



May 4, 2021

Sent Via Electronic Mail

The Honorable Gina McCarthy, White House National Climate Advisor
1600 Pennsylvania Ave., NW
Washington, DC 20500

Dear Administrator McCarthy,

The need for immediate solutions to the climate and biodiversity emergencies has never been more pressing.¹ We welcome the Biden Administration's commitment to acting quickly to address these interrelated crises, including developing the U.S. Nationally Determined Contribution (NDC), committing to the 30 x 30 protected area targets, centering environmental justice, and pushing for broader international action on natural climate solutions, particularly lands and waters protections. While biodiversity loss and climate change can combine in a mutually reinforcing downward spiral, addressing these crises together in a holistic, equitable manner offers unique opportunities to amplify solutions to both.

The protection of carbon-dense, biodiverse U.S. forests and large trees needs to be a key pillar in pursuing these priorities. As a steward of some of the world's most climate-critical forests, the U.S. needs strong, science-based, equitable domestic conservation policies to not only meet its own climate and environmental justice goals but to credibly lead in international climate and biodiversity negotiations. These policies are critical to securing immediate climate benefits that

¹ William J. Ripple et al., "The Climate Emergency: 2020 In Review," *Scientific American*, January 6, 2021, <https://www.scientificamerican.com/article/the-climate-emergency-2020-in-review/>.

will provide the most cost-effective, substantial carbon savings over the coming decades. To maximize these benefits, the U.S. should pursue a two-pronged strategy on forests.

First, as a matter of the highest priority, the U.S. should, through equitable, inclusive processes, protect all remaining primary (unlogged), mature, and old-growth forests, as well as large trees on federal lands, as these harbor the largest carbon stocks and also the highest levels of biodiversity. Primary and older forests generally store 30-70%² more carbon than logged forests, and because of their higher levels of biodiversity they are also much more resistant and resilient to natural disturbances,³ which makes their carbon stocks more stable and secure. Older trees also continue to absorb carbon as they age, with one study finding that in different multi-aged forests around the world, half of all the carbon was stored in the largest one percent of trees.⁴ Once an older forest has been logged, it can take over a century to make up the resulting carbon debt, if ever.⁵

Second, the U.S. should also promote “proforestation,” of young carbon dense forests on federal lands by allowing them to reach their optimal carbon potential and incentivizing longer timber harvest rotations on nonfederal lands wherever possible. Proforestation is a far superior climate mitigation strategy to planting trees because trees in existing forests will draw down much more carbon dioxide over the next few decades than newly planted seedlings.⁶

Within these two priorities areas, we urge you to take these additional specific actions for biodiversity and the climate:

Create A Strategic Natural Carbon Reserve Network: The U.S. should provide strict protection to primary and older forests and large trees on federal lands. Such a reserve system, which should also support Tribal sovereignty and self-determination, would focus on protecting existing carbon stocks (i.e., carbon reservoirs; Article 5 of the Paris Climate Agreement) while also allowing for proforestation.

Strengthen emissions accounting in the forest sector to better track and incentivize best practices: In order to accurately capture the logging industry’s impact on forest carbon across both federal and non-federal lands and place the proper incentives on encouraging long-term increases in carbon sequestration, forest carbon accounting in annual emissions reporting should

² H. Keith et al., “Managing Temperate Forests for Carbon Storage: Impacts of Logging Versus Forest Protection on Carbon Stocks,” *Ecosphere* (2014). Mackey B, D.A. DellaSala et al., “Policy Options for the World’s Primary Forests in Multilateral Environmental Agreements,” *Conservation Letters* (2014). B. Mackey, “Counting Trees, Carbon, and Climate Change,” *The Royal Statistical Society* (2014):19-23. H. Keith et al., “Under What Circumstances Do Wood Products from Native Forests Benefit Climate Change Mitigation?” *PLoS ONE* (2015).

³ Damon B. Lesmeister et al., “Mixed-Severity Wildfire and Habitat of an Old-Forest Obligate,” *Ecosphere* (2019).

⁴ James A. Lutz et al., “Global Importance of Large-Diameter Trees,” *Global Ecology and Biogeography* 27, no. 7 (2018).

⁵ Tara W. Hudiburg et al., “Meeting GHG Reduction Targets Requires Accounting for All Forest Sector Emissions,” *Environmental Research Letters* (2019).

