Data Submitted (UTC 11): 3/17/2025 4:00:00 AM
First name: Dave
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Organization: Conservation Northwest
Title:
Comments: Please accept our comments on the proposed Northwest Forest Plan amendment

Dave Werntz

Conservation Northwest

Jacque Buchanan, Regional Forester Pacific Northwest Region

United States Forest Service 1220 SW 3rd Avenue, G015 Portland, OR 97204

Jennifer Eberlien, Regional Forester Pacific Southwest Region

United States Forest Service 1323 Club Drive

Vallejo, CA 94592

March 17, 2025

RE: Draft Environmental Impact Statement on the Northwest Forest Plan amendment

Dear Mss. Buchanan and Eberlien,

On behalf of Conservation Northwest and our members and supporters, please accept these comments in support of Alternative B of the Northwest Forest Plan (NFP) amendment as modified by our comments. The NFP amendment represents an important and necessary step toward incorporating Indigenous Knowledge and Tribal rights and interests and addressing climate change. A modified Alternative B (B+) would broaden partnership opportunities with Tribes, reduce climate-related threats to aquatic ecosystems and habitat connectivity, increase ecological resilience through old-growth recruitment and more burning in dry forests, and focused restoration in moist forest stands.

Spanning 24 million acres across Washington, Oregon, and California, the NFP is the world's first ecosystem management plan, setting out to protect and restore fish and wildlife habitat and support local communities. Overall, the NFP is making good progress, but climate change is now amplifying fire, drought, and flood events, and a climate-smart amendment is warranted.

Furthermore, instructive new scientific and monitoring information has been collected, compiled, and published, and it is important under the NFP's adaptive management procedures to incorporate new information and knowledge into management plans. We also must include Indigenous knowledge and co-management actions and practices in the NFP that uphold tribal treaty rights and were not previously considered.

Our proposed modifications to Alternative B are provided with deleted text in red strikethrough and new text in green underlined.

I. Tribal Inclusion

At Conservation Northwest we have a personal and ethical interest in working with our Tribal partners and practicing conservation through reconciliation action. It can be difficult to reconcile USFS history, culture, and authority (from Congress) with the goals of building partnerships and collaborative projects and advancing co-management agreements with Tribes. Even with formal government-to-government consultation, Tribes experience many of the same challenges and partnership-building obstacles as we do when trying to work with the USFS: bureaucratic structures, competing USFS missions (see the Multiple-Use Sustained-Yield Act of 1960), differences in perspectives and expectations, lack of partnership resources or emphasis, and personnel turnover.1

We applaud and support the inclusion of Indigenous Knowledge and Tribal rights and interests in the NWFP Amendment; many of the Recommendations work to resolve the challenges named above. We offer these comments and suggestions for consideration.

General Comments

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* While Tribal Inclusion and Tribal - Indigenous Knowledge were written for the NWFP Amendment, they serves a broader purpose in the implementation of the 2023 USFS Tribal Action Plan and execution of other related Memorandums and Orders. Therefore, we suggest that the new plan direction associated with tribal inclusion; incorporation of Indigenous Knowledge decision making; and opportunities to expand co-stewardship on NFS lands to better address tribal needs, achieve forest management goals, and meet agency trust responsibilities, be replicated and included in the updating of all USFS Forest Plans.
* Since this is a NWFP Amendment, we suggest the addition of Desired Conditions, an Objective, and a Guideline specific to mature and old growth forests (see Tribal - Biodiversity below).
* We support the creation of a Tribal wildlife and biodiversity regional interagency working group (FACA Recommendation 1-43)2 and would like to see it in the Final EIS.

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1 Michael Dockry, Sophia Gutterman, Mae Davenport (2018): Building Bridges: Perspectives on partnership and collaboration from the US Forest Service Tribal Relations Program, Journal of Forestry 116(2):123-132

2 2024. Northwest Forest Plan Amendment Federal Advisory Committee Recommendations.

https://static1.squarespace.com/static/66db67adb0d5ba2a542f9fef/t/673b61b42e5335495c18de08/1731944886298/NWFP_FAC_Recommendatio ns_Final_July2024.pdf

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* We suggest that language related to increasing Tribal access also reference the importance of maintaining ecological connectivity and integrity.

