation in the INR report—one of the practices that stands to contribute the most to carbon sequestration in Oregon—and the importance of ecological sideboards for NCS practices to ensure carbon benefits are not pursued without regard to ecologically appropriate species composition and other factors that affect ecosystem resilience.

**Grassland and Rangelands Projects.** TNC appreciates the inclusion of ODA's Invasive Annual Grasses project and ODFW's Carbon Capture & Restoration in North-Central Oregon Rangeland project as important restoration work aligned with conservation priorities. We note, however, that geographic context and existing native plant community integrity is critical to pursuing successful rangeland restoration for the purposes of carbon sequestration. In Oregon's semi-arid rangelands, protecting and expanding large "cores" of sagebrush habitat with perennial bunchgrass understories offers the best chance for increased carbon sequestration and avoided carbon loss. In areas already heavily converted to annual grasses, it will take a great deal of effort, luck, and time to stabilize carbon stocks. Similarly, we encourage ODA to consider placing one of its Invasive Annual Grass-focused positions in Harney or Lake Counties where there is greater opportunity to "defend and grow the core" than in other parts of the state.

**Environmental Justice and Fund Accessibility.** While we appreciate the broad commitments to supporting environmental justice communities in the proposal, it will take more specific actions and intention to successfully connect available funds with community needs. We note that the Social Vulnerability Index developed through SB 762 implementation could be a helpful guide to ensure funds directly support the most vulnerable communities.

As agencies adjust program design to deliver these funds, it will be critical to consider not just which communities to support, but what capacity exists in partner organizations to intake or pass through funds. TNC provides applicable recommendations on increasing public funding accessibility in a recent [white paper](#), including the following recommendations for agencies providing funding:

- Prioritize strong relationships with communities through skilled local navigation and outreach staff who can offer tailored communication and assistance.
- Identify local entities that already support and connect agencies and communities, particularly when government engagement is limited.
- Simplify application and administrative processes as much as possible, e.g., scaling requirements with grant size and providing step-by-step support for "first-time" applicants.
- Be transparent about grant flexibility and administrative requirements up front to help new applicants understand expectations and commitments.
- Create as many opportunities to fund planning, project pre-development, and capacity building as possible.

**Forest Practices.** Climate-smart forestry as defined in ODF's Climate Change and Carbon Plan (CCCP) includes a broad spectrum of silvicultural practices with varying degrees of carbon sequestration potential. Improved forest management as an NCS practice should emphasize activities with high sequestration potential such as extended rotations and variable retention harvesting. As noted above and in prior TNC comments on the INR NWL report, it is also critical to apply sufficient ecological sideboards to maintain resilience and avoid unintended consequences. TNC also looks forward to continued engagement to better define activity-based metrics for these and other NCS practices.

**Intentional Use of Staff Time.** TNC recognizes that successful delivery of these funds requires increased agency staff capacity. In line with the recommendations on public funding access above, we strongly encourage agencies to be intentional in scoping positions, with a focus on relationship development and outreach efforts. This is particularly important as new program staff works to mobilize state funds in partnership with small organizations and environmental justice communities. The current descriptions and allocation of new staff time appears more

generally weighted towards technical work and administration support. For example, ODF has budgeted 2 FTE for the nursery program and only 1 FTE combined for disbursing \$2.5M in grants and technical assistance program. Adding staff through this fund offers an opportunity for agencies to increase their capacity to engage with communities and partners, to listen deeply to understand their needs related to NCS, and to adapt program delivery to meet those needs. Taking this opportunity will be essential to adequately implement this fund with respect to the environmental justice priorities of HB 3409.

**From:** Dani Madrone <DMadrone@farmland.org>  
**Sent:** Wednesday, January 17, 2024 1:29 PM  
**To:** Oregon GWC \* ODOE <Oregon.GWC@Oregon.gov>  
**Subject:** Proposed Allocation of Natural and Working Lands Fund

You don't often get email from [dmadrone@farmland.org](mailto:dmadrone@farmland.org). [Learn why this is important](#)

To Chair Macdonald and Members of the Oregon Climate Action Commission,

Please find the attached comments for the proposed Natural and Working Lands funding allocation. I am available if you have any questions!

Kindly,  
Dani Madrone

**Dani Madrone**  
*Pacific Northwest Policy Manager*  
her/she/hers  
**American Farmland Trust**



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**Email:** [DMadrone@farmland.org](mailto:DMadrone@farmland.org)  
**Website:** [www.farmland.org](http://www.farmland.org)

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January 17, 2024

To: Oregon Climate Action Commission  
**Re: Proposed Allocation of Natural and Working Lands Fund**

To Chair Macdonald and Members of the Oregon Climate Action Commission,

Thank you for the opportunity to provide comment on the funding proposal for the Natural and Working Lands Fund. Our mission at American Farmland Trust is to save the land that sustains us by protecting farmland, promoting sound farming practices, and keeping farmers on the land. We appreciate that the funding proposal directs funding to the Oregon Agricultural Heritage Program for climate smart agricultural practices, and recognizes the additional ecosystem and community benefits of these practices.

Through the advocacy for this funding and previous efforts at the Legislature, farmers and ranchers have demonstrated an eagerness and readiness to implement climate smart practices on their land. We are concerned that the proposed \$750,000 is simply not enough funding to provide them what they need to make a meaningful difference. Additionally, while technical assistance is important to the adoption of new practices, financial incentives are crucial. Many farmers and ranchers will struggle to bear all the upfront costs to implement these practices.

Encouraging the adoption of voluntary practices is only successful when farmers and ranchers believe the state is fully invested. Any message of hesitancy or uncertainty from the state, including inadequate funding, will inhibit the trust needed for producers to adopt new, long-term practices that support Oregon's climate goals. Please allocate more funding for financial incentives for farmers and ranchers to implement natural climate solutions through the Oregon Agricultural Heritage Program.

