April 29, 2021

The Honorable Tom Vilsack
Secretary of Agriculture
1400 Independence Ave SW
Washington, DC 20250

Comments on Docket Number: USDA-2021-0003

Dear Secretary Vilsack:

Thank you for the opportunity to provide input on the U.S. Department of Agriculture's (USDA) Climate Smart Agriculture and Forestry Request for Information. We appreciate the effort the Department is making to include the voices of a number of diverse and interested parties in this process and to drive greater carbon sequestration, reduction in emissions, and smarter forestry and agriculture practices on the ground. However, we have a number of concerns with the approach that the Department is taking, including the significant emphasis on "climate-smart forestry" and carbon markets without any acknowledgement of the importance of protecting existing, mature, and old growth forests across the country and the impacts of industrial silviculture on carbon emissions. In particular, Southern forests are our nation's most diverse but least protected forests and the rate of deforestation in southern forests is four times the rate of the Amazon rainforest. However, the fact that 80-90% of carbon emissions in the forestry sector are from logging – not forest fires, land use change, disease, drought, or insect damage – remains underreported and represented in this and other climate accounting processes.

In addition, the RFI relies heavily on the theory of carbon neutral biomass, which is not supported by current science, and is problematic in recognizing the important role that healthy, mature forests play in establishing and maintaining our national forest reserves and carbon sink. Thus, for the aforementioned and other reasons, we encourage USDA to incorporate into its policies and support:

1. **Proforestation, or the practice of allowing forests to grow to full ecological maturity**. USDA should start by protecting all forests on all federal lands – most importantly mature forests – and encourage at least one-third of "working forests" on private lands to transition out of commercial production, and instead begin producing ecosystem services: carbon storage, natural flood control, water regulation, biodiversity protection, and outdoor recreation.
2. **Increased ownership of lands by Black**, **Indigenous and BIPOC** individuals and community groups. Land managed by a community or indigenous tribes (vs private individuals or corporations) results in less forest disturbance and more protection and investment in BIPOC land ownership would help address long-standing inequities in U.S. land ownership due to a history of discriminatory practices and policies that have restricted Black and Indigenous land ownership.

3. **Updated forest inventory data, which shows that between 80-90% of carbon emissions are attributed to silvicultural activities.** These numbers reflect USDA's own determinations that the vast majority of carbon emissions from forests are attributed to silvicultural activities, not forest fires, land use change, disease, drought, or insect damage. USDA should separate out silviculture emissions in the Land Use, Land-Use Change and Forestry (LULUCF) category of the Greenhouse Gas Inventory, and direct any states who use a similar format to adopt this method as well.
4. **Termination of subsidies for biomass, biofuels, wood pellets, and silviculture**. Annual carbon emissions from logging in U.S. forests are comparable to the greenhouse gas emissions from the residential and commercial sectors combined. In addition, wood pellet mills are disproportionately being sited in low-income and communities of color, perpetuating systemic environmental racism.
5. **Rejection of carbon markets.** Carbon markets suffer from fatal issues with additionality and leakage. They also perpetuate sacrifice zones and economic inequities which disproportionately impact low-income and BIPOC communities. Carbon markets are not viewed as a panacea for climate mitigation and sequestration in the forestry sector; rather USDA should focus on proforestation and protection to strengthen our land-sector carbon sink.
6. **Accruing benefits for Southern forest communities, not just producers, or industry**. USDA must take a holistic view of its investments and focus on listening to community leaders from the Black Belt and numerous environmental justice communities, many of which are opposed to increased forest product production. Rather, these communities are focused on securing sustainable jobs – including outdoor recreation – that produce greater economic benefits and more jobs than timber. High concentrations of wood products facilities have been found to negatively affect income, education, unemployment, and poverty.

