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Title: Executive Director
Comments: Thank you for the opportunity to comment on the U.S. Forest Service's Draft Environmental Impact Statement for the Northwest Forest Plan Amendment. Please see our comments attached.

March 17, 2025

USDA Forest Service

1220 Southwest 3rd Avenue, Ste. G015 Portland, OR 97204

Submitted electronically via Comment Portal

Re: The Northwest Forest Plan Amendment Process - Draft Environmental Impact Statement

To Whom It May Concern,

Thank you for the opportunity to comment on the U.S. Forest Service[rsquo]s Draft Environmental Impact Statement for the Northwest Forest Plan Amendment.

Save California Salmon is a 501(c)(3) non-profit dedicated to policy change and community advocacy for Northern California[rsquo]s salmon and fish dependent people, including Tribes. We support the fisheries and water protection work of the local communities, and advocate effective policy change for clean water, restored fisheries, and vibrant communities.

We commend the Forest Service for taking a hard look at its management and relationship with Tribes and for focusing on critical issues to the communities that rely on, and live within, the Northwest Forest Plan (NWFP) region. While there are recent and emerging changes to the NEPA and CEQA process, we still feel it is important - and perhaps even more necessary now - to submit comments regarding some concerns we have regarding what we feel the Draft Environmental Impact Statement (EIS) is lacking, or areas that it needs to emphasize more. As such, we respectfully submit the following comments:

Tribal Involvement
There appears to be a lot of recognition for the fact that Tribes need to be included in land management and land management decision making processes. We applaud this. The Forest Service now has an opportunity to implement Tribal inclusion within the drafting of the EIS. For example:

* The Forest Service should commit to turning Tribal recommendations into policy requirements, not suggestions.
* Tribal people should be hired by the government, including the Forest Service, and including every Forest Service District in order to create trust and more open communication between Tribes and the Forest Service, and ensure Tribal voices are heard. One or two Tribal representatives is not enough - there should be several Tribal representatives per district.
* The Forest Service should work with Tribes to identify opportunities for land return and long term exclusive use permitting.
* The Forest Service should apply for adequate funding for the purpose of Tribal Inclusion.

* The Forest Service should compensate Tribes for their time, energy, and sharing of important information.
* Opportunities to co-manage Forest Service lands with respective Tribes should be actively sought out and pursued. Tribes should be a part of all decision making processes and final decisions.

We recognize that there have been mass layoffs for the U.S. Forest Service employees and we understand that many federal environmental and DEI grants have been axed. We would like to be sensitive to this reality while also holding the line in terms of expectations for fairness and inclusion of Tribes. Regardless of the impacts to Diversity, Equity, and Inclusion matters, there are many Tribal sovereign governments and obligations to these Tribes are an issue of Tribal Trust. Employment and budget cuts should not determine how Tribes are treated with regards to the Northwest Forest Plan Amendment.

Including these provisions within the EIS will greatly increase the chances of better forest management through the incorporation of Indigenous Knowledge and Tribal best management practices such as cultural burns and watershed restoration practices. Co-management and land back opportunities will also greatly increase the chances of improved forest management.

The subcommittee meeting on January 31, 2024 made clear that there are categories of important topics to focus on including: biodiversity, fire resistance, climate change, and protecting old growth. Indigenous Knowledge is listed as a bucket category, but it[rsquo]s the only one that also helps address all the other categories. One committee member made the point that all efforts should be halted until Tribal inclusion is adequately addressed.

As an organization, Save California Salmon is open and happy to work with the Forest Service in order to achieve timely and meaningful Tribal inclusion. We have been conducting interviews with Tribal members, cultural fire practitioners, basket weavers, and cultural teachers in order to be able to offer recommendations that reflect Tribal visions and Indigenous Knowledge. While we cannot speak for Tribes, we can share contacts, recommendations, and advice.

Cultural Resource Protection

When it comes to forest planning, protection of cultural resources is a concern for Tribes. Protection of cultural resources is one of the reasons Tribal engagement is so important. For example, the use of chemical herbicides and/or pesticides in forest management presents a threat to cultural resources, specifically related to basket weaving materials such as tule, willow, beargrass, fern, hazel, and conifer roots. Chemicals can have negative long term impacts on the Tribal communities. Traditional Tribal harvesters have rational concerns over the potential exposure to environmental toxins when herbicides or pesticides are used. Dangerous exposure can come through terrestrial and aquatic food resources.

Exposure can also occur through traditional basket materials that people place in their mouths during the basketweaving process. We urge the Northwest Forest Plan managers to refer to the statement made by the California Indian Basketweavers Association on the use of pesticides on cultural resources.1

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1 California Indian Basketweavers[rsquo] Association, [ldquo]Pesticides & Basketweavers: CIBA Policy Statement on Pesticides [ndash] Adopted by the CIBA Board of Directors on March 5, 1994.[rdquo] https://ciba.org/ciba-policy-statement-on-pesticides/

Indigenous Peoples within the Northwest Forest Plan region managed forests for centuries without the use of chemical herbicides and pesticides. The Forest Service has the resources to manage forests in the same way now and should partner with local Tribes to implement traditional management practices.

