



## CREATION JUSTICE MINISTRIES

**To: Chief Randy Moore, U.S. Forest Service**

**Re: Comments on the Draft Environmental Impact Statement for Land Management Plan Direction for Old-Growth Forests**

**Date: September 19, 2024**

Creation Justice Ministries (CJM) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Land Management Plan Direction for Old-Growth Forests. We commend the Forest Service for recognizing the critical importance of these forests, which, as Psalm 104 tells us, “the trees of the Lord are watered abundantly; the cedars of Lebanon that he planted. In them the birds build their nests” (Psalm 104:16-17). These ancient ecosystems sustain not only wildlife but also the spiritual and physical well-being of communities.

While we appreciate the steps taken, we believe that the DEIS does not go far enough to protect these invaluable ecosystems, which play a significant role in mitigating climate change and preserving biodiversity. As Christians, we are called to protect, restore, and rightly share God’s creation. Our responsibility requires that we advocate for strong and enforceable protections for mature and old-growth forests. Therefore, we ask that the Forest Service adopt a modified version of Alternative 3 in the final record of decision.

Specifically, we urge the Forest Service to include the following:

**1. End the Cutting of Old-Growth Trees in All National Forests and Forest Types:**

The final decision must prohibit the cutting of old-growth trees in all national forests and forest types. Additionally, it should end the cutting of any trees in old-growth stands in moist forest types, where these ecosystems are most vulnerable. The current DEIS leaves room for ambiguity, and stronger, unequivocal language is needed to safeguard these trees from logging and other forms of exploitation.

**2. End Any Commercial Exchange of Old-Growth Trees:**

Even in rare circumstances where an old-growth tree must be cut for reasons such as public safety, that tree should not be sent to the mill. We support the “no commercial exchange” provision of

Alternative 3 and ask that this prohibition be applied universally. These trees are ancient, sacred gifts from God, and it is morally wrong to allow their commercial exploitation.

**3. Remove the “De Minimis” Logging Exception:**

The DEIS currently allows for “de minimis” logging of old-growth trees, which creates a dangerous loophole. We urge the Forest Service to remove this exception entirely.

**4. Eliminate the Agency’s Discretion to Manage Old-Growth Out of Existence in Pursuit of “Proactive Stewardship”:**

The final decision should eliminate any provision that allows the Forest Service to manage old-growth forests out of existence under the guise of “proactive stewardship.” The DEIS gives too much discretion to agency staff to remove the “old-growth” designation from forests. Any plan that allows for the degradation or reclassification of old-growth forests fails to live up to our sacred responsibility to protect creation.

In closing, we urge the Forest Service to adopt these recommendations as part of a modified Alternative 3. By doing so, we can ensure the long-term protection of old-growth forests, which serve as both a carbon sink and a place of spiritual refuge. As followers of Christ, we believe that protecting these ecosystems honors God’s creation and secures a healthier, more just future for all.

Thank you for considering these requests. We look forward to the adoption of a final policy that reflects a true commitment to conservation and the protection of our national forests.

Sincerely,  
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*Creation Justice Ministries (formerly the National Council of Churches Eco-Justice Program) represents the creation care and environmental justice policies of major Christian denominations throughout the United States. We work in cooperation with 38 national faith bodies including Protestant denominations and Orthodox communions as well as regional faith groups, and congregants to protect and restore God's Creation.*

***Creation Justice Ministries' Member Communions include:***

African Methodist Episcopal

African Methodist Episcopal Zion

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National Baptist Convention of America, Inc.

National Baptist Convention USA, Inc.

Progressive National Baptist Convention

Eastern Diocese of the Armenian Church of America

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Christian Church (Disciples of Christ)

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