We appreciate your consideration of these issues and have provided specific input on each of the questions in the RFI, which is attached for your consideration. We have also attached the Southern Communities for a Green New Deal, a platform which is signed by over 200 groups that support the principles outlined in this comment letter and encourage a new vision for the South, one which is based on a regenerative land-based economy rooted in justice and equity for those communities which have suffered a legacy of pollution and ecological destruction. The platform can also be found here: https://www.scen-us.org/scgnd. We urge you to engage with signers of this letter and the communities who are co-signers of this platform and to hear their perspectives on delivering climate action, building sustainable economies, and addressing environmental justice now and into the future.

If you have any further questions you can contact Rita Frost at rita@dogwoodalliance.org

Thank you for your consideration and we stand ready to answer any additional questions you may have and look forward to continuing to engage on this important set of issues around climate and justice.

Sincerely,

Dogwood Alliance

350.org Triangle

Black Christian Leaders Coalition

Center for a Sustainable Coast

Climate Reality Project

Climate Reality Project of Coastal Georgia

Climate Reality Project- Upstate South Carolina Chapter

Concerned Citizens of Cook County

Concerned Citizens of Northampton County

Education, Economics, Environmental, Climate, and Health Organization (EEECHO)

Healthy Gulf

Indivisible Asheville/WNC

Jail and Prison Rehabilitation Information (JAPRI.org)

Justice First Coalition

Kingdom Living Temple

NAACP- Charlotte-Mecklenburg Branch

New Alpha Community Development Corporation

Old People Working for the Greater Good

Our Revolution Greenville

Rachel Carson Council

Sierra Club Ready for 100

Southern Forests Conservation Coalition

Spruill Farm

Unitarian Universalist Congregation of Greater Naples

Weeks Consulting

Whitney M. Slater Foundation

Winyah Rivers Alliance

Women's International League for Peace and Freedom

USDA Request for Information – Docket Number: USDA-2021-0003

Question by Question Responses

1. Climate-Smart Agriculture and Forestry Questions

A. How should USDA utilize programs, funding and financing capacities, and other authorities, to encourage the voluntary adoption of climate-smart agricultural and forestry practices on working farms, ranches, and forest lands?

Climate-smart forestry practices are practices that prioritize carbon sequestration and long-term carbon storage over more traditional approaches to forestry management.(Verkerk et al., 2020) Climate-smart forestry practices involve a trade-off: reducing the "productivity" of forests in exchange for reaping more the climate and carbon benefits that they provide.

Proforestation is the practice of allowing forests to grow to full ecological maturity.(Moomaw et al., 2019) Converting public lands to "carbon and ecosystem services reserves" would allow the USDA to practice proforestation, allowing forests to grow to full ecological maturity.(Moomaw et al., 2019) Proforestation is essential because the country cannot reach the Paris climate accords goal by other techniques alone. Fossil fuel reductions will only provide a fraction of the carbon sequestration needed, and other techniques like planting trees will not achieve enough carbon sequestration in the desired timeframe. In contrast, allowing trees to mature through proforestation (a scientific term which means allowing forests to grow to their ecological potential) can provide a significant carbon sequestration benefit.

The priority for transitioning forests on private lands out of commercial production should be given to mature natural stands, high biodiverse areas, riparian forests and wetland forests in high-risk flood zones across the coastal plain of the US South where disturbance rates, attributed to logging, are estimated to be four times that of South American Rainforests.(Curtis et al., 2018; Hansen et al., 2013) Southern forests are our nation's most diverse but least protected forests.(Jenkins et al., 2015) Minimizing forest carbon loss must be a top priority along with protecting existing carbon stores.(Moomaw et al., 2019)

As federal forest stewards, the USDA is in charge of ensuring that its owned lands are managed for the benefit of the American people. Roughly 37% of the continental United States is owned by public entities, which means that there is an opportunity for over a third of the continental United States to be engaged in climate-smart forestry practices. As the USDA considers this directive from the President, we believe that programs, funding, and financing should be directed towards transitioning lands to a new normal. The USDA should transition all federal lands and encourage at least one-third of "working forests" on private lands to transition out of commercial production, and instead begin producing ecosystem services: carbon storage, natural flood control, water regulation, biodiversity protection, and outdoor recreation.