Sincerely,

Dani Madrone  
*Pacific Northwest Policy Manager*  
**American Farmland Trust**

From: Greg Holmes <greg@friends.org>  
Sent: Wednesday, January 17, 2024 2:16 PM  
To: Oregon GWC \* ODOE <Oregon.GWC@Oregon.gov>  
Subject: Comments for January 26 meeting on Natural and Working Lands Fund proposal

[You don't often get email from [greg@friends.org](mailto:greg@friends.org). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Please place the attached comments in the record for the Oregon Climate Action Commission meeting on January 26--Agenda Item regarding the Natural and Working Lands Fund Proposal. Please confirm receipt. Thank you.

--

Greg

Greg Holmes  
Pronouns: He/Him  
Working Lands Program Director /  
Southern Oregon Advocate  
1000 Friends of Oregon  
PO Box 2442 Grants Pass OR 97528  
Direct: 541.474.1155  
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January 17, 2024

Cathy Macdonald, Chair, and Members  
Oregon Climate Action Commission  
550 Capitol St. NE, 1<sup>st</sup> Floor  
Salem, OR 97301

Re: Proposed Allocation of Natural and Working Lands Fund

Dear Chair Macdonald and Board Members:

Thank you for the opportunity to provide comments regarding the proposed allocation of the Natural and Working Lands Fund. 1000 Friends of Oregon is a nonprofit, membership organization that has worked with Oregonians for nearly 50 years to support livable urban and rural communities; protect family farms, forests and natural areas; and provide transportation and housing choices.

We have been heavily involved in the issues at hand since the public involvement work that went into the Commission's [Natural and Working Lands Proposal](#). I served on the Commission's Natural and Working Lands Advisory Committee that worked on the [Final Report: Foundational Elements to Advance the Oregon Global Warming Commission's Natural and Working Lands Proposal](#) that informed the proposed distribution of this fund. I have also been an active member of the Natural and Working Lands Coalition that worked on what became the Climate Package (HB 3409) that created this fund during the 2023 legislative session.

I attended both of the listening sessions that are discussed in the Natural and Working Lands Coalition comments that were submitted separately. For the record, the summarized themes presented in that document accurately reflect the concerns that I heard from our constituents that participated in those sessions.

I would like to address one additional issue that was not covered by those comments, but that is explicitly made part of both the Natural and Working Lands Proposal and the Final Report mentioned above. Both of these documents recognize that the practices and programs that are the subject of this fund can not have the hoped for benefits without a land base on which to deploy them. The majority of the lands are subject to protection under the state's land use planning program, administered by the Land Conservation and Development Commission (LCDC). The Natural and Working Lands Proposal includes the following recommendation (at page 14):

Enhance and maintain Oregon's statewide land use planning program goals and commit to a no-net annual loss of natural and working lands and waters.

The Final Report provides further discussion of how the land use planning program protects these lands, and of considerations for how to meet the goal of no-net loss of natural and working lands and waters. (See pages 22 and 23)

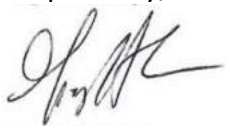
Consistent with the goals of the OCAC in those documents, we offer the following recommendations:

- That as the OCAC and the ODA, ODF, ODFW and OWEB disperse these funds, include in the criteria for qualification the likelihood that the land where the project is being deployed is likely to stay in use as a natural area or as working lands over time. Such a criterion demonstrates wise investment of taxpayer funds and ensures long-term, ongoing benefit for sequestration.
- That the OCAC and all four of the agencies actively support LCDC as that agency moves to strengthen the land use planning program's protections for working lands and to eliminate loopholes and other provisions that allow for the conversion of those lands to uses that increase emissions, decrease sequestration potential, or create conflicts for the resource use of neighboring lands.

Both of these recommendations can be implemented within the context of the agency proposal that is before you now.

Thank you for your consideration of these comments. We look forward to your discussion of these issues on January 26, and to the dispersement of the Natural and Working Lands Fund beginning in subsequent months.

Respectfully,



Greg Holmes  
Working Lands Program Director  
1000 Friends of Oregon

**From:** janleewater@gmail.com <janleewater@gmail.com>  
**Sent:** Wednesday, January 17, 2024 4:13 PM  
**To:** Oregon GWC \* ODOE <Oregon.GWC@Oregon.gov>  
**Cc:** Cathy Macdonald <cmacdonald@TNC.ORG>  
**Subject:** Final Comments to OCAC - on Natural and Working Lands Fund

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

Here are the coalition's comments regarding the Natural and Working Lands Fund. Thank you.

To: Oregon Climate Action Commission

Re: Proposed Allocation of Natural and Working Lands Fund

January 17, 2024

Attention: Chair Macdonald and Members of the Oregon Climate Action Commission

Thank you for the opportunity to review the draft proposal from state agencies regarding the allocation of the new Natural and Working Lands Fund. We appreciate the effort that agencies and Governor Kotek's office have put into assembling a thorough proposal in a short amount of time. This fund has great potential to support land managers, increase carbon sequestration in Oregon's natural and working lands, and deliver ecological, health and other co-benefits of natural climate solutions to communities and landscapes around our state while providing equity access and environmental justice components.

Our organizations enthusiastically supported this fund's creation in the legislature last year and are equally eager to see its effective implementation. To that end, we have gathered input from landowners, land managers, and organizations interested in utilizing these funds for natural climate solutions. We held two listening sessions on January 8<sup>th</sup> and 9<sup>th</sup> with a total of over 100 attendees and received written follow-up survey responses from those individuals. We have attached as appendices the notes taken at the two listening sessions provided last week and survey responses received.

