

November 16th, 2015

Angus Duncan, Chair
Oregon Global Warming Commission
625 Marion St. NE
Salem, OR 97301-3737

RE: *Accounting for timber harvest emissions and lost sequestration capacity on industrial forestlands*

Dear Mr. Duncan:

As you are well aware, Oregon will have a difficult time meeting its 2020 greenhouse gas (GHG) reduction goals and will need to consider a full range of strategies to get there. As the attached report concludes, getting a grip on the substantial emissions from industrial forestlands should be part of the solution. As you also know, emissions from industrial forest operations are not included in periodic GHG inventories the Oregon Global Warming Commission (OGWC) prepares – a policy we believe is based on unfounded assumptions about emissions and carbon sequestration from the forest sector and a single assessment prepared by an intern from the Department of Energy in 2009.

In the attached analysis, Center for Sustainable Economy, Geos Institute, and Oregon Wild estimate that net timber industry emissions have averaged between 9.75 and 19.35 million metric tons carbon dioxide equivalent (MMT CO₂-e) per year since 2000 on State and private forestlands in western Oregon. This represents between 16% and 32% of the 60.8 million MMT CO₂-e “in-boundary” emissions estimated for the State by the latest (2012) GHG inventory. These emissions are seven times higher those associated with coal combustion by the Boardman plant in 2012 and equivalent to adding 2-4 million vehicles to Oregon’s highways, making logging on State and private lands one of Oregon’s biggest GHG polluters and a major impediment to Oregon’s ambitious GHG reduction targets.

The rate of clearcutting is the prime driver of these emissions. Based on best science of carbon accounting, rapid clearcutting rates are contributing to high emissions from timber harvest and lost sequestration and carbon storage capacity. Since 2000, over 1.6 million acres of western Oregon State and private land has been clearcut, releasing most of their carbon stores into the atmosphere. In addition, regrowth has not kept up so on these lands there are 522,000 fewer acres of forest cover performing carbon sequestration services. Statewide, forest cover loss has exceeded 1.08 million acres since 2000. Since emissions from various sectors and changes in carbon sequestration capacity are among factors the Legislature intended you to measure (ORS 468A.250 (f); (i)) we hope you take note of these alarming trends and put this issue on the OGWC agenda for immediate action.

We are writing to ask that you visit with us soon to discuss how to correct the flaws in the State’s current treatment of timber industry GHG emissions, develop policies to promote long-term carbon storage and sequestration capacity, and otherwise comply with the mandates of

Oregon's climate change laws. Key policy reforms that we believe are needed to address this problem in the short term include:

1. Accounting for emissions from industrial forest practices. Emissions associated with the timber industry's operations on industrial forestlands should be treated like any other industrial activity and be carefully monitored and evaluated by the OGWC. By simply assuming such emissions are insignificant the OGWC masks a major source of GHG emissions and contributes to the lack of progress on transforming Oregon's antiquated Forest Practices Act (OFPA) to be a tool rather than an impediment to achieving Oregon's GHG reduction goals. As explained in the report, emissions from timber harvest, lost carbon sequestration capacity, and forest chemicals should be reported for each major ownership category rather than lumping industrial forestlands together with those managed by small forestland owners, non-profits, and public agencies in an aggregate "forest sector."
2. Promote alternatives to short rotations, clearcutting, and chemicals. The Legislature has also required the OGWC to track and evaluate "alternative methods of forest management that can increase carbon sequestration and reduce the loss of carbon sequestration to wildfire" (ORS 468A.250 (i)). Sustainable foresters throughout the State are among the international leaders in smart, economically viable alternatives to clearcutting, short rotations, and chemicals – alternatives that enhance rather than degrade carbon sequestration capacity and carbon stores and help rebuild forest resiliency to wildfire by diversifying forest age classes and structural attributes. Scaling these practices up so that they are the rule, not the exception is critical and minor changes to the OFPA can accomplish this with your leadership.
3. Manage State forests as carbon sinks. State forests in western Oregon exist in a sea of industrial tree plantations and can help counteract the GHG emissions associated with those lands if they are managed to maximize carbon storage. State forestlands are managed under a "greatest permanent value" standard and given the catastrophic economic impacts of global climate change, carbon storage rises to the top of values these lands can support. Alternative forestry techniques – such as long rotations – have been well researched and can produce more timber of higher value to help finance schools, the Department of Forestry, and counties all the while vastly increasing carbon storage.
4. Close tax loopholes that increase emissions from industrial forestlands. Oregon's forestland tax structure encourages practices that generate GHG emissions. Property tax breaks of 90% are given to forestland owners regardless of the condition of their lands, even when they are mostly clearcut or densely threaded with logging roads that grow no timber at all. The State's timber harvest (or privilege) tax was unwisely rescinded in 1999 for the class of owners - corporations owning 5,000 acres or more – whose emissions are the greatest in the forest sector. Closing these tax loopholes, imposing a carbon tax on emissions, and providing exemptions or credits for carbon storage will go a long way toward incentivizing sustainable practices.

Thank you, in advance, for initiating a process to resolve these issues and help enroll State and private forest management in the fight against global warming. We look forward to meeting with you and other members of the OGWC soon.

Many thanks,



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Cc/ Brett Brownscombe, Natural Resource Aid, Governor Kate Brown
Doug Decker, State Forester, Oregon Department of Forestry
Tom Imeson, Chair, Oregon Board of Forestry
Senator Bill Hansell, Oregon State Legislature
Senator Chris Edwards, Oregon State Legislature
Senator Floyd Prozanski, Oregon State Legislature
Senator Alan Bates, Oregon State Legislature
Representative Paul Holvey, Oregon State Legislature
Representative Jessica Vega Pederson, Oregon State Legislature

Attached/

Clearcutting our Carbon Accounts:
How State and private forest practices are undermining Oregon's climate agenda.