



Dear Member of the Energy and Commerce Committee:

RE: Adding a Provision on Reduced Domestic Deforestation to ACES

The undersigned fully support the effort of this Administration, this Congress, and the House Energy and Commerce Committee to address the issue of global warming as an urgent matter. We applaud the work of Chairman Waxman and Chairman Markey and the progress reflected in the Discussion Draft of the American Clean Energy and Security Act (ACES). We also believe that this legislation can be strengthened, and that support for it will grow, if the Act addresses not just international deforestation issues, but deforestation here in the United States as well.

The need to reduce emissions from international deforestation is a major global priority that deserves the attention it receives in ACES, including the allocation of 5 percent of the allowance value of carbon credits. However, the problem of deforestation here in the US is also significant. Domestic deforestation will soon be a *net* source of emissions; it already causes substantial CO₂ emissions and reduces the potential for forests to absorb CO₂ in the future. The United States Forest Service (USFS) has documented that we are losing forests and other open space at an alarming rate. We lose approximately 6,000 acres a day, or the equivalent of two Rhode Islands a year. Over the last century the return of once-cleared lands to forests has helped offset increased industrial emissions. Because recovering forests have outpaced the loss of forest carbon to land clearing, forestland has not been a net emitter of CO₂ in recent decades. However, without intervention this situation will reverse, and already has in some parts of the country. USFS researchers project a net loss of 23 million additional acres of forest lands by 2050.

More broadly, it makes little sense to allow the steady erosion of our natural carbon storage just as we are preparing to spend enormous resources to limit emissions economy-wide. Our domestic forests alone remove and store the equivalent of about 13 percent of our annual CO₂ emissions. The cost of replacing natural carbon sinks - such as through reforestation or wetland restoration, or of substituting for them through artificial means - such as through carbon capture and geological sequestration, far exceeds the cost of simply protecting the carbon stores in forests we already have. The country would benefit from avoiding the loss of carbon in our undeveloped natural landscapes and from managing the land to protect its carbon storage value where appropriate. The country would also benefit from safeguarding the many other economic and ecological values existing forests provide. While it is hoped that domestic forest offset markets (if and when established) will help slow forest carbon loss, we cannot rely on markets alone to achieve our domestic deforestation reduction objectives.

The straightforward remedy is to set domestic goals for reduced deforestation that mirror those proposed for other nations. This spirit of equitability would advance U.S. interests in reducing deforestation overseas. We recommend that the Committee insert a domestic provision similar to the internationally focused, “Part E -- Supplemental Emissions Reductions from Reduced Deforestation.” We further recommend that the allowance value for this purpose be approximately 2 percent for the US – less than the 5 percent the Act established for developing countries, but sufficient to implement an effective domestic program. This allowance value would be used to assist the states and the federal government to establish “no net loss of forest carbon” policies and programs within five years; establish 2020 and 2025 emissions reductions targets; set baselines and monitoring systems for measuring progress towards these targets; establish standards; and fund forest preservation activities in order to help states reduce deforestation and meet their forest carbon objectives.

The United States must be as ambitious in achieving our domestic forest carbon goals as we are proposing for other countries. The addition of a robust domestic deforestation provision in ACES would achieve this important goal. It would reverse the anticipated trend of escalating domestic forest carbon loss, and ensure that U.S. existing carbon stocks do not dwindle further. It would protect current carbon sinks in lieu of far more expensive replacement options, while providing additional economic and ecologic benefits to the American people. And it would give the U.S. greater standing in its key efforts to slow deforestation internationally. Thank you for your consideration of our comments and recommendations on this important climate issue.

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