

March 17, 2025

Regional Forester Jacqueline Buchanan
Pacific Northwest Region
U.S. Forest Service
1220 SW 3rd Avenue
Portland, OR 97204

Regional Forester Jennifer Eberlien
Pacific Southwest Region
U.S. Forest Service
1323 Club Drive
Vallejo, CA 94592

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

Re: Tribal Inclusion in the Northwest Forest Plan

Dear Regional Foresters Buchanan and Eberlien,

The 17 national forests in Oregon, Washington, and California that are included in the 1994 Northwest Forest Plan (NWFP) are integral parts of the ancestral homelands of over 80 federally recognized Tribes and several other Indigenous communities. For many millennia, Indigenous peoples nurtured the land with time-tested stewardship practices that sustained their communities with abundant resources and resilient ecosystems based on a rich diversity of habitats and species. The forced removal and genocide of Indigenous peoples and the criminalization of their stewardship practices had dire social and ecological impacts including devastating physical and mental health issues particularly in Tribal communities, loss of resilience to wildfire events and climate change, a decline of landscape and biological diversity, and numerous other adverse impacts that threaten long-term sustainability across the region.

Thirty years ago when the NWFP was created, the Forest Service failed to meaningfully engage Tribes, and Indigenous Knowledge, values and perspectives were excluded from the final analysis. The agency now seeks to amend the NWFP, and this represents a crucial opportunity to make amends for this foundational flaw in the original NWFP, and make meaningful commitments to respect Tribal sovereignty, honor treaty rights, fulfill trust responsibilities, and facilitate co-stewardship.

The agency's Draft Environmental Impact Statement (EIS) contains wide-ranging plan components to advance Tribal inclusion in national forest management. These were derived from the NWFP Federal Advisory Committee's (FAC) consensus recommendations, input gathered from roundtables with Tribes, public scoping letters, and participation of Tribal staff on the Draft EIS writing team. While this effort is unprecedented in a Forest Service NEPA process, and the Draft EIS represents a remarkable improvement compared to the development of the

original NWFP, the current proposed amendment can and should be improved in response to public comments, especially from Tribal entities.

The issues analyzed within the scope of the amendment process (e.g. fire resistance, climate change, forest stewardship, and community sustainability) are all critically important and will require significant changes in management direction. The inclusion and centralization of Tribal leadership and Indigenous Knowledge in national forest management is undoubtedly profound and goes well beyond undoing past wrongs. Implementing Tribal plan components provides direct solutions to many of the significant issues presented in the DEIS, and coupled with strong public support, it is imperative for the USFS to carry out Tribal inclusion in the Final EIS and Record of Decision.

We, the undersigned, call for the Forest Service to advance all of the Tribal inclusion components presented in each of the action alternatives in the Draft EIS, and urge the agency to revise and further expand the Tribal Inclusion section in the Final EIS. The agency needs to provide a more comprehensive analysis that reflects the breadth and importance of the proposed plan components to Indigenous communities, and more accurately discloses the impacts of the proposed amendment on Tribes. The agency needs to utilize the groundbreaking work of the FAC and other Tribal engagement to produce an improved FEIS and amended NWFP that centers Indigenous Knowledge and collaborates with Tribes in forest management policies, programs, and practices in perpetuity.

Sincerely,

Timothy Ingalsbee	Executive Director	Firefighters United for Safety, Ethics, and Ecology (FUSEE)	Eugene, OR
Ryan Reed	Program Director	FireGeneration Collaborative	Eugene, OR
Grace Brahler	Wildlands Director	Cascadia Wildlands	Eugene, OR
Margo Robbins	Executive Director	Cultural Fire Management Council	Weitchpec, CA
Rose High Bear	Founding Director	Elderberry Wisdom Farm	Salem, OR
Theresa May	Co-founder	Illioo Native Theatre at Very Little Theater	Eugene, OR
Susan Jane Brown	Principal & Chief Legal Counsel	Silvix Resources	Portland, OR
Hannah Hull	Communication and Programs Assistant	Association for Fire Ecology	Largo, FL
Lucas Mayfield	President	Grassroots Wildland Firefighters	United States