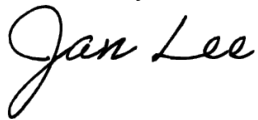
In addition to the enclosed comments, we would like to highlight the following themes which emerged in our outreach.

- **Across sectors, many growers and organizations had difficulty seeing how funds would flow to meet their needs under the proposed allocation.** Concerns included lack of clarity for who growers should approach for funds that will be distributed via intermediaries. Soil and Water Conservation Districts emphasized the need for capacity grants to provide technical assistance and for the Districts to work to leverage additional funds for applicants from state and federal programs. Attendees also noted the importance of interagency communication and consistency, especially for practices such as riparian reforestation which cross sectors.
- **While some attendees appreciated the inclusion of technical assistance, others expressed a strong preference for prioritizing incentives.** Many growers stated that they know what they need to do and simply lack the financial resources to implement natural climate solutions. Several expressed concern about the limited funding for financial incentives for payment-for-practice. Attendees also voiced concern about the funds being used for "business as usual" practices or used too much for internal agency needs. Others highlighted the importance of outreach and communication.

- **Many attendees emphasized the importance of a holistic approach to natural climate solutions that incorporates resilience and ecosystem health.** Some also wanted to better understand agencies' definitions of "climate-smart" practices and had questions and concerns about what practices agencies may prioritize.

Thank you for the opportunity to provide the information we have gathered from the listening sessions and survey. We look forward to hearing your discussion of the proposed funding programs at your meeting on the 26<sup>th</sup>.

Sincerely,



Jan Lee

Oregon Association of Conservation Districts

On behalf of the Natural and Working Lands Coalition, including :

Andrea Kreiner, Oregon Association of Conservation Districts

Teryn Yazdani, Beyond Toxics

Laura Tabor, The Nature Conservancy

Greg Holmes, 1000 Friends of Oregon

Megan Kemple, Oregon Climate and Agriculture Network

Joe Liebezeit, Portland Audubon

Dani Madrone, American Farmland Trust

Josie Koehne, LWV

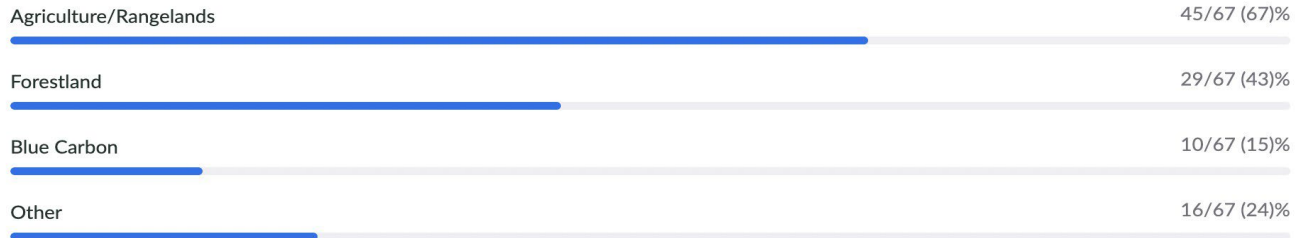
Appendices:

- Listening session attendees by resource type
- Agriculture listening session notes
- Forestry listening session notes
- Survey responses from attendees

# Listening Session Poll Results

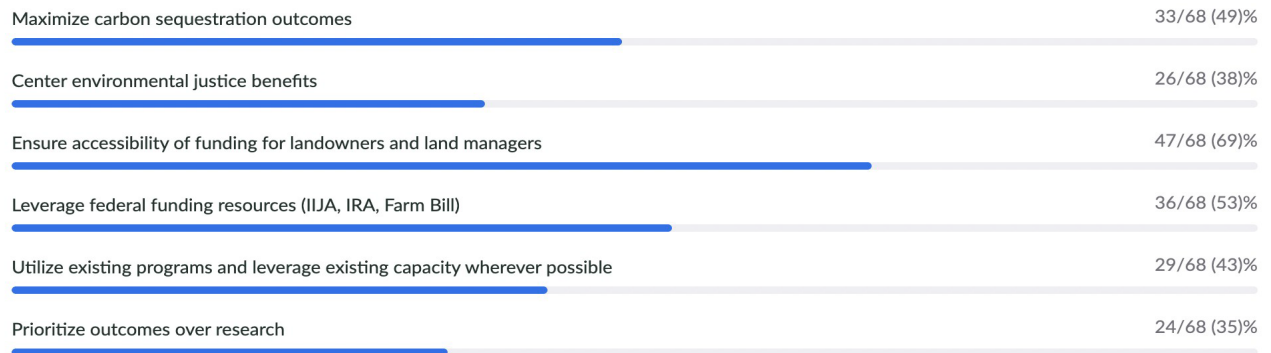
## 1. Which sector do you represent/work in? (Multiple Choice)

67/68 (99)% answered



## 2. Which values would you like to see reflected in the NWL Fund? (Select all that resonate with you) (Multiple Choice)

