



January 29, 2018

Mayor Ted Wheeler
1221 SW 4th Ave, Room 340
Portland, OR 97204

Re: Cross-laminated timber and environmental sustainability

Dear Mayor Wheeler,

On behalf of our tens of thousands of members and supporters from the Portland region, and all across Oregon, we write to express our concern over the City of Portland's investment in the Framework housing project in the Pearl District, and in other projects using cross-laminated timber (CLT). Our organizations are committed to the protection of our public lands and ecosystems and the transition to climate smart policy at every level of government. We understand that CLT can be either beneficial or harmful to our environment, based on the sourcing of the wood used in these products, and the production process.

Unfortunately, the City currently has no requirement that CLT investments be required to source wood from sustainable harvest practices, such as Forest Stewardship Council (FSC) certified operations. While FSC certification is not perfect, particularly in that it fails to fully account for climate change impacts from logging, it is currently the only credible standard to judge whether logging companies are seriously committed to sustainability. Without such a requirement, the City of Portland may be encouraging the already rampant clearcutting of Oregon's forests.

Our organizations strongly support Portland's investments in affordable housing projects, and we do not oppose cross-laminated timber as a technology. However, it is important to recognize that CLT is simply that— a technology for laminating smaller pieces of wood together into larger beams and other

materials suitable for structural components in buildings. **Its environmental effects are determined by where the wood used to fabricate CLT components came from, how it was harvested, and the carbon impacts of that harvest and of the product throughout its lifecycle.** In addition, like any other industrial activity releasing potentially harmful chemicals, CLT production facilities must strive to eliminate or minimize the release of volatile organic compounds (VOCs) and other pollutants into our air.

Since CLT technology can produce large structural components utilizing smaller logs than traditional milling operations and timber construction, some have argued that it could make sustainable forestry more economically attractive. Promoters of CLT argue that if large beams and construction materials can be made from small diameter wood, such products could alleviate pressure to log mature and old-growth forests on public lands.

However, CLT can also be sourced from clearcuts on state, federal, and private lands. In fact, because it can utilize smaller material than traditional timber construction, **it may provide a perverse incentive to shorten logging rotations and more aggressively clearcut.** Shorter rotations mean more frequent clearcuts, more mud and silt running into rivers, and more applications of herbicides. To combat climate change we need to encourage forest owners and managers to increase forest carbon sequestration and storage by extending rotations, not shortening them.

Compounding these issues is the fact that the Oregon Forest Practices Act is woefully inadequate when it comes to regulating clearcutting and conserving carbon in our state. This provides little incentive for timberland owners and logging operations to adopt FSC certification, or other modern environmental standards. Thus, for the foreseeable **future CLT products used in Portland building construction are more likely to come from a clearcut** than from an FSC certified sustainable logging operation.

In addition, CLT mills are known to be large emitters of formaldehyde and other VOCs due to the glues used in their production processes. In fact, CLT operations are currently seeking an exemption for their emissions from Governor Brown's "Cleaner Air Oregon" program. VOCs are very serious pollutants, linked to cancer and other illnesses. Oregon does not yet have a strong set of rules in place to ensure CLT mills do not endanger the health and wellbeing of people living downwind of them.

In summary, the environmental costs and benefits of CLT products are similar to other wood products. If the source material comes from sustainable forestry and toxic emissions from CLT mills are controlled or eliminated, it may produce benefits. However, if no standard is in place to ensure such steps are taken, CLT is no more "green" than any other wood product. If the City of Portland wishes to use public resources to encourage the use of more sustainable building materials, such investments should require truly sustainable sourcing. This would ensure the public gets the benefits it is paying for, and support forestry operations in the state that seek to pursue sustainable practices.

Mayor Wheeler, we would strongly encourage your office, and the City, to take immediate steps to ensure that investments of public money in building projects utilizing CLT do not have negative consequences for Oregon's forests, rivers and wildlife. Specifically, we would suggest that:

- Your office require that the developers of the Framework project secure an FSC certified (or better) source for the CLT components to be used in the project.

- The City of Portland require Forest Stewardship Council (FSC) certification (or better) as a requirement for future investment of public funding in building projects that seek to expand the use of CLT and other wood products. This would both ensure that these projects truly provide significant environmental benefits, and provide incentives for more widespread adoption of sustainable forestry practices in Oregon.
- Your office weigh in with Governor Brown and the Oregon Department of Environmental Quality (DEQ) and urge them not to exempt CLT production facilities from pollution standards designed to protect human and environmental health from volatile organic compounds (VOCs).
- Your office weigh in with Governor Brown and the ODEQ, urging them to include emissions from timber production in the state’s carbon management policies.

Mayor Wheeler, we appreciate your work to address Portland’s affordable housing crisis and your desire to protect Oregon’s environment. We strongly believe these two goals are not mutually exclusive. However, when it comes to CLT technology and public investment, we believe your office and the City must adopt a more discerning approach. If CLT building investments are to live up to the many promises being made to Portland taxpayers, the City must require that wood products come from FSC certified sources and milling facilities that are truly sustainable.

Sincerely,

Bob Sallinger, Conservation Director
Audubon Society of Portland

Steve Pedery, Conservation Director
Oregon Wild

Rob Sadowsky, Executive Director
Bark

Kelly Campbell, Executive Director
Oregon Physicians for Social Responsibility

John Talberth, President
Center for Sustainable Economy

Rhett Lawrence, Conservation Director
Oregon Chapter Sierra Club