



October 16, 2018

Re: Public Comments, Oregon Global Warming Commission Forest Carbon Accounting Project Report

To: Members of the Oregon Global Warming Commission,

For the record, my name is Taylor Lucey and I am here on behalf of the Oregon Forest & Industries Council. OFIC represents Oregon's large industrial forest landowners and wood products manufacturers. We support the Commission's decision to transfer the OGWC's most recent Forest Carbon Accounting Project Report to the Oregon Department of Forestry. However, we would also like to express some reservations about the conclusions and recommendations drawn from the report.

The report carries implicit bias about the role of active forest management by focusing solely on one role that our forests can play when it comes to carbon. The report claims that thinning and prescribed fire are not worth the loss of carbon in the long-term, despite the looming reality that wildfires have been increasing and will continue to do so in the future. The report cites a single study (Law et al. 2018) that estimates wildfire emissions were around 6.8 million tons of CO₂e annually from 2001-2015 but did not include emissions from the Biscuit Fire. There is a footnote in the report that states the 2002 Biscuit Fire emissions were anywhere between 14-18 million tons CO₂e, which is more than twice or even three-times the annual wildfire emissions described in the report. Downplaying the consequences of not managing Oregon's forests puts our forests in a precariously vulnerable position for larger wildfire risk and subsequent CO₂ emissions in the future. While the Biscuit Fire may have been anomalous at the time, larger wildfires are becoming less anomalous, especially as we look to our neighbors to the south, making it all the clearer that we should be vigilant to mitigate wildfire risk in both the context of our forest health and the impact those fires have on human health in the form of air pollution. We recommend that as ODF moves forward in the work they have begun, that they keep in mind the inherent risks involved in discounting emissions associated with fire and they not reject active forest management as part of the climate solution (Vance et al. 2018).

The report also claims that there is not enough evidence to conclude that harvesting timber conserves carbon, however, there is abundant peer-reviewed literature that concludes, "active forest management and the use of biomass in place of fossil fuels and alternative products most often have greater long-term C benefits than maintaining or increasing forest stocks alone (Pingoud et al., 2010; Gonzalez-Benecke et al., 2011; Malmshemer et al., 2011; Krug et al., 2012; Peckham et al., 2012; Poudel et al., 2012; Chen et al., 2014; Miner et al., 2014;



Kilpeläinen et al., 2016; Kurz et al., 2016; AiXin et al., 2017; Taeroe et al., 2017)” (p. 351, Vance 2018). While there may be uncertainty around the fate of some wood products, wood is an unrivaled, sustainable and locally-produced construction material.

Furthermore, the report only briefly mentioned the leakage that would occur from Oregon importing its wood products from other jurisdictions, if the state chose to store more carbon on the landscape instead of in our homes and buildings. While the report refers to the large amounts of carbon stored in Oregon’s federal forests due to the loss of harvesting on federal lands, one study estimated that the leakage that occurred due to the implementation of the Northwest Forest Plan was over 87%. In other words, the carbon emissions are still occurring and were made worse by the shift in harvest and manufacturing (Muray, McCarl, and Lee 2004).

We support the work that ODF is conducting in conjunction with FIA and BBER regarding the stock and flux of forests, harvested wood product accounting, and policy recommendations. Because of the limitations with the OGWC report, which include insufficiently accounting for wildfire emissions and leakage, as well as the bias against active forest management, we strongly encourage ODF to recognize that this report is the product of preliminary findings and will benefit from further analysis. We look forward to continuing to work with ODF and the Office of Carbon Policy in the Forest Carbon Advisory Group during this process.

Thank you,



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