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Comments: To: The Regional Forester, U.S. Forest Service, 1220 SW 3rd Avenue, Portland, OR 97204.

From: Firefighters United for Safety, Ethics, and Ecology (FUSEE)

RE: FUSEE's scoping comments on the NOI for the Northwest Forest Plan amendment

Date: February 1, 2024

The following letter represents our organization's scoping comments on the notice of intent to amend the Northwest Forest Plan (NWFP). Our comments are organized within the key issues currently being discussed by the Federal Advisory Committee empaneled to work with the USFS on the plan amendment.

FIRE RESILIENCE

End Obsolete Fire Exclusion Philosophy and Policies

The agency needs to use the NWFP amendment to end its fire exclusion philosophy and policies which are obsolete and contrary to the best available fire ecology science. The attempt to exclude fire from the landscape has caused widespread ecological harm and is not viable or sustainable. Climate change is increasing wildfire activity from all sources of ignition, and a fire deficit from prohibition of Indigenous cultural burning, lack of prescribed burning, and systematic fire suppression has caused fuels accumulation and forest densification that is increasing the size, frequency, and intensity of wildfires. It is simply impossible to prevent or suppress all fires on the landscape. Language referring to "fire resistance" should be removed from the DEIS, or used only in reference to structures in the human-built environment (i.e. homes and communities). It is ecologically inappropriate to apply it to fire-dependent species and fire-adapted ecosystems.

Fire Inclusion is the Antidote to Fire Exclusion

The NWFP amendment should make the case for shifting the paradigm of fire management from fire exclusion to fire inclusion as both means and ends of proposed forest/fuels management projects. Use of fire is the cheapest, most effective, most natural tool for managing fires and fuels across broad landscapes and will help recover forests from the historic fire deficit. All proposed fuels management projects must require some form of burning component (e.g. pile or broadcast prescribed burning) before the project can be considered "completed." The goal of fuels projects should be to prepare the ground for future fires, not prepare sites for future firefighting or fire exclusion. (see Reinhardt et al 2008).

Ecological Fire Use (a.k.a. "Managed Wildfire") Should be Authorized in all Forests

Managing wildfires with ecological fire use across the widest possible land base--in contrast to routinely "fighting" them with aggressive suppression--must be authorized in the NWFP amendment. Using alternative ecological fire use strategies and tactics when conditions for desired fire behavior and fire effects are optimal will maximize the social and ecological benefits of burning while minimizing their potential adverse effects. Ecological fire use as the norm rather than aggressive fire suppression is far more economically and ecologically rational, and ultimately will be sustainable. A more strategic and selective approach to fire suppression would be to focus it on frontcountry communities which absolutely cannot tolerate fire, and then implement ecological fire use tactics in backcountry wildlands which generally require more fire.

Include the Full Range of Fire Management Tools and Actions Across the Broadest Possible Land Base

Prescribed burning and Indigenous cultural burning must be authorized across all land use allocations in order to expand opportunities to restore fire's functional role in ecosystems. The NWFP amendment can serve as a programmatic analysis for proposing future landscape-scale prescribed burning projects or burns on multiple units when burning conditions are optimal. Authorization for Indigenous fire practitioners to practice their cultural burning is another necessary outcome of the NWFP amendment. Finally, ecological fire use (a.k.a. "managed wildfire" or "wildland fire use") needs to be authorized across all land use allocations in order to provide the opportunity, when conditions are right, to maximize beneficial fire from unplanned ignitions. Authorization of ecological fire use will finally gain compliance of the NWFP with the 2001 Federal Wildland Fire Management Policy.

Plan for Strategic Fuels Management Projects Designed to Increase Beneficial Fire Use

Past fuels treatments were "randomly" placed across the landscape and lacked any strategy for broader goals of restoring fire resilience. The NWFP should map out strategic fuels treatment areas such as Potential Operational Delineations (PODs). The goal of PODs will be to further fire resilience by facilitating more beneficial fire use from large-scale prescribed burns or ecological wildfire use. PODs should be located where crews can safely and effectively manage fire, and should look like shaded fuelbreaks, not linear clearcut corridors. These strategic fuels management zones would serve primarily as safe anchor points for crews to ignite controlled burns and or confine fire spread during suppression actions with minimal additional ground disturbance needed.