To achieve these climate outcomes, USDA should increase investment in Forest Service Land Acquisition, Forest and Rangeland Research, Community Forest and Open Space Conservation, Recreation, Heritage and Wilderness, and Wildlife and Fisheries Habitat Management.

Finally, we believe that tree planting is a potential solution with many pitfalls. Tree-planting should not be used as a substitute for restoring and protecting natural ecosystems. All tree-planting should be focused on restoring native ecosystems, not supporting commercial aims with slash and loblolly plantations.

1. How can USDA leverage existing policies and programs to encourage voluntary adoption of agricultural practices that sequester carbon, reduce greenhouse gas emissions, and ensure resilience to climate change?

There are many ways to alter or improve existing programs to reduce greenhouse gas emissions and improve resilience against climate change.

Cost-share programs that currently enable the conversion of natural forests to pine plantations should be redirected to cost-share programs that leave forests standing and re-establish native ecosystems. This would be in line with the aims of proforestation by preventing further carbon emissions from natural forest conversion to plantations, which store significantly less carbon. (Moomaw et al., 2019; Sohngen & Brown, 2006) Programs to realign towards proforestation include: the Forest Legacy Program; Conservation Easements, in particular Wetland Reserve Easements, which can be used to protect the peat and pinelands of the south and the Healthy Forest Reserve Program; Conservation Reserve Program, in particular the Bottomland Hardwoods Program; Conservation Reserve Enhancement Program, and other USDA and Forest Service Programs.

Voluntary programs will not be sufficient to address the scale of change needed in forest management. The USFS should support and help enforce a new set of regulations designed to protect forests. These new regulations could include removing the federal silvicultural exemption from the Clean Water Act, and requiring expanded buffers along rivers to protect water quality. Studies show that logging has significant impacts on water quality; in contrast, leaving forests intact along waterways can help store carbon, optimize natural flood control and protect biodiversity.(Lui, 2006; McCallie, 2016)

Technical assistance should be provided to landowners in high-priority forests to develop and access growing markets for outdoor recreation (hiking, camping, paddling, climbing, trail running) and other such local enterprises consistent with standing forests. High-priority forests could be identified through existing conservation priority models, like the SECAS Blueprint or the Wetland Forest Initiative's

conservation maps.(*Southeast Conservation Adaptation Strategy*, n.d.) High priority areas should also be identified through a focus on low-income communities and communities with above average populations of Black, Indigenous and People of Color. This will ensure an equitable distribution of natural resources and avoid the pitfalls of "play deserts" - areas where there are not enough natural amenities to sustain a population.

We should invest in economic development that can not only help keep forests in forests but also keep them standing such as outdoor recreation -- not more wood products. Outdoor recreation represents one of the largest potential avenues for "green" employment in the US South. In the latest stats from the Bureau of Economic Analysis, Outdoor Recreation represented 2.5% of the total value added to the South's economy, $152 trillion in 2017, controlled 3.5% of the job market, employing 1.8 million people, for an average salary of $39,701.08 per employee per year.(*Outdoor Recreation Satellite Account, U.S. and Prototype for States, 2017 | U.S. Bureau of Economic Analysis (BEA)*, n.d.) However, the amount of land available for the growing outdoor recreation industry cannot increase if most other private lands are tied up in commercial forest production.

On average across the South, the Outdoor Recreation Industry:

- Is worth $198 Billion (2.6x) more than the Forest Products Industry
- Employs 2.2 million (6.8x) more people than the Forest Products Industry
- Pays $17 Billion (10.7x) more taxes to state and local governments than the Forest Products Industry

Tax incentives and subsidies for logging on public and private lands should be redirected to support outdoor recreation and to establish a new generation of federally-owned forests in priority areas as described above. Equity must be central to the establishment of new public lands in a manner that increases access to protected areas in historically marginalized communities, including specifically in the Black Belt of the Coastal Plain of the US South.(Quisumbing King et al., 2018)

2. What new strategies should USDA explore to encourage voluntary adoption of climate-smart agriculture and forestry practices?

