FEDERAL FOREST
RESOURCE COALITION

Policy Position
Managing the National Forests to Sequester and Store Carbon

Background

Forests play an important role in global carbon cycles. Growth, disturbance, and wildfire are natural processes in forest and rangeland ecosystems. However, in many cases, our national forests are overstocked, unhealthy, and outside the range of natural variation. As a result, wildfires burn hotter, damaging the forest ecosystem, impairing forest regeneration, and releasing substantial amounts of Green House Gases (GHG) into the atmosphere. Other disturbances, such as wind throw and ice storms, can have similar impacts. In order to maximize carbon sequestration and storage on our national forests and BLM lands, the Federal government must:

- Plan and execute forest health treatments at larger scales that meaningfully reduce the threat of catastrophic wildfire; and
- Prepare in advance to recover usable wood fiber and prepare sites to restore green and growing forests while capturing carbon in durable wood products or renewable energy.

Failure to rapidly recover damaged trees and replant damaged stands forgoes the opportunity to store carbon in long-lasting wood products and to resume the process of sequestration by establishing new stands of trees.

USDA and other government researchers have concluded that wildfires are a substantial source of carbon emissions. In addition to releasing $C0_2$, wildfires release substantial amounts of black carbon, which can intensify short-term warming and can reduce snowpack longevity, leading to earlier spring runoff and increased local drought[1]. In many Western States, emissions of CO_2 from wildfire in some years equals or exceeds the emissions from fossil fuel combustion. Even in states with large fossil

FFRC Policy Recommendations

The Forest Service must act on larger landscapes in order to significantly reduce the threat of large catastrophic fires, which have uniquely damaging carbon emissions implications. Significant disturbance events on the National Forest System provide a unique opportunity to capture carbon stored in standing timber, while establishing green and growing forests which will rapidly begin sequestering carbon while protecting watersheds and wildlife habitat. We urge USDA to adopt the following policies which will help sequester and store carbon and restore forests.

USDA and CEQ must take the following concrete steps to address the Wildland fire and forest health emergency, while implementing the President's climate action strategy.

1. **Declare an emergency** on all federal lands designated as condition class 2 or 3 on wildfire risk maps, as well as lands identified as priorities for treatment in a Community Wildfire Protection Plan. **Adopt NEPA compliance strategies** for all such lands, including:

    a) Allow any hazardous fuel reduction project, including creation of fuel breaks, thinning, defensible space around developed property, campgrounds, or other facilities, to be carried out concurrent with development of NEPA documentation.
    b) Ensure that HFRA authorities are utilized on any fuels reduction project on Condition Class 2 or 3 lands, that no more than one action alternative is considered, and explicitly limit required cumulative effects analysis to known impacts of previous management in the project area.
    c) Use an existing categorical exclusion (or develop a new CE) for any hazardous fuels reduction project on condition class 2 or 3 lands recommended by a collaborative group.
    d) Put a firm page limit of 15 pages on EA's for projects on Condition Class 2 or 3 lands in order to expedite action.

2. **Develop Large Scale Responses to Insect Infestations:** Direct each forest with a known insect infestation to develop large scale control projects along the lines of the Black Hills Mountain Pine Beetle Response Project within the next 6 months, using the provisions of the Healthy Forest Restoration Act.

3. **Develop a model forest plan amendment** to allow each National Forest to plan, in advance of any catastrophic event, an active program that allows the Forest Service to leverage existing industry infrastructure to recover usable wood fiber and re-establishes green, growing, and carbon-sequestering forests as rapidly as possible. In general, on lands designated as suitable for timber production or otherwise designated as general forest, the Forest Service should adopt a requirement to recover and reforest at least 75% of damaged acres.

By rapidly adopting and implementing these policies, the Forest Service will help turn around the current negative trend in forest mortality – and carbon sequestration – while putting itself in a position to make sure that future catastrophic events have minimal impacts on forest carbon emissions. Rapid recovery not only ensures that wood from the National Forests will store carbon rather than releasing it, it also allows the agency to establish new stands of trees more quickly. Reforested, young stands have a much higher rate of carbon sequestration than older ones, and certainly exponentially higher than in stands experiencing significant mortality.

The policies recommended above show that better management of the National Forest System can have substantial benefits in terms of carbon sequestration and storage. Of course, these are not the only steps needed to improve the management of our National Forests. In order to successfully implement many of these steps, Congressional action to streamline the way the Forest Service conducts NEPA would be helpful, if not necessary, in the face of nearly constant objections and litigation from groups that do not support any management of the National Forests.

Rapid steps are required to cope with the forest health and wildfire crisis on our Federal public lands. Allowing current negative trends to continue simply diverts precious time and money into needless analysis, while allowing negative carbon trends on the National Forest System to worsen.