

Data Submitted (UTC 11): 3/14/2025 4:00:00 AM

First name: Sarah

Last name: Wald

Organization:

Title:

Comments: To Whom It May Concern,

I am writing to comment on the Northwest Forest Plan Draft Environmental Impact Statement. I have been residing in Oregon since 1997. There were then several years I was able to be in Oregon only part time due to school and career. However, I always returned during any time I had available. I currently live and work here full time.

I write these comments wearing two hats. The first hat I wear is that of an Oregonian who is dedicated to the ecosystems of the Pacific Northwest. The first time I visited a forest in the Cascade Mountain range I fell in love with this place. Protecting the ecosystems of this bioregion is important for a diverse set of reasons for disparate communities, including the First Nations of this region. The perspectives of Indigenous people should be prioritized in this process. The cultural and ecological wellbeing of Indigenous communities must be prioritized in a plan that failed to engage in Tribal consultation when it was created. Protecting the diverse ecosystems of our region from commercial exploitation is also of prime concern to me. The second hat I wear is that of a professor of Environmental Studies. My research includes public lands and environmental justice. The comments I make here come often from my own scholarly expertise and research in the field. To be frank, I was quite disappointed with the lack of analysis of environmental justice in the DEIS. I hope the EIS will rectify that situation. To be clear, these comments are no reflection on my institution. They are my comments as a private citizen. They do reflect my knowledge and education.

I also want to state at the outset that the DEIS places many areas of concern to me as "outside of the scope," and I fundamentally disagree with that assessment. If I mention the issues here it is because I believe it should be within the scope of the EIS. In my read, decisions about what to include and exclude from the scope reflect a problematic bias that forests are for commercial extraction and that commercial extraction is the primary "management action" that can be taken as part of stewardship.

You'll note that my comments incorporate many sentences directly from the white paper, "Recommendations for Tribal Sovereignty and Environmental Justice in the Northwest Forest Plan Amendment Draft Environmental Impact Statement." I was one of the authors of that white paper and endorse its recommendations. I am including it as an appendix to my comments.

Tribal Inclusion

I was delighted to see the serious attention that was given to Tribal Inclusion in the Draft EIS. I hope that the final EIS retains and enhances all tribal inclusion components.

Specifically, I ask that the NWFP Amendment EIS:

- * Retain all Tribal inclusion plan components (Goals, Desired Conditions, Objectives, Standards, Guidelines, and potential Management Approaches) in Alternative B. Strengthen Tribal inclusions plan components in Alternatives C and D by including (most or all) approaches from Alternative B.

- * Include the FAC's full Tribal Inclusion recommendation preamble (pg. 8-9) into the Record of Decision and any other relevant areas, with special emphasis on the section:

Over a century of fire suppression, coupled with regulatory restrictions, removal of Indigenous practitioners and

practices (including cultural fire), as well as assimilationist policies from the boarding school era, have led to today's increased risks from catastrophic wildfire and has also created structural barriers and mechanisms preventing Indigenous peoples from enacting sustainable stewardship. The NWFP amendment must signal a shift in Tribal relations across NWFP forests and include an apology for the exclusion of Tribal communities from the original formulation of the NWFP and call for healing and reparations for over a century of settler colonialism, land dispossession, criminalization and marginalization of Indigenous cultural stewardship practices, and mismanagement of Tribal lands.

* Add Tribal inclusion measures to Alternative B and C that are included in Alternative D but not in B, which include Tribal involvement in protecting rare and listed plants, post-disturbance management, and first foods management. These plan components are:

- o TRIBAL-FORSTW-ALL-GOAL-08-D

- o TRIBAL-FORSTW-ALL-GOAL-09-D

- o TRIBAL-FORSTW-ALL-PMA-D

* For restoring dry, serpentine, and wet meadow-associated culturally significant species, use TRIBAL-FORSTW-ALL-OBJ-03-D from Alternative D rather than TRIBAL-FORSTW-ALL-OBJ-03 from Alternative B across Alternatives B and C.

- o TRIBAL-FORSTW-ALL-OBJ-03-D uses "10 projects" as the metric rather than 2000 acres, which can better allow for different scales of stewardship as defined by Tribes.

* Change TRIBAL-FORSTW-ALL-DC-05 and TRIBAL-FORSTW-ALL-DC-09 to incorporate stronger language from Federal Advisory Committee Desired Condition 1-16, which reads:

- o "Cultural burning is recognized as an inherent Tribal right and responsibility that has existed for millennia and is rooted in Tribal laws and Indigenous knowledge, practices, and belief systems. The Forest accommodates cultural burning and coordinates, consults, and collaborates with Tribes in order to create conditions conducive for this Tribal sovereign practice."

* National forests should accommodate both cultural fire and Tribally-led prescribed fire, allowing Tribes to define for themselves the management techniques needed to achieve their objectives.

* Change TRIBAL-FORSTW-ALL-STD-06 to remove this sentence: "A closure shall affect the smallest practicable area for the minimum period necessary for activities of the applicable Tribe." This sentence could be used to justify restricting the scope of closure orders desired by Tribes.