68/68 (100)% answered





## Notes from the Agriculture Breakout Sessions

- Growers want more financial support, not technical assistance. We know what we need to do, we just need the \$\$ to do it. Money on the ground over admin and technical assistance.
- Excited for funding for conservation management plans support and TA. People who are motivated to make changes can get overwhelmed. Plans help service providers organize themselves to help have regional capacity.
- We need to maximize capacity by having state funds to match federal funds is a high need.
- Concern: Focus on carbon sequestration, carbon storage could have perverse consequences. Co-benefits of certain practices need to be included. Where is resiliency being built into results?
- Interest in conservation management plans related to conservation easements.
- Appreciate tribal entities on-the-ground input and implementation. Excited that tribal people are being recognized and supported to continue work they were already doing.
- SWCDs and ODF have a history of getting work done on the ground and additional capacity is appreciated.
- Concern: As SWCD, don't see how funds would come to us. Would prefer to see direct funds through Capacity Grants that already funds our work, so we can do work on the ground.
- Collaboration with other entities and SWCDs are helpful to secure funding and need to use interagency and entity efforts to enhance capacity.
- Would have liked to have seen something about outreach to growers. Not that many people know about this at the grassroots level and attention to outreach needs to be considered.
- Concern: What programs can I access for these programs? get the information out. What's coming down the pike? Disseminate information on the agency website. How do projects under these programs coordinate with other agency (NRCS, etc.) programs? would have liked to see actual outreach (1:1) to growers about the NWL fund. Really hard to get this info and know how to tap into programs. We aren't building the base of native seed growers and things that we need because we are not pulling in new folks. Went into NRCS office and asked what programs I am eligible for—is there a listserv I can be on? NRCS didn't know ODA.

- Can provide TA to help recognize projects. We need agency people to outreach and help connect people to the programs—it's not a question about "how to" but "where to go" to access. Agency people could help identify what is available and how it can be used.
- In the NW there is a lot of money going to tribal entities and other entities and it's not hitting the ground—someone on the property with experience needs to implement projects and receive allocation. There has to be easier access to funding on-the-ground and physical people to assist.
- Conservation plans (such as NRCS) don't always have the same priorities as individuals/farmers may need versus trying to fit projects into agency guidelines.
- Concern: Agencies put out proposals for work that they can't do elsewhere—almost feels like the agencies are saying that other things are being funded fully and that is not the case. This isn't "extra money". There is still a need for other things not listed here.
- Concern: there isn't collaboration with other entities and SWCDs to access funds
- Need to know the growers on an individual basis and know the people in their area. How can projects get on the ground if people don't know about it? Don't think we need TA—only have NRCS and SWCD in my county, not an ODA staffer. We need outreach to other agencies in the state that aren't getting those funds, to help growers know about these programs. Connections needed between agencies and growers. We don't need to be told how to do something.
- Concern: Back off the carbon sequestration idea - go towards water cycling as key climate solution (decrease bare ground increase soil covering)
- Focus should be on ecosystem restoration
- Collaborative projects are key, need to work on a landscape basis, not landowner by landowner.
- Put resilient ecosystems back into place
- Concern: Values crisis - when maximizing carbon sequestration is top of list . Need to learn a new perspective of serving the earth instead of taking from the earth. Soil diversity, native plant diversity.
- Collaboration is important
- Concern: Isn't a lot of clear funding for farming to implement smart practices, needs to be more opportunities for farmers to implement CS practices.

- Excited About: Payment for practice
- Echo need more \$ to ag (excited and wanting more)
- Concern: Didn't see \$ for staff in ODA - particularly staff that understands CS practices
- Need to look at climate smart solutions - start working on a soil carbon baseline, to measure long-term impact of practices, should include testing in the grants, not expensive, SWCD's can be trained to take the samples
- Rangelands in Jefferson are grazed, will the rangeland programs apply to those grazed rangelands?
- Concern: from SWCD perspective - Districts are here to provide on the ground TA, there's very little involved in these funds to help Districts add capacity to get these and the IRA funded projects done. Is there clarity on what percentage can be used for TA for staff?
- Concern: about the helpfulness of TA from farmer perspective hasn't even been able to get help writing grants for on the ground projects.
- Rental costs money. Can't this funding just cover it? This is what I am saying the "T.A" doesn't actually cover actual costs
- Would like front end TA - eg in writing grants to get funding, help designing projects
- Get helpful examples of things being done elsewhere on a collaborative level (eg viticulture in CA)
- Concern: The amount of money going to admin is frustrating
- Are there ways in which more of the pool of money can go to farmers on agricultural producing lands?

## Forest Sector Comments and Questions

- *What parts of the proposal are you most interested in or excited about and why? Which pieces could you see benefiting you/your organization?*
  - Happy about the \$1.5 million for small landowners and forest managers to NCS on their land
    - Attachment 1 in the proposal on investment areas talks about ODF biologists and habitat restoration projects—curious about what that might entail (permit apps at the county level, additional technical support, etc.)?
  - Curious about how the funding could come down to the landowner level in projects.
    - Does the funding go through existing programs? How does it connect to landowners on the ground?
  - What practices/ projects might be financially incentivized?
    - EX: Will longer logging rotations qualify?
  - Riparian restoration was an NCS practice that was vocalized as an area of interest specifically
  - Emphasis on better access to seedling services; also stronger connections to tribal forest stewards and nontribal forest stewards
  - Also need inspiring stories of success to inspire change. Must build a better community of practice
    - How can we communicate the good news and how is it being communicated?
  - What is the definition of “climate-smart forestry” in this proposal?
  - Money should go to making sure those trees grow in the long term (keep them alive) and a need for trees to stay alive for the next generation.
  
- *What concerns, if any, do you have about the proposal? What high-level changes, if any, would you suggest?*
  - Concerned that there is not a role for the growers in the guidance of this work; there is not a clear mark of those that make a living as part of the development of this proposal
    - Growers need a central role
  - If there is scarce money, is that used to enforce those that have been doing this work or prioritizing the late adopters of this work?
  - In forestry there is a pilot in Washington County doing this work. There is a need to meet folks where they are and support the work that is already being done.
  - Are there any opportunities for scaling up biochar and the mitigation work that folks are doing?
    - That is missing from this proposal