Fuels Management Projects Must be Strategic; Prioritize Treatments Near Communities, Inside Plantations, and PODs

Fuels management should be guided by goals for restoring fire resilience rather than furthering fire suppression or timber extraction. They should be targeted treatments as part of a strategic fuels management program that focuses on protecting communities and mitigating fire hazards of young plantations. Thinning projects should emphasize construction of shaded fuelbreaks that reduce surface and ladder fuels and remove understory small-diameter trees in order to safely reintroduce fire into stands while reducing the risk of crownfire initiation. The first priority for constructing fuelbreaks should be within the Wildland-Urban Interface zone to provide defensible space for fire suppression actions as well as anchor points for prescribed burning adjacent to rural communities. The second priority should be fuelbreaks inside plantations that border adjacent mature and old-growth (M/OG) stands in order to reduce risk of wildfires spreading crownfire from plantations into M/OG stands. The third priority for thinning should be construction of Potential Operational Delineations (PODs) for creating infrastructure for large-scale prescribed burning, ecological fire use (a.k.a. "managed wildfire"), and confinement strategies for wildfire suppression. Once constructed, fuels management units and fuelbreaks should be maintained primarily with prescribed fire to increase resilience while reducing fuels.

Commercial Thinning Should be Restricted in Mature/Old-Growth Stands and All Reserves

Commercial thinning projects should be highly restricted in mature/old-growth (M/OG) stands. In moist forests in the westside Cascades, there should be no commercial timber extraction inside primary forest stands wherever they are located (i.e. both inside or outside of currently designated reserves). In dry forests in the eastside Cascades, Siskiyou and Klamath regions, thinning in M/OG stands should be restricted to non-commercial understory removal of shrubs, saplings, and small-diameter pole-sized trees. These should be implemented as manual pre-treatments for reintroducing fire. Understory thinning projects must ensure that all larger and older trees are retained in fuels treatment sites wherever they are found on the landscape.

Fire Management Plans Should Guide all Fuels Management Projects

All commercial timber extraction must be following by fuels reduction treatments, but all fuels treatment projects do not have to begin with commercial logging. All fuels management projects should be guided by strategic fire

management planning that is oriented towards restoration of fire resilience, not continued fire exclusion or commodity extraction. Fire management planning and fuels management projects should be considered pre-fire preparation for prescribed burning, Indigenous cultural burning, and ecological fire use during wildfire events.

Recent Wildfire Footprints Must Anchor Fire/Fuels Management Projects

The DEIS should provide a map of all recent wildfires (e.g. burned since the original NWFP was established). Maps should provide accurate ecological analysis of fire effects, and include a balanced discussion of both the adverse and beneficial effects of these wildfires. Maps should not be used as "scare tactics" with exaggerated and inaccurate claims that forests were "lost" or "destroyed" by fire. Recent wildfires should be considered for future fuels management projects with prescribed fire treatments, and places for application of ecological fire use in confinement strategies for managing wildfires.

TRIBAL INCLUSION

The Agency Must Compensate for Prior Lack of Tribal Engagement

The agency must compensate for the lack of inclusion of Tribes and Indigenous communities during development of the original NWFP. The concept of Tribal inclusion must involve more than simply a one-way flow of information from the agency to the Tribes about the NWFP amendment process. Instead, Indigenous science perspectives and traditional ecological knowledge need to be fully included in the design and analysis of the range of alternatives in the DEIS, and also in the planning, implementation, and monitoring of projects guided by the NWFP. Tribal liaisons within the USFS should actively and repeatedly solicit input from the Tribes and other non-federally recognized Indigenous communities during the drafting of alternatives for the NWFP. Where needed, resources should be invested to assist Tribal representatives to attend meetings and other activities to fully participate in developing the DEIS.

Authorize a Regional Indigenous Fire Stewardship Program to Facilitate Cultural Burning Projects

The NWFP must authorize a regional Indigenous fire stewardship program and permit cultural burning projects to restore and maintain fire-dependent cultural resources, protect heritage sites, and perform religious ceremonies. If agreed upon by Tribes, the DEIS should map and analyze priority areas for cultural burning projects led by Indigenous fire practitioners. The DEIS should provide rationale for authorizing Indigenous cultural burning projects as a matter of environmental justice as well as ecological sustainability. Tribal inclusion is vitally interconnected with fire inclusion, and the DEIS needs to disclose the various treaty rights and trust responsibilities that convey the Tribes' sovereign right to burn.