* Move Potential Management Approaches to Standards or Guidelines so they are enforceable, especially:

- o TRIBAL-FORSTW-ALL-PMA-A through TRIBAL-FORSTW-ALL-PMA-H

Beneficial Fire Use

I was glad to see that the DEIS take seriously beneficial fire use and specifically cultural burning as part of Tribal sovereignty. I ask that the DEIS retain current components related to beneficial fire and cultural fire. I also recommend that the DEIS go further in incorporating more of the FAC recommendations on Indigenous cultural

burning and/or Indigenous-led prescribed fire with cultural objectives.

Please do not bow to pressure and use outdated science to justify more logging in the name of wildfire prevention. I worry a great deal about the catastrophic wildfires that we see as a result of climate change and the suppression of cultural burning. Increased commercial logging will cause substantial ecological degradation. It will not decrease catastrophic fire risk and may actually increase that risk. The science here is clear. Please follow it.

I suggest the following:

- * Expand the discussion of the numerous social, cultural, economic, and ecological benefits of cultural burning and prescribed fire, and contrast these effects with the costs and impacts of mechanical fuels reduction treatments alone and conventional wildfire suppression operations.

- * Describe the numerous safety risks, economic costs, and direct environmental impacts of conventional wildfire suppression operations to make the case for alternative fire use practices.

- * Tier the authorization of beneficial fire use from Indigenous cultural burning, prescribed fire, and managed wildfire to the Federal Wildland Fire Policy (1995/2001) and the growing literature on Indigenous fire use.

- * Provide spatial fire management information on the locations of Potential Operational Delineations (PODs) and fire management zones where wildfires could be managed for resource benefits.

- * Require that any/all fuels reduction or fire resilience projects include a fire use component (e.g. prescribed pile burning and/or broadcast understory burning) and specify that the primary objective of these fuels projects is to prepare sites for managing future fire for resource benefit rather than fire suppression.

- * Indigenous peoples use fire lighting, not firefighting, and mature/old-growth trees are an outcome, not an objective, of Indigenous fire use. Frequent low intensity burning helps nurture soil, water, and fuel conditions that enabled some trees to grow big and old, with wide range of tree species' diversity, and survive occasional passage of wildfires.

- * Follow the Good Fire II Report's Recommendation #3 to identify barriers to the exercise of reserved, retained, and other rights by Tribes and their members, including the right to engage in cultural burning and prescribed fire. Make clear to employees and representatives of that agency that the exercising of these rights is welcome and encouraged.

* Work to remove bureaucratic barriers to beneficial fire inclusion and managed wildfire. This includes following the Good Fire II Report's Recommendation #35 to create concrete policies that allow for managed ignitions under particular conditions.

* Implement recommendations #15, 16, and 92 from the Wildlife Fire Mitigation and Management Commission's "On Fire" report to empower Tribes to plan and implement more beneficial fire through expansion of the Tribal wildland fire workforce and legal authority to promote cultural burning.

Mature and Old Growth Forests

I was particularly disappointed that Alternative C, which is in many ways the strongest environmental alternative, lacked the Tribal Inclusion of Alternative B and even Alternative D (the timber industry give away). It seemed to suggest a false binary between Tribal inclusion and environmental consideration. There is no reason that Alternative C could not have included the majority of the Tribal inclusion measures of Alternative B. I recommend that the final EIS combine many of the ecological considerations of Alternative C with the Tribal Inclusion and Beneficial Fire recommendations of Alternative B.

It is essential that we protect mature and old growth forests from commercial timber extraction. Mature and old growth forests are essential to the economy of the Pacific Northwest. They are essential to flourishing human life in this region. They are essential to the diversity of species (of all types and sizes) that rely on intact ecosystems. I oppose any weakening of environmental protections on public lands, including weakening protections for wildlife habitat and water quality. I oppose any increase in commercial timber harvest in mature and old growth forests.

Additional Environmental Justice (EJ) Concerns

Tribal inclusion is at the forefront of an environmental justice (EJ) approach to federal lands management because all federal lands are Indigenous lands and because environmental justice centers Tribal sovereignty. However, it is not the only environmental justice concern relevant to the Northwest Forest Plan (NWFP).

I know that the Trump administration has eviscerated environmental justice protections and mandates across the US. However, the issues discussed below are important to public land management whether or not the frame of environmental justice is the one used. Land management is always about people. It is always about communities. Assessing and analyzing the impact of land management on the communities in the Pacific Northwest should be central in any land management planning documents.

In particular, I am concerned about the ways that the DEIS refuses to offer appropriate landscape level analysis on the impacts of the proposed alternatives on workers, recreators, and other people who have meaningful relationships with public lands in the NWFP management area.

I suggest the following:

* Incorporate all management suggestions from Chapter 10-Environmental Justice of the "Synthesis of Science to Inform Land Management Within the Northwest Forest Plan Area" (pages 839-841). Many of these are about labor issues and do not require the USFS to use the framing of environmental justice.

* Consider how the NWFP amendment is consistent with the Presidential Memorandum "Promoting Diversity and Inclusion in Our National Parks, National Forests, and Other Public Lands and Waters" (2017), including the two sections "Enhancing Diversity and Inclusion in the Federal Workforce" and "Enhancing Opportunities for all Americans to Experience Public Lands and Waters." I certainly understand that the Trump administration has

revoked this Presidential Memorandum. The EIS can still analyze how the NWFP amendment engages with the federal workforce and equal access to all for the public lands.

