



# L.I.G.H.T. FOUNDATION

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Leadership  Indigenous  Guardian  Honor  Teach

30 January 2024

Regional Forester, U.S. Forest Service  
1220 SW 3rd Avenue  
Portland, OR 97204

*Sent via electronic submission via webform to:*

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=64745>

RE: [Region 5 & Region 6: California, Oregon, and Washington: Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl](#)

Dear Regional Foresters of Pacific Northwest & Southwest Regions,

The [L.I.G.H.T. Foundation \(LF\)](#) is an independent, Indigenous-led, conservation 501(c)(3) nonprofit organization established on the Colville Indian Reservation in the traditional territory of the Nespelem Tribe. We support the restoration and cultivation of native plant and pollinator species of Pacific Northwest Tribes and the culturally respectful conservation of habitats and ecosystems which are climate resilient and adaptive.

This letter provides comments on the Forest Service's notice of intent to prepare an environmental impact statement for Northwest Forest Plan (NFP) amendment #64745: U.S. Forest Service; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl, Notice of Intent to Prepare an Environmental Impact Statement, 88 Fed. Reg. 87393 (Dec. 18, 2023)<sup>1</sup>.

Indigenous Peoples (IP) and the ecosystems we have stewarded for time immemorial have been adversely impacted by the industrialization and privatization of resources for commodification and extraction. This has manifested in many forms since contact with Euro-Americans and has resulted with fractionated lands, piecemeal protections for environmental and public health, and reduced the resiliency of Indigenous cultural ecologies. The proposed NFP amendment provides us with an opportunity via public comment to address

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<sup>1</sup> Northwest Forest Plan Amendment:

[https://www.fs.usda.gov/detail/r6/landmanagement/planning/?cid=fsbdev2\\_026990](https://www.fs.usda.gov/detail/r6/landmanagement/planning/?cid=fsbdev2_026990) and  
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=64745>

the negative impacts these structures have had on the human rights, Indigenous food systems, habitats, species, socio-economic, and cultural heritage of IP throughout California, Oregon, and Washington.

The NFP is an unprecedented, science-based, regional ecosystem management plan to ensure the viability of fish and wildlife associated with late-successional and old-growth forest ecosystems in the Pacific Northwest and to economically support local communities. These forest ecosystems are vital to our region, providing cold, clean water and other functioning ecosystem services necessary for species survival, mitigation against climate change, with older forests that support enormous biological diversity. As IP have known since time immemorial, these forest ecosystems are living landscapes integral to cultural identity, traditional trade economies, and Indigenous food systems. Since its establishment in 1994, the NFP has improved watershed conditions and reduced threats to mature and old-growth forests and the plants and animals living there, including many very rare, unique species only found in the Pacific Northwest.

However, there are ways to improve the NFP to make it more substantially inclusive of IP and to address the impacts resulting from climate change. Climate stressors and disturbances such as fire, drought, windstorm, and flood events reduce the resiliency of these landscapes and negatively impact IP's relationship with and access to their traditional territories.

To meet these challenges and to secure healthy ecosystems into the future, the Forest Service should take a targeted, inclusive science-based approach to amend the NFP for climate resilience. Specifically, LF recommends that the amendment should:

1. Protect mature and old-growth ("Elder") stands in moist forests and protect mature and old-growth trees in seasonally dry forests. Elder stands and trees are inordinately important for storing carbon, supporting biological diversity, and resisting stress from fire, drought, and other disturbances. Additionally, Elder stands will provide important seed sources genetically attuned to local conditions and robust at adapting to changing conditions over time.
2. Recognize and address threats from climate change, such as increasing flood, fire, drought, and windstorm activity. Accordingly, the NFP amendment must establish clear standards and guidelines for reducing road density to 1-2 miles/m<sup>2</sup> and hydrologically decoupling the road network from aquatic ecosystems to support water quality throughout the watershed. In the uplands, the NFP should prioritize restoring landscape spatial patterns of native plants desirable to native pollinators that increase resilience to disturbance and fluctuations in soil moisture, as well as characteristic fire activity in drier forests.
3. Incentivize Indigenous-led leadership to establish habitat connectivity standards and guidelines which prioritize native plants of Indigenous food systems. This will support native pollinator species and wildlife movement to adapt to changing climate and habitat

conditions, including establishing road density standards and other measures, especially proximate to crossing structures or other identified connectivity pathways.