⁶ William R. Moomaw, Susan A. Masino, and Edward K. Faison, “Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good,” *Frontiers in Forests and Global Change* (2019).

be reexamined and improved to reflect the latest life cycle analysis.⁷ This reform process should include a transparent, open collaboration among scientists, environmental policy thought leaders, and government and lead to a data-driven reporting system that accurately reflects the full suite of anthropogenic forest impacts. Inventories should also reflect key differences in the condition of forest ecosystems that reduce forest stability from anthropogenic disturbances.

Comprehensive gross stock and flow accounts that reflect differences in forest ecosystem integrity, including the greater long-term stability of carbon in primary and older forests and large trees, would increase transparency and encourage improved protection and recovery of our most important forest carbon stocks from human disturbances.⁸

Designate Climate Sanctuaries: Announce a new protected areas designation, climate sanctuaries, that would be based on maintaining suitable microclimate and habitat conditions for species in search of climate refuge. Candidate areas could include intact watersheds; landscape connectivity and migration stop-over areas; drinking water source areas in headwater ecosystems; and representative native grasslands, oak woodlands, wetlands, deserts, and rangeland ecosystems. Climate sanctuaries should reduce land-use stressors and include Traditional Ecological Knowledge and opportunities for Tribes to engage meaningfully in stewardship and monitoring.

Partner with Canada on Cross-Border Opportunities: The U.S. should prioritize two key policy outcomes in its work with Canada: 1) development of cross-border protected areas that prioritize carbon-rich, biodiverse and other natural ecosystems and involve the leadership and traditional ecological knowledge of Indigenous peoples; and 2) working jointly to improve and harmonize best practices around forest carbon accounting and regulation, based on collaborations among scientists, Indigenous leaders, and environmental policy experts in each country.

Stop conversion of forests into wood chips and pellets for biomass burning: Many policies currently classify burning forest wood for energy as “zero carbon,” ignoring the reality that burning biomass emits more CO₂ per unit energy than even coal, and that because burning wood emits carbon immediately, while young trees sequester it more slowly than the release, bioenergy adds to atmospheric CO₂ loading for decades to centuries. In addition, polluting biomass processing facilities disproportionately impact low income and people of color communities. Simply put, biomass burning is a catastrophe for the climate, biodiversity, and social justice. This administration cannot be a credible force for conservation domestically or abroad if it continues to allow this enormously destructive practice to continue.

⁷Tara W. Hudiburg, et al 2019 Ibid.

⁸ Keith et al. Evaluating nature-based solutions for climate mitigation and conservation requires comprehensive carbon accounting *Science of the Total Environment* (2021).

U.S. Involvement in Multilateral Environmental Agreements: U.S. participation in multilateral environmental agreements and other key international fora (e.g. the G20) should mirror the approaches outlined above to maximize biodiversity and climate benefits and also to help reduce the risk of future zoonotic pandemics.⁹ In particular, the U.S. should endorse a goal of “no loss,” rather than “no net loss” for carbon-dense ecosystems and for ecosystems that retain a high degree of ecological integrity, and prioritize ecological restoration aimed at landscape-scale connectivity strategies. The U.S. should also strongly support enhanced cooperation and integrated solutions across the UNFCCC and the CBD. In addition, the Biden Administration should drive science-based rule changes around forest carbon accounting, and uphold and promote the rights of Indigenous Peoples and the principle of Free Prior and Informed Consent.

All of these policy recommendations should also intersect with this Administration’s commitments to environmental justice, including through creating pathways to promote Indigenous-led conservation initiatives and support Tribal self-determination.

President Biden has laid a strong framework for leadership on natural climate solutions and now has the opportunity to reshape forest and protected areas policy in a way that maintains the value of our climate- and species-critical forests for present and future generations.

We would welcome the opportunity to discuss these policy proposals in a meeting in advance of the June 11th G7 Summit.

Sincerely,

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⁹ Dominick A. DellaSala, William J. Ripple, and Franz Baumann, “Public Health Depends on a Healthy Planet,” *New Republic*, April 20, 2020, <https://newrepublic.com/article/157361/public-health-depends-healthy-planet>.

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The Honorable Deb Haaland, United States Secretary of the Interior
The Honorable Robert Bonnie, USDA Deputy Chief of Staff for Policy and Senior
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The Honorable Ali A. Zaidi, Deputy White House National Climate Advisor