- Adaptation work is interconnected with mitigation work and it is a delicate balance
    - Good feedback that managers are weighing these pieces
  - Are you only going to incentivize the new adopters/people of climate-smart practices?
    - Biggest issue: Some folks have been trying to do climate-smart forestry for a long time and it has been financially difficult. Will the money flow to those folks or only those new to implementing climate-smart practices?
  - Need incentives for longer rotations and keeping trees growing instead of cutting them.
- *What sideboards/considerations will be important for the agencies to follow/uphold in implementation?*
  - A strategic decision needs to be made on mitigation vs resilience/adaptation; a large portion of OR citizens will be focused on the resilience side. We need to have something that looks at the emphasis on mitigation; need to create solutions and not just preparations for what's coming.
  - Communication to farmers and landowners on how to best work with SWCDs is needed. There needs to be more transparency and communication on how folks can access these funds.
  - Timing of the funding is also key—the time of the year is important to keep in mind (*e.g.*, August is not the best for farmers).
  - Need to do a better job of using common ground and meeting people where they are to better engage.
  - Are there other existing groups that could use support?
    - Suggestion to go directly to the practitioners to find out who is interested in building.
- *Other Comments:*
  - Zena has started planting species that have the best chances of survival. Don't want to plant trees that will die in 10-15 years, there needs to be more education and outreach to forest owners on what species are best.
  - **Re: Technical Assistance:** For maintaining riparian areas, folks wouldn't know where to go for tech assistance. ODF has a new office (Spencer Mitchel), but a lot of people don't know about the new resources.
    - Oregon Small Woodlands Association is a resource but there is a need to better get the word out to OSWA and OFRI that this new office is for small landowners.
  - **Re: Seed Banking:** Willamette Valley Ponderosa Pine is drought-resistant. Ask land owners to contribute to seed banks.

- **Re: Agency Collaboration and Transparency:** Agencies need to communicate with each other. There is also a need to make sure landowners know OWEB is handling riparian restoration (overlap between agencies on projects). Landowners need to have contacts/ resources with each agency.
- **Re: Environmental Justice Concerns:**
  - Small forest owners - white privileged landowners - how to interface with environmental justice groups, how to access folks who need resources, how to spread the support? Don't know where to start.
  - Need for additional outreach when it comes to EJ groups specifically, not just working with existing partners, need new relationships in many cases.
- OFRI has a new forest landowner education manager (working with OSU extension folks) and wants to work on this landowner outreach.
  - Comment in response to OFRI Comment from a landowner: OSU folks are behind the curve, their science is 20 years out of date. They wouldn't even admit climate is a threat for the last decade. Skeptical they will have much to contribute.
- OFRI commented that they were surprised this wasn't interfacing with prescribed fire and wildfire, funding for mechanical treatment, beyond burning and chemicals (which have local impacts). Harder for small landowners to get hold of that money.

## Follow-up survey of interested parties

### Respondents

<b>Name</b>	<b>Affiliation</b>	<b>Sector</b>
Carly Boyer	Oregon Climate and Agriculture Network	Agriculture
Nella Mae Parks	Nella Mae's Farm	Agriculture
Teresa Matteson	Benton SWCD	Agriculture
Penny Feltner	Coast Fork Willamette Watershed Council	Agriculture, Forestry
Jan Lee	Clackamas SWCD	Agriculture, Forestry
Allan Branscomb	Oregon State University	Agriculture
Steve Kennett	Citizens Climate Lobby	Forestry
Peter Hayes	Family Forester	Forestry
Dean Moberg	Tualatin Soil and Water Conservation District	Agriculture, Forestry
Rose High Bear	Elderberry Wisdom Farm	Agriculture, Forestry, culturally-tailored environmental conservation and agriculture education to Native American and other communities of color
Michelle Week	Good Rain Farm	Agriculture
Chris Schreiner	Executive Director, Oregon Tilth	Agriculture
Spring Alaska Schreiner	Chugach Alaska Native Corporation/Valdez Native Tribe/Sakari Farms	Agriculture

<b>What parts of the proposal are you most interested or excited about and why?</b>
OWEB, OAHP - working lands
Focus on on-the-ground projects rather than research
tribal seed work, technical and financial assistance to implement practices on the ground
OWEB's proposal to fund conservation plans, technical assistance, and incentives for practice implementation on working lands through the Oregon Ag Heritage Program. Having a state source of matching funds for federal incentives will make large shifts in land management practices feasible for land managers who take on great personal risks.
Using OWEB's OAHP program to coordinate farmer/rancher needs while providing them with technical assistance they identify they need is a good opportunity to expand existing capacity. Small woodland owners and farmers and ranchers can use the programs to enhance their current work while making positive steps toward climate change mitigation.
Supporting innovation in agricultural practices.
The fact that money is going to actual projects
1 - The commitment to leveraging federal funds to create the greatest possible impact, 2) The balanced focus on increasing resilience and mitigation, 3) ODF's commitment to work in partnership with place-based groups who are already involved in this work.
I am completing this survey based on my own opinions, which are not official viewpoints of the Tualatin Soil and Water Conservation District. I'm most excited about the funding requested by ODF and ODFW because it appears those funds are focused on helping landowners and Tribes change forest management and implement new projects on natural lands.
Efforts to strengthen climate resilience funding opportunities are deeply appreciated, especially for underrepresented groups with a history of being excluded. We are tracking OWEB's initiative plus ODFW because they provide grant funding to NGOs and prioritize initiatives from communities of color.
As a Farmer myself seeking viable farmland and support in building a sustainable business the OWEB proposal and the ODA proposal are of most interest.
OWEB's OAHP \$875K investment appears to be the one that's most relevant to organic practices that build soil health and offer climate mitigation & resilience. As details of that program are developed and criteria to evaluate proposals come into focus, we would like to see organic practices required under the USDA National Organic Program be explicitly recognized for their climate-friendly impacts and benefits. We work with over 400 certified organic farmers in Oregon, who are actively contributing to natural climate solutions on working lands.
Increase in funding for TA, Oregon Native Seed Strategy, Conservation Plan



**Which pieces could you see benefiting you/your organization?**

Not seeing a lot of direct funding for soil health, but we are focused on working agricultural lands not necessarily rangelands.

