

From: [William Stewart](#)
To: Borras_Thembi@BOF
Subject: suggested addition for the Oct 2015 TRA2 on cumulative effects
Date: Wednesday, November 04, 2015 3:35:55 PM
Attachments: [October FPC 2015 TRA2 Plead WCS.docx](#)
[bergman_2014_woodproducts.pdf](#)

Thembi,

On page 25, I would suggest adding the clause below to 4th clause in the list of 5 things that the GHG model should cover. I presume that the BOF considers wood chips that go to energy plants to be a product, albeit one that is immediately turned into renewable energy. Adding 'substitution benefits' is a simple way to consider the benefits of burning less fossil fuel. I am attaching a recent article from the Forest Products Journal that provides detail on substitution benefits of various products.

- Emissions and storage associated with life cycle of harvested wood products, including production related emissions and substitution benefits of using wood products rather than common fossil-fuel intensive substitutes

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