

FRIENDS of BLACKWATER

571 Douglas Road • PO Box 247 Thomas, WV 26292 • 304-345-7663 • info@saveblackwater.org

November 17, 2021

Council on Environmental Quality
Office of Budget and Management
Re: Docket CEQ—2021—0003—0001

Dear CEQ and OMB officials,

Friends of Blackwater, a conservation organization based in the heart of the million-acre Monongahela National Forest, submits these comments on the Federal Agency Climate Adaptation and Resilience Plans for the U.S. Department of Agriculture's Forest Service and the Department of Interior's Bureau of Land Management.

Among the most significant and far-reaching steps the USDA and DOI can take to enhance climate adaptation and resilience on public lands is to protect older (mature and old-growth) forests and trees across all federal forestlands -- because of their outsized contributions to storing and sequestering carbon, and for the other ecological co-benefits they provide.

The absence of even a mention of older forests and trees in the USDA and DOI action plans is a glaring omission that ignores the scientific consensus that increasing nature-based storage by drawing down accumulated atmospheric CO₂ is necessary **now** -- even if aggressive greenhouse emissions reduction targets were to be achieved by the 2030 and 2050 critical timelines.

We will not duplicate the extensive science submitted on this issue by our nation's leading conservation and forest protection groups. We will simply add our experience -- that **the U.S. Forest Service is continuing to ignore the carbon storage factor** in its management proposals for our region's forest stands.

Logging immediately releases decades of accumulated carbon back into the atmosphere, with only a fraction of live-tree carbon stored in wood products long-term. The released carbon is irrecoverable on any time scale relevant to avoiding the worst impacts of climate change. Tree regrowth/planting following logging, a major plank in the USDA and DOI's climate adaptation and resilience action plans, is not an adequate measure, as **it takes about a century to make up the carbon lost in logging old trees**. And that is time we no longer have.

USDA and DOI should place a moratorium on logging older forests and trees, and initiate a federal rulemaking to protect these forests and trees.

Sincerely,



Judith S. Rodd Director, Friends of Blackwater, Inc.