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• Blue Mountains Biodiversity Project • Cascadia Wildlands • Center for Biological Diversity • Center for
Sustainable Economy • Central Oregon LandWatch • Coast Range Association • Concerned Citizens of Franklin
County • Conservation Northwest • Cottonwood Environmental Law Center • Defenders of Wildlife • Drew Forest
Preserve & Hepburn Woods • Earth Ethics, Inc. • Earthjustice • EcoFlight • Endangered Species Coalition •
Environment America • Environment Now • Environmental Protection Information Center • Firefighters United for
Safety, Ethics, and Ecology (FUSEE) • Foundation Earth • Friends of Blackwater, Inc. • Friends of Douglas-fir
National Monument • Friends of Mohawk Trail State Forest • Friends of Pelham Hills • Friends of the Bitterroot •
Friends of the Kalmiopsis • Gallatin Wildlife Association • Gallatin Yellowstone Wilderness Alliance • Grand Canyon
Trust • Great Old Broads for Wilderness • Great Old Broads for Wilderness, Bozeman Broadband • Greater Hells
Canyon Council • Green Berkshires, Inc. • Greenpeace USA • Heart of the Gila Inc. • High Country Conservation
Advocates • Humanity • John Muir Project • Kalmiopsis Audubon Society • Kentucky Heartwood • Kettle Range
Conservation Group • Klamath Forest Alliance • League of Conservation Voters • Los Padres ForestWatch • Maine
Audubon • Maine Rivers • Maine Unitarian Universalist State Advocacy Network • Massachusetts Forest Watch •
Mendocino Trail Stewards • Metro Climate Action Team • Native Ecosystems Council • Native Fish Society • Native
Tree Society • Natural Resources Council of Maine • Natural Resources Defense Council • Natural Resources Law •
New Mexico Wild • NJ Highlands Coalition • North American climate, Conservation and Environment(NACCE) •
Northeastern Minnesotans for Wilderness • Ohio Environmental Council • Old-Growth Forest Network • Oregon
League of Conservation Voters • Oregon Wild • Partnership for Policy Integrity • PATH Ashfield • Rachel Carson
Council • Retired National Park Service Wilderness Manager • Rust Temple • San Juan Citizens Alliance • San Luis
Valley Ecosystem Council • Santa Fe Forest Coalition • Save Massachusetts Forests • Save the Dells • Sierra Club •
Sierra Club Alaska • Social Justice Commission (Episcopal Diocese of Western MA) • Soda Mountain Wilderness
Council • Southeast Alaska Conservation Council • Southern Environmental Law Center • Standing Trees Vermont
• Sunrise Movement PDX • The Enviro Show, WXOJ/WMCB/WMNB • The Forest Advocate • The Larch Company •
The Rewilding Institute • Two Rivers Action Coalition • Umpqua Watersheds • United plant savers • University of
Minnesota • Upper Gila Watershed Alliance • Upper Valley Affinity Gp, XRVT • Vermonters for a Clean
Environment • Weeden Foundation • Wendell State Forest Alliance • Western Watersheds Project • White
Mountain Conservation League • WILD Foundation • Wild Heritage • Wild Nature Institute • WildEarth Guardians
• Williams Community Forest Project • Woodwell Climate Research Center • Yaak Valley Forest Council • Athens
County's Future Action Network (OH) • NJ Forest Watch • Highlands Nature Sanctuary/Arc of Appalachia Preserve
System • Berkshire Bike Path Council • Law Office of Stephen A. Engel • Institute for a Thriving Planet • JAPRI.Org •

April 16, 2021

Dear Presidential Advisor McCarthy and Presidential Envoy Kerry:

We deeply appreciate the work you and your staff are doing to ensure that our Nation is committed to a Nationally Determined Contribution (NDC) under the Paris Climate Agreement that is reflective of the urgency of the climate crisis and restores U.S. leadership in the fight to limit it. After four years of climate denial, counter-productive actions, and withdrawal from the Paris agreement by the Trump administration, we have, as President Biden recently warned, “a narrow moment to pursue action at home and abroad in order to avoid the most catastrophic impacts of that crisis,” one that “threatens our people and communities, public health and economy, and, starkly, our ability to live on planet Earth.”¹