Native plant and seed production focus

technical and financial assistance to help land managers implement practices on the ground; also we buy native seed from tribe so their component indirectly improves our work

Grant available for TA and the creation of conservation plans will benefit our organization, by funding staff time to build relationships with land managers and craft action plans for shifting their land management practices. Comprehensive conservation plans that map out all the priority actions and opportunities on a property over time allow our network of partners to better mobilize and build capacity to meet those needs in our service region.

The OWEB programs would definitely allow SWCDs to better serve their landowners and managers by providing the funding for implementation on-the-ground in a way that uses climate smart tools and carbon sequestration opportunities. The ODA programs offered are not detailed enough yet to determine how they can be used and implemented but there is an expectation they will become better defined. SWCDs have other capacity programs through ODA but the suggested programs may or may not coordinate--more detail needed. There will also be benefit from fire recovery programs included by other agencies under the NWL funding.

Regenerative agriculture and integrated solar power.

Understanding the carbon sequestration contribution of natural and working lands is important to our lobbying efforts

1 - Focus on improved availability of seedlings, 2 - More resources to the growers, 3 - the overall emphasis on accountability

I think all three funding paths (OWEB, ODA, ODF, ODFW) will benefit my SWCD and other SWCDs around the state.

OWEB and ODFW

Primarily the OWEB proposal could be of most benefit to my and my peers farm business. paying for practice is a huge boom to agricultural generally and have shown great results for the investment. Farmers struggle to make a living wage in a society that undervalues food and the trade skills needed to successfully grow it, especially as farmers are learning and pivoting quick to sudden climate changes. Farmers are investing in future generations soil, undergrounds water reserves, establishing economically viable food systems and nutritionally nourishing the next generation. However our government can justify paying farmers for all this work beyond the food product they grow the better for all of us! In fact our government already pays farmers to not grow or to over produce, surely we can fund climate smart practices as well.

As a nonprofit organization, we offer education, outreach and technical assistance on organic practices. There's a growing body of peer-reviewed science that demonstrates how organic practices can be part of the climate solution. Organic practices build healthy soil, increase biodiversity, promote water conservation and quality, and position farmers / ranchers to mitigate and adapt to climate change. We want to incentivize the selective adoption of more organic practices by more farmers, while also recognizing the climate resilience and mitigation benefits of existing organic farmers by supporting them for continued use of these practices..

Oregon Native Seed Strategy, Increasing infrastructure for supporting on the ground work for tribal people working in/throughout Oregon on Agricultural/Native Habitat increase projects.

**What concerns, if any, do you have about the proposal? Are there elements missing that you were hoping to see?**

I see a lot of money tied up with admin/ TA and not much money allocated directly for farmers to implement climate smart farming practices. As far as I can see 750k was set aside for OWEB working lands, but not all of that pool will go directly to farmers. Most is tied up in TA. How can this be addressed to help boots on the ground farmers?

Technical Assistance should be focused on grower outreach. It is not likely for growers to encounter these programs or funding on their own without direct outreach by local agency folks. For example, current seed growers should be contacted by agency folks to discuss growing native seeds and plants. Direct, one-on-one interaction is the best way to recruit new seed growers and restoration sites. This is something agency folks do less of all the time. I would like to see specific language about "one on one outreach" rather than technical support.

n/a

I have some concerns that weight or priority given to land management practice that sequester the most carbon or store the most carbon, may overshadow the benefits of other practices that perhaps have greater contributions to the overall resilience of the agricultural landscape. My concern is that a preoccupation with maximizing carbon sequestered could undervalue the co-benefits of other climate smart practices and create perverse incentives that are detrimental to overall resiliency for landscapes, rural communities, and local economies.

Matching up state and federal grants would be fantastic! I hope in the coming future there can be more clarity about how the federal programs can fit into the framework to enhance capacity and utilize the state funding to even greater good.

The absence of Regenerative Agriculture in the agriculture section.

The measuring and monitoring of results and understanding how these funded projects help us reach our carbon sequestration goals

1 - I think the effort will be stronger if there is greater emphasis on engaging grower in the guidance and shaping the work. We are on the front lines with this topic and there is deep experience, commitment and vision that can be better integrated into all dimensions of the work. We're in the best position to assess what's practical and impactful. 2 - The proposal will also be stronger if it includes commitments to building and supporting peer-to-peer communities of practice - both within and between sectors. 3 - Given that there is already an active pilot program supporting climate smarter forestry in Washington Co., it seems prudent to support work that is already moving forward and needs support. 4 - I hope that there is an emphasis throughout on actively and effectively sharing inspiring stories of success - shifting the work from theoretical to proven and practical. 5 - I like the commitment to two-way learning with tribes and recommend that this be expanded to include strong, two-way learning between state agencies and all growers.

I'm concerned that funds will be used for a business as usual approach rather than focusing on helping working lands managers transition to new systems that sequester carbon, reduce greenhouse gas emissions, and improve resiliency in the face of climate change. For example, I'm concerned that the new OWEB criteria for climate considerations in their grant system appear somewhat weak and may result in perfunctory consideration by grant applicants who will continue with the same types of projects they've traditionally done, without true adaptation of projects to sequester carbon, reduce greenhouse gas emissions, and create more resilient systems.

Agencies need to make sure they are not reserving all the funds for their internal needs, including hiring new staff, but also provide opportunities to organizations.

