Data Submitted (UTC 11): 3/13/2025 2:46:54 AM First name: Amy Last name: Rachkowski Organization: Title: Comments: Dear decision maker,

I am deeply concerned that the Forest Service's proposed amendment to the NWFP weakens protections for our region's older forests, clean water, and wildlife habitat. I live in Mount Shasta, California surrounded by the Shasta-Trinity and Klamath National Forests. Part of what makes this area unique is it's incredible biodiversity, wild, remote areas and stands of old growth and mature forests. Now more than ever it is critical that we take steps to protect and manage the integrity of these ecosystems for future generations of ALL species not just humans.

I have devoted the past 17 years to a professional career as a field botanist studying and documenting our rare, special-status plant species to protect them from the detrimental impacts of development and timber harvest. I spend my free time recreating in these beautiful forests; hiking, backpacking and backcountry skiing in these mountains, rafting the wild rivers and swimming in the pristine mountain lakes. Our public lands and national forests are the gems of our nation. They are what make our country truly exceptional. The Klamath Mountains have been called the Galapagos of North America because the area hosts an astonishing diversity of species, many of which are endemics found nowhere else on the planet. We must prioritize the preservation of this biodiversity when developing any plan to manage these incredible forests.

I am concerned that if enacted, changes to the NWFP would significantly increase logging levels across our public forests, open mature and old-growth trees to commercial logging, and sideline the protections that communities, wildlife, and ecosystems depend on. As you know, the Northwest Forest Plan centered ecosystem health as a primary goal. It remains unique in its vision, and uniquely successful as a model for forest management. In the decades since unchecked logging across national forests in the northwest, the Plan has largely preserved remaining old-growth forests. It thereby has preserved critical habitat for endangered old-growth dependent species such as the spotted owl and marbled murrelet; cold and clean streams for species including salmon and trout, as well as for downstream communities' drinking water supplies; and an irreplaceable store of carbon.

The central pillars of the NW Forest Plan were put in place to ensure these ecosystems can be sustained. Those pillars include land use allocations such as the Late Successional Reserves which have helped ensure distribution and abundance of old-growth forests in perpetuity, and measures like the Aquatic Conservation Strategy to protect river corridors from degradation. Any amendment that undermines the foundation of the NW Forest Plan, like Alternative D, should not be considered.

There are valid reasons to update the Northwest Forest Plan. We must include indigenous communities in the creation and implementation of a plan. We do need to ensure appropriate management in an era of wildfire, and that must be directed by the restoration of ecosystem health, not by timber profits. The Forest Service should retain all of the Tribal inclusion plan components analyzed in the DEIS.

I also support elements of the proposed amendment that include a beneficial fire approach and support of indigenous cultural burning and co-stewardship agreements. Fire resistance and resilience can be bolstered by preserving and restoring mature and old-growth forests. Fuels and fire management should focus on the home ignition zone and on non-commercial treatments and beneficial fire use, not commercial logging. Indigenous cultural burning and wildland fire use should be prioritized. Commercial logging for fuel reduction can negatively impact wildlife habitat, remove large fire-resistant trees, introduce invasive species, and create hazardous fire conditions. Standards must ensure that fuel reduction is both needed and effective before logging is allowed.

Moving forward as stewards of these forests, we must evolve beyond our reductionist and anthropocentric ecosystem views and not regress back to pre-Northwest Forest Plan times, where timber harvest was prioritized above all else. The highest values of our oldest forests can only come from keeping them standing. The NW Forest Plan recognized this in 1994. The amendment should also recognize the wide variety of social and economic benefits national forests provide for local communities and the region as a whole - not just timber, but also clean water, climate stability, quality of life, and outdoor recreation opportunities.

I appreciate your time and consideration and am hopeful that the amendment to the NWFP will ultimately be for the betterment of these forest ecosystems.

Sincerely, Amy Rachkowski