Toxicities

- * Assess the air and water quality impacts of pesticides, herbicides, fire retardants, and other chemicals used in the forest as part of NWFP management. These should be assessed in relation to worker exposure, in relation to nearby communities exposed through drift, and in relation to food, including first foods, and water, including drinking water, upon which many communities rely. Mandate assessing and addressing these concerns within project-specific analysis.

Recreational access and equity

- * Provide analysis and discussion of inequities in access to recreational opportunities and different cultural uses of the NWFP area at the landscape scale, not only (but also) in site-specific project design. Include clear plan components in all alternatives that site-specific project analysis should:

- o Assess and protect sites with recreation use by diverse communities and that are disproportionately used by certain underrepresented or historically-excluded communities (by race, ethnicity, income, disability, etc.) following EO 14096's mandate to improve equitable access to public lands as environmental justice praxis. Again, much of this can be assessed and addressed outside of the revoked EO and the environmental justice frame.

- o Assess and protect sites in relationship to the economic impact that disruption of recreation will have on local communities, especially given that recreation is the primary economic contributor of NWFP lands to the regional economy.

- o Assess and protect sites for lesser-known recreation values by diverse communities.

- o Survey for and protect culturally or historically sensitive and/or meaningful sites for diverse communities.

Youth education and mentorship

- * Maintain and build on ECON-SUST-DC-3 and ECON-SUST-GOAL-1 from the DEIS to promote meaningful youth education and mentorship opportunities on every national forest in the plan area, particularly in the realms of prescribed, cultural, and wildland fire mentorship and training.

Environmental workforce

The DEIS acknowledges that the environmental workforce is largely "composed of low-income Hispanic or Latino immigrants and undocumented workers" (3-145) who travel long distances for work. Similarly, other Communities of Interest, "Nontimber Forest Products Gathering" and "Recreation," also travel frequently to different sites across NWFP locations. Without landscape scale analysis, it is unlikely that these groups will be adequately considered in site-specific project analysis since they are unlikely to be present at the time of Environmental Assessment. Although the DEIS mentions that evaluating for EJ implications within EJ communities and Communities of Interest should include "opportunities for meaningful involvement in the decision-making process" made available (3-141), it does not offer any recommendations to do so.

- * Create an additional ECON-SUST-GOAL that aims to remove financial barriers to public participation, invests in communication beyond translation, and uses regional liaisons or trusted channels of communication to form connections with Communities of Interest.

In DEIS Section 3.8.1.12 Environmental Justice, the subsection titled "Environmental Workforce" (3-145) acknowledges some of the inequitable labor practices that this workforce faces. However, this section fails to provide a more in-depth analysis of how the workforce is distributed and quantify the size and scale of this workforce. More discussion is needed on the equity implications of using temporary migrant workers to compensate for labor shortages. Without comprehensive immigration reform, this form of employment is predicated on inequitable power dynamics perpetuated by centuries of neocolonial practices. Furthermore, the DEIS refers to certain types of labor performed by the environmental workforce as "unskilled" (3-121; 3-151) or "low-skilled" (3-122) labor. This type of language is demeaning to workers that have accumulated decades of experience by doing this type of work and erodes class solidarity by reinforcing a hierarchy of labor.

- * Provide mechanisms to consistently inspect for and aggressively enforce federal, state, and local wage and safety regulations for contractors in the NWFP management area, including regarding wage theft, worker intimidation, and heat and catastrophic wildfire smoke exposure.

- * Consult regularly with workers and worker-organizations to develop protocols for worker protections in the implementation of NWFP projects. More thoroughly address and assess the over-representation of Indigenous, Black, and other marginalized and racialized communities in certain forms of work and the specific vulnerabilities of that work.

- * Create an additional ECON-SUST-DC that incentivizes safe, sustainable, and equitable working conditions for forest workers and fair compensation for this work.

- * Use language that elevates the importance of the environmental workforce and does not demean worker labor or reinforce the segmentation and hierarchical arrangement of the workforce.

- * Provide landscape level analysis of disproportionate harm to forest and fire workers caused by catastrophic wildfire caused smoke and heat (both of which are exacerbated by climate change).

Resources

- o Davis et al 2023 "Multiple Stories, Multiple Marginalities: The Labor-Intensive Forest and Fire Stewardship Workforce in Oregon"

- o Costa 2021 "Temporary work visa programs and the need for reform"

Economic sustainability objective

The DEIS's ECON-SUST-OBJ-01 focuses exclusively on treatment of acres. This type of framing prioritizes efficiency and incentivizes the use of contracting tools which favor selection of contractors who, in addition to meeting the base selection criteria (which does not include local benefits) can get the most work done, the most quickly, for the lowest price. Efficiency does not always equate to effectiveness; by using acres treated as the sole metric of success, it incentivizes practices that contribute to worker inequity and ignore working conditions and local benefits. As noted by Rural Voices for Conservation Coalition, "Although low-price contracting might appear to save the government money, in reality it costs the American taxpayer more money when poor quality work has to be redone, and when poorly-paid workers have to apply for food stamps and other public assistance, or seek medical care without insurance." Additionally, low-bid contracting perpetuates inequities as Latine contractors tend to attain labor-intensive service contracts (LISCs) while white contractors tend to secure more technical work included in master stewardship agreements and stewardship contracts.