The USDA should support acquisition of community-owned and indigenous owned land, with a focus on low-income BIPOC communities disproportionately impacted by high-commercial production. Around the world, it has been demonstrated that land managed by a community or indigenous tribes (vs private individuals or corporations) results in less forest disturbance and more protection.(Kashwan, 2020; Muller et al., 2019) This strategy would also help address long-standing inequities in land ownership due to a history of discriminatory practices and policies that have restricted black and indigenous land ownership in areas with high check-in percentages of black and/or indigenous populations.(Bullard, 1999; Norgaard et al., 2011; Quisumbing King et al., 2018) USDA should start by expanding on the Socially Disadvantaged Farmers and Ranchers under the Pandemic Assistance for Producers Initiative.

B. How can partners and stakeholders, including State, local and Tribal governments and the private sector, work with USDA in advancing climate-smart agricultural and forestry practices?

The USDA should encourage local and state governments to prioritize expanding protected lands and reducing the acreage of lands in commercial production as set forth above. USDA should direct funds to programs including Urban and Community Forestry; Direct funds from LWCF towards Environmental Justice communities, including in the Forest Legacy Program. USDA should also incentivize states to leverage CRP funds in the Conservation Reserve Enhancement Program for actions which provide durable long-term conservation for communities.

C. How can USDA help support emerging markets for carbon and greenhouse gases where agriculture and forestry can supply carbon benefits?

Forest carbon markets are a false solution to the climate crisis and perpetuate sacrifice zones and economic inequities which disproportionately impacts low-income and BIPOC communities.(Böhm et al.,

2012; Climate Justice Alliance & Indigenous Environmental Network, 2017; Elgin, 2020, 2021; Gorte & Ramseur, 2008) Their development should not be supported by the federal government. Issues with carbon markets include:

Carbon markets operate as a "license to pollute" and do not inspire behavioral changes from large polluters like fossil fuel companies, pulp, paper, and pellet companies. Instead, carbon credits become a "license to pollute" for large polluters and therefore perpetuate racial injustice, as BIPOC communities are disproportionately impacted by large emitters.(Climate Justice Alliance & Indigenous Environmental Network, 2017) ProPublica reported that California's oil and gas industries have increased emissions by 3.5% since a carbon cap-and-trade program has begun.(Song, 2019)

Carbon markets suffer from issues with additionality and leakage. Additionality is the concept that a credit-issuing project would not have gone forward without the economic benefit of the carbon market. In practice, determining additionality is wholly subjective and the owners of the parcel will be biased towards making a strong case in order to get their payment.(Elgin, 2020, 2021) Leakage is when forest protection in one area is mitigated through increased activity in another. In other words, protecting ten acres of a property may just mean that ten extra acres get logged elsewhere. There is no true way to safeguard against this, and it may wipe out any benefit received from the initial forest preservation.(Gorte & Ramseur, 2008)

Rather than supporting carbon markets, USDA should invest in durable conservation by increasing land ownership by BIPOC, indigenous and community-held entities as well as federal acquisitions, conservation easements, and marginal land retirement programs.

D. What data, tools, and research are needed for USDA to effectively carry out climate-smart agriculture and forestry strategies?

The USDA should adopt and integrate the work done by Harris, Curtis, and others, in evaluating the emissions currently coming from US forests.(Curtis et al., 2018; Hansen et al., 2013; Harris et al., 2016) In sum, the vast majority of carbon emissions from forests, between 80-90%, are attributed to silvicultural activities, not forest fires, land use change, disease, drought, or insect damage. Since silviculture is a major cause of forest emissions, the USDA should separate out those emissions in the LULUCF category of the Greenhouse Gas Inventory, and direct any states who use a similar format to adopt this method as well. "Net-growth" does not tell the entire story of forest carbon in the US, and hides potentially large savings from changing silvicultural practices.

E. How can USDA encourage the voluntary adoption of climate-smart agricultural and forestry practices in an efficient way, where the benefits accrue to producers?