Additions, Comments & Tracked Changes Regarding Specific Proposed Actions in Alternative B

Tribal - Access and Gathering

Maintaining ecological connectivity and integrity is a critical component of a sound stewardship strategy regarding human access. We suggest the addition of language to reflect this.

TRIBAL-AG-OBJ-01. Within 5 years, work with Tribes to co-develop a long-term strategy to improve tribal access to important cultural places in the Northwest Forest Plan area, while alsoensuring ecological connectivity and integrity. The strategy must be consistent with applicable federal law, regulations, executive orders, and agency policies, tribal laws, constitutions and treaty, reserved, retained and other tribal rights, including any privacy and consultation protocols.

Tribal - Biodiversity

This is the Northwest Forest Plan. A holistic understanding of mature and old growth ecosystems and trees should be a key component of Tribal Inclusion. We suggest the addition of the following Desired Conditions, an Objective, and a Guideline to reflect this.

ADD:TRIBAL-BIO-DC-03. The Forest has a broader understanding and acknowledgement ofold growth forests and ecosystems that have been stewarded by Indigenous people for millennia.The current NWFP definition of old growth focused on infrequently disturbed moist forestscharacterized by dense canopy layers and downed wood,

is expanded to more explicitly includefrequently disturbed drier forests characterized by open canopy structure and understory plantsthat foster low-intensity fire.3

ADD:TRIBAL-BIO-DC-04. The Forest has an increase in the acreage and health of mature andold growth forest ecosystems and associated species across the NFP region in both moist and dryforest types and in any land allocation where they are most likely to persist into the foreseenfuture. Also appropriate if added at FORESTW-ALL-DC-08.

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3 Eisenberg, C., Prichard, S., Nelson, P., Hessburg, P. 2024. Braiding Indigenous and Western Knowledge for Climate-Adapted Forests: An Ecocultural State of Science Report. https://depts.washington.edu/flame/mature_forests/pdfs/BraidingSweetgrassReport.pdf

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ADD:TRIBAL-BIO-OBJ-02. Within two years, hold a Regional summit with NWFP Tribesspecific to mature and old growth ecosystems. Co-define "old growth forest," acknowledge theirevolution over time and understand the role of Indigenous peoples in maintaining theseecosystems, and co-create guidelines that will ensure their conservation and health.

ADD:TRIBAL-BIO-GDL-03. The Forest works with Tribes to identify, locate, protect, andrestore mature old growth forest habitat, ensuring Special Forest Products use and Indigenousfire use for cultural and ecological purposes in ways that support the integrity, sustainability, andconnection of old growth ecosystems.

Tribal - Forest Stewardship

This is the Northwest Forest Plan. Consultation with Tribes about stewarding mature and old growth habitats should be a Standard, not a Goal. An Objective regarding same is suggested under Tribal - Biodiversity.

TRIBAL-FORSTW-DC-01. National forests in the Northwest Forest Plan area coordinate, consult, and collaborate with Tribes, and work with Tribes to establish a co-leadership role in the context of a co-stewardship agreement to restore, promote, and enhance traditional cultural use species. Ensure these species are accessible to tribal members while maintaining ecologicalintegrity and connectivity.

TRIBAL-FORSTW-GOAL-02STD-07. Consult and coordinate with Tribes to identify culturally relevant characteristics of mature and old growth habitats associated with cultural use species and develop management strategies through co-stewardship agreements to promote, enhance and recruit culturally important plant, animal, and fungi communities in desired growth forms and locations.

Tribal - Indigenous Knowledge

We suggest TRIBAL-IK-STD-02 be shifted to an Objective and modified to reflect each Tribe's unique vision for consultation, and to ensure coordinated, consistent processes and protocols regarding Tribal sovereignty, knowledge sovereignty, and data sovereignty.

TRIBAL-IK-STD-02OBJ-01. Within five years, with each Tribe, the Forest shall co-create aTribal Data Sharing Plan or Knowledge and Data Stewardship Agreement. If should referencethe Executive Office Memo re: Guidance for Federal Departments and Agencies on IndigenousKnowledge and the National Historic Preservation Act Section 304 regarding confidentiality.

Confidentiality of Tribal knowledge, information, data, and resources collected during

consultation or as part of co-stewardship, collaboration, and co-management agreements shall follow the Plan/Agreement and any other USFS data sovereignty protocols, as guided by best practices, and be maintained as allowed by law, unless express permission to share information is given by the relevant Tribe. This shall include the non-disclosure of highly confidential tribal knowledge, information, data, and resources regarding ceremonial activities and features, except where authorization is specifically given by a representative designated by the Tribe. This may involve a higher standard of confidentiality than what is typically disclosed to a qualified Forest Service archaeologist.

