

Appendix B: Incorporating Alternative D Plan Components into the Final Preferred Alternative

We support the inclusion of the following Alternative D Tribal-specific plan components in the Preferred Alternative (these were not included in Alternative B) in addition to the Alternative B plan components as discussed previously:

1. (TRIBAL-FORSTW-ALL-GOAL-08-D): Coordinate with Tribes to promote alternate treatments for protecting rare and listed plants, integrating Indigenous Knowledge approaches with special attention to enhancing and restoring disturbance-dependent plant species like geophytes, plants with bulbs, corms, or tubers, where standard avoidance treatments may impair plant survival. Move toward landscapes supporting traditional Tribal practices, such as large, low-intensity prescribed burns.

Notes: compare to alt B, Goals FIRE-ALL-GOAL 1, which has similar language regarding post-fire disturbance. We support including this alternative (TRIBAL-FORSTW-ALL-GOAL-08-D), which is more specific and applies to all disturbance types, in the preferred action.

2. (TRIBAL-FORSTW-ALL-GOAL-09-D): For post- disturbance areas, Tribes should be invited to collaborate on designing post-disturbance management prescriptions and plans that integrate Indigenous Knowledge and western science to encourage restoration of woodlands and resources at gathering sites, protect or enhance conditions at ceremonial sites, and maintain or improve access to culturally important sites and resources.

Notes: This is important and should be included in the preferred action.

3. (TRIBAL-FORSTW-ALL-PMA-D): Silvicultural treatments, including fire, are used to restore and maintain non-forested habitats within moist forest landscapes and promote ecologically and culturally appropriate species such as beargrass and huckleberry.

Notes: We support the inclusion of this in the preferred action but are wondering why it is focused on moist forests specifically? Can we include a similar one for dry forests or make this applicable across all forest types?

For the following recommendations with **contrasting plan components in Alternatives B and D**, we recommend the following (in “notes” below the two versions of the plan components):

1. Huckleberries v. First Foods

Alternative B: (TRIBAL-FORSTW-ALL-PMA-B): To promote **huckleberry** abundance over the long-term on NFS lands within the range of the NSO and potential habitat for huckleberry, the Forest consults with interested and relevant Tribes on annual huckleberry restoration actions at a scale meaningful to the Tribes and implements restoration actions through consultation with and/or through co-stewardship agreements if possible.

Alternative D: (TRIBAL-FORSTW-ALL-PMA-D): Work with interested and relevant Tribes to determine annual restoration actions of **First Foods and culturally significant botanical species** at a scale meaningful to the Tribes, within the range of the NSO. Complete those restoration actions through coordination with Tribes or through co-stewardship agreements if possible.

Notes: We recommend including both in the preferred alternative. If it’s important to include a huckleberry-specific one (alt B), we should also include a more general one (alt D) that refers to all cultural use species, e.g. “first foods and culturally significant botanical species”.

2. Number of Acres vs. Projects

Alternative B: (TRIBAL-FORSTW-ALL-OBJ-03-B): Annually implement projects that increase populations or maintain or restore habitat for dry, serpentine, and wet meadow-associated culturally significant species, such as camas or other species by **2,000 acres** across the Northwest Forest Plan area.

Alternative D: (TRIBAL-FORSTW-ALL-OBJ-03-D): Annually implement work that increase populations or maintain or restore habitat for dry, serpentine, and wet meadow-associated culturally significant species, such as camas or other species identified through tribal consultation on **10 projects** across the Northwest Forest Plan area.

Notes: We recommend combining these so that the preferred alternative include both acreage and project targets> e.g. on at least 10 projects covering at least 2,000 acres total.

3. Number of Projects

Alternative B: (TRIBAL-FORSTW-ALL-OBJ-01-B): **Within 5 years**, each national forest in the Northwest Forest Plan area should develop and implement **at least three**

projects in partnership and collaboration with Tribes that support restoration of priority culturally relevant species.

Alternative D: (TRIBAL-FORSTW-ALL-GOAL-06-D): Collaborate with Tribes to jointly develop and implement programs and projects that support the restoration of priority culturally relevant species.

Notes: The Alternative B language regarding 5 years and 3 projects should be included in the preferred alternative as an objective.

4. Number of Areas and Timeframe

Alternative B: (TRIBAL-FORSTW-ALL-OBJ-02-B): Through engagement and consultation with interested Tribes, develop techniques and approaches to implement forest restoration, enhancements, fuels reduction, or maintenance actions in at least three areas of tribal importance, as jointly determined by Tribes and the national forests in the Northwest Forest Plan area, on a yearly basis following plan approval.

Alternative D: (TRIBAL-FORSTW-ALL-GOAL-07-D): Through engagement and consultation with interested Tribes, develop techniques and approaches to implement forest restoration, enhancements, fuels reductions, or maintenance actions in areas of tribal importance, as jointly determined by Tribes and national forests in the Northwest Forest Plan area.

Notes: We support the objective from alt OBJ B regarding 3 areas on a yearly basis in the preferred alternative.

Apart from the Tribal inclusion recommendations, we also support the addition of much of Alternative D plan components to Alternative B as the preferred alternative. The Draft Plan components provided in “Wildfire Resistance and Resilience – Alternative D” from A2-19 to A2-25, including the guidance for Strategic Fire Management Zones, should be added to the Alternative B plan components as the preferred alternative, with some specific edits (noted below).

