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.”

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. 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 carbon in those stands, which collectively account for the majority of federal forest carbon.
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.\textsuperscript{5} Forests store and sequester more carbon than any other terrestrial ecosystem,\textsuperscript{6} and provide more than two-thirds of cost-effective natural climate solutions to global warming.\textsuperscript{7} Notably, intact, primary or unlogged forests store 30-70\% more carbon than logged forests.\textsuperscript{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.\textsuperscript{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.\textsuperscript{10}

U.S. forests already sequester nearly 12\% percent of our annual CO\textsubscript{2} emissions,\textsuperscript{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 forests\textsuperscript{12} 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 emissions\textsuperscript{13} and more in some places.\textsuperscript{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.\textsuperscript{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.\textsuperscript{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.\textsuperscript{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\degree \textsuperscript{C} warming targets.\textsuperscript{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,\textsuperscript{19} that creates a decades-to-centuries carbon debt.\textsuperscript{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,
350MA-Berkshires’s
350 Central Mass
Alaska Rainforest Defenders
Bee Friendly Williamstown
Biofuelwatch
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 of Earth Island Institute
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, Center for Forest Ecology
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

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

1 President Joseph R. Biden, Jr. 2021. Executive Order 14008, Tackling the Climate Crisis at Home and Abroad.
4 Buotte et al. (2019), supra note 2.
6 Pan, Y. et al. 2011. A large persistent carbon sink in the world’s forests. Science.
17 Hoover, Katie and Anne A. Riddle. 2020. U.S. Forest Carbon Data: In Brief. Congressional Research Service. (Citing the Environmental Protection Agency’s National Greenhouse Gas Inventory.)