Tribal - Treaty and Protected Tribal Rights

Each forest will only be able to develop a Tribal Relations Program if there are staff dedicated specifically to doing so. See the recommended addition of FAC 1-30 DC under section Adding FACA Recommendations to the Proposed Alternative B.

TRIBAL-TPTF-OBJ-01. By the end of year 8 following amendment approval, each national forest in the Northwest Forest Plan Area have designed, and implemented, and staffed a Tribal Relations Program to build partnerships, uphold trust and legal responsibilities, and help consult, coordinate, and collaborate with federally recognized Tribes that have ancestral lands on national forests in the Northwest Forest Plan area.

Tribal - Awareness and Coordination

Decolonization specifically brings about the repatriation of Indigenous land and life. Too often the word is used as a metaphor and so, if used, it should be defined. We suggest removing it or offering different language below.

TRIBAL-AWA-OBJ-01. Semiannually, and with Tribal input and leadership as appropriate, conduct employee training and education regarding Tribal cultural awareness; terminology; general trust responsibilities and Tribal rights; relevant treaty rights and history, settler colonialism, decolonizationtwo-eyed seeing, and Indigenous ecocultural restoration; principles of free, prior, and informed consent; data sovereignty; Indigenous values that underpin Indigenous Knowledge such as reciprocity, cultural humility, and the Seventh Generation Principle; and the Principles and Best Practices for Working with Indigenous Knowledge.

Indigenous trainers and/or cultural monitors from willing Tribes should be engaged to co-lead this instruction. Consider hosting an annual knowledge sharing event where practitioners from the Forest Service and from area Tribes can teach, train, share, and learn.

Adding Alternative D Proposed Actions to Alternative B

The following Proposed Actions are included in Alternative D and should be included in the final plan amendment as modified below.

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 towards landscapes supporting traditional Tribal practices, such as large, low-intensity prescribed burns.

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 while maintaining ecological connectivity andintegrity.

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.

Adding FACA Recommendations to the Proposed Alternative B

The Northwest Forest Plan Federal Advisory Committee (FACA) developed several recommendations that were not incorporated into any action alternative in the DEIS. To strengthen the ability to execute Tribal Inclusion plan components, we suggest that the Forest Service include the following FACA Proposed Actions in the final amendment (some modified).

FAC 1-30 DC. To implement the Tribal Relations Program on each Forest and to ensure that individual Tribal needs are respected and understood, each Forest employs staff with the sole responsibility of stewarding relationships between each Tribe and the Forest. The roles and responsibilities of the Tribal Relations Program Manager include Tribal outreach, staff-to-staff coordination, leadership and specialist collaboration, and support for USFS staff training, and are separate from Forest Service staff responsibilities associated with heritage and/or archaeology program tasks.

FAC 1-43 OBJ. Within two years, establish a Tribal wildlife and biodiversity regional interagency working group (Regional Tribal Operations Working Group) with Tribal and Forest Service representatives from Regions 5 and 6 to explore co-stewardship of wildlife and biodiversity that is inclusive of Indigenous knowledge and cultural practices, and western science, and that honors Tribal data and knowledge sovereignty and includes free, prior, and informed consent by Tribes and Tribal people.

FAC 1-92 GOALOBJ. Upon Tribal request, enter into long-term contracts, master stewardship agreements, and other sovereign-to-sovereign cooperative instruments with Tribes and Tribal entities. Within two years, establish a working group of tribal and Forest Service leadership to revise existing templates, including Data Sharing Plans or Knowledge and Data StewardshipAgreements so that cooperative instruments are consistent in the way that they respect Tribal sovereignty and knowledge and data sovereignty.

FAC 1-109 MONT. Conduct ongoing monitoring of visitor use and assessments of culturalawareness. Develop responses in coordination with relevant Tribes when needed to safeguard treaty, reserved, and other similar Tribal rights and the resources and places upon which those rights depend, and generally, to ensure the ecological compatibility of recreation with Tribal treaty rights and resources.