Instead of asking how we can ensure benefits accrue to producers, we need to be asking how benefits can accrue to communities at large. Under the Biden Executive Order on climate change 40% of sustainability investments must be directed at historically marginalized low-income and BIPOC communities. Rural, low income BIPOC communities across the Coastal Plain of the US South for example have failed to reap financial benefits from the current model of industrial wood extraction, while bearing the brunt of the impacts. Investing in community-led forest solutions that help keep more forests standing should be a priority.

This question is biased towards protecting the financial interests of producers. This perpetuates economic inequities and fails to consider how land management affects the broader rural community and economy. Forest landowners and forest product companies are not the only stakeholders in the forest economy and we need to stop centering their financial interests above everyone else's. Our priority needs to be solving the climate crisis, building climate resiliency and transitioning to a regenerative economy that works for more people than just those within the supply chain.

2. Biofuels, Wood and Other Bioproducts, and Renewable Energy Questions

A. How should USDA utilize programs, funding and financing capacities, and other authorities to encourage greater use of biofuels for transportation, sustainable bioproducts (including wood products), and renewable energy?

USDA should not encourage or subsidize the expanded use of wood products, because they are emitting significant amounts of carbon dioxide into the atmosphere and working against climate change efforts. In May 2020, over 200 scientists came together to endorse a letter to congress asking that they avoid funding extra logging activities during the pandemic, because the costs of forest products are too high for carbon and wildlife.(John Muir Project, 2020; Scherer, 2020) Those scientists noted that annual carbon emissions from logging in U.S. forests are comparable to emissions from the residential and commercial sectors combined.(Curtis et al., 2018; Harris et al., 2016; John Muir Project, 2020) Equally as important, pollution from wood processing mills, like other major sources of pollution, disproportionately impact low-income BIPOC communities. The question should be reframed - How can USDA utilize programs, funding and financing capacities to facilitate a just transition from industrial forestry and wood production towards greater protection of forests, less pollution and an equitable, clean, regenerative economy?

B. How can incorporating climate-smart agriculture and forestry into biofuel and bioproducts feedstock production systems support rural economies and green jobs?

There is no evidence that the forest products industry supports thriving rural economies or "green jobs." Evidence shows the opposite: that biofuels and biomass production is dirty and destructive, causing air and water pollution and furthering ecological degradation of forests.(Davis et al., 2019)

Wood products facilities are closely tied to domestic and international economics. Wood products facilities are especially prone to closure - in Canada, the average lifespan of a wood or furniture manufacturing facility is less than eight years.(*Manufacturing Plants Have Short Lives*, 2007) Biomass combustion plants are particularly prone to closure because of the high cost of producing fuel and power, when other renewable energies are continuously becoming more competitive.(Patel, 2018) From 2004 to 2009, the South lost over twenty percent of total jobs associated with the wood products industry.(*The Southern Forest Products Industry*, 2016) Areas that are dominated by one industry are more likely to have higher rates of unemployment and be less economically stable.(Malizia & Ke, 1993) Meanwhile, high concentrations of wood products facilities have been found to negatively affect income, education, unemployment, and poverty (Wear & Greis, 2002) as is evidenced throughout the Coastal Plain of the Southern US - the world's largest wood-producing region. When mills close, they leave rural communities in flux with high unemployment and few transferable skills to other positions.

Dirty and destructive wood pellet mills are disproportionately being sited in low income and communities of color, perpetuating systemic environmental racism.(Koester & Davis, 2018) Low income, BIPOC communities across the rural Southern Black Belt are at the epicenter of our nation's industrial logging and wood production and also are ground zero for the recent expansion in the production of wood pellets as fuel for electricity. In addition to health impacts associated with air pollution from wood products facilities, intensive forestry leaves the surrounding forests in an ecologically degraded condition.

