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First name: Chris

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Organization:

Title:

Comments: Dear Regional Foresters Eberlien and Buchanan,

My name is Chris Berry, and I have lived in the Portland area for almost two years. Prior to living in Oregon, I lived in Northern California, closer to Mount Lassen and Mount Shasta. Over the last 5 years I've fallen in love with the beauty of the forested lands of Northern California and Western Oregon (lands now labeled as Shasta-Trinity, Lassen, Willamette, and Mount Hood National Forest, to name a few). Starting as someone that appreciated nature but didn't know much about how our forests function, I gradually learned to appreciate the true values of our remaining intact old-growth forest ecosystems. I still have much to learn, however I know enough to say that our country needs to make radical changes to the treatment of the forested lands that we all share and value.

The Northwest Forest Plan established in 1994 contains some outdated metrics in regards to forest management, and it also fails to advocate for values that are essential to the proper care of our intact forest ecosystems, primarily tribal inclusion. I urge the USFS to integrate the NWFP Federal Advisory Committee's full Tribal Inclusion recommendation preamble into the final EIS (environmental impact statement) and Record of Decision, especially the following:

"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."

I also adamantly recommend the USFS to integrate the following values into the final EIS and Record of Decision:

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 5 through expansion of the Tribal wildland fire workforce and legal authority to promote cultural burning.

The USFS can do so much more to preserve the cultural and economic values of our forest ecosystem (including how they contribute to the health of local communities), and tribal inclusion is essential to that. We all share these lands now, and I know that you are capable of protecting them for the benefit of future generations. You can do it.

ATTACHMENT - LETTER: NWFP Comment.pdf. This is the same content that is coded in text box; it was also included as an attachment.