

## Testimony Opposing SB 936

Education, Energy, and the Environment Committee

Tuesday, March 5, 2024

### **Position: Unfavorable**

Dear Chair Brian J. Feldman and Members of the Committee,

As a resident of Maryland and a person who has actively fought environmental degradation for over 50 years, I am appalled at this bill, especially by its greenwashing.

The concept of a wood vault when attached to carbon credits automatically turns the goal towards profit and away from forest health, biodiversity, and climate. This particular project aims to create wood vaults that are “economically viable for large scale in a world-wide carbon market.” (See [presentation](#) at 26:30)

**The problem is providing carbon credits for logging. If only waste wood from construction projects were being considered it would be a different matter.**

**Carbon Credits:** Allowing for carbon credits to be earned with wood vaults creates a perverse incentive to increase unnecessary logging. Some wood vault companies are going as far as automating logging to fill the vault as needed, which can generate steep profits for the owners and allow big polluters to conduct business as usual.

### **The problems with logging:**

Maryland is already logging too much, as per the [2023 Maryland Stewardship Disalignment Report](#) authored by the Environmental Policy Center, the Maryland Forestry Foundation, and the Department of Natural Resources, which warns that the “harvest allowances built into the stewardship plans may preclude forest landowners from participating in certain ecosystem markets.” Logging removes trees that would continue to draw down CO<sub>2</sub> to store it in the soil and their mass until they die- often centuries, sometimes even millennia. When we log our trees (usually between 50-100 years of age), we cut their life short and limit their carbon uptake capacity. Newly planted trees will take decades to start drawing down pollution and often centuries to match the draw-down capacity of a mature logged forest. We don’t have the time to wait for these trees and forests to grow back.

**Emissions calculations:** Not all of the following emissions are being counted:

Logging is one of the [most polluting industries](#) and includes: road building, logging equipment and fuel; loss of soil-c; Arbuscular Mycorrhizal Fungi Network (AMF) die off; soil compaction, transportation of the wood, processing. While the wood vault for now would focus on waste wood, as a product of logging, it generates the same emissions. (Only the live biomass & CO<sub>2</sub> is removed from the forest: the above ground trees. The roots, AMF, damage to other trees, soil, and vegetation – which all release CO<sub>2</sub> when they die- is generally not counted in logging operations.)

**Vault operating emissions:** Collecting and transporting wood (potentially from up to 10,000 square miles); testing it for chemicals (at a UMD laboratory); sorting the wood and filling the vault; unless it is an abandoned pit, quarry, or mine, there is necessary construction involved in any type of vault – consider the size. Finally, there has to be monitoring – ideally by a third party- and testing for leaks for centuries or millennia and then finally closure and cleanup of the vault. Will the Maryland Department of the Environment be continually monitoring the vaults for generations? At what cost?

**Additional problems:** *As written*, the bill presents concerns around:

The wood vaults speed up decomposition substantially, releasing more CO<sub>2</sub> into the atmosphere than would have resulted by allowing natural forest processes.

Wood type: *As written*, any woody biomass, as long as it does not contain toxic chemicals or has a different purpose, would qualify for a wood vault.

**Land: Wood vaults are planned for land that was placed in agricultural preservation easements.** The wood vault would disrupt the protected land and potentially pollute it, including aquifers and waterways in order to generate additional profits on an existing easement. How can we know how land, waterways, and aquifers may shift over the next centuries?

Permits: Existing permitting for landfills and incinerators has proven insufficient to keep our communities safe. The same permitting would apply to this new and untested concept. As we are working to remove incinerators from the Renewable Portfolio Standards (RPS) how can we now add another polluter?

The best strategy to support carbon drawdown and sequestration remains to protect existing forests, let them grow old and provide the ecosystems services we truly need. It may be cool science to some folks, but wood vaults are greenwashing under the present bill.

Respectfully,

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