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Organization:

Title:

Comments:

Dear Regional Foresters of Pacific Northwest & Southwest Regions,

I'm writing to provide scoping comments on the Forest Service's notice of intent to prepare an environmental impact statement for Northwest Forest Plan (NFP) amendment #64745: U.S. Forest Service; Forest Plan Amendment for Planning and Management of Northwest Forests Within the Range of the Northern Spotted Owl, Notice of Intent to Prepare an Environmental Impact Statement, 88 Fed. Reg. 87393 (Dec. 18, 2023).

I support the comments provided for the NFP amendment by the L.I.G.H.T. Foundation, an Indigenous-led native plant and pollinator conservation 501(c)(3) nonprofit organization. These comments recommend that the amendment should:

1. Protect mature and old-growth ("Elder") stands in moist forests and protect mature and old-growth trees in seasonally dry forests. Elder stands and trees are inordinately important for storing carbon, supporting biological diversity, and resisting stress from fire, drought, and other disturbances. Additionally, Elder stands will provide important seed sources genetically attuned to local conditions and robust at adapting to changing conditions over time.
2. Recognize and address threats from climate change, such as increasing flood, fire, drought, and windstorm activity. Accordingly, the NFP amendment must establish clear standards and guidelines for reducing road density to 1-2 miles/m² and hydrologically decoupling the road network from aquatic ecosystems to support water quality throughout the watershed. In the uplands, the NFP should prioritize restoring landscape spatial patterns of native plants desirable to native pollinators that increase resilience to disturbance and fluctuations in soil moisture, as well as characteristic fire activity in drier forests.
3. Incentivize Indigenous-led leadership to establish habitat connectivity standards and guidelines which prioritize native plants of Indigenous food systems. This will support native pollinator species and wildlife movement to adapt to changing climate and habitat conditions, including establishing road density standards and other measures, especially proximate to crossing structures or other identified connectivity pathways.
4. Incentivize Indigenous-led management goals, priorities, and strategies of conservation and stewardship informed and sustained by Indigenous Knowledges (IK) in non-extractive and ethically responsible ways.
5. Through the development of an Indigenous Task Force:
 - a. Safeguard and secure IK through development of Indigenous Data Sovereignty Agreements (ISDA), and implement Principles for Indigenous Data Governance,
 - b. Safeguard and secure the free exercise of customary laws, rules, and cultural protocols established by IP, or which are priorities of IP, including access to cultural and religious sites,
 - c. Safeguard and secure the retention and intergenerational transmission of ancestral languages and IK, prioritizing and incentivizing Indigenous leadership in cultural burning and habitat restoration at scale and frequency to restore ecologically characteristic fire activity in fire-prone areas,
 - d. Safeguard and secure the free exercise of IP's right to exist, practice their cultural traditions, and access their territories unencumbered by harm or threats of harm; prioritizing Indigenous access to hunting, fishing and gathering on National Forests,
 - e. Safeguard and secure the body autonomy of Indigenous women and girls, ensuring their full and free access to social, cultural, spiritual, and political institutions associated with the U.S. Forest Service and NFP, and

f. Identify other means and mechanisms of the U.S. Forest Service generally, and the NFP specifically, may better uphold the federal trust responsibility and treaty rights of Tribal Nations.

6. Support local communities through:

- a. Planning processes which implement the Seven Generations Principle, a multigenerational approach (70+ years) to identifying and quantifying how stewardship projects and conservation actions benefit biodiversity, humans, and nature,
- b. Implementing the Precautionary Principle of First Do No Harm to address the loss of biodiversity, negative impacts to Indigenous Peoples and local communities, and the loss of food security in forest ecosystems,
- c. The creation of watershed restoration workforces which integrate IK, providing economic opportunities for smaller, local firms,
- d. Education about the rights of IP and obligations of the U.S. Forest Service to Tribal Nations,
- e. Sustainable and non-harmful processing of restoration by-products,
- f. Supporting sustainable and non-extractive recreation opportunities which are culturally appropriate, and
- g. Other measures of mutual benefit to Tribal Nations, IP, the federal government, local communities, and the environment.

7. Maintain and improve protections for at-risk pollinators, native plants, fish, and wildlife species by ensuring that the NFP components sustain the ecological integrity of National Forests and identify and implement approaches to address Western science knowledge and information gaps and integrate IK methodologies.

Thank you for the opportunity to provide feedback on this monumental climate-smart amendment to the NFP. I encourage the Forest Service to maintain its timeline for this amendment process, transparently and respectfully work government-to-government with Tribal Nations as rights holders, and engage important stakeholders like the public to protect and conserve the integrity of national forests in Washington, Oregon, and California for the next seven generations.

Cheers,

Alishia Orloff