May XX, 2021

The Honorable Raúl Grijalva

Chair

Committee on Natural Resources

U.S. House of Representatives

1324 Longworth House Office Building

Washington, D.C. 20515

Re: Letter of Opposition to the Trillion Trees Act

Dear Chairman Grijalva,

On behalf of the undersigned organizations and our millions of members and supporters, we write to express our opposition to the Trillion Trees Act, introduced by Congressman Bruce Westerman (R-Ark) on April 19, 2021.

On its face, planting trees to sequester carbon seems like the very definition of a bipartisan, noncontroversial policy with obvious benefits, and when backed by sound science and principles of ecological restoration, tree-planting can play an important role in long-term carbon sequestration.

However, like any policy proposal, the details are critical. Upon close inspection of this bill, it is clear that the goal is not to combat climate change, but rather to increase logging on national forests. Despite the [claims](https://republicans-naturalresources.house.gov/legislative-priorities/trillion-trees-act.htm) made by Congressman Westerman about the amount of carbon sequestration that could result from this bill, the Trillion Trees Act has the potential to greatly increase carbon emissions by focusing on and promoting the harvesting of our nation’s forests, including old growth and mature trees that store and continue to sequester the vast majority of carbon.

The following sections summarize our main concerns with the current bill.

**Logged trees do not have the same carbon-storing potential and benefits as live trees.**

The bill falsely promotes wood products as equal to standing trees in terms of carbon storage potential by including “harvested wood products” in the definition of “forest carbon stock.” The bill therefore claims that timber production adds to forest carbon storage, despite the well-documented negative effects that logging can have on carbon storage through emissions.[[1]](#footnote-1)

In Section 101, the bill goes on to require the Forest Service to set targets for increased forest carbon stock. Because the definition of forest carbon stock includes logged trees, this section would promote increased logging in national forests.

**The bill de-emphasizes the importance of relying on science and uses a biased and inaccurate carbon-accounting methodology.**

The carbon stock targets mentioned above would be set based on the recommendations of a “Trillion Trees Task Force.” Membership of this taskforce would be weighted heavily toward timber industry representatives, who would make up eight out of 15 members and whose businesses benefit from increased logging of federal forests, while only one membership slot is reserved for a scientific expert on forest carbon.

Another instance of this bill’s failure to use best available science is found in Section 105(c), which requires the Forest Service to develop lifecycle models for evaluating forest carbon stock potential. This section requires the Forest Service to consider the net carbon stored and sequestered through the manufacture of harvested wood products and through active forest management, but there is no mention of considering or giving weight to forest conservation in sequestering carbon. As currently written, it is possible this section could even constrain the Forest Service from including conservation in its forest carbon modeling.

**The bill relies on outdated reforestation policies**

Several problematic sections of the Trillion Trees Act amend provisions of the Forest and Rangeland Renewable Resources Planning Act of 1974 (RPA). Section 111, for example, would reinstitute a long-expired provision that requires the Forest Service to provide financial information to Congress about anticipated reforestation needs. While information regarding reforestation needs is important, the RPA provision at issue was written to promote the damagingly high levels of timber production and clearcutting that occurred during the 1970s, not to improve carbon sequestration. Resurrecting this provision would require the Forest Service to compile and transmit information promoting timber production rather than mitigating climate change.

**The bill undermines the National Environmental Policy Act (NEPA), public engagement, and judicial review.**

Section 201 of the bill would blatantly circumvent the NEPA process and judicial review by authorizing the Forest Service to “deem” large-scale logging projects to be in compliance with NEPA based on a nine-year-old programmatic environmental impact statement on Forest Service planning regulations. This section would result in significantly curtailing or eliminating environmental reviews and public engagement and would take away the public’s right to hold the Forest Service accountable if it fails to meaningfully review projects or ignores local community concerns. It also reinforces our overall concern that this bill is essentially designed to increase timber production and create industrial plantations through reforestation under the guise of increasing carbon stocks.

In summary, the Trillion Trees Act places far more emphasis on removing trees from our nation’s forests than it does on planting new trees, and the provisions that do deal with reforestation call for outdated policy not backed by best available science. We urge you to please oppose this bill.

Sincerely,

Center for Biological Diversity

Earthjustice

Natural Resources Defense Council

Sierra Club

Southern Environmental Law Center

The Wilderness Society

Western Environmental Law Center

1. *Logging study reveals huge hidden emissions of the forestry industry*, <https://www.newscientist.com/article/2215913-logging-study-reveals-huge-hidden-emissions-of-the-forestry-industry/> September 10, 2019. [↑](#footnote-ref-1)