Too little of the budget goes to agricultural over all, and too much of that little budget goes to Administrative and Technical Assistance salaries. Farmers deserve salaries, Farmers are smart, Farmers already know what and how to be more climate smart they however lack the money to purchase equipment and make payroll to fund the labor of climate smart agriculture. Simply put we need to reduce the burden and need for admin through more streamlined and simplified application and reporting measures, and allow more funds to go straight to the Farmer with little to no restrictions. So often my engagement with the ODA, FSA and NRCS grants has put us in a bind - they'll pay for stuff but they resist paying for labor, labor needs to be valued and funded. Unless the TA's want to come out to the farm to pilot a tractor or build infrastructure or is willing to actually be a free cost bookkeeper or grant writer I am more than eager to reduce these positions that profit and redirect funds from the Farmers who are doing the real work. Admin and TA is all fluff sucking up money in comfy offices with full bennies while farmers scrape by. - In fact many of these people are in this job because their farms don't make enough money to pay them that they take second jobs administrating these burdensome programs instead. Let's continue to push to simply pay farmers to farm and reduce our societies general need for 2nd, 3rd or gig jobs.

Concerns: It appears the areas of investment that relate to agricultural working lands fall under OWEB (\$875K for conservation mgmt, planning, TA and payment-for-practices) and ODA (\$396K to treat priority areas – presumably with herbicides - for invasive grasses; \$583K to source and select and distribute native seeds as part of rangeland habitat restoration and expansion). If that's correct, then that's about 18% of the total \$10M. This seems relatively small. Also we want to ensure sufficient funds are available for payments directly to farmers and ranchers implementing climate-friendly practices (such as organic).

What's missing: Generally speaking, we'd highlight the importance of measurement, reporting and verification of the climate change mitigation impacts of all these investments. We understand this is an issue facing all public and privately funded efforts to invest in natural climate solutions. Identifying reliable, practical ways to measure impacts in meaningful ways is important from an accountability and return-on-investment perspective. That being said, we caution against saddling farmers with overly burdensome monitoring requirements.

I would like to see more tribal representations pre/post decision making to ensure native voices are present during this process. This can include but not limited to tribal scientists, tribal consultants, on/off reservation agricultural/ecological specialists.

**What high level changes, if any, would you suggest? E.g. total funds to each agency, funding amount for specific priorities, etc.**

Funding for climate smart farming practices, soil health. Also there needs to be a carbon baseline - if we fund carbon sequestration with no baseline, it will delay showing actual benefits. It would all be conjecture, it is imperative that carbon testing is established through OSU or NRCS to establish a baseline and then we can demonstrate how effective certain practices are over time. Some practices could damage carbon sinks, and we need to be able to demonstrate that.

n/a

I would have liked to have seen OWEB come closer to a \$3 million program and provide about half to natural lands and half to working lands in the OAHP program. The funding is a good start and the hope is to build on it with federal assistance. The ODA program for grasslands is a little troublesome because the SWCDs have the contacts and working relationships with the grower/managers and I am unaware with the limited ODA staff how they will be able to take on that same kind of role. There may need to be some kind of dual cooperation to make the program most effective.

Provide additional funds to ODA for RA and Agri-Solar trials.

I would suggest experimenting with different approaches measuring effectiveness going beyond business as usual

I hope that the work of the 4 agencies will be approached in an integrated, synergistic way as opposed to parallel and isolated way.

I don't know enough to suggest a different distribution of funds among agencies. I would, though, like the agencies to truly embrace the goals for these funds rather than using the funds for business as usual. (note I am not critical of the work these agencies have done - I just think these new funds need to be for new climate-focused work.

1) The needs in our ecosystems are far greater than these funds can provide. 2) There is no funding for small farmers who are an essential but underserved component of Oregon's agricultural community. 3) A new ODA funding opportunity needs to be added that includes small farmers and ranchers who are currently completely excluded.

Reduce funding for Admin & TA (automations exist, so tired of the government dragging ass to adopt efficient computer systems) and increase Pay for Practice.

See above comments regarding relatively low percentage of total investments towards agricultural working lands.

**What sideboards/considerations will be important for the agencies to follow/uphold in implementation? E.g., how can agencies best administer these funds in a way that is accessible to you/your organization and aligns with your priorities?**

I understand the need for standardization of funding processes but each field, land manager, agency, person is unique. As much fund distribution flexibility as possible will improve the impact.

It would be helpful if each agency had a section on their website detailing the kinds of projects funded to assist land owners and managers with understanding the types of projects that best fit the agency programs. For example, OWEB, in their grants section, make available connections to proposals, stories and other data that assist people in knowing expectations to be more successful in securing grant dollars.

I encourage a better alignment of need and opportunity.

Simple transparency and communication of results

I encourage reinforcing the emphasis on accountability for results and tangible outcomes, not only on outputs. I strongly encourage using a "meet them where they are" approach to working with growers - focusing on removing barriers for those who are already motivated and committed and not pushing the work on those who are not. This includes looking for and effectively using common ground to draw Oregonians together as opposed to creating even greater divides.

I think we need a robust tool (model) that state and local agencies can use to predict sequestration and emission outcomes from projects. This tool should balance accuracy with ease of use. Optimally, a tool like this would be widely used across the United States so that data from Oregon projects can be compiled into results nationwide.

Grants and contracts need to be provided to NGOs and collaborative partnerships so more of our statewide community can be included in the effort.

Streamline applications and reporting needed by the Farmer - take it off the Farmers plate all together.

As criteria and ranking frameworks for proposals / applications to the OWEB OAHP program are developed, we'd like to see a robust stakeholder engagement process and want to ensure the science-based climate benefits of organic practices are explicitly recognized and appropriated ranked.

Having on the ground tribal agricultural farmers, experts working on the ground provide input on funding allocations. Less loan/cost share heavy distribution, more TA fund for on the ground work.

**Do you have any other questions or feedback you would like to share?**

Thanks to each of you for the incredible and thoughtful work on this amazing process. We all will learn many lessons and adapt as we go. This is offering the next step in addressing important conservation issues. This training and survey help us move forward together to make a difference tomorrow. Bravo!