Native Americans' Access to Cultural Resources and Heritage Sites Must Take Priority Over Commodity Resource Extraction

If there is a conflict on a given forest management project site between commodity resource extraction and Indigenous cultural resource subsistence uses, the NWFP amendment should mandate that access of Indigenous people to their cultural resources are prioritized over non-Native commodity extraction. The DEIS should provide a comparison analyzing commodity resource extraction versus Indigenous cultural resource use in terms of socioeconomic benefits and ecosystem sustainability.

MATURE AND OLD-GROWTH FOREST ECOSYSTEMS

Need to Analyze and Disclose the Effects of Executive Order 14072 on the NWFP Amendment

The USFS needs to include relevant analysis and disclosure of the final rule for mature and old-growth (M/OG) forest protection prompted by Executive Order 14072. Depending on the final rule, the NWFP amendment and individual national forests may opt for more stringent protection of M/OG stands wherever they are located.

The Purpose and Need of the NWFP Should be to Expand Mature/Old-Growth Forests

The management intent should be clarified that the main goal of the NWFP is to grow and sustain more M/OG forests, especially within Late-Successional Reserves (LSRs). If and when wildfires burn within LSRs, commercial salvage logging should be prohibited in order to protect the biological legacy (e.g. large snags and logs) within complex early seral forests, and avoid further near-term ground-disturbing actions that would cause long-term impacts on natural regeneration processes. The DEIS should disclose that natural regeneration in complex early seral stands is the only known proven method for reproducing M/OG stands. Any post-fire "recovery" projects or methods involving commodity timber extraction outside of LSRs should be clearly labeled as experimental with all potential risks and impacts fully disclosed.

Logging Should be Declared a Graver Threat to M/OG than Natural Disturbances

As commercial logging has declined and wildfire activity has increased over the last three decades, the probability of fire affecting M/OG stands has greatly increased compared to the probability of a timber sale. But the DEIS should conduct risk analysis that defines "threats" in terms of ecological outcomes as well as statistical probabilities. The threat of adverse ecological outcomes in terms of both short- and long-term degradation of soils, water quality, wildlife habitat, and carbon sequestration/storage is far more severe from commercial timber extraction than it is from natural disturbances such as wildfire, and analysis in the DEIS should clearly disclose these differences in ecological effects and outcomes are qualitatively different levels and kinds of threats.

Distinctions Between Moist and Dry Forest Ecosystems Must Not be Used as an Excuse to Reduce Protections of M/OG Stands

The DEIS should analyze and disclose the different fire regimes and fire ecology dynamics between moist and dry forests, but all proposed active forest management projects should be designed to protect and expand M/OG forests. All M/OG stands and individual large, old trees should be protected from logging wherever they are located (e.g. inside or outside of currently established reserves). This includes protecting isolated M/OG stands in matrix lands in moist westside forests, and individual M/OG trees in dry forests. Firm diameter caps established in the "eastside screens" should be continued for fuels management or restoration projects proposing commercial logging or commercial thinning in dry forests, especially in stands where the legacy of past commercial logging has removed most or all M/OG trees.

Alternatives for Thinning Besides Commercial Timber Extraction Should be Explored

At least one alternative in the DEIS should explore various non-commercial methods of cutting and burning for fuels management or forest restoration/resilience projects. These should aim to reduce excess accumulation of surface fuels and/or reduce the density of younger understory trees that could provide ladder fuels for spreading fire into overstory tree canopies. In dry forest ecosystems, the DEIS should analyze the environmental effects of selectively converting large-diameter shade-tolerant/fire-susceptible trees into snags or logs (via girdling or falling) and leaving the dead or downed trees on-site rather than commercially or mechanically removing them from the site. Analysis comparing commercial commodity extraction vs. non-commercial ecosystem service projects should include effects analysis on soils, wildlife, and carbon stores as well as fire/fuels issues.

