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Title:

Comments: Esteemed US Forest Service,

In reference to Amended NW Forest Plan, on the behalf of the residents of Deadwood, OR, we the Deadwood Community Action, urge you to:

- 1) Protect Old Growth and Late Successional Reserves
- 2) Enhance Ecosystem and Habitat Protection
- 3) Increase Climate Resilience and Economic Value of Old-Growth
- 4) Implement Wildfire Management Based on Best Science
- 5) Apply Tribal Inclusion and Co-Stewardships
- 6) The Amendments outlined in Draft Environmental Statements, we strongly oppose

We the residents of Deadwood, OR, have deep personal connection to these forests, which have provided me with clean water to drink, variety of biodiversity to observe, a beautiful forest to reside within, and a deep sense of spiritual peace, part of my life and community. Knowing that these lands are a home to ancient trees and diverse wildlife fills me with a sense of responsibility to speak up for their protection. We are particularly concerned about the threats these changes pose to old-growth forest and Late Successional Reserves (LSRs), which play an irreplaceable role in maintaining biodiversity, climate stability and cultural values.

#### 1) Protect Old Growth and Successional Reserves

Old-growth forests are a national treasure. Yet, over million acres within a plan area remain unprotected. These ancient stands are irreplaceable for safeguarding biodiversity, establishing climate refugia, and maintain clean, cold water sources essential for wildlife and downstream communities. They are also vital for fire resilience, cultural significance, and outdoor recreation.

The proposed amendments, particularly Alternatives B and D, increase logging levels and open up broader areas of mature trees for commercial exploitation. This approach jeopardizes critical habitats and undermines the ecological integrity of these ancient forests. Scientific evidence indicates that logging old-growth stands reduces bio-diversity, threatens species that rely on complex canopy structures, and disrupts carbon sequestration (Frankin et al..2002).

Hence we urge the forest service to reject all the amendments that weaken old-growth and Late Successional Reserves. Instead the Forest Service should prioritize full protection of these area, ensuring they remain undisturbed for future generations.

#### 2) Ecosystem and Habitat Protections

The DEIS proposes increased logging and "active management" practices that pose significant threats to the region's water quality, wildlife habitats, and overall ecosystem health. In particular, the proposed changes could harm riparian areas which are critical for species like salmon and bull trout. These ecosystems also provide clean drinking water for surrounding communities.

The original NW Plan was grounded in a science based, ecosystem-driven vision that prioritized the protection of endangered species and habitat connectivity. Unfortunately the current amendments stray from this approach, shifting focus toward increased timber extraction without fully considering the short and long term ecological consequences.

Pacific NW Forests are home to endangered species such as the northern spotted owl and marbled murrelet which depend on mature forest habitats. Studies have shown that habitat fragmentation and loss due to logging are primary threat to these species. The proposed amendments do not sufficiently safeguard these critical habitats.

We call on Forest Service to maintain and enhance protection for riparian areas, old growth stands, and critical wildlife habitats. Any management action should be eco-system based, prioritizing biodiversity and long term forest health over short term timber profits.

### 3) Climate Change Resilience and Economic Value of Old Growth

Old-growth are powerful carbon sinks that play a crucial role in mitigating climate change. They store vast amount of carbon, and preserving them is one of the most effective natural solutions for addressing global warming. Conversely, logging these mature forests releases stored carbon, exacerbating the climate crisis (Luyssaert et al., 2008).

The economic value of these forests extend beyond timber. They contribute to climate stability, clean and water, and recreational opportunities that support local economies. focusing primarily on timber profits overshadows the long term economic and ecological benefits that intact old-growth ecosystems provide.

Therefore we strongly urge the US forest Service to recognize and prioritize the climate and economic value of old growth forests. Protecting these ecosystems contributes to regional climate resilience and provide sustainable economic opportunities through recreation, tourism, and ecosystem services.

### 4) Wildfire Management Based on Best Science

We acknowledge the need for wildfire risk reduction, especially in the face of climate change. However, effective fire management must be driven by science and should prioritize ecosystem integrity over timber profits. The current amendments overemphasize vegetation management and logging as wildfire solutions without fully considering ecological impacts. Best practices for wildfire management involve protecting mature wet forests which are naturally more fire resistant due to their moisture retention and structural complexity. The Forest Service should focus on creating fire adopted communities, protecting homes and infrastructure, and allowing natural fire regimes to maintain healthy ecosystem.

We urge the forest service to adopt science based wildfire management strategies that prioritize ecological resilience and protect Late Successional Reserves. Any fuels reduction treatments must be carefully evaluated to ensure they support wildlife habitat and ecosystem health.

### 5) Tribal Inclusion and Co-Stewardship

We appreciate the addition of tribal inclusion in the amendments. However, the true progress requires meaningful consultation with tribes, respecting their sovereignty and supporting traditional practices such as cultural burning and harvesting of first food. Co-stewardship agreements should be fully implemented to ensure that tribal knowledge and values are integrated into forest management.

The Forest Service must prioritize tribal sovereignty and work collaboratively with tribal nations to restore and protect culturally significant landscapes. These partnerships are essential for holistic ecosystem stewardship and justice for indigenous communities historically excluded from decision making processes.

## Conclusion

We the residents of Deadwood, imbedded in the embrace of Pacific North West Forest, hold it as a key to our aesthetic, intellectual, cognitive and even spiritual fulfillment. These forest are more than timber resources--they are vital ecosystem that sustain life, community well-being, and our share natural heritage. Hence, we urge USDA Forest Service to reject the proposed amendments to NW Forest Plan, instead:

We advocate for full protection of old-growth forests, Late Successional Reserves, and critical habitats to safeguard biodiversity, combat climate change, and honor cultural values.

The Forest Service should focus on ecosystem-driven management practices that respect tribal sovereignty, prioritize climate resilience, and enhance long term environmental health.

Thank You for considering our comments. Hopefully Forest Service will take bold and thoughtful action to protect these irreplaceable forests for future generations.

Sincerely,  
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Environmental Protection Committee  
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