4. Incentivize Indigenous-led management goals, priorities, and strategies of conservation and stewardship informed and sustained by Indigenous Knowledges (IK) in non-extractive and ethically responsible ways.
5. Through the development of an Indigenous Task Force:
  - a. Safeguard and secure IK through development of Indigenous Data Sovereignty Agreements (ISDA)<sup>2</sup>, and implement Principles for Indigenous Data Governance<sup>3</sup>,
  - b. Safeguard and secure the free exercise of customary laws, rules, and cultural protocols established by IP, or which are priorities of IP, including access to cultural and religious sites,
  - c. Safeguard and secure the retention and intergenerational transmission of ancestral languages and IK, prioritizing and incentivizing Indigenous leadership in cultural burning and habitat restoration at scale and frequency to restore ecologically characteristic fire activity in fire-prone areas,
  - d. Safeguard and secure the free exercise of IP's right to exist, practice their cultural traditions, and access their territories unencumbered by harm or threats of harm; prioritizing Indigenous access to hunting, fishing and gathering on National Forests,
  - e. Safeguard and secure the body autonomy of Indigenous women and girls, ensuring their full and free access to social, cultural, spiritual, and political institutions associated with the U.S. Forest Service and NFP, and
  - f. Identify other means and mechanisms of the U.S. Forest Service generally, and the NFP specifically, may better uphold the federal trust responsibility and treaty rights of Tribal Nations.
6. Support local communities through:
  - a. Planning processes which implement the Seven Generations Principle, a multigenerational approach (70+ years) to identifying and quantifying how stewardship projects and conservation actions benefit biodiversity, humans, and nature<sup>4</sup>,
  - b. Implementing the Precautionary Principle of First Do No Harm to address the loss of biodiversity, negative impacts to Indigenous Peoples and local communities, and the loss of food security in forest ecosystems<sup>5</sup>,

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<sup>2</sup> ISDA:

[https://www.culturalsurvival.org/publications/cultural-survival-quarterly/protecting-indigenous-intellectual-property-rights-tools?gclid=Cj0KCQiA3uGqBhDdARIsAFeJ5r3-OewANqONcXMLKzaUCkOL3gAiLzM1lrzb4ydidgvdCtwOAvfD7jEaAuhdEALw\\_wcB](https://www.culturalsurvival.org/publications/cultural-survival-quarterly/protecting-indigenous-intellectual-property-rights-tools?gclid=Cj0KCQiA3uGqBhDdARIsAFeJ5r3-OewANqONcXMLKzaUCkOL3gAiLzM1lrzb4ydidgvdCtwOAvfD7jEaAuhdEALw_wcB) and <https://localcontexts.org/indigenous-data-sovereignty/>.

<sup>3</sup> Principles for Indigenous Data Governance: <https://www.gida-global.org/care>.

<sup>4</sup> Seven Generations Principle:

<https://www.weforum.org/agenda/2022/09/indigenous-principle-invest-in-nature/>

<sup>5</sup> Precautionary Principle: <https://www.noaa.gov/precautionary-approach>

- c. The creation of watershed restoration workforces which integrate IK, providing economic opportunities for smaller, local firms,
  - d. Education about the rights of IP and obligations of the U.S. Forest Service to Tribal Nations,
  - e. Sustainable and non-harmful processing of restoration by-products,
  - f. Supporting sustainable and non-extractive recreation opportunities which are culturally appropriate, and
  - g. Other measures of mutual benefit to Tribal Nations, IP, the federal government, local communities, and the environment.
7. Maintain and improve protections for at-risk pollinators, native plants, fish, and wildlife species by ensuring that the NFP components sustain the ecological integrity of National Forests and identify and implement approaches to address Western science knowledge and information gaps and integrate IK methodologies.

Thank you for this opportunity to provide comments on this important proposed amendment to the Northwest Forest Plan. The LF appreciates your consideration and is committed to working with all government entities, partners, and allies to ensure that the native plant and pollinator species associated with IP's traditional homelands remain resilient and strong along with the traditional food systems, socio-economic structures, and cultural heritages of IP throughout the Pacific Northwest.

Sincerely,



Joaquin J. Marchand, B.A.B.,M.P.A.  
Executive Director  
[L.I.G.H.T. Foundation](#)