

December 11<sup>th</sup>, 2017

Governor Kate Brown  
Office of the Governor  
900 Court Street, Suite 254  
Salem, OR 97301-4047

Senator Michael Dembrow  
900 Court St. NE, S-407  
Salem, Oregon 97301



Representative Ken Helm  
900 Court St NE, H-490  
Salem, OR 97301

RE: ***Options for regulating industrial forest practices in climate legislation***

Dear Governor Brown, Senator Dembrow, and Representative Helm:

Clearcutting, short rotations and the spread of industrial tree plantations generate more carbon emissions each year than any other source and pose a serious threat to our water supplies, fish, wildlife and fire resiliency as climate change unfolds. But flipping these practices into climate smart alternatives can help these landscapes capture and permanently store more carbon per acre than any other forest type on the planet and better withstand floods, droughts, and wildfire as weather extremes become more common.

As such, any climate legislation that moves forward in 2018 without addressing these practices would be leaving Oregon's most important contribution to fighting global climate change off the table and leave rural communities without a solution to their climate adaptation needs. Find attached a scientific and technical brief synthesizing these and other key dimensions of the forest carbon situation in Oregon as well as legislative options for enrolling industrial forest practices into Oregon's climate agenda. The research and data synthesized in this brief underscore the urgency of action. In particular:

1. Data obtained from the USDA and compiled by the Oregon Global Warming Commission confirms that timber harvesting is the number one source of greenhouse gas emissions (GHG) in the state. Taking CO<sub>2</sub> removed by logging, forgone sequestration of clearcuts, and decay of logging residuals into account indicates that annual emissions average 33 million metric tons (mmt CO<sub>2</sub>-e).
2. The State's practice of not reporting emissions from entities engaged in timber harvesting but rather net emissions from an aggregated forest sector is based on a set of GHG inventory rules "developed by loggers for loggers" according to international climate negotiation monitors. It focusses attention on the wrong policy target – balancing the ins and outs of carbon on the landscape – rather than carbon density. Ins and outs can be balanced in a tree farm or mowed lawn so the net emissions focus tells us no information about the condition of forests on the land.

3. Industrial forest practices have significantly depleted forest carbon stocks to less than a third of capacity in places where old growth forests once grew. The vast majority of the carbon removed is now in the atmosphere.
4. Even-aged industrial tree plantations managed on short rotations are far more vulnerable to drought, disease, wildfire, floods, landslides, low summertime streamflow, thermal pollution, fish kills, regeneration failures and other climate change-induced impacts than natural forests.
5. Climate smart forest practices can significantly reduce emissions, enhance sequestration, build permanent storage, and increase climate resilience. These include forest carbon reserves, restoring tree plantations back into natural forests, alternatives to clearcutting, alternatives to chemicals and fertilizers, longer rotations, and various silvicultural practices that enhance sequestration while building old growth characteristics.

The report reviews three legislative options for reducing emissions and scaling up climate smart practices. The first option is to include major carbon polluters in the timber industry as entities regulated under the proposed cap-and-invest bill – SB 1070 – now moving toward reconsideration in 2018. As it now stands, the timber industry is exempted. Proposed amendments to SB 1070 have been drafted and submitted to Representative Helm, Senator Dembrow, and other legislators, and have strong support from the environmental community. The second is a carbon tax and reward approach that taxes emissions from clearcutting and short rotation timber plantations and uses funds to reward foresters who know how to log and leave a healthy forest behind. Legislation for this was drafted last year, but has yet to be introduced. The third would require corporate forestland owners to develop and adhere to long term climate resiliency plans that set hard targets for accumulating lost carbon from the land. The Oregon Global Warming Commission is on record supporting the general approach of setting carbon density targets.

We look forward to visiting with each of you soon to discuss the findings of this research in more detail and dig down deeper on legislative options for 2018. Thank you in advance for all you are doing to advance meaningful climate policies for Oregon's future.

Sincerely,



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