* Create an additional ECON-SUST-DC that incentivizes safe, sustainable, and equitable working conditions for forest workers and fair compensation for this work.

* Create an additional ECON-SUST-GOAL that incentivizes increased communication and collaboration between federal agencies, especially land management agencies, the Department of Labor, and OSHA to enforce wage and safety regulations.

* Add language to ECON-SUST-GOAL-03 to incentivize federal land management agencies to prioritize Best Value contracting practices, such as Stewardship contracting rather than BPAs.

* Resources

o Rural Voices for Conservation Coalition 2006 "Workforce and Labor Issue Paper"

o Deak et al 2021 "Documenting Twenty Years of the Contracted Labor-Intensive Forestry Workforce on National Forest System Lands in the United States"

o Machado, M.A., Downey, J., Huber-Stearns, H., and Davis, E.J. (2025). "The Labor-Intensive Forestry and Fire Workforce in the US Northwest: Recommendations for Improving Equity and Growth" [Manuscript in preparation].

On a final note, I want to give a special shout out to any federal employees who read these comments. We see you. We know what you are up against. Stay strong.

Sincerely,

Sarah D. Wald, PhD

ATTACHMENT-LETTER TEXT: Comments3.14.25.docx; this is the same content that is coded in text box; it was also included as an attachment

ATTACHMENT-LETTER TEXT: Comments3.14.25.pdf; this is the same content that is coded in text box; it was also included as an attachment

Northwest Forest Plan Just Futures Collaborative Recommendations for Tribal Sovereignty and Environmental Justice in the Northwest Forest Plan Amendment Draft Environmental Impact Statement What: This white paper provides recommendations around Tribal sovereignty and environmental justice that we hope will be useful to organizations and individuals as they comment on the Draft Environmental Impact Statement for the Northwest Forest Plan (NWFP) amendment. We hope that these suggestions reach a diversity of organizations and individuals with divergent visions of federal land management. We encourage organizations and individuals to

consider where their values align with Tribal sovereignty and environmental justice. Who: The Northwest Forest Plan Just Futures Collaborative is a campus-community collaboration out of the University of Oregon. FUSEE has joined University of Oregon and Portland State University faculty, graduate students, and undergraduate students with expertise in Indigenous studies and/or environmental justice in this work. Our purpose is to amplify Tribal sovereignty and environmental justice issues in the lands managed by the US Forest Service (USFS) through the Northwest Forest Plan (NWFP). Ultimately, we envision contributing to paradigm shifts in land management and beyond that prioritize environmental justice, holistic worldviews, reciprocity, and Tribal sovereignty. Review Process: We consulted with several Tribal, NGO, and academic experts to review this document. We recognize that the Northwest Forest Plan encompasses the territories of 80+ Tribal nations, and our review process does not reflect the diversity of perspectives that exist across these many nations. The consulted Tribal experts reviewed this document as individuals and do not represent Tribal governments or organizations. Acronyms CE: Categorical Exclusion EJ: Environmental Justice DEIS: Draft Environmental Impact Statement NGO: Non-Governmental Organization EA: Environmental Assessment NWFP: Northwest Forest Plan EIS: Environmental Impact Statement Contents Tribal Inclusion Measures

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.....	12	Additional Environmental Justice (EJ) Concerns
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..... Error! Bookmark not defined. Tribal Inclusion Measures The DEIS includes many important measures to expand Tribal inclusion across the NWFP area, through expanded measures for cultural harvesting and access, co-stewardship agreements, fire stewardship, workforce development, and youth education. Alternative B's approach to Tribal inclusion is strongest because it includes concrete requirements that national forests must meet within specified timeframes. When Tribal consultation, collaboration, and co-stewardship is optional, many national forests fail to meaningfully engage Tribes (see NWFP Tribal monitoring reports). We suggest the following:

- * Retain all Tribal inclusion plan components (Goals, Desired Conditions, Objectives, Standards, Guidelines, and potential Management Approaches) in Alternative B. Strengthen Tribal inclusions plan components in Alternatives C and D by including (most or all) approaches from Alternative B.
- * Include the FAC's full Tribal Inclusion recommendation preamble (pg. 8-9) into the Record of Decision and any other relevant areas, with special emphasis on the section:
- * Over a century of fire suppression, coupled with regulatory restrictions, removal of Indigenous practitioners and practices (including cultural fire), as well as assimilationist policies from the boarding school era, have led to today's increased risks from catastrophic wildfire and has also created structural barriers and mechanisms preventing Indigenous peoples from enacting sustainable stewardship. The NWFP amendment must signal a shift in Tribal relations across NWFP forests and include an apology for the exclusion of Tribal communities from the original formulation of the NWFP and call for healing and reparations for over a century of settler colonialism, land dispossession, criminalization and marginalization of Indigenous cultural stewardship practices, and mismanagement of Tribal lands.
- * Add Tribal inclusion measures to Alternative B and C that are included in Alternative D but not in B, which include Tribal involvement in protecting rare and listed plants, post-disturbance management, and first foods management. These plan components are:

*

- * TRIBAL-FORSTW-ALL-GOAL-08-D
- * TRIBAL-FORSTW-ALL-GOAL-09-D
- * TRIBAL-FORSTW-ALL-PMA-D

- * For restoring dry, serpentine, and wet meadow-associated culturally significant species, use TRIBAL-FORSTW-ALL-OBJ-03-D from Alternative D rather than TRIBAL-FORSTW-ALL-OBJ-03 from Alternative B across Alternatives B and C.

