

Data Submitted (UTC 11): 3/17/2025 11:32:04 PM

First name: Janelle

Last name: Chojnacki

Organization: The Wildlife Society, California North Coast Chapter

Title: President

Comments: To Whom It May Concern:

As President of the California North Coast Chapter of The Wildlife Society, I would like to submit comments on the Northwest Forest Plan Amendment #64745 on behalf of our membership. There are approximately 125 wildlife professionals who are members of the California North Coast Chapter of The Wildlife Society (CNCCTWS). We are based in Arcata, CA, and our mission is to enhance the ability of wildlife professionals and wildlife students to conserve biodiversity, sustain productivity, and ensure responsible use of wildlife resources and habitats. The California North Coast Chapter is part of the Western Section of The Wildlife Society, which is comprised of eight local Chapters, representing over 1,000 professional wildlife managers, biologists, ecologists, botanists, and students from California, Hawaii, Nevada, and Guam. These Chapters are organized as a unit of an international organization called The Wildlife Society (TWS; wildlife.org). TWS is an international non-profit scientific and educational association, representing over 15,000 wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education, all devoted to the sustainable conservation of wildlife and wildlife habitat in the western United States.

We have the following comments and recommendations on the proposed amendment to provide on behalf of the CNCCTWS membership:

1. Fire Resistance- The Plan should focus on alternative ways to provide fire resistance other than commercial logging. Preserving and restoring old-growth and mature forests bolsters fire protections due to the fire resistant nature of mature and old-growth trees. Shifting towards stand establishment dates and away from stand age considerations prevents older stands from ageing into protection and minimizes the number of fire resistant old-growth trees on the landscape. The definition adjustment of a "young" stand from 80 years old to 120 years old puts these intact, fire resistant mature and old-growth stands at risk. Fuels management should include indigenous cultural burning and wildlands fire use so as to maintain fire resistance, while keeping wildlife habitat and water quality intact. Fire resistance and fuels reduction strategies should be focused on areas surrounding communities landscapes and communities should implement fire resistant building measures. Alternative C focuses on prescribed burns and selective thinning in fire-prone areas to maintain fire resilience while preserving critical habitats. Salvage logging should be prohibited in dry late-successional reserves except in the rare circumstance where it is warranted, such as for the removal of roadside hazards.
2. Tribal Inclusion - The Forest Service should retain all of the tribal inclusion plan components analyzed in the DEIS. It should acknowledge the effectiveness of indigenous burning practices while implementing strategies to allow for indigenous land management and Traditional Ecological Knowledge. It should ensure that sacred sites, traditional food sources and medicinal plants are protected from habitat destruction. The plan should increase access to ancestral lands for cultural, ceremonial and subsistence purposes and support tribal rights to sustain indigenous communities.
3. Species protection - The NWFP was originally designed to safeguard vital habitat for threatened and endangered species like the northern spotted owl, marbled murrelet, and Pacific salmon. The preservation of biodiversity, species abundance and contiguous wildlife habitat should be a core principle of this plan. However, the proposed Alternative B prioritizes increased logging, including in forests up to 120 years old, which threatens critical ecosystems. In contrast, Alternative C expands protections for old-growth forests and maintains habitat connectivity, ensuring these species have the stable environments they need to survive and recover. This alternative strengthens late seral reserves, which ensures these forests continue to provide critical habitat. The reinforced protections for streams and watersheds within Alternative C ensures clean water and habitat for aquatic species.

On behalf of our membership, we recommend that the Forest Service select Alternative C, with some minor

changes, to better protect forest ecosystems and to incorporate tribal participation in forest management. Alternative C, as currently written, does not incorporate the tribal involvement provisions contained in the Proposed Action. Therefore, we recommend that Alternative C be modified to incorporate this involvement. We also recommend that Alternative C should be modified to prohibit post-fire salvage logging, which can increase water pollution, damage forest ecosystems, and negatively impact carbon storage.

Sincerely,
Janelle Chojnacki
CNCCTWS President