The Black Belt is home to the highest percentage of Black population in the nation. Here there is a disproportionately high concentration of poverty, unemployment, and other indicators of socioeconomic stress. Over 85% of the land is privately owned with 99% in the hands of white landowners.(Quisumbing King et al., 2018; Schelhas et al., 2017) A long history of genocide, slavery, and discriminatory policies and practices has restricted Black and Indigenous ownership of forestland throughout the region. Logging and wood production has simply not delivered equitable economic or community health benefits.

Meanwhile, logging tops the list as the most dangerous job in America.(Samuel Stebbins, 2018) Workers in commercial tree plantations and in wood product facilities such as paper mills are regularly exposed to hazardous toxic chemicals that cause serious health problems.(Michael & Wiedenbeck, 2004) On the other hand, outdoor recreation which relies on standing forests, creates five times more jobs than the forest industry and can also help improve community health and well-being.

C. How can USDA support adoption and production of other renewable energy technologies in rural America, such as renewable natural gas from livestock, biomass power, solar, and wind?

USDA should not support biomass or biogas production as it is not clean or green energy.(John Muir Project, 2020) It results in significant CO2 emissions while degrading ecological functions of forests. Renewable natural gas and biomass power should be phased out as soon as possible in favor of low-carbon energies like solar and wind.

4. Environmental Justice and Disadvantaged Communities Questions

A. How can USDA ensure that programs, funding and financing capacities, and other authorities used to advance climate-smart agriculture and forestry practices are available to all landowners, producers, and communities?

As set forth above, the forests and communities of the Southeastern US have become a sacrifice zone, bearing the brunt of the impacts of our nation's unsustainable wood production and consumption. Rural communities of color across the Black Belt of the US South where much of our nation's wood production is concentrated consistently exhibit high poverty and unemployment rates and other indicators of socio-economic stress. If wood production and industrial forestry were a sound rural economic development strategy, the economy in these communities in the world's biggest "fiber basket" should be thriving not struggling. It's time to focus government programs on supporting a regenerative and equitable

economy. That is going to require transitioning away from industrial scale forest extraction, prioritizing investments in forest protection, job training and nature-based job development in communities that have for too long borne the brunt of the impacts of industrial logging.

The USDA cannot equitably distribute programs, funding, and financing to landowning citizens because many citizens won't qualify (less than 10 acres of ownership) and historically, black and indigenous peoples have been prevented from owning land in the South.(Quisumbing King et al., 2018; Schelhas et al., 2017)

USFS should develop a land reparations program designed to put more forestland in the ownership of historically marginalized black and indigenous communities whose ownership has been restricted as a result of discriminatory policies and practices. We should alleviate federal tax burdens on land owned by black and indigenous people to support land retention.

B. How can USDA provide technical assistance, outreach, and other assistance necessary to ensure that all producers, landowners, and communities can participate in USDA programs, funding, and other authorities related to climate-smart agriculture and forestry practices?

Provide tools and research to educate communities about the climate and economic benefits of protected natural forests and the detrimental climate and economic impacts of intensive forestry. Prioritize ensuring 40% of USDA funding at a local level actually ends up in the hands of BIPOC-led community organizations to develop community-led forest protection and ecosystem restoration projects. Too often, by the time federal dollars "trickle down" to the community level, it reflects a fraction of the amount of funding originally intended to go towards local projects.

Help stop the expansion of the wood pellet and other industrial-scale wood product manufacturing facilities in environmental justice communities and support the phase out of facilities in areas where pollution-linked health and climate-related weather impacts are most profound.

Retrain workers and invest in protected lands and in nature-based jobs such as outdoor recreation, restoration, and rewilding.

C. How can USDA ensure that programs, funding and financing capabilities, and other authorities related to climate-smart agriculture and forestry practices are implemented equitably?

Prioritize the establishment of protected forests in BIPOC communities such as the Black Belt of the Coastal Plain of the US South that have for too long borne the brunt of the negative impacts of our nation's wood production. Stop the expansion of wood production in these areas and begin to phase out production in areas suffering disproportionate health and climate impacts. Support a transition toward healthy, regenerative local economies.

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