*

* TRIBAL-FORSTW-ALL-OBJ-03-D uses "10 projects" as the metric rather than 2000 acres, which can better allow for different scales of stewardship as defined by Tribes.

* Change TRIBAL-FORSTW-ALL-DC-05 and TRIBAL-FORSTW-ALL-DC-09 to incorporate stronger language from Federal Advisory Committee Desired Condition 1-16, which reads:

*

* "Cultural burning is recognized as an inherent Tribal right and responsibility that has existed for millennia and is rooted in Tribal laws and Indigenous knowledge, practices, and belief systems. The Forest accommodates cultural burning and coordinates, consults, and collaborates with Tribes in order to create conditions conducive for this Tribal sovereign practice."

* National forests should accommodate both cultural fire and Tribally-led prescribed fire, allowing Tribes to define for themselves the management techniques needed to achieve their objectives.

* Change TRIBAL-FORSTW-ALL-STD-06 to remove this sentence: "A closure shall affect the smallest practicable area for the minimum period necessary for activities of the applicable Tribe." This sentence could be used to justify restricting the scope of closure orders desired by Tribes.

* Move Potential Management Approaches to Standards or Guidelines so they are enforceable, especially:

* TRIBAL-FORSTW-ALL-PMA-A through TRIBAL-FORSTW-ALL-PMA-H

Beneficial Fire Use Beneficial fire is one of the principal means that Indigenous peoples use to steward the land, protect built dwellings, nurture biological productivity, and sustain vital resources for traditional foods, fibers, medicines, and ceremonies. The Forest Service's fire suppression and fire exclusion policies have significantly altered landscapes and degraded ecosystems and habitats that are nurtured by Native peoples and in turn nourish Native cultures. From its criminalization of Indigenous cultural burning to its militarization of fire management through fire "fighting," the agency's fire exclusion policies represent an insidious form of environmental racism. Alternative B's approach to beneficial fire is strongest because of its support of Indigenous cultural burning and co-stewardship agreements. Remedying cultural and ecological harms caused by fire exclusion requires fire inclusion, in addition to expanding Tribal partnerships as discussed above. Authorizing greater fire use while imposing limits on aggressive firefighting represents an essential step toward environmental justice for Indigenous peoples. In the Pacific Northwest native forests need Native fires, and Tribal inclusion requires fire inclusion. Likewise, fire inclusion requires Tribal inclusion, whether through cultural fire or Indigenous-led prescribed fire with cultural objectives. The DEIS presents numerous supportive statements on beneficial fire use for cultural and ecological purposes. Indigenous cultural burning is rightfully supported across all action alternatives, and statements favoring prescribed burning and managing wildfires for resource benefits are present in alternatives B and C. These praiseworthy statements signify a necessary change in Forest Service fire policy that better recognizes Tribal sovereignty. The DEIS could go further in incorporating more of the FAC recommendations on Indigenous cultural burning and/or Indigenous-led prescribed fire with cultural objectives, as discussed in the prior section. Additionally, the DEIS lacks analysis on how existing bureaucratic barriers to fire use will be overcome. And it lacks disclosure of where and how beneficial fire use will be allowed and applied. The fact that the Northwest Forest Plan amendment is tiered to the agency's Wildfire Crisis Strategy is a warning sign that fuels reduction for fire suppression may continue to dominate Forest Service fire management, turning fire use provisions in the Northwest Forest Plan amendment into broken promises. We suggest the following:

* Expand the discussion of the numerous social, cultural, economic, and ecological benefits of cultural burning and prescribed fire, and contrast these effects with the costs and impacts of mechanical fuels reduction treatments alone and conventional wildfire suppression operations.

* Describe the numerous safety risks, economic costs, and direct environmental impacts of conventional wildfire suppression operations to make the case for alternative fire use practices.

* Tier the authorization of beneficial fire use from Indigenous cultural burning, prescribed fire, and managed wildfire to the Federal Wildland Fire Policy (1995/2001) and the growing literature on Indigenous fire use.

* Provide spatial fire management information on the locations of Potential Operational Delineations (PODs) and fire management zones where wildfires could be managed for resource benefits.

* Require that any/all fuels reduction or fire resilience projects include a fire use component (e.g. prescribed pile burning and/or broadcast understory burning) and specify that the primary objective of these fuels projects is to prepare sites for managing future fire for resource benefit rather than fire suppression.

