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Comments: To accomplish the NOI's stated goal of "Incorporating Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and meet the agency's general trust responsibilities", the draft EIS should consider that Indigenous knowledge requires Indigenous sovereignty (Lake 2021). 100% of the land covered by the Northwest Forest Plan is Indigenous land, and the federal land system continues to cause harm by denying access to Tribal members and Indigenous communities to freely enact stewardship responsibilities, practice cultural traditions, and harvest and gather on their homelands. The EIS process must involve robust consultation with the 80+ Tribes who have relationships to the lands within the NWFP. This Tribal consultation process must allow enough time for Tribes with low staff capacity to respond and engage.

The EIS should look to the breadth of social science literature and precedent for effective Tribal co-management and co-stewardship arrangements (Jacobs et al. 2022; Lake 2021; Mills and Nie 2021; Vinyeta and Lynn 2015). Currently, effective Tribal co-stewardship is not implemented on enough National Forests, and requires that National Forest leadership take initiative voluntarily. The NWFP Amendment should direct every National Forest to work with the Tribes in their area to establish MOUs, MOAs, and Master Stewardship Agreements that allow Tribes to lead management and stewardship projects, harvest and benefit from cultural resources, and generate workforce and economic opportunities for Tribal members. The federal land system undermines Tribal sovereignty, and is a vector of structural racism, by denying access to plants, animals, and other values that are critical for physical, spiritual, cultural, and emotional health. The NWFP Amendment should work to remove barriers for Tribal members and Indigenous communities to harvest cultural species and enact stewardship responsibilities, including with fire. The EIS should look to the Klamath Tribes' MSA with the Fremont Winema NF as an example of meaningful co-stewardship.

Western science is slowly catching up to Indigenous Science in understanding the importance of Indigenous stewardship, including fire stewardship, for sustaining ecosystems in the Pacific Northwest (Long, Lake, and Goode 2021). As the EIS considers shifts to management approaches in Late Successional Reserves and Mature/Old Growth systems, the EIS should look to Indigenous scientific understandings of the importance of cultural fire for tending old trees in a variety of forest types, including in the wetter forests of the west side of the Cascades. As climate change brings uncertainty to future fire regimes, the EIS should consider the role of Traditional Ecological Knowledge in guiding adaptive management that is oriented around the health of cultural species, and intertwined social-ecological relationships (Long and Lake 2018). All incorporation of and direction around TEK in the EIS should be coupled with data sovereignty provisions, ensuring that Tribes have control over what Tribal knowledge is shared and how (Racine 2022; Research Data Alliance International Indigenous Data Sovereignty Interest Group 2019).

To support the expansion of Indigenous fire stewardship, which is critical for meeting the climate, fire resilience, and Tribal inclusion goals expressed in the NOI, the EIS must consider the many barriers that stand in the way of Indigenous fire stewardship on federal lands (Karuk Tribe Good Fire Report, Marks-Block and Tripp 2021). The EIS should consider that Indigenous cultural fire differs from prescribed fire - cultural fire often involves intergenerational participation, ceremony, focus on particular plant and animal species, and may involve elements that are not appropriate for non-Indigenous people to participate in. The EIS should consider removing permitting and federal personnel requirements for Indigenous cultural fire, and providing better funding mechanisms to support Indigenous cultural fire on every National Forest.

The EIS should consider the harm of ongoing fire suppression policy to Indigenous cultural resources, old growth ecosystems, biodiversity, and watershed health. The EIS should consider shifting understanding of "natural

baseline conditions" to acknowledge the current and future role of wildfire across the NWFP area. The EIS should consider ways to prioritize beneficial fire inclusion, rather than exclusion, across all management and habitat types in the NWFP. The EIS should consider the probability of ignition and hazardous wildfire conditions across the plan area, and how beneficial fire use, including cultural and prescribed fire and managed wildfire, can mitigate the effects of high-severity wildfire. The EIS should consider the use of Potential Operational Delineations (PODs) as a decision support tool that can incorporate local knowledge, along with Indigenous and Western science, to shift from a policy of total fire suppression to managed fire inclusion for a variety of ecological and cultural benefits.

The EIS should consider the impacts of the Northwest Forest Plan to rural community wellbeing, and consider the needs of current and future members of the forest and fire workforce. While the NWFP has long sought to balance objectives of timber and environmental protection, the EIS should consider mechanisms to shift from timber-focused economies to regenerative, stewardship economies. The EIS should consider the amount of timber revenue that actually stays in and benefits rural forest-dependent communities, and should consider shifting the goal of matrix lands from timber output, to ecological restoration and stewardship, and stewardship jobs. The EIS should also consider the possibility of utilizing federally funded, publicly or Tribally owned sawmills that would allow for greater flexibility in wood product utilization and could provide long-term stability for communities, unlike many private company mills which shut their doors when they are no longer profitable.

Finally, the EIS must support the future forest and fire workforce by considering education and training needs, including K-12 education and engagement on National Forests, partnerships with community colleges and universities, and apprenticeships and internships with fair wages and housing provided. The EIS must consider the labor conditions of federal employees and contractors who do the work of implementing the Northwest Forest Plan, often in hazardous and precarious conditions (Davis et al. 2023; Moseley and Davis).