FAC 1-110 MONT. At Tribal request and in consultation and cooperation with relevant Tribes, conduct regular monitoring of specified culturally significant resources and First Foods. Support Tribes in selecting the relevant species, designing the monitoring plans, conducting the monitoring, and storing and sharing the data according to Tribal knowledge and data sovereignty protocols. Where the Forest proposes to monitor culturally significant resources, ensure any resulting research or data is protected in consultation with relevant Tribes.

FAC 1-111 MONT. In cooperation with relevant and interested Tribes and according to Tribal knowledge and data sovereignty protocols, conduct monitoring of implementation of the special forest products program in the Forest to ensure that Tribally-important culturally significant resources are harvested in a manner and rate

consistent with sustainability.

FAC 1-112 MONT. At Tribal request, work with Tribes to co-develop monitoring thresholds or triggers and adaptive management pathways that incorporate Indigenous knowledge into management or mitigation responses while protecting Tribal data sovereignty and culturally sensitive information.

II. Forest Stewardship
We propose changes to Alternative B plan components to:

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* recruit the largest and oldest trees in dry forests into old-growth trees,
* manage older-mature moist forests for old forest habitat,
* restore old forest conditions in young-mature moist forest Reserves,
* improve protections for moist old-growth forest stands,
* prioritize previously managed, structurally simplified stands for restoration, and
* limit salvage logging in Reserves.

FORSTW-LSR-MOI-GDL-01: In young, moist forest stands less than 120 years old in Late- Successional Reserves, forest management activities should be designed to maintain or restore late-successional and old-growth forest conditions that (a) contribute to the recovery of federally listed species such as northern spotted owl, marbled murrelet, and coastal marten; [START STRIKEOUT](b) maintain orrestore habitat for other species that depend upon younger stands; [END STRIKEOUT]or (cb) achieve other desired conditions, such as fostering old-growth development and supporting tribal co-stewardship and cultural use.

The purpose of Late-Successional Reserves (LSRs) in wetter climates is to provide large blocks of contiguous late-successional and old growth forest habitat that is well distributed across the landscape. We anticipate complex early seral forest and habitat for other species that depend on younger forest will occur in LSRs as a result of natural disturbance.

FORSTW-MTX-MOI-STD-01 In moist forests in Matrix, no timber harvest shall occur in old growth stands (those that established prior to 1825) except to provide for tribal co-stewardship and cultural use [START STRIKEOUT]or to reduce wildfire risk to communities and infrastructure.[END STRIKEOUT] See also FIRE- ALL-DC-01 and FIRE- ALL-PMA.

Large and old-growth trees are generally resistant to wildfire, and unlikely to contribute to fire risk to communities or infrastructure, so the phrase removed is an unnecessary exemption.

FORSTW-MTX-MOI-GDL-01 In moist forests in Matrix, timber harvest in mature forest stands (those that established between 1825 and 1905) should only occur to maintain and restore ecosystem integrity, including but not limited to: (a) reducing the risk of fire to adjacent old forest stands; [START STRIKEOUT](b) developing and enhancing structurally complex, late-successional habitatincluding characteristics to support federally listed species such as northern spotted owl, marbledmurrelet, and coastal marten;[END STRIKEOUT] (c) maintain or restore habitat for other species dependent on late- successional characteristics or; (d) meeting tribal cultural use priorities. Application of this guideline should be responsive to changes in landscape forest conditions and new scientific information on the effects of silvicultural treatments on ecological benefits of timber harvests in these stands. Treatments can also occur to reduce wildfire risk to communities and infrastructure. See also FIRE-ALL-DC-01 and FIRE-ALL-PMA.

FORSTW-MTX-MOI-STD-03 In moist forests in Matrix, timber harvest in mature forest stands(those that established between 1825 and 1905) shall develop and enhance structurally complex,late-successional habitat including characteristics to support federally listed species such asnorthern spotted owl, marbled murrelet, and coastal marten.

Older-mature stands are essential for restoring old-growth forest distribution and abundance in westside wet forests. This proposed change creates a standard from a guideline to make obligatory the purposes for which timber harvest in moist mature stands may occur (i.e., to develop and enhance structurally complex, late-successional habitat including characteristics to support federally listed species). This provision clarifies that any timber harvest - proactive stewardship - in moist mature stands must develop and enhance old forest conditions.

FORSTW-MTX-MOI-PMA-XX Young, previously managed stands are a priority for active management, including variable density thinning and variable retention harvesting.