* Indigenous peoples use fire lighting, not firefighting, and mature/old-growth trees are an outcome, not an objective, of Indigenous fire use. Frequent low intensity burning helps nurture soil, water, and fuel conditions that enabled some trees to grow big and old, with wide range of tree species' diversity, and survive occasional passage of wildfires.

* Follow the Good Fire II Report's Recommendation #3 to identify barriers to the exercise of reserved, retained, and other rights by Tribes and their members, including the right to engage in cultural burning and prescribed fire. Make clear to employees and representatives of that agency that the exercising of these rights is welcome and encouraged.

* Work to remove bureaucratic barriers to beneficial fire inclusion and managed wildfire. This includes following the Good Fire II Report's Recommendation #35 to create concrete policies that allow for managed ignitions under particular conditions.

* Implement recommendations #15, 16, and 92 from the Wildlife Fire Mitigation and Management Commission's "On Fire" report to empower Tribes to plan and implement more beneficial fire through expansion of the Tribal wildland fire workforce and legal authority to promote cultural burning.

Guide to Avoiding Colonial Environmentalism in Public Comments
Federal land management and wilderness preservation movements have long perpetuated Indigenous erasure and environmental racism. Today, environmental groups still perpetuate harm to Indigenous communities and landscapes when they advocate for a "hands-off" approach that denies/erases the violence that settler land management has enacted to Indigenous ecologies. Here are some considerations for moving past colonial environmentalism in your public comments and forest advocacy: What's your historical baseline?

* Pacific Northwest forests have been dramatically altered by 150+ years of genocide and the associated shift from Indigenous ecologies to settler colonial land management. Exclusion of Indigenous cultural fire regimes, wildfire suppression, timber management, invasive species introduction and spread, and climate change have led to shifted forest species composition (e.g. loss of oak woodland, expansion of Douglas-fir and other conifers), tree and canopy density, and other altered landscape conditions that are not sustainable now or in the future.

* Avoid using a settler ecological baseline when describing a "natural" forest and advocating for hands-off approaches that leave colonial forest conditions intact.

* Understandings of "natural" often ignore long-term, ongoing Indigenous land relations that shape environmental conditions, as well as the changes in forests that have come with genocide as mentioned above.

* Similarly, the concepts of wild and wilderness are colonialist and discriminatory as these terms have been used as part of the racial othering of Indigenous peoples to justify the oppression of Indigenous people and the erasure of their legacy and living connections with their homelands.

* Avoid rigid understandings of "mature" and "old growth" tree and forests that often represent overly dense forests and altered species compositions that have emerged through colonial management and the exclusion of Indigenous stewardship.

* Instead, say this: Draw from specific Tribal climate adaptation plans and Indigenous science syntheses (see resources below) for culturally-informed ecological baseline and stewardship orientations.

* Instead, say this: Across the NWFP area, the Forest Service should collaborate with Tribes to identify and manage for desired ecological conditions. Whenever possible, barriers should be removed for Tribes to engage in stewardship that meets their objectives.

* Instead, say this: Old growth forests across the Pacific Northwest are not wildernesses, and have always been stewarded and managed by Tribes for a variety of cultural objectives.

* Resources

- * Eisenberg et al 2024 "Braiding Indigenous and Western Knowledge for Climate-Adapted Forests"
- * PNW Tribal Climate Change Project - Tribal Climate Change Adaptation Plans database
- * Karuk Climate Adaptation Plan 2019
- * Whyte 2018 "Settler Colonialism, Ecology, and Environmental Injustice"
- * Worl 2022 "Restoring What? And For Whom?"
- * Eichler 2021 "Settler Colonialism and the US Conservation Movement: Contesting Histories, Indigenizing Futures."

Which species matter?

- * Avoid perpetuating single-species approaches. The 1994 Northwest Forest Plan focused too much on single, charismatic species like the spotted owl and other threatened & endangered species. These species are important, but focusing on single species is a colonial approach to environmental management.
- * Instead, say this: Across the NWFP area, the Forest Service should manage for a diversity of habitat and ecosystem types, collaborating with Tribes to identify management actions that foster biological diversity and benefit culturally important species to Tribes. This could include prioritizing for ESA or threatened species, but monolithic management for one desired species typically doesn't achieve the desired outcome.
- * Instead, say this: The Forest Service should also support Tribal management for first foods species, as defined by Tribes.
- * Resources

- * Eisenberg et al 2024
- * Karuk Climate Adaptation Plan 2019
- * Hoagland and Albert 2023 "Wildlife Stewardship on Tribal Lands"
- * Conservation Northwest 2019 "Connecting First Foods and conservation"
- * Amelia and Joaquin Marchand 2023 "Rights of Nature, Indigenous, and Advocacy Perspectives" livestream from Gonzaga Climate Center
- * Reed and Norgaard 2021 "Fire is Food"

Whose science are you citing?[bull]

- * Avoid biasing your advocacy by only drawing from western science, which is rooted in European and colonial understandings of the world. Western science presents an incomplete understanding of forest, fire, and landscape ecology. Land management that emerges from only western science perpetuates settler colonial harm to land and people.
- * Avoid referring to Indigenous knowledge solely in the past tense, which erases present-day Indigenous knowledges that are constantly adapting and evolving.
- * Instead, say this: Cite Indigenous science in addition to western science in public comments, and call on the Forest Service to engage Indigenous science in updating and implementing the NWFP.
- * Resources

- * Lake 2021 "Indigenous fire stewardship: Federal/Tribal partnerships"
- * See Dr. Frank Lake's full list of publications
- * Fisk et al 2024 "Evolving wildlife management cultures of governance through Indigenous Knowledges and perspectives"
- * Medin and Bang 2014 "Who's Asking?"

