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Comments: Thank you for inviting me to submit comments on the June 2024 Draft Environmental Impact Statement ("DEIS") regarding Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System ("Old-Growth Forest Amendments").

As you are aware, the Old-Growth Forest Amendments DEIS was intended to advance President Biden's 2022 Earth Day executive order to conserve and restore America's mature and old-growth forests. The Biden administration's executive order was issued because mature and old-growth forests are vital to providing clean water, absorbing carbon pollution, and supplying habitat for wildlife. This initiative is important because the federal government manages approximately 32 million acres of old-growth (18% of federally managed forest land) and 80 million acres of mature forests (45% of federally managed forest land), for a total of 112 million acres on federal land.

Unfortunately, the Old-Growth Forest Amendments DEIS falls short of the Biden administration's call to action for at least two reasons.

First, the Old-Growth Forest Amendments DEIS limits itself to the management of old-growth forests, and not mature forests, thereby failing to provide a national structure for the management of forests that have a strong likelihood of becoming the next generation of old-growth forests. This is not only contrary to the Biden administration's mandate, but it also fails to preserve and guarantee old-growth forests for generations to come. It is imperative that we emphasize the protection and preservation of tomorrow's old-growth forests-mature forests-as a tool to protect against ongoing and future impacts from climate change. Moreover, older trees are more fire resistant and stronger protections for mature trees would not materially impact the U.S. Forest Service's ability to address and plan for wildfire risk.

Second, the Old-Growth Forest Amendments DEIS does not outright ban the logging or timbering of old-growth forests. On the contrary, the U.S. Forest Service provides a multitude of loopholes through which old-growth forests will be subject to harvesting. This is antithetical to the Biden administration's edict to protect these forests and akin to sawing off the branch you're sitting on. The Old-Growth Forest Amendments DEIS should be amended to include logging or harvesting activities in old-growth forests only where it is absolutely necessary for the protection of the forests or human health and safety.

I have an interest in the Old-Growth Forest Amendments DEIS given that the SNF has approximately 100,000 acres of old-growth forest and 460,000 acres of mature forest, according to its most recent Land and Resource Management Plan. (See 2004 Superior National Forest Land and Resource Management Plan at Appendix A-23). Sadly, as noted in that 2004 Forest Management Plan, "[m]any of the stands meeting existing old growth criteria, and others that have high potential for meeting these criteria in the not too distant future, would be

available for timber management activities. Therefore, the pool of stands with old growth potential could be reduced, perhaps substantially." Id.

Unless the Old-Growth Forest Amendments DEIS is broadened to include the protection of mature forests and strengthened to categorically prohibit the harvesting of such aforementioned forests except in the most necessary instances, the U.S. Forest Service will both fail the Biden administration's charge and the American people by slowly eroding existing old-growth forests and not protecting the next generations' old-growth forests.

?The forest was once our haven, our refuge from the violence and chaos that consumed our homeland. As the war in Laos escalated and our people became the targets of relentless persecution, we, the Hmong, had no choice but to flee. We left behind our villages, our homes, and all that was familiar, taking only the clothes on our backs and the hope for survival. The dense, ancient forests of Southeast Asia became our shield, a place where we could disappear into the trees, hiding from our oppressors who sought to wipe out our existence.

The journey was perilous. For days, sometimes weeks, we would navigate the treacherous terrain, where the jungle's thick canopy provided a natural cover but also created a world of uncertainty. The forest was both our protector and our greatest challenge. We had no provisions, no shelter, no safety nets. We were forced to rely on the land to provide for us—roots and herbs for medicine, wild fruits and small animals for food, leaves and branches to build makeshift shelters. The forest, with its towering old-growth trees and dense underbrush, became our sustainer, and we learned to move like shadows through its paths.

We knew the dangers that lurked in the wilderness—the poisonous plants, venomous snakes, and unpredictable weather—but none were as deadly as the threat of being discovered by our enemies. We lived in constant fear, the sounds of helicopters overhead or the sudden crack of gunfire in the distance reminding us that we were never truly safe. Yet, the forest held us, giving us the means to survive when all else was lost. The trees stood as silent witnesses to our suffering, as we clung to life in a world that wanted us erased.

For generations, the Hmong people had lived in harmony with the forests, understanding their rhythms, respecting their power. It was this knowledge that helped us survive in the most desperate of times. We knew how to blend in, how to move through the forest without leaving a trace. We whispered our prayers to the spirits of the trees, asking for protection and guidance. The old-growth forests, ancient and resilient, mirrored our own struggle for survival.

As we journeyed through these forests, we carried with us not just the weight of our present suffering, but the legacy of our ancestors and the hope for a future. Every step we took through the forest was a step toward freedom, toward a new life, even as the cost of survival grew heavier. Many of us would never leave the forest; they became the resting places of our fallen, hidden graves beneath the trees that had sheltered us.

Today, when I hear about efforts to protect old-growth forests, I think of those ancient trees as more than just part of the natural landscape. They are living memorials, reminders of the lives saved and lost in their embrace. To protect these forests is to honor our history, to preserve the sanctuaries that once gave shelter to the oppressed. Without these forests, we would not have survived.

Our survival, like the survival of these old-growth forests, is a testament to resilience, endurance, and hope. And just as the forest gave us life in our darkest hour, we must now fight to ensure that these ancient woodlands are protected, so that they, too, may stand for generations to come.