The highest priority for active management with greatest ecological return on investment are forest stands that are young and previously managed, those with an anthropogenic disturbance history that have simplified stand structure and composition that can benefit from silvicultural intervention to increase characteristic heterogeneity, stand structure and composition, and ecological function. We encourage the Forest Service to add "previously managed" to the Glossary supporting the final amendment.

FORSTW-ALL-DRY-STD-01 Vegetation management and harvest shall retain all trees older than 150 years and sufficient large trees as appropriate for the forest type to restore characteristicquality, structure, abundance, distribution, pattern, and composition of old growth trees.

Exceptions apply for tribal co-stewardship and cultural use, restoration of unique ecosystems, and to reduce wildfire risk to communities and infrastructure. See also FIRE-ALL-DC-01 and FIRE- ALL-PMA.

Dry forest landscapes are generally deficient in large and old-growth trees, compelling action to recruit old trees

through proactive stewardship. The additional clause above provides for the recruitment of old growth trees in dry forests by requiring the retention of sufficient large trees as appropriate for the forest type to supplement the retention of existing old growth trees in these forests. The edit also includes an intent statement in that the retention of large trees is intended to "restore characteristic quality, structure, abundance, distribution, pattern, and composition of old growth trees."

FORSTW-ALL-DRY-GDL-02 Dry forest restoration should conserve older trees and recruitsufficient large trees from the largest size and oldest age classes at high risk of mortality from fire, insects and disease, or drought through a variety of silvicultural and stewardship techniques including but not limited to thinning and wildland fire appropriate for restoring characteristic older dry forest conditions.

The additional language above clarifies that dry forest restoration should conserve older trees and recruit future old-growth trees from the largest size and oldest age classes.

FORSTW-ALL-DRY-GDL-03 In Late-Successional Reserves in dry forests, limited fuel management salvage is permitted when beneficial to ecological goals, fire resilience, and wildlife needs [start strikeout], and local communities.[end strikeout] Dry forest salvage should retain a high number of large snags as well as all live trees. Exceptions are authorized for protection of critical infrastructure and existing system roads.

Given that the purpose of LSRs is large blocks of intact old forest for the persistence of late- successional and old growth obligate species, it is inappropriate to conduct salvage operations for the benefit of "local communities," which could be read to permit salvage when economically beneficial to those communities. "The NFP states that 'salvage will not be driven by economic or timber sale program factors.' NFP Appendix F, F-21.

Barred Owl Management

The NFP was developed in large part to conserve the northern spotted owl. Despite the conservation measures in the 1994 Plan, spotted owl populations continue to decline. In addition to habitat loss from timber harvest and disturbance, the spotted owl is threatened with extinction due to competitive pressure from the barred owl, an invasive species to the Pacific Northwest.

Barred owls are larger, more aggressive and fecund, aggregate in higher densities, and displace spotted owls, disrupting nests and competing for food, and causing spotted owl population declines. As a generalist and novel predator, barred owls prey on a broad spectrum of mammals, birds, reptiles, amphibians and insects that have not previously been subject to this predator, raising the potential for broader ecological disruption.

The US Fish and Wildlife Service recently developed a barred owl control program, which relies on voluntary implementation by federal and non-federal landowners, including the Forest Service. To enable and encourage the Forest Service's successful participation in the barred owl control program, we recommend the following new

Objectives:

FORSTW-ALL-OBJ-02 Annually conduct barred owl removal in northern spotted owl sitemanagement locations, General Management Areas, Focal Management Areas, and SpecialDesignated Areas.

FORSTW-ALL-OBJ-03 Within 5 years, remove all barred owls from all Priority A and PriorityB spotted owl nest sites.

FOREST-ALL-OBJ-04 Within 10 years, remove barred owls from all Priority A and Priority BGeneral Management Areas and Priority C and D spotted owl nest sites.

FOREST-ALL-OBJ-05 Within 15 years, remove barred owls from all Priority C, D, and EGeneral Management Areas, and Special Management Areas

Snoqualmie Pass AMA
The Snoqualmie Pass AMA recognizes the importance of the Snoqualmie Pass area as a critical connectivity link for species moving along Cascade Range in Washington State. We request that the connectivity emphasis be retained in the Snoqualmie Pass AMA.