Are you tokenizing Indigenous knowledges?

- * Avoid the common settler environmentalist practice of referencing Indigenous knowledge and stewardship only when it fits existing advocacy goals.
- * Avoid referring to Indigenous knowledge and stewardship in the past-tense, as a static, historical body of knowledge to draw from and inject into settler colonial management frameworks.
- * Avoid referencing or treating Tribes as stakeholders rather than sovereign nations.

- * Avoid paternalistic and white savior assumptions that Tribes need help or that you know what they need.
- * Instead, say this: The USFS should create decision-making structures and share power to honor Tribal sovereignty, including fulfilling governmental trust responsibilities and upholding Tribal Treaty Rights. This includes the expansion of co-stewardship and co-management agreements where Tribal nations (both federally recognized and not federally recognized) have decision-making power over their territories.
- * Instead, say this: The USFS should include additional language that incorporates empowerment of Tribal decision making, self-defining terminology, and self-autonomy, thus substantiating Tribal sovereignty. For example, the USFS should revise existing plan components to place decision making in Tribal hands, where appropriate (i.e., use language such as "At Tribal request" or "As determined by Tribes" etc.)
- * Instead, say this: The USFS should promote and incorporate a more holistic worldview consistent with Indigenous concepts of kinship and stewardship toward the ecological world and all species that share our planet. Move away from an anthropocentric approach to "resource" management and more toward ecosystem stewardship where the rights of nature are valued alongside those of humans.
- * Resources

- * Gilio-Whitaker 2017 "The Problem with the Ecological Indian Stereotype"
- * Adlam and Martinez 2021 "Decolonizing Prescribed Fire"
- * Martinez et al 2024 "Indigenous Fire Futures"
- * Anderson 2024 "What's Misunderstood about Indigenous Cultural Fire is Sovereignty"
- * Karuk Knowledge Sovereignty Reports:
- * Part I: Karuk Traditional Ecological Knowledge and the Need for Knowledge Sovereignty 2014
- * Part II: Retaining Knowledge Sovereignty 2016

Additional Environmental Justice (EJ) Concerns Environmental justice matters to assess and address the uneven burdens and benefits created by and/or exacerbated by federal lands management. Tribal inclusion is at the forefront of an environmental justice (EJ) approach to federal lands management because all federal lands are Indigenous lands and because environmental justice centers Tribal sovereignty. However, it is not the only environmental justice concern relevant to the Northwest Forest Plan (NWFP). This section addresses some of these additional environmental justice concerns. The DEIS fails to offer appropriate landscape level analysis or plan components to address EJ concerns. The EJ appendix focuses on identifying which communities are to be considered as EJ communities in project-level analysis, using race, ethnicity, and income. Addressing predictable EJ concerns should happen on a landscape level across the NWFP management area, not only (but also) in site-specific project design and outreach. In other words, analysis and plan components (including Standards and Guidelines) should be found in the Environmental Impact Statement (EIS), rather than deferring such analysis only to the Environmental Assessment (EA) or Categorical Exclusion (CE) for each individual site-specific project (such as individual timber sales). We suggest the following:

- * Incorporate all management suggestions from Chapter 10-Environmental Justice of the "Synthesis of Science to Inform Land Management Within the Northwest Forest Plan Area" (pages 839-841).
- * Consider how the NWFP amendment is consistent with the Presidential Memorandum "Promoting Diversity and Inclusion in Our National Parks, National Forests, and Other Public Lands and Waters" (2017), including the two sections "Enhancing Diversity and Inclusion in the Federal Workforce" and "Enhancing Opportunities for all Americans to Experience Public Lands and Waters."

Toxicities

- * Assess the air and water quality impacts of pesticides, herbicides, fire retardants, and other chemicals used in the forest as part of NWFP management. These should be assessed in relation to worker exposure, in relation to nearby communities exposed through drift, and in relation to food, including first foods, and water, including drinking water, upon which many communities rely. Mandate assessing and addressing these concerns within project-specific analysis.

Recreational access and equity

* Provide analysis and discussion of inequities in access to recreational opportunities and different cultural uses of the NWFP area at the landscape scale, not only (but also) in site-specific project design. Include clear plan components in all alternatives that site-specific project analysis should:

- * Assess and protect sites with recreation use by diverse communities and that are disproportionately used by certain underrepresented or historically-excluded communities (by race, ethnicity, income, disability, etc.) following EO 14096's mandate to improve equitable access to public lands as environmental justice praxis.
- * Assess and protect sites in relationship to the economic impact that disruption of recreation will have on local communities, especially given that recreation is the primary economic contributor of NWFP lands to the regional economy.
- * Assess and protect sites for lesser-known recreation values by diverse communities.
- * Survey for and protect culturally or historically sensitive and/or meaningful sites for diverse communities.