COMMUNITY SOCIOECONOMIC SUSTAINABILITY

The NWFP must help guide a paradigm shift in forest management by recognizing broader and more sustainable socioeconomic benefits of forests for their carbon sequestration and storage capacity, and their role in providing numerous ecosystem services. The NWFP amendment should not be a means of "turning back the clock" to revive the former economic dominance of private timber corporations over rural communities within the Pacific Northwest. In many respects, Big Timber has moved on and abandoned many formerly timber-dependent rural communities. The DEIS should disclose the current lack of logging and milling capacity, especially for processing large-diameter trees, and analyze the effects of this on prospects for implementing fuels reduction or forest restoration projects with commercial logging. The DEIS must address the timber industry's desire for a "predictable supply of timber" by disclosing that, for the sake of climate recovery, biodiversity preservation, the emerging restoration and recreation-based economy, and long-term ecosystem sustainability, the supply of commodity timber on national forests is going to be predictably low.

Focus on the Workforce of the Future in Fire and Fuels Management

The DEIS analysis should focus on rural workforce development and the number jobs beyond commodity timber extraction jobs. In particular, analysis should examine the full range of socioeconomic benefits that will come from ecological fuels management and ecosystem fire restoration programs. Analysis should calculate the number and duration of jobs instead of board feet of timber extracted. The full breadth of fire management jobs should be included: surveying and monitoring fuels, fire planning, community fire preparation and education, fire suppression, manual cutting and controlled burning. Other non-timber jobs related to recreation, restoration, non-timber forest products, and other work should also be included in the analysis. The DEIS should compare the total potential number of local jobs and their long-term duration in fire/fuels management and non-timber programs versus commodity timber extraction.

Conclusion: The DEIS Must Make the Case for Ending the Dominant Fire Exclusion Paradigm

The Forest Service's dominant fire exclusion paradigm and systematic fire suppression are economically and ecologically unsustainable. The fire exclusion paradigm is obsolete and should be replaced with a fire inclusion paradigm that guides public acceptance for the safe, ethical, ecological use of beneficial fire in fire-adapted forest ecosystems. The DEIS must take this opportunity to educate the public about the tremendous social, cultural, economic, and ecological harms that have and continue to result from the agency's century-long "war" on wildland fire. There is nothing "past" about fire suppression, it is still ongoing with the agency aggressively attacking over 95% of ignitions, in many cases suppressing wildland fires that are doing beneficial fuels reduction and resilience restoration work for free. But the problem of fire exclusion is not only due to the fires we put out, but also the fires we fail to put in.

The attempt to protect old-growth or biodiversity or communities through fire exclusion via aggressive firefighting is ultimately doomed to fail and has been failing for quite some time. The NWFP amendment must not mandate aggressive suppression for fire exclusion in LSRs or M/OG stands. Not only this is not possible, but it ignores the impacts of fire suppression. The primary means of safely suppressing weather-driven wildfires in dense forests on steep slopes in the Cascades is through indirect attack "box and burn" strategies where firefighters back off and burn out. Thus, aggressive wildfire suppression is not really excluding fire; instead, it's igniting human-caused fires often during severe weather and fuel conditions where high-intensity fire is almost guaranteed. Please do not continue the folly of fire exclusion and false promise of fire suppression in native or old-growth forests.

The USFS should shift from reactively "fighting fire with fire" to proactively managing forests and fuels with fire. Fire resilience will be restored in old-growth forests with ecological fire use, not with aggressive fire suppression. As a matter of fact, the only proven human means of actively managing forests for fire resilience has been through Indigenous cultural burning. The NWFP amendment must authorize a revival of Indigenous cultural

burning along with large-scale prescribed burning and managed wildfire. We see fire inclusion as a vital aspect of Tribal inclusion--the two go together hand in hand. In conclusion, the Pacific Northwest's native forests need Native fires.

Thank you for this opportunity to provide scoping comments for the NWFP amendment. To repeat: past, present, and future impacts of fire exclusion and fire suppression are significant issues that require detailed analysis and disclosure among the range of alternatives in the DEIS.

Sincerely, Timothy Ingalsbee, Ph.D., Executive Director, Firefighters United for Safety, Ethics, and Ecology (FUSEE)