Marissa Christiansen	Executive Director	Climate and Wildfire Institute	Los Angeles, CA
Jane	Women in Wildfire Lead	Women in Wildfire	Helena, MT
Amanda Monthei	Creator	Life with Fire Podcast	Bellingham, WA
Justin DeMoss	Director	Hotshot Wellness	San Diego, CA
Matt Weiner	CEO	Megafire Action	Calabasas, CA
Eytan Krasilovsky	Deputy Director	Forest Stewards Guild	Santa Fe, New Mexico
Tom Wheeler	Executive Director	Environmental Protection Information Center (EPIC)	Arcata, CA
Michael Dotson	Executive Director	Klamath-Siskiyou Wildlands Center	Ashland, OR
Jordan Latter	Forest Watch Program Manager	Bark for Mt. Hood	Portland, OR
Chuck Willer	Executive Director	Coast Range Association	Corvallis, OR
David Woodsmall	Staff Attorney	Western Environmental Law Center	Portland, OR
Quinn Read	Executive Director	Oregon Wild	Portland, OR
Dan Ritzman	Director, Conservation Campaign	Sierra Club	Seattle, WA
Aurora Janke	Senior Attorney	Earthjustice	Seattle, WA
Megan Birzell	Washington State Director	The Wilderness Society	
Ryan Talbott	Pacific Northwest Conservation Advocate	WildEarth Guardians	Portland, OR
Joe Liebezeit	Statewide Conservation Director	Bird Alliance of Oregon	Portland, OR
Joseph Youren	Forest Policy Director	Seven Capes Bird Alliance	Lincoln City, OR
Shenandoah Marr	Conservation Coordinator	Spokane Audubon Society	Spokane, WA

Nick Joslin	Forest and Watershed Watch Program Manager	Mount Shasta Bioregional Ecology Center	Mount Shasta, CA
Laurel Harkness	Coalition Director	Rural Voices for Conservation Coalition	Mount Shasta, CA
Brel Froebe	Executive Director	Center for Responsible Forestry	Quilcene, WA
Woody Jackson	President	Friends of the Breitenbush Cascades	Lyons, OR
Cheryl Bruner	Secretary	Williams Community Forest Project	Williams, OR
Don Dillinger	Authorized Signatory	GreenSnohomish	Snohomish, WA
Nick Goulette	Co-Executive Director	Watershed Research & Training Center	Hayfork, CA
Luna Latimer	Director	Mid Klamath Watershed Council	Orleans, CA
Janice Reid	President	Umpqua Watersheds	Roseburg, OR
Michelle Emmons	Executive Director, Upper Willamette Riverkeeper	Willamette Riverkeeper	Portland & Eugene, OR
Sydney Nilan	Director	Upper Willamette Stewardship Network	Springfield OR
Jerry Allen	President	Water League	Selma, OR
Kiersten Rossing	Event Corrientes and Team Member	Regenerate Northern Willamette Valley	Portland, OR
Brian Byers	Executive Director	Lost Valley Education Center	Dexter, OR
Betsy Robblee	Conservation & Advocacy Director	The Mountaineers	Seattle, WA
Brenna Bell	Forest Climate Manager	350PDX	Portland, OR
David Perk	Forests Lead	350 Seattle	Seattle, WA
Patricia Hine	Co-President	350 Eugene	Eugene, OR
Bill Sheets	Board Member	350 Everett	Everett WA
Susan Kane	Newsletter Editor	350Wenatchee.org	East Wenatchee
David Camp	Board Secretary	350 Spokane	Washington

Julianne Gale	Executive Director and President	Mason County Climate Justice	Belfair, WA
Kate Gessert	Member	Climate Writers	Eugene, OR
Ed Chadd	Forests Chair	Olympic Climate Action	Port Angeles, WA
Melinda Mueller	Organizing Team Member	Wallingford Indivisible	Seattle, WA
Valentine Bentz	Co-Director	University of Oregon Radical Organizing and Activism Resource Center	Eugene, OR
Sue Craig	President	Oregon Unitarian Universalist Voices for Justice	Oregon
Eric Griswold	Chair	CHANGES	Oregon City, OR
Emily Hartlerode	Director	Oregon Folklife Network	Eugene, OR
Karen Ashikeh LaMantia	Media Manager	Earth Neighborhood Productions	Oregon
Tim Ingalsbee	Executive Director	Cascadia Fire Ecology Education Project	Eugene, OR
Sara Clark	Co-Lead	The Stewardship Project	San Francisco, CA
Jeff Parker	President	Northwest Youth Corps	Eugene, OR

(61 organizations total)