Youth education and mentorship

* Maintain and build on ECON-SUST-DC-3 and ECON-SUST-GOAL-1 from the DEIS to promote meaningful youth education and mentorship opportunities on every national forest in the plan area, particularly in the realms of prescribed, cultural, and wildland fire mentorship and training.

Environmental workforce The DEIS acknowledges that the environmental workforce is largely "composed of low-income Hispanic or Latino immigrants and undocumented workers" (3-145) who travel long distances for work. Similarly, other Communities of Interest, "Nontimber Forest Products Gathering" and "Recreation," also travel frequently to different sites across NWFP locations. Without landscape scale analysis, it is unlikely that these groups will be adequately considered in site-specific project analysis since they are unlikely to be present at the time of Environmental Assessment. Although the DEIS mentions that evaluating for EJ implications within EJ communities and Communities of Interest should include "opportunities for meaningful involvement in the decision-making process" made available (3-141), it does not offer any recommendations to do so.

* Create an additional ECON-SUST-GOAL that aims to remove financial barriers to public participation, invests in communication beyond translation, and uses regional liaisons or trusted channels of communication to form connections with Communities of Interest.

In DEIS Section 3.8.1.12 Environmental Justice, the subsection titled "Environmental Workforce" (3-145) acknowledges some of the inequitable labor practices that this workforce faces. However, this section fails to provide a more in-depth analysis of how the workforce is distributed and quantify the size and scale of this workforce. More discussion is needed on the equity implications of using temporary migrant workers to compensate for labor shortages. Without comprehensive immigration reform, this form of employment is predicated on inequitable power dynamics perpetuated by centuries of neocolonial practices. Furthermore, the DEIS refers to certain types of labor performed by the environmental workforce as "unskilled" (3-121; 3-151) or "low-skilled" (3-122) labor. This type of language is demeaning to workers that have accumulated decades of experience by doing this type of work and erodes class solidarity by reinforcing a hierarchy of labor.

* Provide mechanisms to consistently inspect for and aggressively enforce federal, state, and local wage and safety regulations for contractors in the NWFP management area, including regarding wage theft, worker intimidation, and heat and catastrophic wildfire smoke exposure.

* Consult regularly with workers and worker-organizations to develop protocols for worker protections in the implementation of NWFP projects. More thoroughly address and assess the over-representation of Indigenous, Black, and other marginalized and racialized communities in certain forms of work and the specific vulnerabilities of that work.

* Create an additional ECON-SUST-DC that incentivizes safe, sustainable, and equitable working conditions for forest workers and fair compensation for this work.

* Use language that elevates the importance of the environmental workforce and does not demean worker labor or reinforce the segmentation and hierarchical arrangement of the workforce.

* Provide landscape level analysis of disproportionate harm to forest and fire workers caused by catastrophic wildfire caused smoke and heat (both of which are exacerbated by climate change).

* Resources

* Davis et al 2023 "Multiple Stories, Multiple Marginalities: The Labor-Intensive Forest and Fire Stewardship Workforce in Oregon"

* Costa 2021 "Temporary work visa programs and the need for reform"

Economic sustainability objectiveThe DEIS's ECON-SUST-OBJ-01 focuses exclusively on treatment of acres. This type of framing prioritizes efficiency and incentivizes the use of contracting tools which favor selection of contractors who, in addition to meeting the base selection criteria (which does not include local benefits) can get the most work done, the most quickly, for the lowest price. Efficiency does not always equate to effectiveness; by using acres treated as the sole metric of success, it incentivizes practices that contribute to worker inequity and ignore working conditions and local benefits. As noted by Rural Voices for Conservation Coalition, "Although low-price contracting might appear to save the government money, in reality it costs the American taxpayer more money when poor quality work has to be redone, and when poorly-paid workers have to apply for food stamps and other public assistance, or seek medical care without insurance." Additionally, low-bid contracting perpetuates inequities as Latine contractors tend to attain labor-intensive service contracts (LISCs) while white contractors tend to secure more technical work included in master stewardship agreements and stewardship contracts.

* Create an additional ECON-SUST-DC that incentivizes safe, sustainable, and equitable working conditions for forest workers and fair compensation for this work.

* Create an additional ECON-SUST-GOAL that incentivizes increased communication and collaboration between federal agencies, especially land management agencies, the Department of Labor, and OSHA to enforce wage and safety regulations.

* Add language to ECON-SUST-GOAL-03 to incentivize federal land management agencies to prioritize Best Value contracting practices, such as Stewardship contracting rather than BPAs.

* Resources

* Rural Voices for Conservation Coalition 2006 "Workforce and Labor Issue Paper"

* Deak et al 2021 "Documenting Twenty Years of the Contracted Labor-Intensive Forestry Workforce on National Forest System Lands in the United States"

* Machado, M.A., Downey, J., Huber-Stearns, H., and Davis, E.J. (2025). "The Labor-Intensive Forestry and Fire Workforce in the US Northwest: Recommendations for Improving Equity and Growth" [Manuscript in preparation].

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