Most of all, I want to thank all of the entities who have been involved in working with the CAC and the legislature over these past several years to bring a program to fruition. Accolades to all. And we will all share in the success with better approaches to climate change and our ability to work together while blending in our environmental justice needs and securing support of all of our partners.

The combination of RA and AS may simultaneously improve crop production, crop nutrient value, soil re-hydration, carbon sequestration, clean energy delivered preferentially to under served communities, and save family farms. Over the last two years, interest in this dual use option has erupted in the US and elsewhere, a phenomenon that has its beginning in Oregon. It is disappointing to see that the agriculture portion of the proposal makes no mention of it.

I am assuming that the Commission will be leading this effort so that Natural and Working Lands meet goals for carbon sequestration

This is really important work and I appreciate the efforts and interest in feedback

I'll state again that my answers are my opinions only and are not official viewpoints of the Tualatin Soil and Water Conservation District.

When "maximizing carbon sequestration" outcomes emerge at the top of the list, it confirms that the "values crisis" is still alive and well in Oregon today. We are better than that. There is growing concern that the primary focus upon carbon sequestration is short sighted. There have been hints that measuring carbon will become a requirement, but this has not been revealed publicly, which raises concerns and could jeopardize trust in the community when we so desperately need to strengthen unity among our agencies, institutions and organizations. This needs to be discussed transparently and brought into the open during the public engagement process.

From: Debora Landforce <deboralandforce@onlinenw.com>  
Sent: Wednesday, January 17, 2024 6:29 PM  
To: Oregon GWC \* ODOE <Oregon.GWC@Oregon.gov>  
Subject: NWL Proposal Feedback

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Dear Commission,

I took part in a zoom meeting on January 8th about the Natural Working Lands Fund Proposal. I would like to give some feedback about the proposal. This email was provided as one way to do so:

I am the owner/manager of a family farm in the Willamette Valley. My partner and I are very committed to conservation on our farm and have grants through NRCS for this purpose and work closely with the SWCD and OSU Extension to take advantage of the myriad of resources available. We are grateful for the help and funding we have received for these projects, and for the most part we are satisfied with the process. My main concern is that the vast majority of landowners are not taking advantage of these programs and in fact are using agricultural practices and philosophies that are diametrically opposed to conservation and healthy soils. In reflecting on my own experience and talking with other farmers I would share the following:

First, the funding allocations needs to include more money that directly impacts privately owned agricultural lands. As you know privately owned agricultural lands constitute a huge portion of Oregon's total land mass. What happens on these farms matters a lot to climate change. Since the ODA funds only cover rangeland resilience and native seed strategies, that means that all funds for other farm owners/managers must come from the OAHP. The OAHP administers 2 grant types, one of which is not available to private landowners. Considering that OWEB funds and ODA funds combined barely equal the ODF or ODFW, this is not much trickle-down to farmers.

Second, I highly support the funds that are available to farmers in the form of payment-for-practices. To be honest I don't know exactly how this works, but I hope that it pays farmers directly for doing the right thing. I hear three important things from farmers about getting money for conservation work; "I don't apply for grants because 1.) I don't have time for all the paperwork, 2.) I have to put in all the money up front, and 3.) I don't get credit for all the years of effort I have already put into stewardship on this farm". If there is a fund that can recognize the features that farmers have already created on their farms, and provides money up front, it would make big difference in farmer's interest to work with the government. Remember that farmers pretty much only trust other farmers. If one farmer says " I'm getting credit for all the work I've done on this place already", it causes other farmers to take note.

Personal story: 80 acres of the farm next to ours was recently sold by a distressed farm family to a large corporate absentee farmer (fragmentation). The acreage has a beautiful ancient 5 acre oak grove on it that the new owner planned to immediately destroy. I know the new owner from past encounters and so far I've been able to convince him to leave the trees standing. We have discussed the value of trees because he knows we love trees and that we have gotten government money for our tree projects. His statement to me was ' No one cares about these trees. You got money for your trees because it's a new deal for them and they can feel good about whatever thing they're working on now. No one comes to look at what I do to help nature. They don't care about whether I leave these trees or I bulldoze them

over". I am hoping that I can protect the trees long enough to get some funds to the farmers who are already doing the right thing.

Third, I notice that ODFW might get two new positions to help with their projects, the Natural Climate Lead and the Carbon Sequestration and Habitat Restoration Service Provider. I don't begrudge ODFW at all, as I have deep family roots in that field, and their work is critical. I would like to propose a new position for OAHP, a Land Management Implementation Specialist. As a farmer I need someone who can actually provide the physical work of the grants. In my experience, the technical assistance that is provided by the agencies stops just short of boots-on-the-ground work. As a farmer, I need someone to come in after the grant is approved and help me with the excavating, spraying, ground prep and planting. It would be a subcontractor type of position. Someone who can operate all the equipment themselves and has the expertise to select and hire knowledgeable excavators, etc.. Some of the most stressful parts of our grants is having to hire all our own heavy equipment operators, rent and use planting equipment and spray equipment, buy new implements for our tractor, and water the little trees until they get established. Most 'guys' who operate heavy equipment and sprayers don't know the difference between native and non-native species, invasive species, etc. and we've done a lot of expensive hand-holding in the implementation of our grants. If there was a person aligned with the grant that could come with their own pick-up, 4X4, tools, equipment, and know-how, it would be awesome! Farmers have too much of their own work to do on the farm to dedicate days, fuel, and equipment to working on conservation when it's based on someone else's schedule and approval.

In summary; more money to OAHP, payment-for-practices including those practices that are already underway, new position to guide and perform implementation.

Thank you for listening. Respectfully, Debora