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February 2, 2024

Ms. Linda Walker, Acting Director  
Ecosystem Management Coordination  
U.S. Forest Service  
U.S. Department of Agriculture

RE: National Old Growth Amendment

Ms. Walker:

The Stewardship Project would like to express its strong support for the Forest Service's effort to conserve and expand our nation's old growth forests, as well as our appreciation for the ability to participate in the development of a national forest plan amendment. The Stewardship Project is a collaboration of leading academics and Indigenous fire practitioners supported by the Climate & Wildfire Institute. We are focused on the development of policies that promote the Indigenous right to engage in stewardship and co-management of wildlands, the expanded use of prescribed fire and management of wildfires for resource benefit, and establishing a sufficient workforce to meet the unprecedented moment we face in stewarding these lands. Our forests, particularly old growth trees, have become increasingly vulnerable to the effects of climate change and forest management practices. Thoughtful, place-based stewardship of our forests is essential and has the potential to alleviate the impacts of increasing wildfire damage, insects, disease, declining in biodiversity, degraded water quality, and increased carbon emissions. Indigenous practices serve as keystone processes that create fire-resistant and resilient ecosystems, greater biodiversity, improved water quantity, and other outcomes.

It is critical to realign policies to fully support and prioritize scientifically sound restoration and stewardship that is complementary to, and where feasible, led by Indigenous peoples. The concept of "Active Stewardship" is central to this effort. Indigenous management focuses on stewarding the land for diverse objectives and

conservation. It is not a passive enterprise but requires active engagement, long-term commitments, and sufficient capacity.

To that end, throughout the development of the national old growth amendment and in accordance with the directives of Executive Orders 14072 and 14112, the Forest Service should pursue Tribal co-management opportunities and incorporate indigenous knowledge to the fullest extent possible. The perspectives of Tribal leaders and practitioners should be actively solicited and prioritized in implementation.

In the advancement of Indigenous knowledge to protect our old growth forests, we urge the Forest Service to clearly define the term "Indigenous Knowledge" in the text of the proposed amendment. In this case, we believe referencing or altering the definition of "native knowledge" used in 36 C.F.R. § 219.19 would be sufficient.

Effectively analyzing and implementing the practices of Indigenous peoples will require extensive resources and expertise. In furtherance of our objective to establish an effective workforce, and given that the proposed amendment requires the incorporation of Indigenous Knowledge to support the conservation and recruitment of old growth, we strongly recommend that the Forest Service do whatever possible to increase the capacity of Tribal-facing offices, including USDA's Office of Tribal Relations, and the Tribes and Indigenous peoples whose contribution are sought.

Finally, we support any attempt by the Forest Service to further the recommendations of the Wildland Fire Mitigation and Management Commission's final report. Many of our recommendations above align with the report's recommendations, especially around Indigenous stewardship, increased use of beneficial fire, and workforce development.

We appreciate the opportunity to provide comments in preparation of the Forest Service's proposed national old growth forest plan amendment. We look forward to supporting the development of a comprehensive management framework that will protect and expand our nation's old growth forests. If we can provide any additional information or insight, please do not hesitate to contact us.

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The Stewardship Project



THE STEWARDSHIP PROJECT IS SUPPORTED BY THE:

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