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July 29th, 2021

The Honorable Ron Wyden
221 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Joe Neguse
1419 Longworth House Office Building
Washington, DC 20515

RE: Concerning Provisions of the 21st Century Conservation Corps that are Inconsistent with a True Civilian Climate Corps

Dear Senator Wyden, Representative Neguse, and other Members,

We the undersigned environmental, scientific and faith-based organizations, individuals and on behalf of our members and supporters write to express our concerns and opposition to specific provisions of HR 1162/S 487, the ‘21st Century Conservation Corps Act’, introduced by Rep. Neguse (D-CO) and Sen. Wyden (D-OR) which would critically damage our National Forests and Public Lands and accelerate climate change. While there are several sections of this bill that are worthy of support, including the grant program for planting trees in urban areas and support for outdoor recreation, the legislation also supports programs that would increase destructive logging on public and private lands.

Touted as “wildfire resiliency”, the troubling provisions of this bill would pump an additional \$6 billion into accelerating the continued removal of native vegetation and trees from our forests, activities that most often increase wildfire intensity/severity, while also increasing carbon emissions and eliminating the very trees and vegetation that we need to lower the amount of carbon in our atmosphere, maintain biodiversity and help us cool the planet. Such provisions have no place in a Conservation or Civilian Climate Corps and we encourage you to strip the following (or similar) provisions from any Reconciliation package which moves to implement the American

Jobs Plan. Below is a brief description of the harmful provisions, which would increase threats to communities and worsen climate change:

- \$3.5 billion in additional funding over three years (a tripling of current annual funding levels) for removal of native vegetation and trees on National Forest System lands that are deemed “hazardous fuels” by the US Forest Service. **Section 2(a)(1)(A)(i)**. Though well-meaning, the attempt to subject these projects to some conditions unfortunately does not prohibit the use of this money for logging or the sale of timber from public lands, including mature and old trees. Nor does it ensure robust environmental analysis (many projects are done through categorical exclusions or tiered to historic documents with no notice to the public). Such “sideboards” have proved to be unenforceable in court. But most concerning is that these activities, which have been practiced for decades, greatly increase carbon emissions, and are not effective at altering fires that are primarily driven by weather and climate or protecting communities.
- \$150 million additional funding (a tripling of current annual funding levels) to the Collaborative Forest Landscape Restoration Fund which encourages groups to collaborate on promoting projects that increase logging and use native forests as “feedstock” for biomass energy facilities that emit even more carbon than burning coal for equal energy produced. **Section 2(a)(1)(A)(ii)**
- \$100 million (a tripling of current annual funding levels) for logging and vegetation removal at the landscape scale on private, state and tribal lands. **Section 2(a)(1)(C)(i)**
- An additional \$100 million for the Community Wood Energy and Wood Innovation Program which subsidizes the building of energy systems that burn wood or facilities that turn trees into wood products, incentivizing the removal of trees from our forests and increasing the emission of carbon into the atmosphere and pollutants into communities. **Section 2(a)(3)**
- Another \$2 billion for the Bureau of Land Management to double the amount of funds they use to remove native vegetation and trees from wildlands. **Section 2(a)(4)(A)(i)** This funding would, as discussed above, be wholly ineffective in reducing fire risk and would critically damage native ecosystems and their ability to store and sequester carbon, all while increasing overall greenhouse gas emissions.
- \$45 million specifically designated to subsidize and expand logging on tribal lands. **Section 2(a)(4)(D)(ii)**.
- \$3.5 billion annually to establish tree plantations on federal lands. **Section 10**. While planting trees sounds like a good thing, forests do not actually need to be replanted after natural disturbances. They simply grow back naturally as they have for over three hundred million years. While none of this money could be used to log a burned area or replant an area that was recently logged after a fire, the provision that allows for funds to be used for “site-preparation” would facilitate harmful activities involving bulldozing trees and shrubs into piles for on-site burning and the widespread use of the carcinogenic herbicide glyphosate to kill all remaining live vegetation.

Rather than allocate over \$6 billion dollars to eliminate native vegetation and increase logging, or \$3.5 billion per year to plant trees in forests that do not need to be planted, this money should be invested in putting our young people to work on public and private lands in their geographic region doing jobs that will enhance the environment, reduce emissions and help to draw carbon out of the atmosphere while creating community resilience to the impacts of climate change. Such jobs could include:

- Harden homes and community facilities against extreme weather events such as wildfires, hurricanes, as well as flooding and sea surge;
- Vegetation pruning within 100 feet of homes and buildings to create defensible space and make it easier for fire-fighters to protect homes;

- Decommission and rewild roads, skid trails and timber landings;
- Maintain Level 4 roads;
- Upgrade culverts;
- Reintroduce beavers and other native species;
- Non-toxic invasive plant reduction - an ignition source as well as a competitor with native plants for wildlife;
- Maintain and increase trails and interpretive centers;
- Maintain and staff campgrounds;
- Provide staffing on public lands as recreation officers to assist visitors and prevent unplanned human ignitions;
- Install water bars and road blocks for closed roads;
- Supporting native species by installing nest boxes, bat boxes, and plugging the tops of pipes on gates and other human infrastructure that pose hazards for wildlife;
- Repair livestock damage to stream banks and protect streams/riparian areas from livestock impacts;
- Creation of cattle exclosures;
- Removing barbed wire fences to protect wildlife and ensure freedom of movement and access to critical areas within their range;¹

Sincerely,

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Allen Johnson
Christians For The Mountains

Connie Hanson
Christians Caring for Creation

Raena Garcia
Friends of the Earth

¹ Endnotes:

- 1: See e.g. (a) <https://johnmuirproject.org/wp-content/uploads/2020/05/200TopClimateScientistCongressProtectForestsForClimateChange13May20.pdf>
 (b) <https://www.dogwoodalliance.org/wp-content/uploads/2018/08/Industry-Impacts-on-US-Forests.pdf>
 (c) https://www.researchgate.net/publication/267028232_The_Role_of_Defensible_Space_for_Residential_Structure_Protection_During_Wildfires
 2: See e.g. <https://www.frontiersin.org/articles/10.3389/fevo.2021.596282/full>;
https://www.fs.fed.us/psw/publications/north/psw_2019_north002.pdf)

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