III. Climate, Ecosystem Integrity, and Carbon Plan Components.
We appreciate and support the inclusion of climate, ecosystem integrity, and carbon plan components in the proposed action. However, we believe additional plan components are warranted to address other climate-related impacts such as protecting streams from climate- induced flooding, and providing for wildlife habitat connectivity for species moving from areas rendered inhospitable by climate change to hospitable habitat.

CLIMATE-DC-05 The transportation network is resilient to the effects of climate change, including the ability to accommodate increased erosion, runoff and peak flows that may exceed historic streamflow events. Roads and trails are located in low-risk areas and do not impair fishand wildlife habitat connectivity or climate-induced movement. Culverts and stream crossings are appropriately sized to accommodate expected peak flows.

CLIMATE-DC-XX During climate-enhanced storm events, roads are not a risk to aquaticresources.

CLIMATE-DC-XX Roads do not disrupt hydrologic or aquatic habitat function.

These additional plan components focus on Desired Conditions related to the road network, which is often the most significant cause of aquatic degradation. The insertion into CLIMATE- DC-05 sets a Desired Condition that roads do not impair fish and wildlife habitat connectivity or movement in response to climate change, which are objectives of the Forest Service's 2012 Planning Rule. The intent of the two new Desired Conditions is that roads do not impair ecological integrity of aquatic systems.

CLIMATE-OBJ-XX Within 15 years, reduce road-hydrologic connections and sediment deliveryfrom roads by 50% across all management areas through hydrologic decommissioning and othertreatments.

CLIMATE-OBJ-XX Within 15 years, attain a minimum road system needed for safe efficienttravel. The minimum road system is the network of roads that can be well maintained with abudget equal to the average road maintenance budget over the previous five years.

CLIMATE-OBJ-XX Within 15 years, road density within Late-Successional Reserves and KeyWatersheds will not exceed 1 mile of road per square mile area within each subwatershed.

CLIMATE-OBJ-XX Within 15 years, road density within Matrix and Adaptive ManagementAreas will not exceed 2 miles of road per square mile area within each subwatershed.

Alternative B has no Objectives associated with the Climate, Ecosystem Integrity, and Carbon plan components, without which there is no sense of urgency with which we must proactively steward watersheds in the face of increasingly violent and novel weather events, including intense downpours and flood events. Roads act to capture and funnel water from the landscape into streams systems, altering sediment flow and basin hydrology. Hydrologically separating roads from the stream network will mitigate impacts from climate-induced flood events.

CLIMATE-GDL-03 In Late-Successional Reserves and Key Watersheds, reduce road mileagethrough full road decommissioning.

CLIMATE-GDL-04 Reduce road mileage and hydrologically disconnect roads from waterresources across all land allocations. Treatment priority shall be given to roads that pose thegreatest ecological risk to climate-enhanced storms and fish and wildlife habitat connectivity.

CLIMATE-GDL-05 Within Matrix and Adaptive Management Areas, reduce road mileagethrough full road decommissioning, hydrological stabilization, and other treatments.

These additional Guidelines are intended to prioritize proactive stewardship of the road network to contribute to climate resilience and mitigation.

IV. Fire Resilience: adding Alternative D components into Alternative B.
We request that Fire Resilience objective 2D replace 2B in the preferred alternative as well as guideline 5D.

We support FIRE-ALL-OBJ-02D over FIRE-ALL-OBJ-02B because the former would treat more acres (2.75 million acres vs. 1.75 million acres) per decade with wildland fire (prescribed, unplanned ignitions, cultural) to meet resource objectives. Given the significant fire deficit on NWP landscapes, and the urgent need to mitigate and adapt to climate change, we believe restoring fire to the landscape is appropriate and desirable and will reduce risk of uncharacteristic fire activity to communities and natural resources.

We support FIRE-ALL-GDL-05D to use wildland fire to meet multiple resource objectives including congressionally reserved lands for the same reasons as above.

We would also suggest the inclusion of an Objective in the final amendment that seeks to accomplish an appropriate level of maintenance treatments in dry forest areas that have been restored. We recognize that forest restoration and proactive stewardship are often not a one-time event, and that ongoing maintenance treatments - particularly in dry forests - may be required.

We are excited to see Tribal knowledge and sovereignty included in the NWFP Amendment Recommendations and hope to see many of them replicated in Forest Plan updates and other USFS planning across the country. Thank you for considering our comments.