In addition, salmon and streamside vegetation (such as Tan Oak, Willow, and Madrone) are considered cultural resources and should be protected through the Northwest Forest Plan Amendment. Tan Oak, Willow, and Madrone are considered hindrances to Timber production, however, these types of vegetation are important for sustenance and cultural resource creation. Similarly salmon are an important source of food and cultural traditions. Protections should logging prohibitions in areas containing these species as well as best management practices for species identification and protection - especially in areas being considered for logging.

Fire Resistance, Resilience, and Cultural Burning

Alternative B states, [ldquo]Fire resilience recognizes that wildland fire plays a critical ecological function and is part of important cultural practices. Resilience against severe wildfire effects is the primary desired condition.[rdquo] Alternative B should clearly state the necessity of - and commitment to including cultural burns in addition to prescribed burns within the NWFP Amendment. Similarly, the NOI states that, [ldquo]Indigenous fire stewardship and cultural burning regimes can contribute to the ecological health of NWFP forests.[rdquo] Indigenous fire stewardship and cultural burning are imperative for preventing

large-scale, catastrophic fires, as well as caring for the ecological health of forests. Cultural and

Tribally-led prescribed burning promotes biodiverse habitats and creates critical shade fire breaks on the landscapes. For instance, studies show that cultural and prescribed burning greatly improves elk habitat and plant species diversity.2

We have also seen cultural burns and Tribal-led, prescribed burns create important fire breaks and back burning ignition areas - especially around towns. Recent fires in areas such as Somes Bar and Orleans, California demonstrate that naturally ignited fires (areas that were treated by Tribes) can be used as critical fire breaks and low intensity back burning areas. This allows fires can burn under low intensity conditions. Low intensity back burning can be utilized around homes and towns. This is important as In contrast, backburns that burn at high intensity decrease habitat for endangered species and increase future fire threats to communities.

Backburns can also cause extensive and long-term watershed damage. For example, the Klamath River area in California experienced multiple high intensity fires around towns that led to mudslides. These mudslides caused Dissolved Oxygen to enter the Klamath River, killing all aquatic species within a thirty miles stretch. This incident impacted the river for many months.

The section on Environmental Consequences is far too short to adequately provide guidance to prepare for and mitigate against catastrophic fires. The section should include proposals to fund and fasttrack cultural

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2 Connor, Thomas, et al. [ldquo]Karuk ecological fire management practices promote elk habitat in Northern California.[rdquo]

Journal of Applied Ecology, vol. 59, no. 7, 25 May 2022, pp. 1874[ndash]1883, https://doi.org/10.1111/1365-2664.14194.

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and prescribed burning. Returning fire to a landscape where it has been excluded and in areas where plantation creation has been a priority, has made burning complex and expensive. In some cases, extensive pretreatment is needed - even in lands that are not designated as [lsquo]matrix.[rsquo] It has required local flexibility and planning structures that the Forest Service not only discourages, but often stands directly in the way of.

It is important to note that the amount of fire-based restoration needed is far higher than what the Forest Service supports. In addition to greater allowances in general for prescribed and cultural burns, we recommend that burning regulations either: (a) be evaluated and applied to smaller areas, or (b) allow for greater flexibility within larger regulatory jurisdictions. Presently, there are communities that are thousands of miles apart, but still subject to the same no-burn rules. This creates a situation where either critical burn windows are not used or community members have to burn during non-ideal times.

Modifying burn regulations in this way will aid in adapting to a changing climate.

Fighting Wildfires with Tribes
While there have been funding freezes and budget cuts that have severely impacted California[rsquo]s North Coast emergency responses, plans to fight wildfires should be developed in partnership with local Tribes and

communities as much as possible. For example, during the 2023 summer the Karuk Tribe, Forest Service, National Weather Service, and CalFire worked together to place fire lines and create burn plans during the Pearch Fire in Orleans, California. Utilizing local knowledge, Tribal fire crews, and creating regulatory flexibility not only saved homes and culturally important areas from stand replacing fires, but it also allowed for low intensity back burns within threatened neighborhoods and in wildlands. In this way, the Pearch Fire acted like a prescribed fire. The management of the Pearch Fire left the towns of Somes Bar and Orleans more fire resistant. Impacts to watersheds were also mainly positive. Years of fire safe preparation, prescribed fires, real time utilization of Indigenous Knowledge, and new technology made this possible.

In contrast, recent fires in and around the town of Klamath River were quick moving. There, fire lines were placed in creeks and mid slopes. Untreated plantation and high fuels from poor management, coupled with roaded areas that exceeded 5 miles of road per mile of forest, exacerbated this situation. The result has been an ecological disaster that has impacted over one hundred miles of the Klamath River.

Need to Restore, Not Just Protect Watersheds
Among many of the important topics covered in the Northwest Forest Plan, the Draft EIS lists protecting riparian areas and waters as one of its primary purposes. However we have seen many situations where forest service roads and other activities are impacting watersheds to the point that salmon restoration and other agencies' water protection efforts can not be achieved.. For instance, the Forest Service often argues that it cannot meet its water quality permitting and Clean Water Act requirements in California due to its lack of staffing and a road maintenance budget. Despite this, the Forest Service is proposing management activities that will increase roading density, even though some of its watersheds already have over 4 miles of roading per mile of forest.

