

To: The Honorable John Kerry, U.S. Special Presidential Envoy for Climate
Cc: The Honorable Tom Vilsack, United States Secretary of Agriculture
The Honorable Deb Haaland, United States Secretary of the Interior
The Honorable Brenda Mallory, Council on Environmental Quality
John Podesta, Senior Advisor to the President for Clean Energy Innovation and Implementation
Ali Zaidi, Assistant to the President & National Climate Advisor

Date: March 16, 2023

Re: Mature Forests and Trees Must Be Protected to Meet Key International Commitments

The Honorable John Kerry,

To credibly advance the Biden administration's domestic and international climate commitments, the U.S. Forest Service and Bureau of Land Management need to promptly initiate a rulemaking conserving mature and old-growth forests and trees on federal lands from logging. Such a rule would implement a core promise of President Biden's Executive Order 14072. It would demonstrate the government's commitment to using every available tool to fight the climate crisis. It would meaningfully contribute to the last 10-12 percent of President Biden's target of reducing net greenhouse gas emissions 50-52 percent by 2030. It would go hand-in-hand with the administration's other forest conservation efforts—such as the steps taken to protect the Tongass National Forest—to concretely show U.S. international leadership on forest conservation, including on issues of active negotiation such as 30x30. It can be done administratively this presidential term. And, done right, it would be durable into future administrations.

As international climate organizations that represent over 19 countries and members, we urge you to work with your colleagues across agencies and the White House to ensure that these domestic actions take place. Initiating a rulemaking that presumptively conserves mature and old-growth forests and trees on federal lands would strongly signal to other nations the U.S. commitment to climate action. As the administration continues to address the threat posed by uncharacteristically severe wildfire, it must take decisive action on protecting our climate-critical mature forests from logging. And it could readily act as a domestic counterpart to specific international initiatives, such as joint action with the Lula administration to protect the Amazon.

America's mature and old-growth forests and trees play an irreplaceable role in the fight against the climate crisis. No human-made technology can match such forests for their ability to remove and store carbon pollution from the atmosphere at scale. They also buffer key ecosystems from continued biodiversity loss, protect critical drinking watersheds for communities across the country, and provide increasingly scarce high-quality outdoor recreation experiences. Mature and old-growth forests in much of the United States have been eliminated, but federal lands still contain important expanses. And those mature forest expanses account for most carbon storage on federal lands.

These forests and trees can contribute maximally to U.S. climate goals only if they are protected from logging. Logging releases stored carbon, eliminates the older trees' ability to sequester

additional carbon, and damages the other ecosystem services and biodiversity values these forests uniquely provide. Unfortunately, though older forests and trees are in public hands, they continue to suffer ongoing degradation from logging, often at taxpayer expense.

And such action need not come at the expense of managing uncharacteristically severe wildfire. We welcome the administration's recent efforts to address wildfire, including the directive to protect mature and old-growth forests in such management. Logging, however, remains the largest threat that is wholly under agency control. And protections for these climate-critical forests and trees from logging are a necessary complement to the administration's wildfire efforts.

As other nations decide how thoroughly to join the existential climate fight, they will be watching what happens to these remaining federal forests. Business-as-usual logging will thus not only reduce U.S. climate gains, it will also undermine international credibility on both climate and forest conservation. Conversely, effective regulatory protections from logging for federal mature and old-growth trees and forests would demonstrate leadership on forest conservation, strengthen U.S. international climate negotiators' positions, and significantly advance key international commitments that the Biden administration has made (such as the Nation's updated Nationally Determined Contribution and the Roadmap for Nature-Based Solutions). The Glasgow Climate Pact notes the importance of ensuring the integrity of forests and emphasizes "protecting, conserving and restoring nature and ecosystems to achieve the Paris Agreement temperature goal, including through forests . . . acting as sinks and reservoirs of greenhouse gases." Furthermore, the U.S. committed in the Glasgow Leaders' Declaration on Forests and Land Use to "strengthen" its effort to "[c]onserve forests and other terrestrial ecosystems and accelerate their restoration." And the Biden administration commended the outcome of COP15, which emphasized the importance of intact ecosystems for their higher biodiversity and climate values.

Regulatory protections for mature and old-growth forests and trees would also help the U.S. meet the commitments it has made internationally to advance the interests of Indigenous peoples. At COP26, the U.S. committed to "renewed collective and individual efforts to further recognize and advance the role of Indigenous Peoples and local communities as guardians of forests and nature." Both the [Affiliated Tribes of Northwest Indians](#) and the [National Congress of American Indians](#) have adopted resolutions calling on the United States government to initiate a rulemaking to protect mature and old-growth forests and trees on federal forestlands from logging. Pursuing these protections in a way that helps honor key Tribal interests would concretely demonstrate the renewed effort the government has pledged.

The recent COP27 Sharm El-Sheikh Implementation Plan re-affirmed parties' commitment to limiting warming to 1.5 degrees Celsius; this decade is our last chance to hold that line. But we can no longer leave potential gains on the table. The Biden administration must promptly advance all agency actions that will help the U.S. and world reach their goals expeditiously.

A durable regulation presumptively conserving mature and old growth trees and forests from logging is one of the most cost-effective and immediate impact options the administration can take to protect the U.S. and the world from climate impacts while also strengthening and advancing international forest conservation commitments. Our organizations ask that you work with your agency and White House colleagues to start a rulemaking as soon as possible.

Thank you very much for considering our request on this extremely pressing question.

Sincerely,

Abibinsroma Foundation

Agent Green

AJESH

Australian Forests and Climate Alliance (AFCA)

Centre for Economics and Ecosystem Management, Eberswalde University for Sustainable Development

Coastal Plain Conservation Group

Comité Schone Lucht

Congo Basin Conservation Society CBCS

Conservation North

Earth Ethics, Inc.

Earth InSight

Earthjustice

Environment America

Environmental Investigation Agency

Environmental Protection Information Center

Foreign Policy for America

Foundation Conservation Carpathia

Foundation Earth

Friends of ZOKA

Fundación Gaia Amazonas

Hip Hop Caucus

International Conservation Fund of Canada

Leefmilieu

Natural Resources Defense Council

Nature Nova Scotia

Old-Growth Forest Network

Oxfam America

Re:wild

Save Estonia's Forests (Päästame Eesti Metsad)

Sierra Club BC

Stand.earth

Strong Roots Congo

The Australian Rainforest Conservation Society

The Lifescape Project

The Samdhana Institute

The Woodland League

Wild Europe Foundation

Wild Heritage

Wildland Research Institute

Wildlife Conservation Society

Women's Earth and Climate Action Network (WECAN)