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Comments: I am writing to submit my public comment on the notice of intent to prepare an amendment to the Northwest Forest Plan. I have lived for decades within the area of the NWFP. I rely on the forest of Mt Hood for my drinking water. I rely on the forests for clean air, and a climate that can support the continued survival of all beings within the web of life. I frequently work as a volunteer to field-survey proposed actions within Mt. Hood National Forest, and have in-depth on-the-ground firsthand knowledge of the forests and the Forest Service actions. I have been a member for three years of two Forest Collaboratives.

I strongly support the proposed amendment process, and applaud the work of the members of the committee.

I have specific comments relating to the five areas proposed for amendment.

FIRE

The NOI acknowledges that fire's role in the forests of the NWFP area has changed, but does not fully account for the role that the Forest Service played in this change, through a century of total fire exclusion across all forest types. Although there are significant differences among historic fire regimes in different forest types throughout the NWFP area, fire played a significant role in all NWFP-area forest ecosystems prior to total fire suppression. Failure to acknowledge this will only exacerbate the problems of the status quo. I urge the agency to acknowledge that the current pace of necessary prescribed burning in fire-deprived forests is pathetically inadequate, and to enable forest managers to work with Indigenous communities to increase the scale of prescribed burning to levels needed to return forests to health.

"Plan direction is sought to prioritize mature and old growth forest conditions including habitat for the NSO and other ecosystem services during wildfire suppression activities." (NOI p. 9)

I urge the agency to totally rethink the entire strategy of wildfire suppression, including to allow fire management on forests (including Mt. Hood) which currently require full suppression of all non-prescribed fires. The last decade has shown that total suppression is no longer possible; the historic record shows that it was never a good idea. The agency must engage all possible resources to change the whole narrative and engagement with fire, refocusing on protecting communities, which may include increased use of closing forest access during extreme fire weather.

"New post-wildfire silvicultural direction would guide reforestation and restoration of burned landscapes and for other post-disaster recovery efforts." (NOI p. 9)

I urge the agency to radically revise its approach to fire-impacted forest landscapes. In NWFP forest areas, the Pre-Forest Stage seral type is even more rare, even more imperiled (often by so-called "salvage" logging post-fire, a practice which must be halted), and even more biologically diverse than the Mature/Old-Growth seral type. Not every fire is an ecological disaster, and not every burned landscape is in need of intervention to accelerate reforestation. Mature/Old-Growth stands that experience fire become areas of unparalleled diversity, even when they experience high-intensity, high-severity fire. Giving emphasis to the ecosystem value of PFS areas is a critical element that must be included in new post-wildfire silvicultural direction.

The NOI acknowledges that: "the NWFP did not adequately address the severe ecological impacts of a century of fire suppression and removal of Indigenous fire practices and cultural fire regimes on the landscape." (NOI p. 9) I strongly support all movement towards restoration of full tribal co-stewardship, co-management, and land sovereignty. I urge the agency to engage with Indigenous communities with humility, and to fully embrace tribes' renewed practice of cultural burning and forest management.

CLIMATE CHANGE

The 1994 NWFP did not consider climate change at all, so any inclusion of climate change considerations is an improvement. I support the consideration of both climate change impacts, and forests' role in climate change mitigation, especially the acknowledgment that there must be a significant role for Tribes. I urge the agency to

radically revalue the importance of NWFP-area forests' role in carbon storage, and to include in the amended NWFP:

- *a requirement for quantitative analysis of net CO₂ emissions of all proposed commercial timber sales
- *acknowledgment that fire-affected forests continue to store large quantities of carbon dioxide
- *agency-wide change in messaging, to convey to the public the urgency of the role of forests in staving off climate change's most dire possible future outcomes.

MATURE AND OLD-GROWTH ECOSYSTEMS

I strongly support the revision of the NWFP to improve the agency's care of these ecosystems. Necessary revisions in this area include:

- *Allowing no net loss of M/OG acreage during timber harvest.
- *Revised surveying using LIDAR to identify all M/OG areas.
- *Coordination of NWFP amendment with Land Management Plan Direction for Mature and Old-Growth, so that there is agency-wide consistency, and the highest level of protection nationwide.
- *Eliminating Pechman exemption for Survey and Manage in thinning in forest stands mapped as under 80 years of age. These stands frequently include significant areas of legacy living trees and snags, which serve as refugia for sensitive species within these stands.
- *When timber harvest occurs within M/OG stands as part of "forest health" management treatments, final marking of large-diameter trees must be the decision of Forest Service specialist, not the contractor.
- *Incorporate, inventory, and develop protections for Pre-Forest Stage stands which occur as a result of fire within M/OG stands. Recognize PFS stands as a necessary component of landscape-wide ecosystem integrity.

TRIBAL INCLUSION

The NOI rightfully acknowledges that Tribal representation in the development of the 1994 NWFP was inadequate. This is a historic opportunity to address this and to begin to restore justice to Tribal communities. I support the highest degree of Tribal inclusion in the development and implementation of this amendment. Every Tribal group, those with and those without Federal recognition, whose current and ancestral homelands are within the NWFP area, have an inherent right to participate in co-management of National Forest lands. I urge the agency to engage with Tribal groups with humility and apology. I also urge the agency to incorporate a much higher degree of information-sharing about tribal inclusion in communications with the general public, to inform non-Tribal public members about sovereignty and treaty rights in forest management. The process of government-to-government engagement does not need to be a black box, and the agency can do much more to inform the general public about sovereignty and treaty rights through forthright communication and messaging.

COMMUNITIES

Treating forests as long-term sources of wealth extraction opportunity by the creation of national forests was a plan that was never going to work. The 1994 NWFP acknowledged the detrimental impact of this approach on ecosystems, and changed the pace and scale of extraction on National Forest land. It was always unreasonably optimistic to believe that this could happen without consequences elsewhere in the system, especially when timber production was the cause of the harm and also the economic goal. This contradiction undergirds the whole idea of National Forests. I urge the committee members to bring Tribal communities into the heart of this conversation in the amendment process, and to embrace the need for deep and broad change.

The NOI states: "Above all, changes in plan direction would ensure effective wildfire risk reduction to reduce risks to communities, life, and property." (NOI p. 14) This goal has appealing qualities, but falls into the same trap as the 1994 NWFP, of positing that two conflicting goals can be simultaneously achieved. Changes in fire behavior are being driven by changes in global climate. The NWFP amendment cannot undo global climate change in the absence of immediate worldwide ending of burning fossil fuels. The evidence is clear and abundant that the protection of communities, life, and property, from fire, begins at the community level, using fire-resistant building techniques, creating defensible space, ending the encroachment of building into forests, improving public communication and evacuation routes: these measures are not within the scope of the NWFP. It is more achievable to design goals of the NWFP amendment that will support the long-term wellbeing of forests and the

long-term wellbeing of communities, so that community members can reduce risks to their community.
Thank you for your consideration of my comments.