The Aquatic and Riparian Effectiveness Monitoring Program has identified key subwatersheds as areas for monitoring and protection efforts. Save California Salmon urges Northwest Forest Area managers to also identify and take on large-scale watershed restoration and road removal projects in order to protect endangered species such as Chinook, Steelhead, Chum, Bull Trout, and Coho Salmon.

As outlined in the Draft EIS, climate change is impacting waters that either originate or run through the Northwest Forest Plan area. Watersheds within the Northwest Forest Plan region are critical to the well being of millions of people as well as the survival of a number of endangered species. Critical water supplies should be identified and analyzed for protection and restoration as a part of the Draft EIS.

A century of mismanagement (including clear-cutting, heavily-roaded landscapes, undersized culverts, unthinned monoculture-style plantations, grazing, and mining) has left NWFP region watersheds with serious impairments including: damaged fish passage, debris torrents, road failures, chemical runoff, large fires and damaged aquatic habitat. In the case of road-related sediment input, the presence of some fine sediment along the channel bed is normal and benefits some species, such as native lamprey. However, excess fine sediment deposition can be detrimental. For example, it reduces salmon egg-to-fry survival by clogging spawning gravels. These impairments render watersheds more vulnerable to the impacts of climate change, including temperature increase, duration and intensity of drought conditions/reductions in precipitation, changes in river instream flows, and groundwater recharge rates. Therefore, restoring - not just protecting watersheds and riparian areas - is critical. Other actions

that are critical for the survival and well-being of fisheries and fish-dependent communities include: removing unneeded roads, improving needed roads, replacing culverts, as well as restoring floodplains, wetlands, and estuaries. We would like to see effective climate change adaptation and resilience through this type of watershed management that adequately responds to the crises of our time.

The Aquatic and Riparian Effectiveness Monitoring Program identifies upgrading roads, replacing culverts, and facilitating the growth of larger trees along streams as solutions to improving fish passage. We recommend that roads - especially old logging roads - be identified for removal as a part of the Northwest Forest Plan Amendment. More specifically, only roads that are critical for firefighting, recreation, and the transportation system should be retained and maintained. The Forest Service has not been able to maintain even a fraction of its road systems. In many areas, forest roads are the main source of sediment pollution and habitat fragmentation. Road removal as well as maintenance plans for needed roads will save money and watersheds in the long term. We also recommend utilizing Indigenous Knowledge and working with Tribal communities and other agencies to restore critical watersheds and floodplains, and to remove or maintain system roads. This would protect communities and help restore biodiversity in watersheds and forests.

Need to comply with the Clean Water Act and California Environmental Laws
The U.S. Forest Service is the largest landowner in California, managing around 20 million acres of land, which constitutes about 57% of California's 33 million acres of forest land. Much of this land surrounds reservations, private lands, and communities and feeds critical rivers, local drinking water supplies, and state infrastructure. Unfortunately, the Forest Service has not always been a good neighbor. Now, the forest is covered by abandoned mines, overgrazed lands, and old, unmaintained roads and plantations. In some areas, environmental damage is leading to the violation of state laws, including California[rsquo]s Porter Cologne Act and Public Trust protection laws. To this day, Tribes and the state struggle to enforce pollution control within the Forest Service jurisdiction. Many of California[rsquo]s waterways are now listed as [ldquo]impaired[rdquo] due to sediment and other pollutants as a result of Forest Service activities. Similarly, the Forest Service activities are sometimes partially responsible for California Endangered Species Act (CESA) listings, especially in the cases of rare plants and salmonids. Many of the state[rsquo]s rural superfund sites are also located on Forest Service lands. While we recognize much of the superfund pollution comes from the boom and bust extraction of corporations and individuals that use the forest, this extraction was permitted by the Forest Service and landowners remain responsible for the pollution on their lands under both federal and state laws.

Over the last few decades, the North Coast and Central Valley Regional Water Boards have tried to bring the Forest Service into compliance with state law and the Federal Clean Water Act by controlling its pollution discharges into California[rsquo]s waters though timber waivers and other permitting measures.

Individual forest proponents regularly argue against controlling their pollution or meeting the terms of their permits. Often this is because resources are not sufficient to properly manage impacted forests and dense road systems, or monitor watersheds. The Forest Service is often the absentee landowner when watershed restoration planning or fire protection management happens. In order to pursue compliance with state laws, we recommend prioritizing some of the actions we suggest above, including prioritizing co-management with Tribes along with partnerships with fisheries and natural resource management agencies.

Thank you for the opportunity to comment on the U.S. Forest Service[rsquo]s Draft Environmental Impact Statement. Save California Salmon looks forward to a robust and inclusive final EIR that will protect and enhance national forests in the Northwest for generations to come. Please feel free to reach out to us with any questions.

Sincerely,

[] Executive Director Save California Salmon

ATTACHMENT-Letter text: NWFP - DEIS Comment Letter.pdf; this is the same content that is coded in text box; it was originally included as an attachment