We also note the following instances where Alternative D recommendations are in contrast to Alternative B recommendations and make the following recommendations regarding our preferences between the alternatives:

- 1. Forest Supervisor Approval:** We support FORSTW-LSR-PMA-D, moving approval of LSR review/assessment to **Forest Supervisor** instead of the Regional Ecosystem Office, as we think it will streamline important forest management actions in LSRs. We support the REO continuing to play an advisory role regarding LSR management planning and project design/approval, but think that the Forest Supervisor should be the decision-maker. **Tribes must also be consulted and coordinated with regarding LSR planning, management and project implementation.**

2. Survey & Manage: We support the recommendation FIRE-ALL-GDL-06-D regarding exemption from pre-disturbance surveys and survey and manage for 0.25 mile buffer in areas near communities, of tribal importance and infrastructure. "Within all LUAs, to improve efficiency in implementing actions to reduce the threat of wildfire adjacent to communities, areas of tribal importance, and infrastructure, treatments to reduce hazardous fuels within a 0.25-mile buffer of these areas are exempted from pre-disturbance surveys, and associated management requirements as described in 2001 ROD and S&Gs for Amendment to Survey and Manage for species identified in Table 1-1 (April 2014, or subsequent update). Management of known sites shall not be exempt." **We support the transitioning away from Survey and Manage surveys for all land use allocations and working with Tribes to develop Species of Conservation Concern for individual forests.**

3. NSO Suitable Habitat: We support the adoption of FORSTW-LSR-DRY-DC-01-D regarding defining suitable habitat for NSO as the historical range and the capacity of the landscape to support: "Suitable habitat for northern spotted owl is maintained at an amount reflective of a range of historic conditions within the inherent capability of the landscape given expected fire activity and other effects of climate change. Locations of northern spotted owl habitat change over time, but generally concentrate in areas more likely to persist". **We encourage consultation, coordination and collaboration with Tribes in defining suitable habitat, the historical range and the capacity of the landscape to support this habitat, as well as any ensuing Critical Habitat designations and limited operating periods, for NSO and all listed and proposed Threatened and Endangered species.**

4. Treatment Acres and Timber Volumes: Regarding targets for timber volumes in dry v. moist forests, Alternative B seems to have more acres treated in dry forests and overall than Alt D, but Alt D seems to have more acreage treated and more timber volume in moist forests (Matrix):

FORSTW-ALL-DRY-OBJ-01B v. C. v. D Re How much acreage to treat in dry forests:

- **Alt B: 527,000-643,000 acres per decade**
- Alt C: 104,000-127,000 acres per decade
- Alt D: 208,000-254,000 acres per decade

ECONSUST-OBJ-01B v. D, fewer acres treated overall in Alt D than Alt B:

- **Alt B: 660,000-810,000 acres and 5,900-13,500 MMBF**
- Alt C: 171,000-211,000 acres/decade
- Alt D: 474,000-588,000 acres/decade and 4,700-12,200 MMBF

Notes: We support reduced restrictions on doing the treatments necessary to restore forest health, the abundance of traditional foods, and resilience to wildfire and climate change.

5. Fire Resilience Treatments:

-Alternative B: Treat 2.65 million acres (including all fuels treatments) per decade across all LUAs including 150,000 in CPAs and 1.75 million acres w. wildland fire (Rx, unplanned ignitions, cultural fire) that meets resource objectives per decade, reforestation on 100,000 acres in 1st decade and 115,000 acres in second decade

-Alternative D: Treat 4.95 million acres per decade across all LUAs including 900,000 acres/decade in CPAs including 2.75 million acres with wildland fire (Rx, unplanned ignition and cultural) to meet resource objectives per decades in all LUAs including LSR, reforestation on 100,000 acres in 1st decade and 125,000 in second decade.

Note: Treatment goals should be tied to achieving outcomes of communities not burning down, and forests not burning at high severity across broad acreages rather than certain numbers of acres treated. Cultural fire must be understood to be a Tribal activity under Tribal sovereign authority, not something that falls under the Forest Service's jurisdiction.

6. We also advocate for including a target and standards, guidelines, and objectives regarding **ongoing maintenance treatments** in order to retreat areas **within 3-7 years** of the initial treatment and also post-high severity fire. If you're treating a certain acreage every decade and then moving to untreated acreage, the fuel load in the original treatment areas will likely have grown back.

7. We prefer Alternative D ("retain all trees established before 1850") in FORSTW-ALL-DRY-STD-01D to Alternative B ("retain all trees older than 150 yrs) in FORSTW-ALL-DRY-STD-01B and the sentence regarding exceptions: **"Exceptions apply for tribal co-stewardship and cultural use, restoration of unique ecosystems, and to reduce wildfire risk to communities and infrastructure."** Trees established prior to 1850 are guides, landmarks, and supports for guiding restoration of Indigenous fire regimes and management systems, so they have great value. In a few decades, trees older than 150 years will include Douglas firs that have encroached on oak woodlands in the absence of fire, and this will be very problematic for continued restoration efforts.

8. We recommend removing the term "effective suppression" in FIRE-ALL-DC-01 "Wildland fuel conditions facilitate ~~effective suppression~~ by local resources..." We'd suggest replacing it with: **"Wildland fuel conditions facilitate effective wildland fire management by local resources..."**. We strongly believe that the USFS must signal a paradigm shift away from full wildland fire suppression policy and towards more

strategic management of fire for resource benefit, social-ecological resilience and fire-adapted communities and forests.