



To: CARB Staff
From: Peter Miller, NRDC (peter.miller@earthlink.net)
Re: Forest Sector Forecast in Draft Scoping Plan
Date: August 16, 2008
Via: Electronic submission at
<http://www.arb.ca.gov/cc/scopingplan/spcomment.htm>

CARB recently posted a summary of a draft forecast of statewide emissions in 2020 by sector. The CARB forecast projects that net forest sector emissions in 2020 will be zero compared to current emissions which are approximately -4.7 MMTCO₂E/yr.¹

According to CARB's inventory, forest sector emissions since 1990 show a clear trend of increasing net emissions, totaling about 2 MMTCO₂E/yr from 1990 to 2004. However, CARB's inventory data also clearly shows that 95% of the increase is from increases in the decomposition of wood products in landfills and composting operations. In contrast, the estimate of emissions from forest fires and development of forestlands are essentially constant from 1990-2004.²

Absent clear evidence to the contrary, it seems reasonable that a forecast of emissions in 2020 should assume that current trends will continue into the future. Indeed, if emissions from decomposing wood products continue to grow at the same rate from 2004 to 2020 as it has from 1990 to 2004, these sources will add another 4.8 MMTCO₂E/yr to forest sector emissions, totally offsetting sequestration in California forests and resulting in zero net forest sector emissions in 2020.

Rather than referring to increased decomposition of wood products, the summary of the forecast cites "loss of forest land due to conversion and increased threat of wildfires" as factors that are responsible for the increase in emissions since 1990. But as the CARB data clearly show, emissions from conversion and forest fires aren't responsible for any of the increase in emissions since 1990 in the inventory.

The summary of the forecast also states that increasing emissions from conversion and forest fires are the reason for the projected increase of 4.7 MMTCO₂E/yr in forest sector emissions between 2004 and 2020. But again, as the CARB data clearly show, the trend of increasing emissions from decomposition of wood products is by itself enough to increase 2020 emissions to zero.

The description of the forest sector forecast appears to be at odds with CARB's own data. Instead of forest fires and conversion, the increased consumption and subsequent decomposition of forest products – everything from

¹ http://www.arb.ca.gov/cc/inventory/data/forecast.htm#summary_forecast

² http://www.arb.ca.gov/cc/inventory/data/tables/net_co2_flux_2007-11-19.pdf

toilet tissue to 2x4s – is responsible for the increase in forest sector emissions from a net sink of -6.7 MMTCO₂E/yr in 1990 to forecasted emissions of zero in 2020.

Some may argue that as a result of climate change and/or past fire suppression programs, the 2020 forecast should assume that there will be increased emissions from forest fires. But regardless of one's position on this issue, all should agree that any forecast increase in emissions from forest fires or loss of forest land would be in addition to the expected increase in emissions from decomposition of wood products. If the 2020 forecast does eventually project a significant increase in forest fire emissions, then the forecast of net forest sector emissions in 2020 will be substantially greater than zero.

CARB's summary description of their 2020 forecast appears to perpetuate the common misconception that the growth in California's forest sector emissions is driven primarily by changes on California forestlands. As CARB's own data show, this is simply not the case. The increasing consumption of forest products – most of which are imported into the state – is the key driver of the increase in emissions.

NRDC recommends that CARB revise the summary statement to accurately reflect CARB's own data. The summary statement should clearly state that decomposition of wood products is the factor that is primarily responsible for the increase in emissions since 1990 and, if unchecked, will result in a further increase of nearly 5 MMTCO₂E/yr by 2020.