



To: Chris French, Deputy Chief, USFS  
Meryl Harrell, Deputy Under Secretary for Natural Resources and Environment  
Sean Babington, Senior Advisor, Office of the Secretary

Cc: Kathleen Rutherford Riggs, USFS  
Stephene Harding, CEQ

September 15th, 2024

Re: Public comments for the draft EIS for the Nationwide Old-Growth Amendment

Dear Secretary Vilsack and Chief Moore,

Thank you for your efforts to protect mature and old-growth trees and forests. Please find the comments below from 1,107 people of faith and conscience collected by Interfaith Power & Light. I'm also submitting 297 comments on behalf of Sisters of Mercy.

I've submitted them via a spreadsheet form because of the challenges of submitting individual comments through the CARA system. On the following page is the comment they submitted.

Thank you for the opportunity to comment.

Tiffany Hartung  
Interfaith Power & Light, Chief Strategy Officer  
tiffany@interfaithpowerandlight.org

Washington, D.C. Office: 100 Maryland Ave. NE, Suite 400, Washington, DC 20002  
+1-510-444-4891 • info@interfaithpowerandlight.org • www.InterfaithPowerandLight.org  
facebook.com/interfaithpowerandlight • twitter.com/interfaithpower •  
instagram.com/interfaithpowerlight

Dear Secretary Vilsack and Chief Moore,

Mature and old-growth trees and forests protect our climate by absorbing and storing carbon, boost resilience to fire, help regulate temperatures, filter drinking water and shelter wildlife.

As people of faith, we believe we have a moral responsibility to care for our Sacred Earth and ensure these forests remain to mitigate climate change and maintain their natural benefits for current and future generations.

The Draft Environmental Impact Statement fails to protect old-growth trees and forests. The proposal allows old-growth trees to be sent to the mill and allows agency staff to manage old-growth out of existence in pursuit of “proactive stewardship” goals. The draft also contains ambiguous language that could be used to justify continued commercial logging of old growth in the Tongass National Forest.

The final record of decision should:

- End the cutting of old-growth trees in all national forests and all forest types, and end the cutting of any trees in old-growth stands in moist forest types.
- End any commercial exchange of old-growth trees. Even in the rare circumstances where an old-growth tree is cut (e.g. public safety), that tree should not be sent to the mill.

The draft also fails to protect mature trees and forests. Mature forests and trees – future old growth – must be protected from the threat of commercial logging in order to recover old growth that has been lost to past mismanagement. Protection of mature forests can be accomplished in a manner that is consistent with addressing the threat of fire. They must be protected to aid in the fight against worsening climate change and rampant biodiversity loss. And they must be protected to ensure that our children are able to experience and enjoy old growth.

We urge you to use this moral opportunity to protect our oldest trees and forests.

Sincerely,