Sincerely,

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Sr. Science and Conservation Director dwerntz@conservationnw.org

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Sr. Manager, Conservation Programs jsyrowitz@conservationnw.org

ATTACHMENT-LETTER TEXT: NFP EIS Amendment Comments CNW 3.17.25.pdf; this is the same content that is coded in text box; it was originally included as an attachment

[***Letter text with plain text indications of format edits--for coding purposes***]

TRIBAL-FORSTW[start strikeout]-GOAL-02[end strikeout] [start underlined text]STD-07[end underline text]. Consult and coordinate with Tribes to identify culturally relevant characteristics of mature and old growth habitats associated with cultural use species and develop management strategies through co-stewardship agreements to promote, enhance and recruit culturally important plant, animal, and fungi communities in desired growth forms and locations.

TRIBAL-IK [start strikeout]-STD-02[end strikeout][start underline text]OBJ-01. Within five years, with each Tribe, the Forest shall co-create aTribal Data Sharing Plan or Knowledge and Data Stewardship Agreement. If should referencethe Executive Office Memo re: Guidance for Federal Departments and Agencies on IndigenousKnowledge and the National Historic Preservation Act Section 304 regarding confidentiality. [end underline text]Confidentiality of Tribal knowledge, information, data, and resources collected during consultation or as part of co-stewardship, collaboration, and co-management agreements shall follow the Plan/Agreement and any other USFS data sovereignty protocols, as guided by best practices, and be maintained as allowed by law, unless express permission to share information is given by the relevant Tribe. This shall include the non-disclosure of highly confidential tribal [start underline text] knowledge [end underline text], information,[start underline text] data, and resources [end underline text] regarding ceremonial activities and features, except where authorization is specifically given by a representative designated by the Tribe. This may involve a higher standard of confidentiality than what is typically disclosed to a qualified Forest Service archaeologist.

TRIBAL-TPTF-OBJ-01. By the end of year 8 following amendment approval, each national forest in the Northwest Forest Plan Area have designed, [start strikeout] and [end strikeout] implemented,[start underline] and staffed end underline] a Tribal Relations Program to build partnerships, uphold trust and legal responsibilities, and help consult, coordinate, and collaborate with federally recognized Tribes that have ancestral lands on national forests in the Northwest Forest Plan area.

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 [start underline] while maintaining ecological connectivity andintegrity. [end underline]

FAC 1-30 DC. To implement the Tribal Relations Program on each Forest and to ensure that individual Tribal needs are respected and understood, each Forest employs staff with the sole responsibility of stewarding relationships between each Tribe and the Forest. The roles and responsibilities of the Tribal Relations Program Manager include Tribal outreach, staff-to-staff coordination, [start underline] leadership and specialist [end

underline] collaboration, [start underline] and support for USFS staff training, [end underline] and are separate from Forest Service staff responsibilities associated with heritage and/or archaeology program tasks.

FAC 1-92 [start strikeout] GOAL [end strikeout] [start underline]OBJ[end underline]. Upon Tribal request, enter into long-term contracts, master stewardship agreements, and other sovereign-to-sovereign cooperative instruments with Tribes and Tribal entities. [start underline]Within two years, [end underline] establish a working group of tribal and Forest Service leadership to revise existing templates,[start underline] including Data Sharing Plans or Knowledge and Data StewardshipAgreements so that cooperative instruments are consistent in the way [end underline] that they respect Tribal sovereignty [start underline] and knowledge and data sovereignty. [end underline]

FAC 1-109 MONT. Conduct ongoing monitoring of visitor use and [start underline] assessments of culturalawareness. D[end underline]evelop responses in coordination with relevant Tribes when needed to safeguard treaty, reserved, and other similar Tribal rights and the resources and places upon which those rights depend, and generally, to ensure the ecological compatibility of recreation with Tribal treaty rights and resources.

[start underline] FORSTW-MTX-MOI-STD-03 In moist forests in Matrix, timber harvest in mature forest stands(those that established between 1825 and 1905) shall develop and enhance structurally complex,late-successional habitat including characteristics to support federally listed species such asnorthern spotted owl, marbled murrelet, and coastal marten. [end underline]

FORSTW-MTX-MOI-PMA-[start green]XX[end green] Young, [start underline] previously managed stands are a priority for active management, including variable density thinning and variable retention harvesting. [end underline]