



TO: Oregon Global Warming Commission  
FROM: Beyond Toxics  
DATE: June 1, 2021  
RE: June 4th Meeting--NWL Goal Draft Strategy

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Dear Chair Macdonald and Members of the Commission,

We are submitting these comments in response to the [Draft Strategy Recommendations](#) posted for the Commission's upcoming June 4th meeting on behalf of Beyond Toxics, a statewide environmental justice organization advancing policies that ensure meaningful participation and cultivating grassroots leadership from Oregon's frontline and impacted communities. Beyond Toxics also serves as Co-lead of the Natural and Working Lands Policy Tables of the Oregon Climate Action Plan (OCAP) Coalition, which engages at every step of the Executive Order on Climate Action (EO 20-04) implementation process to ensure the strongest possible outcomes for our climate, our communities, and our economy.

We appreciate the efforts the Oregon Global Warming Commission (OGWC or Commission) and the Oregon Watershed Enhancement Board have taken to engage with a variety of stakeholders and synthesize recommendations for ways in which we can reach statewide emissions reduction targets. These comments focus on Oregon's agricultural lands, which provide an important opportunity to enhance carbon sequestration and storage, support associated co-benefits, and improve community health and wellbeing.

First, we appreciate the common theme to "[e]nsure that equity is fully embedded in the prioritization and design of natural and working lands strategies." We wish to see more specific ways in which the proposed strategies will accomplish this and offer the following recommendations:

- Recognize that traditional best management practices and ecological knowledge form the foundation for the practices that sequester and store carbon on natural and working lands and that Black, Indigenous, and People of Color (BIPOC) communities have been practicing these for generations. Honor and support the production of traditional foods.
- Acknowledge that historically and currently disadvantaged groups face unique barriers to participation in the programs in place now and those imagined in the Draft Strategy. The state must actively and continually reach out to determine what resources socially disadvantaged farmers need to engage fully in these programs and successfully implement regenerative practices; then, design the programs to meet those needs.
- Set aside funding specifically for BIPOC farmers. The most effective way to ensure that program benefits are available to BIPOC and other disadvantaged producers is to set aside funds specifically for these groups. Refer to [HB 3112](#) as an example. The Commission could recommend the establishment of a similar model/program to create an Equity Fund for Oregon

farmers implementing climate-smart practices. Recommend continual appropriation of monies to the fund to be provided to qualified applicants for the equity program.

- Recommend that any technical assistance, education and outreach services be provided in multiple languages and formats to ensure these programs are accessible and culturally competent. Agency staff must be equipped with the skills needed to meaningfully engage with producers and workers from a wide range of backgrounds and cultures.
- Support all efforts to protect farmworkers from climate-related dangers like heat stress and exposure to wildfire smoke. Ensure that employers have a plan in place to provide these basic needs and that farmworkers are fully aware of the plan by working in direct conjunction with Oregon OSHA to ensure enforcement of climate-related worker protection standards.
- When developing the “centers of excellence” in Oregon Universities (Strategy #2) to support climate-smart land use and management practices, recommend that the programs actively seek out and provide direct financial support to BIPOC staff, students and faculty. We would like to see more details from the Commission about what the centers of excellence would look like.

Further, we fully support the creation of a natural and working lands implementation plan (Strategy #1) and recommend making the related programs more effective in the following ways:

- Ensure that the Natural and Working Lands Council is composed of a diverse group of councilmembers, including Native Tribal representatives.
- Application processes for programs stemming from the plan should be simple and straightforward. Staff should be available to assist applicants and provide support in multiple languages and formats. The application period should align with the off-season to minimize interference with production periods.
- Technical assistance will need to be available long-term for many of the techniques suggested in the Draft Strategy to successfully store carbon. This requires necessary investments in state agency resources and staff capacity so that producers receive continued support.

We also support the following recommended strategies to increase carbon sequestration and storage on Oregon’s natural and working lands and offer ways to strengthen them below:

- We appreciate the Commission’s clear focus on improving soil health and agree that the Legislature should provide funding for an in-house soil specialist at the Oregon Department of Agriculture. We also want to call for an emphasis on the importance of organics and regenerative farming practices in the establishment of this position, which reduce the need for additional inputs and increase climate resilience. We would like to see OGWC assist in the fulfillment of the position to ensure the specialist will take a climate-focused, holistic approach to improving Oregon’s soil health.
- We support the creation of an integrated soil health and climate-smart agriculture program in Oregon (Strategy #6). We advocate for a holistic approach to increasing soil health by incentivizing transitions to systems that build resilience to climate impacts and result in more fertile soil. For example, the state can do this by funding nutrient management research and incentivizing practices that optimize fertilizer application timing, placement, amount, and method, composting, and returning on-farm generated manure and plant residues to the land effectively recycling nutrients rather than applying more. This will reduce emissions and pollution resulting from fertilizer manufacturing and application as well.

- More can be done to promote the diversification of crop rotations and cover crops. These practices sequester carbon in the soil and reduce the need for synthetic fertilizers, thus mitigating emissions and improving water quality. Diversification also reduces vulnerability to pests and disease, in turn reducing the need for pesticides that harm pollinators, water quality, and soil health.<sup>1</sup> The state should set regionally-appropriate targets for adoption of diverse crop rotations and cover crops, provide technical assistance for implementing these practices, and incentivize these practices.

Finally, the Draft Strategy Recommendations should also address the following:

- In addition to expanding urban forest canopy, the Commission should recommend support for community-based gardens and urban farms. This will further aid in reducing heat island effects while providing sources of education, community connections, and nutrition.
- The Draft Strategy should address renewable energy. Encourage and incentivize the use of renewable energy (wind and solar) in agriculture to reduce GHG emissions and energy costs. Provide grants and/or tax incentives for installation of renewable energy projects on farmland. Offer education, outreach, and technical assistance to help farmers integrate renewable energy projects on land for crop or livestock production and develop resilient food-production and energy-generation systems.
- The Draft Strategy should address manure from industrial-scale livestock facilities. Manure emits significant amounts of potent GHGs methane and nitrous oxide, contaminates groundwater, and introduces toxic pollutants like hydrogen sulfide and particulate matter into the air. This leads to grave environmental and public health concerns for workers and communities living near these operations. Support practices that reduce the production and concentration of manure and improve its storage and application, such as imposing size limitations on industrial livestock facilities or incentivizing producers who transition from industrial livestock systems to grazing-based systems.

Thank you for your work in developing a strategy to achieve Oregon's climate goals and the opportunity to provide feedback.

Sincerely,

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<sup>1</sup> See Giovanni Tamburini et al., Agricultural Diversification Promotes Multiple Ecosystem Services Without Compromising Yield, 6 *Sci. Advances* 2020 eaba1715 (2020), available at <https://advances.sciencemag.org/content/6/45/eaba1715>.