Among the most significant and far-reaching steps you could take would be to include with the U.S. NDC a commitment to protect—across all federal forestlands nationwide—the remaining mature and old-growth forests and trees because of their outsized contribution to storing and sequestering carbon. This means, in part, temperate rainforests with extraordinary carbon storage per acre.² But more broadly it requires protecting all remaining mature and old growth stands from the Southeast to Alaska, as well as large, fire-resistant trees in mixed-age stands, trees that shade and cool forests and can store 40% or more of above-ground carbon³ in those stands, which collectively account for the majority of federal forest carbon.⁴

Safeguarding current carbon stored in forests and increasing those stores is recognized by the Intergovernmental Panel on Climate Change as an essential component of addressing the climate crisis.⁵ Forests store and sequester more carbon than any other terrestrial ecosystem,⁶ and provide more than two-thirds of cost-effective natural climate solutions to global warming.⁷ Notably, intact, primary or unlogged forests store 30-70% more carbon than logged forests.⁸ Protecting existing carbon stocks concentrated in mature and old-growth forests and trees, and allowing logged forests to continue to grow and reach their full biological carbon sequestration potential, is a highly and immediately effective, low- or zero-cost approach to removing carbon dioxide from the atmosphere.⁹ It also advances President Biden's goal of combating the climate crisis in ways that "conserve[] our lands, waters, and biodiversity," including protecting 30 percent of the Nation's lands and waters by 2030.¹⁰

U.S. forests already sequester nearly 12% percent of our annual CO₂ emissions,¹¹ but they can do much more if managed properly to retain carbon. Federal forests owned and administered primarily by the U.S. Forest Service and Bureau of Land Management (BLM)—which at 238 million acres account for almost one third of U.S. forests—can play an especially important role. They generally store much more carbon per acre than non-federal forests¹² and by law must be sustainably managed to serve the public interest. Thus, the most durable gains in forest sequestration over the next decades would come from protecting federal mature and old-growth forests and trees.

Unfortunately, federal agencies continue to log these forests widely, often targeting areas and trees with high carbon storage, further degrading carbon stores. This logging is the largest source of emissions from federal forests in the conterminous 48 states, twice as much as wildfire emissions¹³ and more in some places.¹⁴ The climate impact goes far beyond just releasing carbon that large and older trees and forests store at the time they are logged. Left alone, these forests and trees will continue to pull additional carbon from the atmosphere for centuries.¹⁵ And a single big tree can add the same amount of carbon to the forest every year as the cumulative total contained in an entire mid-sized tree.¹⁶ But if they are logged and processed for wood products, the majority of their carbon is released to the atmosphere, with only 19% stored in wood products and 16% in landfills.¹⁷

By contrast, while planting native trees in appropriate places can play a long term role, the principal benefits would not be realized for many decades to centuries until most of the new trees reach maturity and begin to store significant amounts of carbon—too late to help achieve 1.5°C warming targets.¹⁸ And when sites are cleared for tree planting, for example of dead trees that still retain the large majority of their carbon even if burned,¹⁹ that creates a decades-to-centuries carbon debt.²⁰

Implementing this approach to federal forest management, guided by climate imperatives and designed to optimize ecological, economic, and social co-benefits, will require a joint rulemaking by the Forest Service and BLM. Right now, however, this administration can ensure a strong outcome by making clear that its NDC commitment includes protecting our remaining older federal forests and trees.

With many thanks for your leadership on the most crucial environmental issue our country has ever faced.

Sincerely,

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Law Office of Stephen A. Engel
Institute for a Thriving Planet
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Cc:

Hon. Deb Haaland, Secretary of Interior
Hon. Tom Vilsack, Secretary of Agriculture
Ali A. Zaidi, Deputy White House National Climate Advisor
David Hayes, Special Assistant to the President for Climate Policy

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