



**October 16, 2018**

**Re: A) Comments on Committee Charter and Operating Principles, B) Oregon Ecosystems Report Tables, and C) Chapter 8: Strategies For leveraging Forest for Emission Reductions**

**Submitted via email to:** [forest.carbonstudy@oregon.gov](mailto:forest.carbonstudy@oregon.gov)

To Whom It May Concern:

Thank you for the opportunity to comment on the Oregon Forest Ecosystems Report in the Forest Carbon Advisory Group. I am commenting on behalf of the Oregon Forest & Industries Council, which is a trade association that represents large forest landowners and woods products manufacturers in Oregon. Please find below comments regarding the following aspects of the report: A) Comments on Committee Charter and Operating Principles, B) Oregon Ecosystems Report Tables, and C) Chapter 8: Strategies For leveraging Forest for Emission Reductions. We look forward to having more opportunities to comment at future dates and meetings.

**A) Comments for Committee Charter and Operating Principles:**

We would like more clarity regarding the following statement in the stakeholder Charter and Operating Principles that ODF provided at the last meeting: “The assessment of Oregon’s forests should provide estimates of the impact of wildfire.” We would like to know if this is regarding social impacts, health impacts, economic impacts, impacts of the carbon emissions that result from catastrophic fires, or impacts of forest management loss.

**B) Comments for Oregon Ecosystems Report Tables**

- 1) We would like to see table B10, “Annual Net Change Per Acre in Carbon Stock for Aboveground Pools on Forest Land by Disturbance, Forest Land Status and Owner Group, 2001-2005 to 2011-2015: All California,” distributed by owner type and ecoregion. This would accurately capture the annual net per acre rate of sequestration by ownership type. It is important to capture sequestration rate by ownership when later we want to examine the role that forest management styles play. For example, countless studies have concluded that “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).

- 2) We would like to see the harvested wood product carbon pool data broken out by owner type to see the net growth rate of that carbon pool over time. We think it is critical that the benefits of this carbon pool are properly accounted for. While growing a carbon pool is not equivalent to emissions reductions in other sectors (e.g. transportation), there are quantifiable benefits to measuring the carbon stored in wood products, especially when compared to the use of more fossil fuel intensive materials. When considering the value of harvested wood products and carbon accounting associated with wood products, we recommend that ODF look to the report submitted to the Department by Dr. Edie Sonne Hall and 18 other PhDs titled, “A science context for forest sector carbon mitigation in Oregon.”
- 3) Though it has been suggested in meetings, LANDFIRE accounting methodology (e.g. as used in Gonzelez et al. 2015), should not be used in the Oregon Ecosystems Report. This methodology has been problematic in peer-reviewed literature and California’s AB 1504 Ecosystems Report acknowledged that, “the 2004 Winrock estimate of forest carbon sequestration in California had a high uncertainty of roughly +/- 38%” (p. 12). California’s Ecosystem Report found using FIA stock and flux accounting data to be more accurate and we support Oregon’s Ecosystem Report using FIA data as well. Furthermore, FIA data is a more appropriate, repeatable way to measure change in carbon over time that does not require assumptions or modeled projections.

### **C) Comments for Chapter 8: Strategies For leveraging Forest for Emission Reductions**

As I stated in an email on August 1, 2018, we believe it would be most effective for Chapter 8 in the forest ecosystems report to remain in the forest carbon advisory stakeholder group. This stakeholder group will have had time to comment and review the preceding chapters which will inform discussion around Chapter 8 and allow all the stakeholders an appropriate amount of time to synthesize the material and comment when asked for feedback. Furthermore, ODF will have compiled the quantitative reports and drafted the preceding chapters so it would be fitting that they draft Chapter 8 as well for continuity.

Thank you,



**Taylor Lucey**

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Sources:

Gray, A.D., Whittier, T.R., Harmon, M.E. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. *Ecosphere* 7(1):e01224.10.1002/ecs2.1224

Vance, E.D. 2018. Conclusions and caveats from studies of managed forest carbon budgets. *Forest Ecology and Management*, 427 (2018) 350-354.